



Air Quality Permitting Statement of Basis

January 12, 2003

Project No. P-030062

The Amalgamated Sugar Co. LLC, Nampa

AIRS Facility No. 027-00010

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FINAL PERMIT TO CONSTRUCT

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ACRONYMS, UNITS, and CHEMICAL NOMENCLATURE

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
BACT	Best Available Control Technology
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Idaho Department of Environmental Quality
HAPs	hazardous air pollutants
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
lb/hr	pound per hour
MACT	Maximum Achievable Control Technology
NESHAP	Nation Emission Standards for Hazardous Air Pollutants
NO _x	nitrogen oxides
NSPS	New Source Performance Standards
PM	particulate matter
PM ₁₀	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTE	potential to emit
SO ₂	sulfur dioxide
T/yr	tons per year
TASCO	The Amalgamated Sugar Co. LLC
VOC	volatile organic compound

1. PURPOSE

The purpose for this memorandum is to satisfy the requirements of IDAPA 58.01.01.200, *Rules for the Control of Air Pollution in Idaho*, for issuing permits to construct (PTCs).

2. SUMMARY OF EVENTS

The Amalgamated Sugar Co. LLC (TASCO) is proposing to install a new thick juice storage tank (i.e., Tank No. 10) at the Nampa facility. TASCO has proposed installation of the new tank due to an unexpectedly large beet crop in 2003, and notes that the tank itself does not constitute an emissions source (refer to Section 4.2 of this document).

Representatives from the Idaho Department of Environmental Quality (DEQ) initially met with TASCO personnel to discuss the proposed project on November 4 and 6, 2003. On November 10, 2003, DEQ received a PTC applicability concurrence request from TASCO. TASCO submitted additional information on November 13, 2003. After review of TASCO's submittals, DEQ determined that installation of the new storage tank is a physical modification to the facility that could allow increased utilization of existing equipment and/or sources which may result in an annual emissions increase (i.e., a PTC is required for installation of the tank).

Consequently, the proposed project was revised and resubmitted by TASCO as a PTC application on November 24, 2003. The PTC application was submitted as a 15-day pre-permit construction approval request, per IDAPA 58.01.01.213. Per the requirements of IDAPA 58.01.01.213.02.a, public notice of the informational meeting initially appeared in *The Idaho Statesman* on November 21, 2003, and a public informational meeting regarding TASCO's proposal was held at the Nampa facility at 7:00 p.m. on December 1, 2003.

Based on the information in the November 24, 2003 application, DEQ issued a notice of pre-permit construction approval to TASCO on December 3, 2003. At DEQ's request, TASCO submitted additional information regarding the proposed project on December 8, 2003. DEQ determined the application to be complete in a letter issued to TASCO on December 9, 2003. On December 9, 2003, TASCO submitted comments and additional information to DEQ in response to an informal draft PTC. A proposed PTC and this statement of basis were then drafted for the 30-day public comment period. The comment period ran from December 11, 2003 through January 9, 2004, and three written comments were received from members of the public. These comments and DEQ's responses are contained in Appendix A of this document. A final permit and this statement of basis were prepared on January 12, 2004.

3. FACILITY / AREA CLASSIFICATION

In accordance with IDAPA 58.01.01.006.55, the facility is classified as a major facility for a potential to emit (PTE) particulate matter (PM), particulate matter with an aerodynamic diameter of ten microns or less (PM₁₀), carbon monoxide (CO), nitrogen oxides (NO_x), sulfur dioxide (SO₂), and volatile organic compounds (VOCs) at rates greater than 100 tons per year (T/yr). The facility is also classified as major in accordance with IDAPA 58.01.01.008.10(c) for a PTE PM₁₀, CO, NO_x, VOC, and SO₂ at rates greater than 100 T/yr. In the event of a major modification, the facility may become subject to prevention of significant deterioration (PSD) permitting requirements, due to a PTE PM, PM₁₀, CO, NO_x, and SO₂ at rates greater than 250 T/yr. The steam plant (B&W Boilers No. 1 and No. 2, Riley Boiler, and Union Boiler) is a designated facility in accordance with IDAPA 58.01.01.006.27(v).

