



STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

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

C.L. "Butch" Otter, Governor
John H. Tippets, Director

March 9, 2017

Eric Erickson
Plant Manager
The Amalgamated Sugar Company LLC
138 W Karcher Road
Nampa, ID 83687

RE: Facility ID No. 027-00010, The Amalgamated Sugar Company LLC, Nampa
Final Tier II Operating Permit Letter

Dear Mr. Erickson:

The Department of Environmental Quality (DEQ) is issuing Tier II Operating Permit No. T2-2016.0073 to The Amalgamated Sugar Company LLC for the Riley BART permit renewal located at Nampa, in accordance with IDAPA 58.01.01.400 through 406, Rules for the Control of Air Pollution in Idaho (Rules).

The enclosed Tier II operating permit is based on the information contained in your permit application. This Tier II permit is effective immediately and replaces your previous permit, T2-2009.0105, issued on September 19, 2014. 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. Please note that this permit expires five years after the issuance date.

This Tier II operating permit does not contravene any existing Tier I operating permit conditions. Therefore the process or equipment may be operated in accordance with the Tier II operating permit before the Tier I operating permit is revised.

In accordance with IDAPA 58.01.01.407, DEQ has assessed the emissions for this permit and determined that a Tier II processing fee of \$10,000 will be due. A fee invoice will be sent to you from the DEQ fiscal office shortly. Failure to submit a Tier II operating permit processing fee within 45 days of receipt of the fee invoice will result in a monthly accrual of interest in the amount of 12% per annum on the outstanding balance until the fee is paid in full.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting J.R. Fuentes, Title V Source Inspector, at (208) 373-0550 to review and discuss the terms and conditions of this permit. Should you choose to schedule this meeting, DEQ recommends 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 to address any questions or concerns you may have with the enclosed permit.

Sincerely,

A handwritten signature in black ink, appearing to read "Mike Simon". The signature is written in a cursive, flowing style.

Mike Simon
Stationary Source Manager
Air Quality Division

MS/KW Permit No. T2-2016.0073 PROJ 61831

Enclosure

✂-----

Please make checks payable to: Department of Environmental Quality. Please write your permit number on the check and remit the fee and this information to the following:

Idaho Department of Environmental Quality
Fiscal Office – Air Quality
1410 N. Hilton, Boise, ID 83706-1255

Amount Enclosed: \$ 10,000.00

Check No.: _____

DEPARTMENT USE ONLY:			
Facility	The Amalgamated Sugar Company LLC, Nampa	Facility ID:	027-00010
Project	Riley BART permit renewal	Permit No.:	T2-2016.0073
Fee Type:	Tier II Processing Fee	Fee Amount:	\$ 10,000.00
Routing Instructions: Copy Air Program upon receipt of fee.			

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**AIR QUALITY
TIER II OPERATING PERMIT**

Permittee The Amalgamated Sugar Company LLC
Permit Number T2-2016.0073
Project ID 61831
Facility ID 027-00010
Facility Location 138 W Karcher Road
Nampa, ID 83687

Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules) (IDAPA 58.01.01.400–410); (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 March 9, 2017

Date Expires March 9, 2022



Kelli Wetzel, Permit Writer



Mike Simon, Stationary Source Manager

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1. Permit Scope

Purpose

- 1.1 The purpose of this Tier II operating permit is to renew the Best Available Retrofit Technology (BART) permit. The BART Alternative emission standards and requirements for the TASCO (The Amalgamated Sugar Company) Riley Boiler and Nampa factory are established in accordance with 40 CFR 51.308(e) and IDAPA 58.01.01.668.
- 1.2 This Tier II operating permit supersedes the following permit(s):
 - Tier II Operating Permit No. T2-2009.0105, issued September 19, 2014.

Regulated Sources

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

Table 1.1. Regulated sources.

