Statement of Basis

Tier I Operating Permit No. T1-2019.0020
Project ID 62617

The Amalgamated Sugar Company LLC - Paul
Paul, Idaho

Facility ID 067-00001

Final

May 21, 2021

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Permit Writer

The purpose of this Statement of Basis is to set forth the legal and factual basis for the Tier I operating permit terms and conditions, including references to the applicable statutory or regulatory provisions for the terms and conditions, as required by IDAPA 58.01.01.362

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1. ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

acfm	actual cubic feet per minute
ASTM	American Society for Testing and Materials
BACT	Best Available Control Technology
BMP	best management practices
Btu	British thermal unit
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
cfm	cubic feet per minute
CFR	Code of Federal Regulations
CO	carbon monoxide
CO_2	carbon dioxide
CO_2e	CO_2 equivalent emissions
DEQ	Department of Environmental Quality
dscf	dry standard cubic feet
EPA	U.S. Environmental Protection Agency
GHG	greenhouse gases
gph	gallons per hour
gpm	gallons per minute
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
HHV	higher heating value
hp	horsepower
hr/yr	hours per consecutive 12 calendar month period
IDAPA	a numbering designation for all administrative rules in Idaho promulgated in accordance with the Idaho Administrative Procedures Act
iwg	inches of water gauge
km	kilometers
lb/hr	pounds per hour
m	meters
MACT	Maximum Achievable Control Technology
mg/dscm	milligrams per dry standard cubic meter
MMBtu	million British thermal units
MMscf	million standard cubic feet
MRRR	Monitoring, Recordkeeping and Reporting Requirements
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_2	nitrogen dioxide
NO_x	nitrogen oxides
NSPS	New Source Performance Standards
O&M	operation and maintenance
O_2	oxygen
PC	permit condition
PM	particulate matter
$PM_{2.5}$	particulate matter with an aerodynamic diameter less than or equal to a nominal 2.5 micrometers
PM_{10}	particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers
ppm	parts per million
ppmw	parts per million by weight
PSD	Prevention of Significant Deterioration

psig	pounds per square inch gauge
PTC	permit to construct
PTE	potential to emit
Rules	*Rules for the Control of Air Pollution in Idaho*
scf	standard cubic feet
SO_2	sulfur dioxide
SO_x	sulfur oxides
TASCO	The Amalgamated Sugar Company LLC
T/day	tons per calendar day
T/hr	tons per hour
T/yr	tons per consecutive 12 calendar month period
T1	Tier I operating permit
T2	Tier II operating permit
TAP	toxic air pollutants
U.S.C.	United States Code
VOC	volatile organic compound

2. INTRODUCTION AND APPLICABILITY

This document provides the basis for a Tier I operating permit administrative amendment to incorporate the provisions of a permit to construct into a Tier I operating permit in accordance with IDAPA 58.01.01.209.05.c.

3. FACILITY INFORMATION

3.1 Facility Description

The Amalgamated Sugar Company LLC – Paul (TASCO) operates an existing beet sugar manufacturing plant that processes sugarbeets into refined sugar, which is located in Paul, Idaho. The facility is also known as the Mini-Cassia Facility. Sugar beet processing operations consist of beet end processing and sugar end processing.

Beet End Processes - Mechanically harvested sugar beets are delivered to piling grounds near the point of harvest. At the piling grounds, the beets are partially cleaned using beet pilers that remove loose dirt by passing the beets over rollers. The pilers then stack the beets onto storage piles. Beets are shipped from off-site storage piling grounds to the facility using trucks. Beets are dumped by trucks into hoppers, screened, and conveyed to the beet washers. After cleaning, the beets are separated from the water and are conveyed to the sugar beet processing operations. The operations comprise several steps including slicing, diffusion, juice purification, evaporation, and beet pulp processing.

