



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 North Hilton • Boise, ID 83706 • (208) 373-0502
www.deq.idaho.gov

Brad Little, Governor
John Tippetts, Director

April 30, 2020

Stan Case, Plant Manager
The Amalgamated Sugar Company LLC
P.O. Box 700
Paul, ID 83347

RE: Facility ID No. 067-00001, The Amalgamated Sugar Company LLC, Paul
Final Permit Letter

Dear Stan Case:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2017.0012 Project 62363 to The Amalgamated Sugar Company LLC located at Paul to correct boiler NSPS requirements and remove a source testing requirement. This PTC is issued 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 January 10, 2020.

This permit is effective immediately and replaces PTC No. P-2017.0012 issued on October 18, 2018. This permit does not release The Amalgamated Sugar Company LLC from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

As requested, in accordance with IDAPA 58.01.01.209.05.b, a PTC and Tier I permit have been processed. The Amalgamated Sugar Company LLC 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.

Pursuant to the Construction and Operation Notification General Provision of your permit, it is required that construction and operation notification be provided. Please provide this information as listed to DEQ's Twin Falls Regional Office, 650 Addison Avenue West, Suite 110, Fax (208) 736-2194.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a permit handoff meeting with Bobby Dye, Regional Manager – Air Quality and Remediation, 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.

Mr. Case
April 30, 2020
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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 Kelli Wetzel at (208) 373-0502 or kelli.wetzel@deq.idaho.gov to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink that reads "Mike Simon". The signature is written in a cursive style and is contained within a light gray rectangular box.

Mike Simon
Stationary Source Program Manager
Air Quality Division

MS\kw

Permit No. P-2017.0012 PROJ 62363

Enclosures

Air Quality

PERMIT TO CONSTRUCT

Permittee The Amalgamated Sugar Company LLC - Paul
Permit Number P-2017.0012
Project ID 62363
Facility ID 067-00001
Facility Location 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 April 30, 2020



Kelli Wetzels, Permit Writer



Mike Simon, Stationary Source Manager

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1 Permit Scope

Purpose

- 1.1 This is a DEQ initiated permit to construct (PTC) revision to correct boiler NSPS requirements and to provide a high level citation to those requirements.
- 1.2 Those permit conditions that have been modified or revised by this permitting action are identified by the permit issue date citation located directly under the permit condition and on the right-hand margin.
- 1.3 This PTC replaces Permit to Construct No. P-2017.0012, issued on October 18, 2018.

Regulated Sources

Table 1.1 lists all sources of regulated emissions in this permit.

Table 1.1 Regulated Sources

Permit Section	Source	Control Equipment
3	<u>B&W Boiler (S-B1)</u> Operational Capacity: 175,000 lb/hr steam Fuel: natural gas	Low NO _x burners
3	<u>Rentech Boiler (S-B4)</u> Operational Capacity: 300,000 lb/hr steam Fuel consumption: 385 MMBtu/hr Fuel: natural gas	Low NO _x burners
3	<u>Nebraska Boiler (S-B3, Backup Boiler)</u> Operational Capacity: 200,000 lb/hr steam Fuel consumption: 250 MMBtu/hr Fuel: natural gas	Low NO _x burners

[10/18/2018]

2 Facility-Wide Limits

Definitions

2.1 Campaign Year

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

Beet Throughput

2.2 Daily Throughput

Throughput of beets to the facility shall not exceed 21,550 tons per day (T/day).

[6/8/2017]

2.3 Annual Throughput

Throughput of beets to the facility shall not exceed 3,852,000 tons per campaign year.

[6/8/2017]

2.4 Throughput Monitoring

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.

NSR Applicability Determinations

2.5 Future New Source Review (NSR) Applicability Determinations

The permittee shall not benefit from emission decreases that result from (or were projected to result from) the elimination of coal as fuel for the boilers for any future NSR applicability determinations and emissions netting calculations under the PSD program.

- Baseline actual emissions calculated from the boilers for any future NSR applicability determination shall be adjusted downward, under 40 CFR 52.21(b)(48)(ii)(b), to reflect emissions that would have occurred if the boilers had combusted natural gas, not coal.
- NSR emission decreases from the conversion of the boilers from coal firing 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).

[6/8/2017]

Incorporation of Federal Requirements

2.6 Federal Requirements

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 New Source Performance Standards (NSPS), 40 CFR 60, including Subparts A and Db.
- 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.

[11/20/2017]

3 B&W, Rentech, and Nebraska Boilers

3.1 Process Description

The facility boiler house steam plant which includes the B&W boiler, the Rentech boiler, and the Nebraska boiler (used for backup only) provide steam to the facility.

