



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, Idaho 83706-1255 • (208) 373-0502

Dirk Kempthorne, Governor  
C. Stephen Allred, Director

January 12, 2004

**Certified Mail No. 7099 3220 0009 1975 2836**

Mr. Joe Huff, Director Technology  
The Amalgamated Sugar Co. LLC  
3184 Elder Street  
Boise, ID 83705

RE: AIRS Facility No. 027-00010, The Amalgamated Sugar Co. LLC, Nampa  
Final Permit Letter

Dear Mr. Huff:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-030062 for The Amalgamated Sugar Co. LLC (TASCO) in accordance with IDAPA 58.01.01.200 through 228, *Rules for the Control of Air Pollution in Idaho*. This permit is effective immediately and is based on your permit application received on November 24, 2003.

This permit does not release TASCO from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

Tim Trumbull of the Boise Regional Office will contact you regarding a meeting with the DEQ to discuss the permit terms and requirements. DEQ recommends the following representatives attend the meeting: your facility's plant manager, responsible official, environmental contact, and any operations 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 call Bill Rogers at (208) 373-0502 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

Martin Bauer  
Administrator  
Air Quality Division

MB/SO/sd

Permit No. P-030062

Enclosures

cc: Mike McGown, Boise Regional Office  
Marilyn Seymore, Air Quality Division  
Laurie Kral, EPA Region 10  
Steve Ogle, Tech Services Division  
Bill Rogers, Air Quality Division  
Sherry Davis, AQ Division  
Marilyn Seymore, Data Entry  
Source File  
Phyllis Heitman, (Ltr Only)  
Reading File (Ltr Only)



**Air Quality  
PERMIT TO CONSTRUCT**

State of Idaho  
Department of Environmental Quality

**PERMIT NO.:** P-030062

**FACILITY ID NO.:** 027-00010

**AQCR:** 64

**CLASS:** A

**SIC:** 2063

**ZONE:** 11

**UTM COORDINATE (km):** 534.5, 4828.0

**1. PERMITTEE**  
The Amalgamated Sugar Co. LLC

**2. PROJECT**  
Tank No. 10 Installation

<b>3. MAILING ADDRESS</b> P.O. Box 8787	<b>CITY</b> Nampa	<b>STATE ID</b>	<b>ZIP</b> 83653-8787
--	----------------------	-----------------	--------------------------

<b>4. FACILITY CONTACT</b> Glen Patrick	<b>TITLE</b> Environmental Manager	<b>TELEPHONE</b> (208) 466-3541
--	---------------------------------------	------------------------------------

<b>5. RESPONSIBLE OFFICIAL</b> K. Pete Chertudi	<b>TITLE</b> Senior Vice President Operations	<b>TELEPHONE</b> (208) 383-6500
--	--	------------------------------------

<b>6. EXACT PLANT LOCATION</b> 138 West Karcher Ave, Nampa, Idaho	<b>COUNTY</b> Canyon
--	-------------------------

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**  
Beet sugar manufacturing

**8. GENERAL CONDITIONS**

This permit is issued according to IDAPA 58.01.01.200, *Rules for the Control of Air Pollution in Idaho*, and 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.

This permit (a) does not affect the title of the premises upon which the equipment is to be located; (b) 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; (c) does not release the permittee from compliance with other applicable federal, state, tribal, or local laws, regulations, or ordinances; (d) in no manner implies or suggests that the 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.

This permit is not transferable to another person, place, or piece or set of equipment. This permit will expire if construction has not begun within two years of its issue date or if construction is suspended for one year.

This permit has been granted on the basis of design information presented with its application. Changes of design or equipment may require DEQ approval pursuant to the *Rules for the Control of Air Pollution in Idaho*, IDAPA 58.01.01.200, et seq.

C. STEPHEN ALLRED, DIRECTOR  
DEPARTMENT OF ENVIRONMENTAL QUALITY

**DATE ISSUED:** January 12, 2004

## Acronyms, Units, And Chemical Nomenclature

AFS	AIRS Facility Subsystem
AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
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
km	kilometer
lb/hr	pound per hour
NO <sub>x</sub>	nitrogen oxides
PM	particulate matter
PM <sub>10</sub>	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
PTC	permit to construct
SIC	Standard Industrial Classification
SO <sub>2</sub>	sulfur dioxide
T/yr	tons per year
UTM	Universal Transverse Mercator
VOC	volatile organic compound

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030062**

<b>Permittee:</b> The Amalgamated Sugar Co. LLC	<b>Facility ID No.</b> 027-00010	<b>Date Issued:</b>	January 12, 2004
<b>Location:</b> Nampa, Idaho			

**1. PERMIT TO CONSTRUCT SCOPE**

***Purpose***

This PTC is for the installation of Tank No. 10.

***Regulated Processes***

Table 1.1 lists all regulated units and/or processes in this PTC.