The facility is located in Nampa, Idaho, which is in Canyon County, Air Quality Control Region 64. The area is currently unclassified for all criteria pollutants. Canyon County is located in the Treasure Valley Airshed Management Plan area.

4. PROJECT ANALYSIS

4.1 Process Description

As stated previously, TASCOS has proposed installation of a new juice storage tank. The proposed tank would have a capacity to store 4,000,000 gallons of "thick" juice, produced during the beet campaign-phase of TASCOS's production cycle. The purpose of this section of this analysis is to describe and discuss the production processes affected by TASCOS's proposal. Details regarding other processes at the facility can be found in the technical memorandum for Tier II Operating Permit No. 027-00010, dated September 30, 2002.

The Nampa facility is a seasonal operation, relying upon an annual beet crop grown and harvested each year. The total amount of beets processed each year varies with the amount of beets harvested. As a result of these fluctuations in the number of beets processed each year, annual emissions rates also tend to fluctuate on a year-to-year basis. It should also be noted that the facility currently has considerable operational flexibility regarding thick juice transfer operations conducted during various production cycles (i.e., the following process description outlines the general nature of operations, but does not address every possible operating scenario that could occur at the facility). The Nampa facility also has the capability to transfer offsite materials into the tank farm (e.g., thick juice from another TASCOS facility can be transferred into the storage tanks at the Nampa facility). Similarly, the facility has a capacity to transfer on-sight tank content(s) to offsite locations.

During the beet campaign, the facility extracts sucrose from sliced beets into water to form "raw" juice, which is processed through a series of purification and evaporation units to form thick juice. A portion of the thick juice produced is transferred directly to sugar production processes, or the "sugar end", while the remaining portion is stored in nine, existing storage tanks. TASCOS notes that the hourly beet-processing capacity of the facility during the beet campaign is currently limited, or bottlenecked, by the two diffusers (i.e., in order to process beets at a greater hourly rate, the facility would need to install diffusers with greater capacities). However, it is important to note that the facility can process beets (i.e., produce thick juice) at approximately twice the rate that it can convert thick juice into granulated sugar in the sugar end of the process. Hence, in the absence of the storage tanks, the sugar end of the facility would also act as an hourly bottleneck for the beet-processing end. Therefore, in an effort to process beets at maximum production rates and alleviate the bottleneck situation caused by the sugar end production capacities, the facility temporarily stores the excess thick juice produced during the beet campaign in the existing storage tanks. After all beets are processed (i.e., no new thick juice is produced at the facility), the facility transfers the stored thick juice back into the sugar end. This phase of the production cycle (i.e., operation of the sugar end without concurrent operation of the beet-processing end) is referred to as the "juice run".

TASCOS has proposed the current project because the large beet-crop yield in 2003 will result in a greater amount of thick juice produced during the current 2003-2004 beet campaign. It should be noted that the facility also had some thick juice in storage when the 2003-2004 beet campaign started. Installation of a new storage tank would allow the facility to operate the beet-processing equipment at or near capacity throughout the current beet campaign, because the excess thick juice produced could be stored for later processing during the juice run.

4.2 Emissions Estimates

Although the storage tanks are open to atmosphere, TASC0 has asserted that the juice to be stored in the tanks is not volatile and does not emit any regulated pollutants to the atmosphere in quantifiable amounts. DEQ can find no issue with TASC0's assertion, so long as the tank is utilized as described in the application (i.e., only non-volatile material is transferred through and stored in the tank). Consequently, it appears that the new storage tank, in and of itself, does not constitute an emissions unit or stationary source by definition (refer to IDAPA 58.01.01.006.32 and 103).