Permit Section	Source	Control Equipment
2 & 3	<u>Riley Boiler (S-B3)</u> Installation Date: 1969 Rated steam capacity: 250,000 lb steam/hr Maximum capacity: 350 MMBTU/hr Maximum operation: 8,760 hr/yr Fuel types: coal, natural gas	<u>Baghouse (A-B3)</u> Manufacturer: Envirotech Corp. Control efficiency: $\geq 99.0\%$ for PM (BART for PM) <u>Coal-Firing LNBS</u> Control efficiency: $\geq 60.7\%$ for NO _x (BART for NO _x)
2 & 3	<u>B&W Boiler #1 (S-B1)</u> Installation Date: 1942 Rated steam capacity: 105,000 lb steam/hr Maximum capacity: 126 MMBTU/hr Maximum operation: 8,760 hr/yr Fuel types: natural gas <u>B&W Boiler #2 (S-B2)</u> Installation Date: 1942 Rated steam capacity: 105,000 lb steam/hr Maximum capacity: 126 MMBtu/hr Maximum operation: 8,760 hr/yr Fuel types: natural gas	None (Natural gas is a BART Alternative for SO ₂)
2 & 3	<u>Pulp Dryers (S-D1, S-D2, and S-D3)</u>	<u>Permanent shutdown</u> (BART Alternative for SO ₂)

2. Facility-Wide Conditions

Obligation to Comply

- 2.1 Receiving a Tier II operating permit shall not relieve any owner or operator of the responsibility to comply with all applicable local, state, and federal rules and regulations, in accordance with IDAPA 58.01.01.406.

Incorporation of Federal Requirements by Reference

- 2.2 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:
- Protection of Visibility, 40 CFR Part 51, Subpart P, Section 308 – Best Available Retrofit Technology (BART) requirements

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as BART and CAM), 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 to that regulation.

Reports and Certifications

- 2.3 Any reporting required by this permit—including, but not limited to, records, monitoring data, supporting information, requests for confidential treatment, notifications of intent to test, testing reports, or compliance certifications—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. Any reporting required by this permit shall be submitted to the following address:

Air Quality Permit Compliance
Department of Environmental Quality
Boise Regional Office
1445 N. Orchard
Boise, ID 83706
Phone: (208) 373-0550
Fax: (208) 373-0287

Performance Testing

2.4 When testing is required, the following test methods shall be used to measure the pollutant emissions unless otherwise approved by DEQ in accordance with IDAPA 58.01.01.157.

Table 2.1. Test Methods.

Pollutant	Test Method
PM ₁₀	EPA Method 201.a and Method 202
NO _x	EPA Method 7
SO ₂	EPA Method 6
CO	EPA Method 10

3. Boilers

3.1 Process Description

The Nampa factory operates three industrial boilers to supply steam and generate electricity for processing of sugar beets into sugar and byproducts, including animal feed at the Nampa facility. These boilers are the one Riley Boiler and two Babcock & Wilcox (B&W) Boilers. The Riley Boiler is fired by pulverized coal and/or natural gas. The two B&W boilers are fired by natural gas only.

3.2 BART and BART Alternative Control Equipment Descriptions

- BART for the control of PM emissions is the existing Baghouse (A-B3) on the Riley Boiler.
- BART for the control of NO_x emissions is Coal-Firing LNBs (low NO_x burners) on the Riley Boiler.
- The BART Alternative for the control of SO₂ emissions is B&W Boiler #1 and B&W Boiler #2 are fired using natural gas only and shutdown of the three coal-fired Pulp Dryers (S-D1, S-D2, and S-D3) for the control of PM, NO_x, and SO₂.

Compliance Dates

3.3 BART 40 CFR 51.308, Subpart P – BART Control Equipment Installation and Operation Due Date
In accordance with IDAPA 58.01.01.668.04 and 40 CFR 51.308(e)(1)(iv), the permittee shall comply with the following:

- Install and operate BART controls on the Riley Boiler (Permit Conditions 3.5 and 3.6), unless the Riley Boiler is fired using natural gas only;
- B&W Boiler #1 shall combust natural gas only;
- B&W Boiler #2 shall combust natural gas only.

Emissions Limits

3.4 BART 40 CFR 51.308, Subpart P – BART Emission Limits

On and after July 22, 2016, emissions from the Riley Boiler shall not exceed any corresponding emission rate limit listed in the following BART Emission Limits Table, in accordance with 40 CFR 51.308(e) and IDAPA 58.01.01.668.

Table 3.1. BART Emission Limits Table.

Source Description	PM ₁₀ lb/hr ^{(b)(c)}	NO _x lb/hr ^{(b)(c)}
Riley Boiler	12.4	147

- a) In absence of any other credible evidence, compliance is assured by complying with permit operating, monitoring, and recordkeeping requirements.
- b) Pounds per hour as determined by the prescribed test method (Permit Condition 2.4), or alternative test method approved by DEQ in accordance with IDAPA 58.01.01.157.
- c) BART emission rate limit established pursuant to 40 CFR 51.308(e).