**Table 1.1 REGULATED PROCESSES**

<b>Permit Section</b>	<b>Source Description</b>	<b>Emissions Control(s)</b>
2	Tank No. 10	None

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030062**

<b>Permittee:</b> The Amalgamated Sugar Co. LLC	<b>Facility ID No.</b> 027-00010	<b>Date Issued:</b>	January 12, 2004
<b>Location:</b> Nampa, Idaho			

**2. TANK NO. 10**

**2.1 Process Description**

The primary purpose of the tank farm is to store thick juice produced during the beet campaign. The thick juice stored in the tanks is generally processed during the juice run following the beet campaign. The tank farm consists of eight 4,200,000-gallon storage tanks (Tank Nos. 1-8), a 5,800,000-gallon storage tank (Tank No. 9) and one 3,950,000-gallon storage tank (Tank No. 10).

**2.2 Emissions Control Description**

The tanks in the tank farm do not directly emit any regulated pollutants and are not currently defined as stationary sources of any regulated pollutants. Consequently, no control equipment is utilized or required for use on the tanks.

***Operating Requirements***

**2.3 Throughput Limit**

During the 2003-2004 beet campaign, the maximum volume of thick juice transferred into Tank No. 10 shall not exceed 3,950,000 gallons of thick juice.

**2.4 Thick Juice Storage Restriction**

After September 1, 2004, Tank No. 10 shall not be used to store or transfer thick juice.

***Monitoring and Recordkeeping Requirements***

**2.5 Throughput Monitoring**

The permittee shall monitor and record the volume of thick juice transferred to Tank No. 10. The records shall 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.

***Reporting Requirements***

**2.6 Tank Utilization**

At least ten days after thick juice transfer operations into Tank No. 10 have ceased, the permittee shall submit written notification to DEQ. This notification shall include a copy of the records generated in accordance with Permit Condition 2.5, and shall be certified in accordance with General Provision 8 of this permit.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030062****Permittee:** The Amalgamated Sugar Co. LLC**Facility ID No.**  
027-00010**Date Issued:**

January 12, 2004

**Location:** Nampa, Idaho**3. EMISSIONS INVENTORY**

The following table is a summary of the emissions increases associated with this PTC. The emissions inventory table is provided for informational purposes only.

**Table 3.1 EMISSIONS INVENTORY**

<b>Pollutant</b>	<b>Annual Emissions Increase (T/yr)</b>	<b>Annual Emissions Decrease (T/yr)</b>	<b>Change in Annual Emissions (T/yr)</b>
NO <sub>x</sub>	22.5	n/a	22.5
SO <sub>2</sub>	36.6	n/a	36.6
CO	1.7	n/a	1.7
PM/PM <sub>10</sub>	4.7/4.7	n/a	4.7
VOC	0.1	n/a	0.1
TAPS/ HAPS*	n/a	n/a	n/a
<b>Total:</b>			<b>65.6</b>

\*This modification results in minor annual increases of toxic air pollutants and/or hazardous air pollutants that are not included in this inventory.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030062**

<b>Permittee:</b> The Amalgamated Sugar Co. LLC	<b>Facility ID No.</b> 027-00010	<b>Date Issued:</b>	January 12, 2004
<b>Location:</b> Nampa, Idaho			

**4. PERMIT TO CONSTRUCT GENERAL PROVISIONS**

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., and the permittee is subject to penalties for each day of noncompliance.
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.
3. The permittee shall allow the Director, and/or the authorized representative(s), upon the presentation of credentials:
  - To enter, at reasonable times, upon the premises where an emissions source is located, or in which any records are required to be kept under the terms and conditions of this permit.
  - At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit, to inspect any monitoring methods required in this permit, and require stack compliance testing in conformance with IDAPA 58.01.01.157 when deemed appropriate by the Director.
4. Nothing in this permit is intended to relieve or exempt the permittee from compliance with any applicable federal, state, or local law or regulation, except as specifically provided herein.
5. The permittee shall notify DEQ, in writing, of the required information for the following events within five working days after occurrence:
  - Initiation of Construction - Date
  - Completion/Cessation of Construction - Date
  - Actual Production Startup - Date
  - Initial Date of Achieving Maximum Production Rate - Production Rate and Date
6. If compliance testing is specified, the permittee must schedule and perform such testing within 60 days after achieving the maximum production rate, and not later than 180 days after initial startup. This requirement shall be construed as an ongoing requirement. The permittee shall not operate the source without testing within 180 days. If testing is not conducted within 180 days after initial startup, then each day of operation thereafter without the required compliance test constitutes a violation. Such testing must strictly adhere to the procedures outlined in IDAPA 58.01.01.157 and shall not be conducted on weekends or state holidays without prior written approval from DEQ. Testing procedures and specific time limitations may be modified by DEQ by prior negotiation if conditions warrant adjustment. DEQ shall be notified at least 15 days prior to the scheduled compliance test. Any records or data generated as a result of such compliance test shall be made available to DEQ upon request.

**AIR QUALITY PERMIT TO CONSTRUCT NUMBER: P-030062**

<b>Permittee:</b> The Amalgamated Sugar Co. LLC	<b>Facility ID No.</b> 027-00010	<b>Date Issued:</b>	January 12, 2004
<b>Location:</b> Nampa, Idaho			

7. 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.
  
8. In accordance with IDAPA 58.01.01.123, 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.