Prior to the diffusion process, the cleaned and washed beets are sliced into long thin strips called cossettes. The cossettes are conveyed to two continuous vertical diffusers, in which hot water is used to extract sucrose from the cossettes. Within the diffuser the cossettes are conveyed upward as hot water is introduced into the top of the diffuser. The temperature within the diffusion process is typically maintained between 50°C and 80°C (l22°F and 176°F). This temperature is dependent on several factors, including the denaturation temperature of the cossettes, the thermal behavior of the beet cell wall, potential enzymatic reactions, bacterial activity, and press-ability of the beet pulp. Disinfectants, such as ammonium bisulfite is sometimes added to the diffuser to control bacterial growth. The sugar enriched water that flows from the outlet of the diffuser is called raw juice and contains between 13 and 18 percent sugar. This raw juice proceeds to the juice purification operations. The processed cossettes, or beet pulp, from the diffuser is pressed to remove water and then is conveyed to the dried pulp production operations. The pressed beet pulp is either conveyed to the dried pulp production operations or sold as livestock feed.

In the juice purification stage, non-sucrose impurities in the raw juice are removed so that the pure sucrose can be crystallized. After the diffuser, the raw juice is then heated between 60°C and 70°C (140°F to 158°F) and proceeds to liming tanks, where milk of lime [$Ca(OH)_2$] is added to the mixture to react, absorb or adhere to impurities. The juice is then sent to the first carbonation tanks where carbon dioxide (CO_2) gas is bubbled through the mixture to precipitate the lime and impurities from the juice as insoluble calcium carbonate. A lime kiln calcines lime rock into quick lime and CO_2 used in the juice purification process. Quick lime is hydrated into milk of lime in the lime slakers.

The small insoluble calcium carbonate crystals (produced during carbonation) settle out in a clarifier after which the juice is again treated with CO_2 (in the second set of carbonation tanks) to remove the remaining lime. The pH of the juice is lowered during this second carbonation, causing large, easily filterable, calcium carbonate crystals to form. After filtration, the juice is softened in an ion exchange process. Then, a small amount of sulfur dioxide (SO_2) is added to the juice to inhibit reactions that lead to darkening of the juice. Following the addition of SO_2, the juice (known as thin juice) proceeds to the evaporators.

The evaporation process, which increases the sucrose concentration in the juice by removing water, is performed in a series of multiple effect evaporators. Steam produced by onsite boilers is used to heat the first evaporator, and the steam vapor from the water evaporated in the first evaporator is used to heat the second evaporator. This transfer of heat continues through the six effect evaporators, and as the temperature decreases from evaporator to evaporator, the pressure inside each evaporator is also decreased, allowing the juice to boil at the lower temperatures provided in each subsequent evaporator. Some steam vapor is released from the first four evaporators, and this steam vapor is used as a heat source for various process heaters throughout the plant. After evaporation, the percentage of sucrose in the juice (known as thick juice) is approximately 60 percent. Thick juice can be sent to the sugar end process and/or to storage tanks.

Wet pulp from the diffusion process is another product of the beet end process. Some of the wet pulp is sold as animal feed directly. However, most of the wet pulp is pressed to reduce the moisture content from about 90 percent to about 75 percent. The water removed by the pulp presses is collected and used as diffusion water. After pressing, the pulp is either sold as pressed pulp animal feed or sent to the dryers. Before entering the dryer, molasses or a molasses byproduct is added to the pressed pulp. The pressed pulp is then dried by hot air in a horizontal rotating drum known as a pulp dryer. The pulp dryer can be fired by natural gas, coal, or a combination of both. The resulting product is typically pelletized and is sold as animal feed. The remainder of the dried pulp is sold in an unpelletized form called shreds.

Sugar end processing consists of converting thick juice into refined granulated sugar. The thick juice is combined with crystalline sugars, produced in an ancillary process, and dissolved in the high melter. This mixture is then filtered, yielding a clear liquid known as standard liquor, which proceeds to the crystallization operation. Sugar is crystallized by low temperature (relative to the boiling temperature at atmospheric pressure) boiling in vacuum pans until it becomes super-saturated. To begin crystal formation, the standard liquor is seeded with finely milled sugar. The seed crystals are carefully grown through control of the vacuum, temperature, feed liquor additions and steam. When the crystals reach the desired size, the mixture of liquor and crystals, known as massecuite or fillmass, is discharged to the mixer. From the mixer, the massecuite is poured into high-speed centrifugals, in which the liquid is centrifuged into the outer shell, and the crystals are left in the inner centrifugal basket. The sugar crystals in the centrifugal are washed with pure hot water and are sent to the granulator, which is a rotary drum dryer, and then to the cooler. After cooling, the sugar is stored in large silos for future packaging and bulk shipments.