[10/18/2018]

3.2 Control Device Descriptions

Table 3.1 B&W, Rentech, and Nebraska Boilers Description

Emissions Units / Processes	Control Devices
B&W boiler	Low NO _x burners
Rentech boiler	Low NO _x Burners
Nebraska boiler	Low NO _x Burners

[10/18/2018]

Emission Limits

3.3 Emission Limits

The combined emissions from the B&W, Rentech, and Nebraska boiler stacks shall not exceed any corresponding emissions rate limits listed in Table 3.2.

Table 3.2 B&W, Rentech, and Nebraska Boiler Combined Emission Limits^(a)

Source Description	PM ₁₀ ^(b)	SO ₂	NO _x	CO	VOC
	T/yr ^(c)	T/yr ^(c)	T/yr ^(c)	T/yr ^(c)	T/yr ^(c)
B&W boiler	14.4	1.20	132.0	156.4	10.4
Rentech boiler					
Nebraska boiler					

- a) In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
- b) Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
- c) Tons per campaign year, as defined in Permit Condition 2.1.

[10/18/2018]

3.4 Opacity Limit

Emissions from the B&W boiler, Rentech boiler, and Nebraska boiler stack, or any other stack, vent, or functionally equivalent opening associated with the B&W boiler, Rentech boiler, and Nebraska boiler, shall not exceed 20% opacity for a period or periods aggregating more than three minutes in any 60-minute period as required by IDAPA 58.01.01.625. Opacity shall be determined by the procedures contained in IDAPA 58.01.01.625.

[10/18/2018]

Operating Requirements

3.5 Fuel Limit

The B&W boiler, Rentech boiler, and Nebraska boiler shall combust natural gas only.

[10/18/2018]

3.6 Boiler Operating Requirements

Following the shutdown of the Erie City boiler, the permittee shall not operate more than two of the three boilers (B&W, Rentech, and Nebraska boilers) simultaneously, except during periods of start-up and shut down of a boiler when the three boilers may be partially operated.

[10/18/2018]

3.7 Nebraska Boiler Maximum Heat Input Capacity

The maximum heat input capacity of the Nebraska boiler shall not exceed 250 MMBtu/hr.

[11/20/2017]

3.8 Rentech Boiler Maximum Heat Input Capacity

The maximum heat input capacity of the Rentech boiler shall not exceed 385 MMBtu/hr.

[10/18/2018]

3.9 B&W, Rentech, and Nebraska Boiler Operating Limits

To demonstrate compliance with the Emissions Limits permit condition, operation of the B&W boiler, Rentech boiler, and Nebraska boiler shall not exceed 40,000,000 therms (for all boilers combined) for the campaign year as defined in Permit Condition 2.1.

[10/18/2018]

3.10 Boiler Startup and Shutdown

No later than 30 days following the manufacturer's guarantee testing for the Rentech boiler, the permittee shall permanently shut down the Erie City boiler.

[10/18/2018]

Monitoring and Recordkeeping Requirements

3.11 Boiler Operation Recordkeeping

The permittee shall monitor and record the amount of fuel used in therms per month in the B&W, Rentech, and Nebraska boilers to demonstrate compliance with operating limits permit condition. Annual fuel used shall be determined by summing the monthly operations in the boilers for the campaign year to demonstrate compliance with Permit Condition 3.9.

[10/18/2018]

Boiler NSPS Requirements

3.12 Applicable Requirements

The permittee shall comply with the applicable requirements of 40 CFR 60, Subparts A and Db.

[4/30/2020]

Boiler MACT Requirements

3.13 Applicable Requirements

The permittee shall comply with the applicable requirements of 40 CFR 63, Subparts A and DDDDD.

4 General Provisions

General Compliance

4.1 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, 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.]

4.2 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, 5/1/1994]

4.3 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, 5/1/1994]

Inspection and Entry

4.4 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, 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

4.5 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, 5/1/1994]

4.6 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; and
- A notification of the initial date of achieving the maximum production rate, within five working days after occurrence - production rate and date.

[IDAPA 58.01.01.211.03, 5/1/1994]

Performance Testing

- 4.7** 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.
- 4.8** 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.
- 4.9** Within 60 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 and 4/11/2015]

Monitoring and Recordkeeping

- 4.10** The permittee shall maintain sufficient records to ensure compliance with all of the terms and conditions of this permit. Monitoring records 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, 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, 5/1/1994]

Excess Emissions

- 4.11** The permittee shall comply with the procedures and requirements of IDAPA 58.01.01.130–136 for excess emissions due to start-up, shut-down, scheduled maintenance, safety measures, upsets, and breakdowns.

[IDAPA 58.01.01.130–136, 4/5/2000]

Certification

- 4.12** 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, 5/1/1994]

False Statements

- 4.13** 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, 3/23/1998]

Tampering

- 4.14** 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, 3/23/1998]

Transferability

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

[IDAPA 58.01.01.209.06, 4/11/2006]

Severability

- 4.16** 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, 5/1/1994]