As part of the PTC application, TASC0 also conducted an analysis to quantify the potential emissions increases caused by increased utilization of existing sugar end processes at the facility. This is required because, under certain scenarios, the new, additional storage space could potentially allow TASC0 to process 4,000,000 gallons of thick juice that would otherwise be unavailable for production without the new tank. This additional production capacity for sugar end processes may result in some increase of annual emissions rates. It should also be noted that the beet-processing equipment used to produce the thick juice could be debottlenecked by the addition of the new tank; however, TASC0 has proposed PTC restrictions to prevent this debottlenecking scenario. Specifically, the PTC will establish a limit on the amount of thick juice that can be stored in Tank No. 10 and prohibits the use of Tank No. 10 for thick juice storage after September 1, 2004. Consequently, the only emissions increases associated with this project, after issuance of the PTC, will result from processing the additional, stored thick juice in the sugar end during the 2004 juice run. It is important to recognize that these emissions increases are solely based upon emissions increases associated with processing the volume of thick juice that could be stored in Tank No. 10. This approach appears to be consistent with existing guidance from the U.S. Environmental Protection Agency (refer to July 25, 2001, letter to Ms. Bliss Higgins regarding Motiva Enterprises, LLC and September 17, 1993, letter to Mr. Larry Devillier regarding Union Carbide Chemicals and Plastics Co., Inc.).

DEQ notes that the actual emissions baseline for this project would effectively be zero prior to the modification, because the additional tank capacity did not exist and could not be utilized previously. The future, potential emissions rate for this modification is solely based upon the emissions increase resulting from increased utilization of sugar end processes to process the additional thick juice. These emissions increases are only annual increases; the tank will not allow the facility to process sugar at a faster rate (i.e., there is no hourly increase in emissions rates), but rather, will only extend the amount of time required to process the additional thick juice.

To assess potential increased utilization impacts on emissions rates, TASC0 expressed the potential emissions rates of the boilers used to operate the sugar end processes as a function of the total steaming rate capacity of the steam plant. This relationship between steaming capacity and potential emissions is based on the emissions rate limits in TASC0's current Tier II operating permit and design capacity of the steam plant. TASC0 then projected that 13.5 operating days are required to process 4,000,000 gallons of thick juice through the sugar end, based on engineering estimates for the steam demand of sugar end processes. This information was then used to estimate the total steam required to process the additional thick juice storage capacity of Tank No. 10. The total steam demand is then used with the steam/potential emissions relationship of the steam plant to estimate future, potential emissions rates associated with the additional thick juice storage capacity of the new tank. The emissions increases are presented in the following table.

Table 4.1 ESTIMATED EMISSIONS INCREASES DUE TO INCREASED UTILIZATION

Pollutant	Emissions Increase (T/yr)
PM	4.7
PM ₁₀	4.7
NO _x	22.5
SO ₂	36.6
CO	1.7
VOC	0.1

Although this methodology does not account for some minor increases in PM/PM₁₀ that could occur at sugar end sources (e.g., the sugar handling systems), it should provide a relatively accurate assessment of the emissions increases associated with utilization of the additional thick juice storage capacity. Additionally, DEQ notes that facility-wide emissions rates will not increase above permitted emissions rate limits in the facility's current Tier II permit as a result of this project.

4.3 Modeling

It is important to note that all sources affected by this permit modification are currently permitted for operation under the terms and conditions of the facility's current Tier II operating permit. Although this modification will result in some increases in actual, annual emissions rates from increased utilization of the sugar end processes, these increases will remain below the permitted emissions limits contained in the Tier II permit. As part of the process for obtaining the Tier II permit, TASCO was required to demonstrate that the permitted emissions rates would not cause or significantly contribute to a violation of any ambient air quality standard. Therefore, since the emissions increases involved with this modification do not exceed the permitted emissions limits in the Tier II permit, no modeling is required for this project because the facility has already met the requirements for demonstrating ambient compliance.

