



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706 • (208) 373-0502

C.L. "Butch" Otter, Governor  
Curt Fransen, Director

August 13, 2014

Larry Lloyd  
Plant Manager, Paul Facility  
The Amalgamated Sugar Company LLC  
50 South 500 West  
Paul, Idaho 83347

RE: Facility ID No. 067-00001, The Amalgamated Sugar Company – Paul Facility (TASCO-Paul)  
Final Permit Letter

Dear Mr. Lloyd:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2011.0040 PROJ 61314 to TASCO-Paul in accordance with IDAPA 58.01.01.200 through 228, *Rules for the Control of Air Pollution in Idaho*, and is based on the certified information provided in your PTC application received on December 31, 2013.

This permit is effective immediately and replaces PTC No. P-2011.0040 PROJ 60995, issued on June 11, 2012. This permit does not release TASCO-Paul from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances. In accordance with IDAPA 58.01.01.209.05.b, a PTC and Tier I permit have been processed. TASCO-Paul may operate the source after the PTC is issued, so long as it does not violate any terms or conditions of the existing Tier I operating permit. The Tier I operating permit will be issued in accordance with IDAPA 58.01.01.367.

In order to understand fully the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Bobby Dye, Regional Air Quality Manager, at (208) 736-2190 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends that the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any other staff responsible for day-to-day compliance with permit conditions.

Pursuant to IDAPA 58.01.23, you, as well as any other entity, may have the right to appeal this final agency action within 35 days of the date of this decision. However, prior to filing a petition for a contested case, I encourage you to contact Morrie Lewis at (208) 373-0502 or [Morrie.Lewis@deq.idaho.gov](mailto:Morrie.Lewis@deq.idaho.gov) to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon".

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

Permit No. P-2011.0040 PROJ 61314  
Enclosures

# AIR QUALITY

## PERMIT TO CONSTRUCT

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<b>Permittee</b>	Amalgamated Sugar (TASCO-Paul)
<b>Permit Number</b>	P-2011.0040
<b>Project ID</b>	61314
<b>Facility ID</b>	067-00001
<b>Facility Location</b>	50 South 500 West Paul, Idaho 83347

### Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules), IDAPA 58.01.01.200-228; (b) pertains only to emissions of air contaminants regulated by the State of Idaho and to the sources specifically allowed to be constructed or modified by this permit; (c) has been granted on the basis of design information presented with the application; (d) does not affect the title of the premises upon which the equipment is to be located; (e) does not release the permittee from any liability for any loss due to damage to person or property caused by, resulting from, or arising out of the design, installation, maintenance, or operation of the proposed equipment; (f) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; and (g) in no manner implies or suggests that the Idaho Department of Environmental Quality (DEQ) or its officers, agents, or employees assume any liability, directly or indirectly, for any loss due to damage to person or property caused by, resulting from, or arising out of design, installation, maintenance, or operation of the proposed equipment. Changes in design, equipment, or operations may be considered a modification subject to DEQ review in accordance with IDAPA 58.01.01.200-228.

**Date Issued** August 13, 2014



Morrie Lewis, Permit Writer



Mike Simon, Stationary Source Manager

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## 1. PERMIT SCOPE

### *Purpose*

- 1.1 This is a revised permit to construct for a boiler conversion project to:
  - Modify the B&W Boiler to allow natural gas-firing, and to limit all facility boilers to natural gas-firing only.
  - Establish limitations to resolve historic equipment review.
- 1.2 Those permit conditions revised by this permitting action are identified by the revision date citation in the right hand margin.
- 1.3 This PTC revises Permit to Construct No. P-2011.0040 Project 60995, issued June 11, 2012.

## 2. FACILITY-WIDE LIMITS

### **Definitions**

- 2.1 “Campaign year” shall be defined as the year beginning October 1 and ending the following year on September 30.