Operating Requirements

3.5 BART 40 CFR 51.308, Subpart P – Baghouse Control Equipment

At all times the Riley Boiler is fired with coal on and after July 22, 2016, the permittee shall operate Baghouse (A-B3) to control PM emissions from the Riley Boiler to ensure compliance with the PM₁₀ emission limit (Permit Condition 3.4), in accordance with 40 CFR 51.308(e) and IDAPA 58.01.01.668. The baghouse need not be operated during periods when the Riley Boiler is being fired exclusively with natural gas.

3.6 BART 40 CFR 51.308, Subpart P – Coal-Firing LNBs

At all times the Riley Boiler is fired with coal on and after July 22, 2016, the permittee shall:

- Operate Riley Boiler Coal-Firing LNBs at all times the Riley Boiler is fired by coal, to ensure compliance with the relevant NO_x emission limit (Permit Condition 3.4). The Coal-Firing LNBs shall have a maximum rated heat input capacity (highest heating value) of less than or equal to 350 MMBTU/hr.

3.7 BART 40 CFR 51.308, Subpart P – Maintenance of BART Equipment

On and after July 22, 2016 the permittee shall maintain each required BART control equipment (if required by Permit Conditions 3.3 or 3.5) and establish procedures to ensure such equipment is properly operated and maintained, in accordance with IDAPA 58.01.01.668.05 and 40 CFR 51.308(e)(1)(v).

3.8 Riley Boiler Fuels

- Unless complying with the Coal-Firing LNBs requirements (Permit Condition 3.6), on and after July 22, 2016 the Riley Boiler shall be fired using natural gas only.
- On and after July 22, 2016, the Riley Boiler shall not be fired with coal until such date that the Coal-Firing LNBs are installed and operated in accordance with Permit Condition 3.6.

Monitoring and Recordkeeping Requirements

3.9 Operation and Maintenance Manuals

Within 180 days after installation of Coal-Firing LNBs (Permit Condition 3.6), the permittee shall develop and submit to DEQ an Operation and Maintenance (O&M) manual for review and comment at the address provided (Permit Condition 2.3). Any changes to the O&M manual shall be submitted to DEQ for review and comment within 15 days of the change.

- The O&M manual shall describe for the installed control equipment described in the Regulated Emission Point Sources Table (Permit Condition 1.2), procedures that will be followed to ensure compliance with emission limits (Permit Condition 3.4), the maintenance of BART equipment requirement (Permit Condition 3.7), the control equipment maintenance and operation general provision (General Provision 5.2), and the manufacturer's specifications. The O&M manual shall be developed by the permittee based upon, but independent of, the manufacturer supplied operating manual(s).
- The permittee shall operate control equipment in accordance with the O&M manual. The procedures specified in the O&M manual are incorporated by reference into this permit and are enforceable permit conditions. The O&M manual and copies of any manufacturer's manual(s) and recommendations shall remain on site at all times and shall be made available to DEQ representatives upon request.

- Procedures for periodic calibration of the pressure drop monitor associated with Baghouse (A-B3), including calibration to an accuracy of within $\pm 5\%$ inches of water gauge. The monitor shall be calibrated on at least an annual basis or as specified by the manufacturer.

Performance Testing Requirements

3.10 BART Initial Performance Tests

- Within 180 days of initial startup of Coal-Firing LNBS, performance tests shall be conducted on the Riley Boiler exhaust to demonstrate compliance with the following emission limit, in accordance with IDAPA 58.01.01.405 and IDAPA 58.01.01.157:
 - The Riley Boiler PM₁₀ emission limit in pounds per hour (Permit Condition 3.4)
- Within 180 days of initial startup of Coal-Firing LNBS (Permit Condition 3.6), performance tests shall be conducted on the Riley Boiler exhaust to demonstrate compliance with the following emission limits, in accordance with IDAPA 58.01.01.405 and IDAPA 58.01.01.157:
 - The Riley Boiler NO_x emission limit in pounds per hour (Permit Condition 3.4)