The liquid that was separated from the sugar crystals in the centrifugals is called syrup. This syrup serves as feed liquor for the second boiling and is introduced into a second set of vacuum pans. The crystallization/centrifugation process is repeated once again, resulting in the production of molasses. The

sugar crystals from the second and third boilings are recycled to the production process through remelting in the high melter with thick juice to produce standard liquor.

The molasses produced in the third boiling step can be used in the production of animal feed. This molasses can also be further desugarized using a separator process. However, since the Mini-Cassia factory does not have a separator, molasses is shipped to other factories for separation.

3.2 Facility Permitting History

Underlying Permit History - Includes every underlying permit issued to this facility

The following information is the comprehensive permitting history of all underlying applicable permits issued to this Tier I facility. This information was derived from a review of the permit files available to DEQ. Permit status is noted as active and in effect (A) or superseded (S).

March 19, 1981	13-1020-0001-00, Air pollution source permit which established requirements for the boilers, Permit status (S)
January 1, 1984	1020-0001, Permit revision which established requirements for the pulp dryers, Permit status (S)
September 23, 2002	P-020407, PTC modification to add No. 6 evaporator and establish throughput limits, Permit status (S)
December 12, 2002	T1-9503-039-1, Initial T1 operating permit, Permit status (S)
February 3, 2005	P-050401, Revised PTC to replace the sugar production limit with a stead production limit, Permit status (S)
July 27, 2005	P-050406, Initial PTC for the Nebraska boiler (backup), Permit status (S)
September 23, 2005	T1-030416, Renewal and administrative amendment T1 to incorporate compliance schedule and revisions resulting from an appeal, Permit status (S)
November 17, 2005	P-050424, Initial PTC to add temporary emergency generator, Permit status (T) (terminated)
December 15, 2005	P-050421, Revised PTC to increase daily throughput limit, Permit status (S)
June 14, 2006	P-060404, Revised PTC to increase annual throughput limit, Permit status (S)
May 16, 2007	P-2007.0023, Revised PTC to temporarily increase steam production in 2006, Permit status (S)
September 22, 2010	P-2010.0043, Initial PTC to replace lime kiln system, Permit status (S)
March 8, 2011	P-2011.0040, Revised PTC to revise campaign year definition, Permit status (S)
June 1, 2012	P-2010.0043, Revised PTC to revise slaker control equipment, Permit status (S)
June 11, 2012	P-2011.0040, Revised PTC to increase annual throughput and steaming rate limits, Permit status (S)
March 18, 2014	P-2010.0043, Revised PTC to remove slaker control equipment, Permit status (S)
August 13, 2014	P-2011.0040, Revised PTC to convert boilers to natural gas firing only and to establish limits to resolve a historic equipment review required by T1-030416 compliance schedule, Permit status (S)
October 15, 2014	T1-050414, Renewal T1 to incorporate CAM and PTC revisions, Permit status (S)
June 8, 2017	P-2011.0040, Revised PTC to increase the beet slice throughput limits, Permit status (S)

November 20, 2017	P-2017.0012, PTC to replace P-050406 and P-2011.0040to take the Nebraska boiler from backup operation to full-time operation, Permit status (S)
October 18, 2018	P-2017.0012, Modified PTC to replace the Erie City boiler with a Rentech boiler and increase the annual boiler therm limit, Permit status (A).
April 30, 2020	T1-2019.0020, Renewal T1, Permit status (A, but will become S with the issuance of this permit).
May 3, 2021	P-2010.0043, Modified PTC to increase the lime kiln throughput, Permit status (A)

4. APPLICATION SCOPE AND APPLICATION CHRONOLOGY

4.1 Application Scope

TASCO submitted an application to revise an existing permit to construct (PTC) to increase the lime kiln throughput.