### **Beet Throughput**

- 2.2 Throughput of beets to the facility shall not exceed 19,550 tons per day (T/day).
- 2.3 Throughput of beets to the facility shall not exceed 3,500,000 tons per campaign year.

[8/13/14]

- 2.4 The permittee shall monitor and record the daily and annual beet throughput to the facility to demonstrate compliance with throughput limits (Permit Conditions 2.2 – 2.3). Annual throughput shall be determined by summing each daily throughput monthly, and then summing each monthly throughput for the campaign year. A compilation of the most recent two campaign years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

### **Boiler Steam Production**

- 2.5 Prior to September 30, 2016 (i.e., the end of the 2015 campaign year), total steam production in the B&W Boiler, the Erie City Boiler, and the Nebraska Boiler (combined) shall not exceed 2,050,000 thousand pounds of steam per campaign year (klb/yr). After September 30, 2016, this limit shall no longer be applicable.

[8/13/14]

- 2.6 The permittee shall monitor and record the monthly and annual boiler steam production to demonstrate compliance with Permit Condition 2.5. Annual steam production shall be determined by summing each monthly steam production in the boilers for the campaign year. A compilation of the most recent two campaign years of records shall be kept onsite and shall be made available to DEQ representatives upon request.

### **Boiler Fuel Usage & Conversion**

- 2.7 The permittee shall comply with the following:
- Total coal usage in the B&W Boiler and the Erie City Boiler (combined) shall not exceed 104,900 tons of coal per campaign year (T/yr).
  - On and after January 31, 2016, the B&W Boiler, the Erie City Boiler, and the Nebraska Boiler shall combust natural gas only.
  - On or before January 31, 2016, the boiler coal burners and boiler coal delivery systems in the B&W Boiler and in the Erie City Boiler shall be permanently removed so that the boilers are no longer capable of accommodating coal combustion.

[8/13/14]

- 2.8 The permittee shall monitor and record the monthly and annual boiler coal usage to demonstrate compliance with fuel usage limits (Permit Condition 2.7). Annual coal usage shall be determined by summing each monthly coal usage in the boilers for the campaign year. A compilation of the most recent two campaign years of records shall be kept onsite and shall be made available to DEQ representatives upon request.
- 2.9 On or before January 31, 2016, the permittee shall provide written notification to DEQ of the actual date of permanent removal of the boiler coal burners and boiler coal delivery systems (as required by Permit Condition 2.7).
- The notification shall include a description of the method(s) used to ensure that the boilers are no longer capable of accommodating coal combustion.

[8/13/14]

### **Performance Testing**

- 2.10 On or before July 29, 2016, a performance test shall be conducted on the B&W Boiler stack to measure CO emissions, in accordance with IDAPA 58.01.01.211 and IDAPA 58.01.01.157.
- CO emissions during the test shall be determined and reported in CO concentration (in ppm), CO emission factor (in lb CO/1000 lb steam), and CO emission rate (lb/hr).
  - The average boiler steaming rate (lb steam/hr) during the test shall be measured and reported.
  - The B&W Boiler shall be operated at maximum capacity (at least 80% of the maximum heat input capacity or greater) during the test, unless otherwise approved by DEQ.
  - The permittee is encouraged to submit a performance test protocol prior to testing, and the permittee shall furnish DEQ a written report of the results of the performance test, in accordance with performance testing requirements (Permit Conditions 3.7 – 3.9).

[8/13/14]

### **Boiler MACT**

2.11 **40 CFR 63, Subparts A and DDDDD**

The permittee shall comply with the applicable requirements of 40 CFR 63, Subparts A and DDDDD (Permit Condition 2.16), no later than January 31, 2016, in accordance with 40 CFR 63, Subpart DDDDD and 40 CFR 63.7495(b).

[8/13/14]

2.12 **40 CFR 63, Subparts A and DDDDD**

The permittee shall meet the notification requirements in 40 CFR 63.7545 and Subpart A according to the schedule in 40 CFR 63.7545 and 40 CFR 63, Subpart A (Permit Condition 2.16), in accordance with 40 CFR 63, Subpart A and 40 CFR 63.7495(d).