4.4 Regulatory Review

This section discusses and documents DEQ's regulatory analysis of the proposed project with respect to applicable provisions of the *Rules for the Control of Air Pollution in Idaho*:

IDAPA 58.01.01.201 Permit to Construct Required

DEQ has determined that installation of the new storage tank is a physical modification to the facility that, under certain operating scenarios, could allow debottlenecking or increased utilization of existing equipment, which would result in an annual emissions increase. Although the storage tank is not an emissions source in and of itself, the extra storage capacity of the tank may allow increased utilization of sugar end processes, which could result in an increase in annual emissions from these sources. Consequently, the project constitutes a modification in accordance with IDAPA 58.01.01.006.58, and requires a PTC per IDAPA 58.01.01.201.

The actual-to-potential emissions increases in regulated pollutants are less than the significant levels listed in IDAPA 58.01.01.006.92; therefore, the project is not a major modification. Non-major modifications to existing stationary sources are required to demonstrate compliance with the provisions of IDAPA 58.01.01.203.

IDAPA 58.01.01.210 Preconstruction Compliance with Toxic Standards

Current DEQ policy regarding Section 210 applicability indicates that TAP emission increases are assessed on the hourly emission rate increment. This policy is based upon the screening levels presented in Sections 585 and 586, which are expressed in pound per hour rates.

Although annual emissions rates of toxic air pollutants (TAPs) may increase as a result of this modification, the hourly TAP emissions rates are not expected to increase. This is because installation of the tank does not allow the facility to process raw beets or thick juice at greater rates, which could potentially increase hourly emissions rates; this modification will only allow the facility to extend the length of the sugar end production cycle.

In accordance with IDAPA 58.01.01.210.05, no further preconstruction compliance demonstration is required if the uncontrolled emissions rate increase associated with the modification is less than or equal to the applicable screening level listed in Section 585 or 586. Since there is no hourly increase in any TAP emissions rate associated with this modification, the requirements of IDAPA 58.01.01.203.03 and 210.04 are satisfied.

IDAPA 58.01.01.577 Ambient Air Quality Standards for Specific Air Pollutants

Refer to Section 4.3 of this document for a discussion regarding the ambient impact of emissions from the Nampa facility. The facility has demonstrated that emissions increases associated with this modification will comply with ambient standards, as required by IDAPA 58.01.01.203.02 and 577.

IDAPA 58.01.01.625 Visible Emissions Standards

Any annual emissions rate increases that may occur as a result of this modification are subject to the opacity requirements of IDAPA 58.01.01.625. However, this project does not involve the installation of a new source, and all existing sources affected by this modification are currently subject to the terms and conditions of the facility's Tier I and II permits. These permits require these affected sources to comply with the requirements of Section 625; therefore, the opacity standard has not been reiterated in the PTC for this project.

IDAPA 58.01.01.675 Fuel Burning Equipment

This modification may result in an actual, annual emissions rate increase from the boilers, which are defined as fuel burning equipment. Emissions from fuel burning equipment are subject to the grain-loading standards of IDAPA 58.01.01.675. The boilers are currently subject to the terms and conditions of the facility's Tier I and II permits. These permits require the boilers to comply with the applicable requirements of Section 675; therefore, the fuel-burning requirements have not been reiterated in the PTC for this project.

IDAPA 58.01.01.700 Process Weight Limitations

This modification may result in minor actual, annual emissions rate increase from sources in the sugar end process, which are defined as process equipment. Emissions from process equipment are subject to the PM emission standards of IDAPA 58.01.01.700. The affected process equipment is currently subject to the terms and conditions of the facility's Tier I and II permits. These permits require the sugar end processes comply with the applicable requirements of Section 700; therefore, the process weight rate requirements have not been reiterated in the PTC for this project.

IDAPA 58.01.01.205 Prevention of Significant Deterioration

This is not a major modification and does not trigger PSD requirements.

40 CFR 60, 61, and 63..... New Source Performance Standards, National Emissions Standards for Hazardous Air Pollutants, and Maximum Achievable Control Technology Standards

This source is not currently affected by any New Source Performance Standard (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP), or Maximum Achievable Control Technology (MACT) standards. This modification does not install or modify any source(s) subject to any NSPS provision, nor does the modification trigger any NESHAP or MACT requirements.