TASCO requested in accordance with IDAPA 58.01.01.209.05.c that the PTC be incorporated into the Tier I operating permit as an administrative amendment. According to this Rule the PTC is subject to the same procedural requirements as if it were a Tier I operating permit (a public comment period, affected states review, and EPA review are included). Once the PTC is issued the source may request at any time to have the PTC incorporated into the Tier I permit as an administrative amendment.

This permitting action is solely to administratively amend the existing Tier I operating permit to include the provisions of PTC No. P-2010.0043, project 62519, issued May 3, 2021 for the lime kiln throughput increase. Those permit changes are included in Section 7 of the permit. All other permit conditions remain unchanged.

This Tier I operating permit replaces Tier I Operating Permit No. T1-2019.0020, issued April 30, 2020.

4.2 Application Chronology

September 23, 2020	DEQ received a PTC application with a request of administratively amending the Tier I operating permit once the underlying PTC is issued.
May 3, 2021	DEQ issued the underlying PTC.
May 5, 2021	DEQ made available the draft permit and statement of basis for applicant review.
May 21, 2021	DEQ issued the final permit and statement of basis.

5. EMISSIONS ESTIMATES AND PERMIT CONDITIONS REVIEW

This section lists the emissions units, describes the production or manufacturing processes, and provides the emissions inventory for this facility. The information presented was provided by the applicant in its permit application.

5.1 Process No. 1 – B&W, Rentech, and Nebraska Boilers

Table Error**! Reference source not found.**.1 lists the emissions units and control devices associated with B&W, Rentech, and Nebraska boilers.

Table Error! Reference source not found.**.1 EMISSIONS UNITS AND CONTROL DEVICE**

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)
SB-1	B&W Boiler Operational Capacity: 175,000 lb/hr steam Fuel: natural gas	Low NO_x burners
SB-2	Nebraska Boiler Operational Capacity: 200,000 lb/hr steam Fuel: natural gas	Low NO_x burners
SB-4	Rentech Boiler Operational Capacity: 300,000 lb/hr steam Fuel: natural gas	Low NO_x burners

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

5.2 Process No. 2 – Pulp Dryers

Table Error**! Reference source not found.**.2 lists the emissions units and control devices associated with the pulp dryers.

Table Error! Reference source not found.**.2 EMISSIONS UNITS AND CONTROL DEVICE**

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)
S-D1	South Pulp Dryer Maximum Capacity: 48.5 T/hr Fuel: Coal and/or natural gas	Two cyclones (A-D1A) and two spray-impingement scrubbers (A-D1B)
S-D2	North Pulp Dryer Maximum Capacity: 56.9 T/hr Fuel: Coal and/or natural gas	Two cyclones (A-D2A) and two spray-impingement scrubbers (A-D2B)

The direct-fired pulp dryers are used to dry pressed beet pulp. The dryers are primarily coal-fired, but can also be fired by natural gas. Exhaust gases from each dryer are split into two streams. Each stream is split and passes through two cyclones that operate in parallel. Exhaust from the cyclones is combined and then split between two spray impingement-type scrubbers that also operate in parallel.

5.3 Process No. 3 – Pellet Coolers

Table Error**! Reference source not found.**.3 lists the emissions units and control devices associated with the pellet coolers.

Table Error! Reference source not found.**.3 EMISSIONS UNITS, CONTROL DEVICE, AND DISCHARGE POINT INFORMATION**

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)
S-D3	Pellet Cooler No. 1 Maximum Capacity: 7.5 T/hr	Cyclone (A-D3)
S-D4	Pellet Cooler No. 2 Maximum Capacity: 7.5 T/hr	Cyclone (A-D4/5)
S-D5	Pellet Cooler No. 3 Maximum Capacity: 7.5 T/hr	

The pellet coolers aid in the pulp drying process. The emissions are controlled by cyclones.

5.4 Process No. 4 – Lime Kiln System

Table Error**! Reference source not found.**.34 lists the emissions units and control devices associated with the lime kiln system.