[8/13/14]

### **PSD 40 CFR 52.21 – Annual Emissions Monitoring**

- 2.13 The permittee shall monitor the facility-wide emissions of PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, and CO each calendar year through calendar year 2016, in accordance with 40 CFR 52.21(r)(6). Records of annual emissions shall be calculated and maintained in tons per year on a calendar year basis.

[8/13/14]

- 2.14 The permittee shall submit a report to DEQ if facility-wide annual emissions of PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, or CO exceed baseline actual emissions by a significant amount, and if such emissions

differ from the preconstruction projection as determined in accordance with 40 CFR 52.21(r)(6)(v). The report shall be submitted to DEQ within 60 days after the end of such year and shall contain the following:

- The name, address and telephone number of the major stationary source;
- The annual emissions as calculated pursuant to 40 CFR 52.21(r)(6)(iii); and
- Any other information that the permittee wishes to include in the report (e.g., an explanation as to why the emissions differ from the preconstruction projection).

**2.15** The permittee shall not use any NSR pollutant emission decreases that result from (or are projected to result from) the conversion of facility boilers to natural gas-firing for the purposes of emissions netting calculations under the PSD program.

- NSR emission decreases from the conversion of facility boilers to natural gas-firing only are not creditable for the purposes of calculating NSR pollutant net emissions increases under 40 CFR 52.21(b)(3). These emission decreases shall be excluded from the net emissions increase calculation, notwithstanding whether such emission decreases are treated as a particular change or as a contemporaneous change.

[8/13/14]

### ***Incorporation of Federal Requirements***

**2.16** Unless expressly provided otherwise, any reference in this permit to any document identified in IDAPA 58.01.01.107.03 shall constitute the full incorporation into this permit of that document for the purposes of the reference, including any notes and appendices therein. Documents include, but are not limited to:

- Applicable requirements of National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP), 40 CFR 63, including Subparts A and DDDDD.

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NESHAP), should there be any conflict between the requirements of the permit condition and the requirements of the document, the requirements of the document shall govern, including any amendments.

[8/13/14]

### 3. GENERAL PROVISIONS

#### **General Compliance**

- 3.1 The permittee has a continuing duty to comply with all terms and conditions of this permit. All emissions authorized herein shall be consistent with the terms and conditions of this permit and the *Rules for the Control of Air Pollution in Idaho*. The emissions of any pollutant in excess of the limitations specified herein, or noncompliance with any other condition or limitation contained in this permit, shall constitute a violation of this permit and the *Rules for the Control of Air Pollution in Idaho*, and the Environmental Protection and Health Act, Idaho Code §39-101, et seq.

[Idaho Code §39-101, et seq.]

- 3.2 The permittee shall at all times (except as provided in the *Rules for the Control of Air Pollution in Idaho*) maintain in good working order and operate as efficiently as practicable, all treatment or control facilities or systems installed or used to achieve compliance with the terms and conditions of this permit and other applicable Idaho laws for the control of air pollution.

[IDAPA 58.01.01.211, 5/1/94]

- 3.3 Nothing in this permit is intended to relieve or exempt the permittee from the responsibility to comply with all applicable local, state, or federal statutes, rules and regulations.

[IDAPA 58.01.01.212.01, 5/1/94]

#### **Inspection and Entry**

- 3.4 Upon presentation of credentials, the permittee shall allow DEQ or an authorized representative of DEQ to do the following:

- Enter upon the permittee's premises where an emissions source is located or emissions related activity is conducted, or where records are kept under conditions of this permit;
- Have access to and copy, at reasonable times, any records that are kept under the conditions of this permit;
- Inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
- As authorized by the Idaho Environmental Protection and Health Act, sample or monitor, at reasonable times, substances or parameters for the purpose of determining or ensuring compliance with this permit or applicable requirements.