4.5 Fee Review

TASCO paid the \$1,000 application fee required by IDAPA 58.01.01.224 on November 24, 2003. In accordance with IDAPA 58.01.01.225, a PTC processing fee of \$5,000 was be required because the increase in emissions associated with the new storage tank is greater than ten, but less than 100 tons per year. DEQ received the \$5,000 fee payment from TASCO on January 9, 2004.

Table 4.2 EMISSIONS INVENTORY

Pollutant	Annual Emissions Increase (T/yr)	Annual Emissions Reduction (T/yr)	Annual Emissions Change (T/yr)
NO _x	22.5	0	22.5
SO ₂	36.6	0	36.6
CO	1.7	0	1.7
PM ₁₀	4.7	0	4.7
VOC	0.1	0	0.1
TAPs/HAPs ^a	n/a	0	n/a
Total:	65.6	0	65.6
Fee Due	\$	5,000.00	

^aFor purposes of the processing fee, all TAPs/HAPs are included in PM₁₀ and VOC inventories.

TASCO's Nampa facility is a major facility as defined in IDAPA 58.01.01.008.10 and is therefore subject to registration and registration fees in accordance with IDAPA 58.01.01.387. The facility is current with its registration fees.

5. PERMIT CONDITIONS

This section discusses and documents the reasoning behind monitoring and recordkeeping requirements in the proposed PTC.

Permit Condition 2.4..... Throughput Monitoring

Permit Condition 2.5 requires TASCO to monitor and record the volume of thick juice transferred to Tank No. 10. The records must include start and finish dates for transfer events, as well as the total volume of thick juice transferred into the tank during each transfer event. Permit Condition 2.6 requires TASCO to submit written notification, including copies of the records generated under the terms of Permit Condition 2.5, at least ten days after thick juice transfer operations into Tank No. 10 have ceased.

This monitoring is intended to provide a basis for determining compliance with Permit Condition 2.3, which states that the maximum volume of thick juice transferred into Tank No. 10 shall not exceed 3,950,000 gallons of thick juice during the 2003-2004 beet campaign. This permit condition is required

to limit the increase in emissions associated with the additional storage tank below significant levels as defined by IDAPA 58.01.01.006.92. Without this permit limit, the increase in emissions rates associated with increased utilization of sugar end equipment could exceed significant thresholds, in which case the modification would be classified as a major modification. A major modification at the Nampa facility could trigger PSD requirements.

Finally, it should be noted that Permit Condition 2.4 states that Tank No. 10 shall not be used to store or transfer thick juice after September 1, 2004. This restriction is required in order to assure increased emissions rates due to increased utilization of the sugar end processes (i.e., as a result of the additional storage capacity) only occur once, during the 2003-2004 beet campaign/juice run. This permit condition is necessary to assure that the annual emissions increases associated with this project are maintained below significant level thresholds on a continual basis.

6. PERMIT COORDINATION

The Nampa facility currently operates under Tier II Operating Permit No. 027-00010, dated September 30, 2002. Additionally, this facility is a Tier I source, and is currently subject to the terms and conditions of Tier I Operating Permit No. 027-00010, dated December 12, 2002. The terms of the proposed PTC for this project do not currently contravene or conflict with any permit condition or term in either of the facility's existing permits. Therefore, TASC0 may begin to operate under the terms of the PTC after issuance, prior to rolling the applicable requirements of the PTC into the Tier I permit (refer to IDAPA 58.01.01.209.05.a.iii).

It should be noted that, after final issuance of a PTC for this modification, the permit conditions of the PTC will become applicable requirements as defined by IDAPA 58.01.01.008.03.b. In accordance with IDAPA 58.01.01.209.05.a.iv, these applicable requirements must be rolled into the Tier I permit upon renewal of the current Tier I permit.