Table Error! Reference source not found.**.4 EMISSIONS UNITS AND CONTROL DEVICE**

Emissions Unit ID No.	Emissions Unit Description	Control Device (if applicable)
S-K1	Lime Kiln Maximum Capacity: 810 T/day Fuel: Anthracite coal and/or coke	Gas Washer First Carbonation Tank Second Carbonation Tank (A-K1)

The lime kiln produces calcium oxide (CaO) and concentrated carbon dioxide (CO_2) gas for juice purification. The CaO from the kiln is transferred to Slaker No. 1 (S–K2) to produce milk of lime. The CO_2 gas from the kiln passes through a two-stage high efficiency scrubbing system (A-K1). The gas washer scrubs and cools the exhaust gas prior to the compressors. The compressors convey the CO_2 gas to the first and second carbonation tanks in parallel. The gas is bubbled through the juice from the bottom of the carbonation tanks.

5.5 Emissions Inventory

Table Error**! Reference source not found.**.4 summarizes the emissions inventory for this major facility. All values are expressed in units of tons-per-year and represent the facility's potential to emit. Potential to emit is defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of the facility or source to emit an air pollutant, including air pollution control equipment and restrictions on hour of operation or on the type or amount of material combusted, stored or processed shall be treated as part of its design if the limitation or the effect it would have on emission is state or federally enforceable.

Table Error! Reference source not found.**.4 EMISSIONS INVENTORY - POTENTIAL TO EMIT (T/yr)**

Source Description	$PM_{10}/PM_{2.5}$ T/yr	NO_x T/yr	SO_2 T/yr	CO T/yr	VOC T/yr	CO_2e T/yr	HAP T/yr
B&W Boiler	4.6	63.5	0.4	47.0	3.3	74,296	1.8
Rentech Boiler	9.8	68.3	0.8	109.2	7.1	159,708	4.0
Nebraska Boiler [(a)]	4.6	63.4	0.4	46.9	3.3	74,076	1.7
South Pulp Dryer	83.1	155.2	54.0	540.9	3.5	35,613	4.6
North Pulp Dryer	85.8	153.9	63.4	658.1	4.1	41,807	5.4
Pellet Cooler No. 1	1.95	0.00	0.00	0.00	0.00	0.00	0.00
Pellet Cooler No. 2	1.95	0.00	0.00	0.00	0.00	0.00	0.00
Pellet Cooler No. 3	1.95	0.00	0.00	0.00	0.00	0.00	0.00
Eberhardt Lime Kiln	5.34	33.86	2.60	351.94	3.41	40,386	0.12
Process Slaker	1.20	0.00	0.00	0.00	0.00	0.00	0.00
Drying Granulator	2.35	0.00	0.00	0.00	0.00	0.00	0.00
#1 Cooling Granulator	1.18	0.00	0.00	0.00	0.00	0.00	0.00
#2 Cooling Granulator	1.18	0.00	0.00	0.00	0.00	0.00	0.00
Sugar Handling (Process)	1.31	0.00	0.00	0.00	0.00	0.00	0.00
Sugar Handling (Bulk Loading)	1.31	0.00	0.00	0.00	0.00	0.00	0.00

Main Mill	0.00	0.00	0.00	0.00	145.6	0.00	94.72
Sulfur Stoves	0.00	0.00	14.3	0.00	0.00	0.00	0.00
Coal Unloading Area	0.15	0.00	0.00	0.00	0.00	0.00	0.00
Coal Storage Area	3.51	0.00	0.00	0.00	0.00	0.00	0.00
Boiler Coal Unloading Area & Haul Road	0.50	0.00	0.00	0.00	0.00	0.00	0.00
Beet Hauling – West & Loop	3.24	0.00	0.00	0.00	0.00	0.00	0.00
Beet Hauling – East	4.97	0.00	0.00	0.00	0.00	0.00	0.00
Beet Hauling – North – East	0.74	0.00	0.00	0.00	0.00	0.00	0.00
Cooling Towers	4.02	0.00	0.00	0.00	0.00	0.00	0.00
Dryer Coal Unloading	0.06	0.00	0.00	0.00	0.00	0.00	0.00
Dried Pulp Storage & Loadout	0.45	0.00	0.00	0.00	0.00	0.00	0.00
PCC Storage & Handling	3.94	0.00	0.00	0.00	0.00	0.00	0.00
Total Emissions	**224.6**	**474.8**	**135.5**	**1707.14**	**167.01**	**351,810**	**110.6**

a) The Nebraska boiler is operationally limited to operate when another boiler (B&W or Rentech) is down. Therefore, the Nebraska boiler emissions are not included in total emissions as both the B&W and Rentech boilers have equal or larger emissions.