3.11 CO Initial Performance Tests

Within 180 days of initial startup of the Coal-Firing LNBS (Permit Condition 3.6), performance tests shall be conducted on the Riley Boiler exhaust stack to determine the following emission rates, in accordance with IDAPA 58.01.01.405 and IDAPA 58.01.01.157:

- The Riley Boiler CO emissions in pounds per hour

3.12 Periodic Performance Testing

After completing the BART initial performance tests, performance tests to determine PM₁₀ and NO_x emissions from the Riley Boiler exhaust shall be conducted as described in Permit Condition 3.10 during the Beet Campaign each year, in accordance with IDAPA 58.01.01.405 and IDAPA 58.01.01.157, unless another testing frequency has been approved by DEQ. For the purposes of this requirement, the Beet Campaign shall be defined as October through February of each year.

3.13 Performance Test Conditions, Monitoring, and Recordkeeping

Each required performance test (Permit Conditions 3.10 through 3.12) shall be conducted using an approved test method (Permit Condition 2.4) and under the following conditions unless otherwise approved by DEQ, in accordance with IDAPA 58.01.01.405, IDAPA 58.01.01.157, and General Provisions 5.6 through 5.8:

- Emissions shall be measured while combusting coal fuel in the boiler(s) being tested
- Three separate test runs shall be conducted for each performance test
- The permittee shall monitor and record the following during each performance test for the boiler tested, unless otherwise approved by DEQ:
 - Steam production rate of the boiler, in pounds per hour (lb steam/hr), once every 15 minutes;
 - Coal feed rate to the boiler, in tons per hour (T/hr), once every 15 minutes (the coal feed rate may be determined using alternate relevant operational parameter(s) and a calculation method which has been approved by DEQ);
 - Natural gas firing rate of the boiler, in million standard cubic feet per hour (MMscf/hr), once every 15 minutes;

- Highest heating value and analysis results of the coal fuel fired, including ash content; and
- Pressure drop across Baghouse (A-B3) during each Riley Boiler PM₁₀ test, in inches water gauge (iwg), once every 15 minutes.

3.14 Performance Test Reporting

The permittee shall submit performance test reports to DEQ which include records of the monitoring required (Permit Condition 3.13) and in accordance with the performance testing general provision (General Provisions 5.6 through 5.8). Performance test reports shall be submitted by the permittee to the DEQ address provided (Permit Condition 2.3).

Compliance Notifications

3.15 BART Compliance Notifications

- Notification of the anticipated date of initial startup of Coal-Firing LNBS (Permit Condition 3.6) shall be provided not more than sixty days or less than thirty days prior to such date as provided in General Provision 5.5.
- Notifications shall be submitted to the DEQ address provided (Permit Condition 2.3).

4. South Pulp Dryer

Operating Requirements

4.1 BART 40 CFR 51.308, Subpart P – Shutdown of South Pulp Dryer

The permittee shall permanently shut down the South Pulp Dryer (S-D1).

5. General Provisions

General Compliance

- 5.1 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.]
- 5.2 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 58.01.01.405, 5/1/94]
- 5.3 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 58.01.01.406, 5/1/94]

Inspection and Entry

- 5.4 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 or 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

- 5.5 The permittee shall furnish DEQ written notifications as follows:
- A notification of the date of initiation of construction, within five working days after occurrence;
 - 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 58.01.01.405, 5/1/94]

Performance Testing

- 5.6 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.
- 5.7 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.
- 5.8 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]

Monitoring and Recordkeeping

- 5.9 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 58.01.01.405, 5/1/94]

Excess Emissions

- 5.10 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

- 5.11 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

- 5.12 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

- 5.13 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]

Expiration and Renewal

- 5.14 Only those permit conditions regulated in accordance of IDAPA 58.01.01.400-410 are subject to expiration. The permittee shall submit an application to DEQ for renewal of this permit at least six months before, but no earlier than 18 months before the expiration of this permit. To ensure that the term of the permit does not expire before the permit is renewed the permittee is encouraged to submit a renewal application nine months prior to the date of the expiration. The expiration of a permit will not affect the operation of a stationary source or facility during the administrative procedure period associated with the permit renewal.

[IDAPA 58.01.01.405.03, 5/1/94]

Transferability

- 5.15 This permit is transferable in accordance with procedures listed in IDAPA 58.01.01.404.05.

[IDAPA 58.01.01.404.05, 4/11/06]

Severability

- 5.16 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 58.01.01.405, 5/1/94]