7. PUBLIC COMMENT

In accordance with IDAPA 58.01.01.209.01.c, DEQ determined that this proposed permit should be made available for a public comment period. Public comment packages, which included the application materials, the proposed permit, and associated statement of basis, were made available for public review at the Nampa Public Library and DEQ's State and Regional Offices in Boise. The public comment period was provided from December 11, 2003 through January 9, 2004. Three written comments were received from members of the public. These comments and DEQ's responses are contained in Appendix A of this document. No change was made to the proposed PTC as a result of any comments received by DEQ.

8. RECOMMENDATION

Based on review of application materials and all applicable state and federal rules and regulations, staff recommend that PTC No. P-030062 be issued to TASC0 for the installation of Tank No. 10 at the Nampa facility.

SO/sd Project No. P-030062

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APPENDIX A

**The Amalgamated Sugar Co. LLC, Nampa / P-030062
Public Comments and Responses**

January 12, 2004

**STATE OF IDAHO
DEPARTMENT OF ENVIRONMENTAL QUALITY
RESPONSE TO PUBLIC COMMENTS
ON PROPOSED PERMIT TO CONSTRUCT NO. P-030062
FOR THE AMALGAMATED SUGAR CO. LLC, NAMPA, IDAHO**

Introduction

In accordance with IDAPA 58.01.01.209.01.c of the *Rules for the Control of Air Pollution in Idaho*, the Idaho Department of Environmental Quality (DEQ) provided for public notice and comment on proposed Permit-to-Construct (PTC) No. P-030062 for installation of Tank No. 10 at The Amalgamated Sugar Co. LLC (TASCO) facility located in Nampa, Idaho. Public comment packages, which included the application materials, the proposed permit, and associated statement of basis, were made available for public review at the Nampa Public Library and DEQ's State and Regional Offices in Boise. The public comment period was provided from December 11, 2003, through January 9, 2004. Three written comments were received from members of the public. One of these comments expressed support for TASCO's proposed project and did not address any aspect of air quality; therefore, DEQ has not responded to this comment. The remaining comments expressed concern regarding air quality aspects of the PTC, and have been summarized below with the DEQ's response immediately following.

Public Comments and DEQ Responses

Comment 1: No Additional Air Pollution / Stricter Ambient Air Quality Standards

Two area residents submitted a comment stating that no additional air pollution should be allowed in the area due to the associated health risks/concerns. This comment also states that stricter ambient air quality standards are required in the area, and that the "...grandfather' rule [should be] abolished".

Response to 1:

DEQ is charged by the Environmental Protection and Health Act, Idaho Code § 39-10, to operate a program to issue air pollution permits in accordance with the *Rules for the Control of Air Pollution in Idaho*. The purpose of the air program is to safeguard Idaho's air quality by limiting and controlling the emissions of air contaminants from air pollution sources. DEQ carefully evaluates facility plans for construction and/or operation of these sources to ensure all are capable of meeting applicable state and federal air quality standards. The permit for Tank No. 10 has been developed in accordance with the *Rules for the Control of Air Pollution in Idaho* and satisfies the requirements therein.

To obtain a permit for allowable increases in emissions rates, TASCO has been required to demonstrate that the proposed project would comply with the provisions of IDAPA 58.01.01.203, *Rules for the Control of Air Pollution in Idaho*. This provision requires that 1) the source would comply with all applicable emissions standards, 2) the predicted ambient impacts of the emissions increases would not cause or significantly contribute to a violation of an ambient air quality standard, and 3) the emissions of toxic air pollutants (TAPs) from the source would not injure or unreasonably affect human or animal life or vegetation. These three criteria are intended to assess the risk that a new source, or

modification to an existing source, would pose to the health and welfare of the public and the environment. TASC0 has successfully demonstrated that the proposed project will comply with all of these requirements and thereby has satisfied all requirements of the *Rules for the Control of Air Pollution in Idaho*. Consequently, TASC0 is entitled to an air quality permit for the proposed project and DEQ has granted TASC0's request.