6. REGULATORY REVIEW

6.1 Administrative Amendment

This permit is for an Administrative Amendment in accordance with IDAPA 58.01.01.381 to include the the requirements of P-2010.0043, Project 62519 issued May 3, 2021 in accordance with the requirements of IDAPA 58.01.01.209.05.c. Therefore, this project is an Administrative Amendment of the existing Tier I permit. The amendment date was added to the front page, and permit conditions updated as described in the Permit Conditions Review section of the Statement of Basis to P-2010.0043, Project 62519.

6.2 Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70)

TASCO - Paul is classified as a major facility as defined in IDAPA 58.01.01.008.10:

- The facility emits or has the potential to emit a regulated air pollutant in an amount greater than or equal to 100 T/yr (and greater than or equal to 250 T/yr);
- The facility emits or has the potential to emit a single regulated HAP in excess of 10 T/yr;
- The facility emits or has the potential to emit a combination of regulated HAP in excess of 25 T/yr.
- The facility emits or has the potential to emit greenhouse gases in excess of 100,000 CO_2e T/yr.

TASCO – Paul has a fossil-fuel boiler (or combination thereof) of more than 250 MMBtu/hr heat input; therefore the boiler house (which includes the B&W Boiler, Rentech Boiler, and Nebraska Boiler) was classified as a designated facility as defined in IDAPA 58.01.01.006.30 and 40 CFR 52.21(b)(1)(i)(a), and fugitive emissions were included when determining the major facility classification in accordance with IDAPA 58.01.01.008.10.c.i.

6.3 PSD Classification (40 CFR 52.21)

The facility is classified as an existing major stationary source as defined in 40 CFR 52.21(b), because the boiler house steam plant (which includes the B&W Boiler, Rentech Boiler, and Nebraska Boiler) has a fossil-fuel boiler of more than 250 MMBtu/hr heat input.

6.4 NSPS Applicability (40 CFR 60)

The Nebraska and Rentech boilers are subject to the requirements of 40 CFR 60 Subpart Db – Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units because both boilers commenced construction after 1984 and have a heat input capacity greater than 100 MMBtu/hr. This permitting action does not affect the NSPS applicability for the facility.

6.5 NESHAP Applicability (40 CFR 61)

The facility is not subject to any NESHAP standards in 40 CFR 61.

6.6 MACT Applicability (40 CFR 63)

The facility boilers (B&W Boiler, Rentech Boiler, and Nebraska Boiler) are subject to the requirements of 40 CFR 63 Subpart DDDDD - National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters ("Boiler MACT"), because they are industrial boilers located at a major source of HAP. TASCO - Paul is classified as a major source of HAP; refer to the Title V Classification (IDAPA 58.01.01.300, 40 CFR Part 70) section for additional information concerning facility classification. This permitting action does not affect the NSPS applicability for the facility.

6.7 CAM Applicability (40 CFR 64)

CAM requirements are applicable for this facility on the North Pulp Dryer and South Pulp Dryer and this permitting action does not affect the applicability.

6.8 Acid Rain Permit (40 CFR 72-75)

This facility is not an affected facility as defined in 40 CFR 72 through 75; therefore, acid rain permit requirements do not apply.

7. PUBLIC COMMENT

Public notice is not required for this Administrative Amendment in accordance with IDAPA 58.01.01 381.01.e.

8. EPA REVIEW OF PROPOSED PERMIT

EPA review is not required for this Administrative Amendment in accordance with IDAPA 58.01.01.381.02.c. A copy of the revised permit is being submitted to EPA Region 10 via the online Electronic Permit System (EPS).