



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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

Dirk Kempthorne, Governor  
Toni Hardesty, Director

July 27, 2005

**Certified Mail No. 7000 1670 0013 8128 2626**

Alan Hieb, Plant Manager  
The Amalgamated Sugar Company  
P.O. Box 700  
Paul, Idaho 8334

RE: Facility ID No. 067-00001, The Amalgamated Sugar Co., MiniCassia  
Final Permit Letter

Dear Mr. Hieb:

The Idaho Department of Environmental Quality (DEQ) is issuing Permit to Construct No. P-050406 to The Amalgamated Sugar Co. (TASCO) for its MiniCassia facility, in accordance with IDAPA 58.01.01.200 through 228, Rules for the Control of Air Pollution in Idaho. This permit is effective immediately.

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

A representative of the Twin Falls Regional Office will contact you regarding a meeting with 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

BR/AC/sd      Permit No. P-050406  
Enclosures

- c: **Bill Allred, Twin Falls Regional Office**
- Bill Rogers, Permit Coordinator**
- Almer Casile, Permit Writer**
- Laurie Kral, US EPA Region 10**
- Marilyn Seymore/Pat Rayne, Data Entry**
- Joan Lechtenberg, Public Comment**
- Permit Binder**
- 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-050406

**FACILITY ID No.:** 067-00001

**AQCR:** 063

**CLASS:** A

**SIC:** 2063

**ZONE:** 12

**UTM COORDINATE (km):** 274.0, 4721.0

**1. PERMITTEE**

The Amalgamated Sugar Company LLC - Mini-Cassia Facility

**2. PROJECT**

Initial Permit to Construct – Natural Gas-fired Backup Nebraska Boiler

**3. MAILING ADDRESS**

P.O. Box 700

**CITY**

Paul

**STATE**

ID

**ZIP**

83347

**4. FACILITY CONTACT**

Alan Hieb

**TITLE**

Plant Manager

**TELEPHONE**

(208) 438-2115

**5. RESPONSIBLE OFFICIAL**

Alan Hieb

**TITLE**

Plant Manager

**TELEPHONE**

(208) 438-2115

**6. EXACT PLANT LOCATION**

50 South 500 West, Paul, Idaho

**COUNTY**

**7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS**

Sugar beet processing

**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 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.

  
**TONI HARDESTY, DIRECTOR  
DEPARTMENT OF ENVIRONMENTAL QUALITY**

**DATE ISSUED:** July 27, 2005

## **Table of Contents**

ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE.....	3
1. PERMIT TO CONSTRUCT SCOPE.....	4
2. NATURAL GAS-FIRED BACKUP NEBRASKA BOILER.....	5
3. PERMIT TO CONSTRUCT GENERAL PROVISIONS.....	7

## Acronyms, Units, and Chemical Nomenclature

AIRS	Aerometric Information Retrieval System
AQCR	Air Quality Control Region
BACT	Best Available Control Technology
CAA	Clean Air Act
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
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
MMBtu	million British thermal units
NO <sub>x</sub>	nitrogen oxides
NSPS	New Source Performance Standards
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
PTE	potential to emit
SIC	Standard Industrial Classification
SIP	State Implementation Plan
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-050406**

<b>Permittee:</b>	The Amalgamated Sugar Co.	<b>Facility ID No.</b> 067-00001	<b>Date Issued:</b>	July 27, 2005
<b>Location:</b>	MiniCassia Facility			

**1. PERMIT TO CONSTRUCT SCOPE**

***Purpose***

- 1.1 This PTC is the initial permit for the construction of a natural gas-fired backup Nebraska boiler. The backup boiler will only be used in the event the facility's B&W boiler or Erie City boiler becomes partially or completely inoperable.

***Regulated Sources***

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

**Table 1.1 SUMMARY OF REGULATED SOURCES**

<b>Permit Section</b>	<b>Source Description</b>	<b>Emissions Control(s)</b>
2	250 MMBtu/hr Natural Gas-Fired Nebraska Boiler	None

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**2. NATURAL GAS-FIRED BACKUP NEBRASKA BOILER**

**2.1 Process Description**

The natural gas-fired backup Nebraska boiler (backup boiler) provides up to 200,000 pounds of steam per hour and is only used in the event the facility's B&W boiler or Erie City boiler becomes partially or completely inoperable.

***Emissions Limits***

**2.2 NO<sub>x</sub> Emissions Rate Limit**

The NO<sub>x</sub> emissions from the backup boilers stack shall not exceed 17.52 tons per any consecutive 12-month period.

**2.3 Opacity Limit**

Emissions from the backup boiler stack, or any other stack, vent, or functionally equivalent opening associated with the backup 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.

**2.4 Grain Loading Standard – Gas Fuel**

In accordance with IDAPA 58.01.01.676, PM emissions from the backup boiler stack shall not exceed 0.015 gr/dscf corrected to 3% oxygen when burning gas.

***Operating Requirements***

**2.5 Annual Capacity and Maximum Heat Input Capacity**

- The maximum heat input capacity of the backup boiler shall not exceed 250 MMBtu/hr.
- The annual capacity of the backup boiler shall be limited to 10%.

**2.6 Allowable Fuel Type**

The backup boiler shall burn natural gas exclusively.

**2.7 Backup Operation**

The backup boiler shall only be used in the event the facility's B&W boiler or Erie City boiler becomes partially or completely inoperable.

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***Monitoring and Recordkeeping Requirements***

**2.8 Fuel Type and Usage Monitoring**

In accordance with 40 CFR 60.49b(d), the permittee shall record and maintain records of the amount of natural gas combusted each day.

**2.9 Annual Capacity Monitoring**

In accordance with 40 CFR 60.49b(d), the permittee shall calculate the annual capacity factor for natural gas each calendar month in order to demonstrate compliance with Permit Condition 2.5. The annual capacity factor shall be determined on a 12-month rolling average basis with a new annual capacity factor calculated at the end of each calendar month. Annual capacity factor shall be calculated as follows:

$$\text{Annual Capacity Factor} = \frac{\text{Actual Heat Input for the Previous 12 - Month Period (MMBtu)}}{250 \text{ MMBtu/hr} * 8760 \text{ hr/year}}$$

***Reporting Requirements***

**2.10 Initial Startup Notification**

The permittee shall submit notification of the date of initial startup, as provided by 40 CFR 60.7. This notification shall include:

- The design heat input capacity of the affected facility and identification of the fuels to be combusted in the backup boiler.
- The maximum heat input capacity data from the demonstration of the maximum heat input capacity of the facility.

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**3. 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.
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 5 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 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.

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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.

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.

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.