



STATE OF IDAHO  
DEPARTMENT OF  
ENVIRONMENTAL QUALITY

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

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

November 9, 2012

Gary Pool, Plant Manager  
The Amalgamated Sugar Company LLC  
P.O. Box 127  
Twin Falls, ID 83303

RE: Facility ID No. 083-00001, The Amalgamated Sugar Company LLC, Twin Falls  
Final Permit Letter

Dear Mr. Pool:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2012.0054 Project 61102 to The Amalgamated Sugar Company LLC located at Twin Falls for the sugar end and energy efficiency improvements at the facility. 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 August 14, 2012.

This permit is effective immediately. 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.a, the terms of the PTC will be incorporated into the Tier I permit at the time of renewal. 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.

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, 1363 Fillmore St., Twin Falls, ID 83301, Fax (208) 736-2194.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with Bobby Dye, Air Quality Analyst, 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 Kelli Wetzel at (208) 373-0502 or [kelli.wetzel@deq.idaho.gov](mailto: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, flowing style.

Mike Simon  
Stationary Source Program Manager  
Air Quality Division

MS\KW

Permit No. P-2012.0054 PROJ 61102

Enclosures

## Air Quality

### PERMIT TO CONSTRUCT

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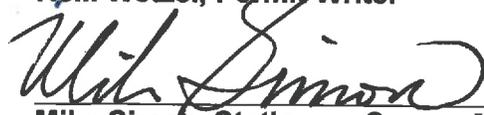
**Permittee** Amalgamated Sugar (TASCO – Twin Falls)  
**Permit Number** P-2012.0054  
**Project ID** 61102  
**Facility ID** 083-00001  
**Facility Location** 2320 Orchard Drive East  
Twin Falls, ID 83301

### 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** November 9, 2012

  
Kelli Wetzel, Permit Writer

  
Mike Simon, Stationary Source Manager

## Contents

1	Permit Scope.....	3
2	Facility-Wide Limits.....	4
3	General Provisions.....	6

# 1 Permit Scope

## Purpose

- 1.1 This permit to construct (PTC) is for a minor modification at an existing Tier I facility.

## Definitions

- 1.2 "Beet campaign year" shall be defined as the period starting with the first day of the new beet crop processing and ending the day before the start of the next year's beet processing.

## 2 Facility-Wide Limits

### 2.1 Process Description

The facility consists of two main production lines, the Beet End and the Sugar End. Both lines are housed in the main mill complex. Within the Beet End, sugar beets are processed to produce thick juice and byproducts including animal feed. Within the Sugar End, thick juice is processed to produce dry granulated sugar and molasses. The boiler house provides steam energy for the Beet and Sugar Ends to evaporate water, heat sugar juice, and produce onsite power.

### Emission Limits

#### 2.2 Emission Limits

The facility-wide emissions shall not exceed any corresponding emissions rate limits listed in Table 2.1.

Table 2.1 Facility-wide emission limits.

PM <sub>10</sub> <sup>(b)</sup> T/yr <sup>(c)</sup>	SO <sub>2</sub> T/yr <sup>(c)</sup>	NO <sub>x</sub> T/yr <sup>(c)</sup>	CO T/yr <sup>(c)</sup>	VOC T/yr <sup>(c)</sup>
352	2219	1228	2001	68

- 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 beet campaign year.

#### 2.3 Opacity Limit

Emissions from the any stack, vent, or functionally equivalent opening associated with the processing of beets or the production of sugar, 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.

### Operating Requirements

#### 2.4 Reasonable Control of Fugitive Emissions

All reasonable precautions shall be taken to prevent PM from becoming airborne as required in IDAPA 58.01.01.651. In determining what is a reasonable, consideration will be given to factors such as the proximity of dust-emitting operations to human habitations and/or activities and atmospheric conditions that might affect the movement of PM. Some of the reasonable precautions include, but are not limited to, the following:

- Use, where practical, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands;
- Application, where practical, of asphalt, oil, water or suitable chemicals to, or covering of dirt roads, material stockpiles, and other surfaces which can create dust;
- Installation and use, where practical, of hoods, fans and fabric filters or equivalent systems to enclose and vent the handling of dusty materials. Adequate containment methods should be employed during sandblasting or other operations;

- Covering, where practical, of open-bodied trucks transporting materials likely to give rise to airborne dusts;
- Paving of roadways and their maintenance in a clean condition, where practical; or
- Prompt removal of earth or other stored material from streets, where practical.

## **Monitoring and Recordkeeping Requirements**

### **2.5 Fugitive Dust Monitoring**

The permittee shall conduct a monthly facility-wide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. If fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of the results of each fugitive emission inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed); any corrective action taken in response to the fugitive emissions; and the date the corrective action was taken.

### **2.6 Annual Emissions Monitoring**

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 beet campaign year for a period of 10 years following the issuance of this permit in accordance with 40 CFR 52.21(r)(6). Records of annual emissions shall be calculated and maintained in tons per year on a beet campaign year basis.

### **2.7 Annual Emissions Reporting**

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).

### **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, 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, 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; 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, 5/1/94]

## **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. 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, 5/1/94]

### **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 start-up, shut-down, 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]