The ambient air quality standards contained in the *Rules for the Control of Air Pollution in Idaho* appear in IDAPA 58.01.01.575 through 587. The specific standards applicable to TASC0's proposal are located in Section 577, and are taken directly from the federal National Ambient Air Quality Standards (NAAQS) established by the U.S. Environmental Protection Agency (EPA). The NAAQS include primary standards intended to protect public health and secondary standards intended to protect public welfare, and have been codified in 40 CFR Part 50. These standards have been determined by EPA to be protective of public health and welfare. In the event that EPA establishes new or more stringent ambient standards, DEQ will implement such changes through the *Rules for the Control of Air Pollution in Idaho*.

The "grandfather rule" referred to in this comment is not a codified federal or state rule. However, many facilities or sources that have not yet satisfied triggering criteria for specific air quality or permitting programs (e.g., New Source Review or Prevention of Significant Deterioration) are often referred to as "grandfathered sources". These sources are not exempt from compliance with applicable provisions of federal or state air quality requirements (e.g., the NAAQS), but rather, have not met the applicability criteria that would require the source to comply with additional more rigorous air quality requirements. In the event that a grandfathered source does trigger an air quality or permitting program for which the facility was not previously required to demonstrate compliance, the source will be required to demonstrate compliance with all applicable requirements for that program.

The project proposed by TASC0 has been subjected to all applicable federal and state requirements. No change has been made to the proposed PTC as a result of this comment.

Comment 2:

Odor Standards / Particulate Matter with an Aerodynamic Diameter of 2.5 Microns or Less / Secondary Air Pollutants / Mercury Emissions / Automobile Emissions

One area resident submitted a comment addressing multiple issues in regard to the proposed project and PTC. Each of these issues has been summarized in the following list:

- 2.1 The comment notes that the PTC does not address odorous emissions associated with the proposed project. The comment requests that odor abatement controls be required in the proposed PTC.
- 2.2 The comment notes that emissions of particulate matter with an aerodynamic diameter of 2.5 microns or less (PM_{2.5}) have not been addressed in the statement of basis for the proposed PTC.
- 2.3 The comment notes that creation of secondary air pollutants is not discussed in the statement of basis for the proposed PTC.

2.4 The comment notes that increased emissions of mercury associated with the proposed project have not been discussed in the statement of basis for the proposed PTC.

2.5 The comment appears to assert that no point source in Canyon County should be allowed to increase emissions rates of air pollutants until such time as Canyon County proactively addresses air pollutants emitted from automobiles.

Response to 2.1:

The requirements regarding odorous emissions is contained in IDAPA 58.01.01.775-776, *Rules for the Control of Air Pollution in Idaho*. Although emissions increases associated with TASC0's proposed project are subject to this requirement, the provisions of Section 776 were not specifically included in the PTC because this provision has already been applied to all sources at the facility under the terms and conditions of TASC0's existing Tier I operating permit.

DEQ issued Tier I Operating Permit No. 027-00010 to TASC0 on December 12, 2002. Permit Condition 2.5 of the Tier I permit requires the facility to comply with IDAPA 58.01.01.775-776, while Permit Condition 2.6 contains monitoring and recordkeeping requirements intended to demonstrate compliance with Permit Condition 2.5. DEQ has determined that the terms of the Tier I permit 1) require the facility to comply with the odorous emissions standard, and 2) are sufficient to determine compliance with the standard. Consequently, this requirement is not required or repeated within the proposed PTC.

Response to 2.2:

Although EPA recently codified a NAAQS for PM_{2.5} in 40 CFR 50, DEQ has not yet promulgated any method for analyses or permitting applications of the standard within the *Rules for the Control of Air Pollution in Idaho*. Consequently, there is currently no mechanism in place to address PM_{2.5} emissions in TASC0's proposed PTC; however, it should be noted that emissions of particulate matter with an aerodynamic diameter of ten microns or less (PM₁₀), which would also include PM_{2.5} emissions, have been reviewed for applicable requirements.