[Idaho Code §39-108]

#### **Construction and Operation Notification**

- 3.5 This permit shall expire if construction has not begun within two years of its issue date, or if construction is suspended for one year.

[IDAPA 58.01.01.211.02, 5/1/94]

- 3.6 The permittee shall furnish DEQ written notifications as follows:

- A notification of the date of initiation of construction, within five working days after occurrence; except in the case where pre-permit construction approval has been granted then notification shall be made within five working days after occurrence or within five working days after permit issuance whichever is later;

- A notification of the date of any suspension of construction, if such suspension lasts for one year or more;
- A notification of the anticipated date of initial start-up of the stationary source or facility not more than sixty days or less than thirty days prior to such date; and
- A notification of the actual date of initial start-up of the stationary source or facility within fifteen days after such date.

[IDAPA 58.01.01.211.03, 5/1/94]

### ***Performance Testing***

- 3.7 If performance testing (air emissions source test) is required by this permit, the permittee shall provide notice of intent to test to DEQ at least 15 days prior to the scheduled test date or shorter time period as approved by DEQ. DEQ may, at its option, have an observer present at any emissions tests conducted on a source. DEQ requests that such testing not be performed on weekends or state holidays.
- 3.8 All performance testing shall be conducted in accordance with the procedures in IDAPA 58.01.01.157. Without prior DEQ approval, any alternative testing is conducted solely at the permittee's risk. If the permittee fails to obtain prior written approval by DEQ for any testing deviations, DEQ may determine that the testing does not satisfy the testing requirements. Therefore, at least 30 days prior to conducting any performance test, the permittee is encouraged to submit a performance test protocol to DEQ for approval. The written protocol shall include a description of the test method(s) to be used, an explanation of any or unusual circumstances regarding the proposed test, and the proposed test schedule for conducting and reporting the test.
- 3.9 Within 30 days following the date in which a performance test required by this permit is concluded, the permittee shall submit to DEQ a performance test report. The written report shall include a description of the process, identification of the test method(s) used, equipment used, all process operating data collected during the test period, and test results, as well as raw test data and associated documentation, including any approved test protocol.

[IDAPA 58.01.01.157, 4/5/00]

### ***Monitoring and Recordkeeping***

- 3.10 The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Records of monitoring information shall include, but not be limited to the following: (a) the date, place, and times of sampling or measurements; (b) the date analyses were performed; (c) the company or entity that performed the analyses; (d) the analytical techniques or methods used; (e) the results of such analyses; and (f) the operating conditions existing at the time of sampling or measurement. All monitoring records and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report, or application. Supporting information includes, but is not limited to, all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation and copies of all reports required by this permit. All records required to be maintained by this permit shall be made available in either hard copy or electronic format to DEQ representatives upon request.

[IDAPA 58.01.01.211, 5/1/94]

### ***Excess Emissions***

- 3.11 The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130-136 for excess emissions due to startup, shutdown, scheduled maintenance, safety measures, upsets and breakdowns.

[IDAPA 58.01.01.130-136, 4/5/00]

### ***Certification***

- 3.12 All documents submitted to DEQ, including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, testing reports, or compliance certification shall contain a certification by a responsible official. The certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document(s) are true, accurate, and complete.

[IDAPA 58.01.01.123, 5/1/94]

### ***False Statements***

- 3.13 No person shall knowingly make any false statement, representation, or certification in any form, notice, or report required under this permit, or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.125, 3/23/98]

### ***Tampering***

- 3.14 No person shall knowingly render inaccurate any monitoring device or method required under this permit or any applicable rule or order in force pursuant thereto.

[IDAPA 58.01.01.126, 3/23/98]

### ***Transferability***

- 3.15 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.209.06.

[IDAPA 58.01.01.209.06, 4/11/06]

### ***Severability***

- 3.16 The provisions of this permit are severable, and if any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

[IDAPA 58.01.01.211, 5/1/94]