Response to 2.3:

There are currently no EPA-approved air dispersion models that account for secondary air pollutants (i.e., secondary aerosols) and, at the same time, are refined enough to determine the maximum ambient impact from a single facility. There are currently no regulatory requirements that can be applied to an analysis of secondary aerosols.

Response to 2.4:

Emissions of mercury are currently regulated by the state of Idaho through application of the TAP standards contained in IDAPA 58.01.01.585, *Rules for the Control of Air Pollution in Idaho*. For the proposed project, Section 203.03 requires that TASC0 demonstrate preconstruction compliance with TAP standards using the methods provided in Section 210. As discussed in Section 4.4 of the statement of basis for the proposed PTC, TASC0 has demonstrated preconstruction compliance in accordance with IDAPA 58.01.01.210.05. Specifically, the proposed project does increase the hourly mercury emissions rate of the facility; therefore, no further action is required by DEQ at this time.

Finally, it should be noted that, during the development of TASC0's existing Tier II operating permit, DEQ reviewed facility-wide emissions estimates and conducted impact analyses for several TAPs, including arsenic, beryllium, cadmium, mercury, nickel, selenium, acetaldehyde, crotonaldehyde, formaldehyde, propionaldehyde, and total aldehydes. The results of this impact analysis appear in the technical memorandum for

the Tier II permit, as Appendix F. Based upon these estimated impacts and toxicological exposure data, it was determined that no injury or unreasonable effect, as required by IDAPA 58.01.01.161, would result. Therefore, no specific emissions rate limits for these TAPs, including mercury, were required in the Tier II permit.

Response to 2.5:

As stated in the Response to Comment No. 1, DEQ is charged by the Environmental Protection and Health Act, Idaho Code § 39-10, to operate a program to issue air pollution permits in accordance with the *Rules for the Control of Air Pollution in Idaho*. The proposed permit has been developed in accordance with the *Rules for the Control of Air Pollution in Idaho* and satisfies the requirements therein. Although DEQ is currently working to address the air quality issues associated with automobile emissions, the scope of this comment is outside of the requirements for PTC applicants and does not appear to adversely impact any analyses conducted during development of the proposed permit.

No change has been made to the proposed permit as a result any issue addressed within Comment No. 2.

SO/sd Project No. P-030062

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APPENDIX B

**The Amalgamated Sugar Co. LLC, Nampa / P-030062
Aerometric Information Retrieval System Information**

B. AEROMETRIC INFORMATION RETRIEVAL SYSTEM INFORMATION

This modification does not result in any new point sources at the Nampa facility. The facility's existing Aerometric Information Retrieval System classification is shown in the following table.

Table A.1 AIRS/AFS^a FACILITY-WIDE CLASSIFICATION^b DATA ENTRY FORM

AIR PROGRAM	SIP	PSD	NSPS (Part 60)	NESHAP (Part 61)	MACT (Part 63)	TITLE V	AREA CLASSIFICATION A – Attainment U – Unclassifiable N – Nonattainment
POLLUTANT							
SO ₂	A	A				A	U
NO _x	A	A				A	U
CO	A	A				A	U
PM ₁₀	A	A				A	U
PM	A	A				A	U
VOC	A	B				A	U
THAP (Total HAPs)	A	B				B	U
			APPLICABLE SUBPART				

^a Aerometric Information Retrieval System (AIRS) / AIRS Facility Subsystem (AFS)

^b AIRS/AFS Classification Codes:

- A = Actual or potential emissions of a pollutant are above the applicable major source threshold. For NESHAP only, class "A" is applied to each pollutant which is below the 10 T/yr threshold, but which contributes to a plant total in excess of 25 T/yr of all NESHAP pollutants.
- SM = Potential emissions fall below applicable major source thresholds if and only if the source complies with federally enforceable regulations or limitations.
- B = Actual and potential emissions below all applicable major source thresholds.
- C = Class is unknown.
- ND = Major source thresholds are not defined (e.g., radionuclides).