Statement of Basis

Permit to Construct No. P-2017.0012
Project ID 62363

The Amalgamated Sugar Company LLC - Paul
Paul, Idaho

Facility ID 067-00001

Final

April 30, 2020

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Permit Writer

The purpose of this Statement of Basis is to satisfy the requirements of IDAPA 58.01.01.et seq, Rules for the Control of Air Pollution in Idaho, for issuing air permits.

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ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AAC	acceptable ambient concentrations
AACC	acceptable ambient concentrations for carcinogens
acfm	actual cubic feet per minute
ASTM	American Society for Testing and Materials
Btu	British thermal units
CAA	Clean Air Act
CAM	Compliance Assurance Monitoring
CEMS	continuous emission monitoring systems
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
EL	screening emission levels
EPA	U.S. Environmental Protection Agency
GACT	Generally Available Control Technology
gph	gallons per hour
gpm	gallons per minute
gr	grains (1 lb = 7,000 grains)
HAP	hazardous air pollutants
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
km	kilometers
lb/hr	pounds per hour
lb/qtr	pound per quarter
m	meters
MACT	Maximum Achievable Control Technology
MMBtu	million British thermal units
MMscf	million standard cubic feet
NAAQS	National Ambient Air Quality Standard
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
POM	polycyclic organic matter
ppm	parts per million
ppmw	parts per million by weight
PSD	Prevention of Significant Deterioration
PTC	permit to construct
PTC/T2	permit to construct and Tier II operating permit

PTE	potential to emit
Rules	Rules for the Control of Air Pollution in Idaho
scf	standard cubic feet
SCL	significant contribution limits
SIP	State Implementation Plan
SM	synthetic minor
SM80	synthetic minor facility with emissions greater than or equal to 80% of a major source threshold
SO_2	sulfur dioxide
SO_x	sulfur oxides
T/day	tons per calendar day
T/hr	tons per hour
T/yr	tons per consecutive 12 calendar month period
T2	Tier II operating permit
TAP	toxic air pollutants
TASCO	The Amalgamated Sugar Company LLC
ULSD	ultra-low sulfur diesel
U.S.C.	United States Code
VOC	volatile organic compounds
yd^3	cubic yards
$\mu g/m^3$	micrograms per cubic meter

FACILITY INFORMATION

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.

Permitting History

The following 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-2011.0043, 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 (A)
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 (A)
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 allow fulltime backup operation of the Nebraska boiler, 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, but will become S upon issuance of this permit)

Application Scope

This PTC is for a DEQ initiated permit revision at an existing Tier I facility. This revision corrects the NSPS requirements for the boilers in the Tier I permit renewal and provides a high level citation to those requirements in this PTC. This permit is processed in accordance with IDAPA 58.01.01.209.05.b.

Application Chronology

January 10, 2020	DEQ initiated the permit revision.
January 17, 2020	DEQ made available the draft permit and statement of basis for peer and regional office review.
January 27, 2020	DEQ made available the draft permit and statement of basis for applicant review.
March 9 – April 8, 2020	DEQ provided a public comment period on the proposed action.
April 14, 2020	DEQ provided the proposed permit and statement of basis for EPA review.
April 30, 2020	DEQ issued the final permit and statement of basis.

TECHNICAL ANALYSIS

Emissions Units and Control Equipment

Table 1 EMISSIONS UNIT AND CONTROL EQUIPMENT INFORMATION

Source Description		Control Equipment	Installation Date
B&W Boiler (S–B1) Operational capacity: Fuel:	 175,000 lb/hr steam natural gas	Low NO_x burners	1952
Rentech Boiler (S–B4) Operational capacity: Fuel:	 300,000 lb/hr steam natural gas	Low NO_x burners	TBD
Nebraska Boiler (S–B3, Backup Boiler) Operational capacity: Fuel consumption: Fuels:	 200,000 lb/hr steam 250 MMBtu/hr natural gas	Low NO_x burners	2005
North Pulp Dryer (S–D2) PW input rate: Coal consumption: Fuels:	 56.9 T/hr 5.7 T/hr coal and/or natural gas	Dryer exhaust is split between two cyclones (A–D2A) that operate in parallel. Cyclone exhaust is D2A that operate in parallel. Cyclone exhaust is combined and then split between two Spray-Impingement Scrubbers (A–D2B) that operate in parallel.	1969
South Pulp Dryer (S–D1) PW input rate: Coal consumption: Fuels:	 48.5 T/hr 4.9 T/hr coal and/or natural gas	Dryer exhaust is split between two cyclones (A–D1A) that operate in parallel. Cyclone exhaust is combined and then split between two Spray-Impingement Scrubbers (A–D1B) that operate in parallel.	1961
Pellet Cooler No. 1 (S–D3) Manufacturer/Model: PW input rate:	 California Pellet Mill/2GA3 7.5 T/hr	Cyclone (A–D3)	Pre 1970
Pellet Cooler No. 2 (S–D4) Manufacturer/Model: PW input rate:	 California Pellet Mill/2GA3 7.5 T/hr	Cyclone (A–D4/5)	Pre 1970
Pellet Cooler No. 3 (S–D5) Manufacturer/Model: PW input rate:	 California Pellet Mill/2GA3 7.5 T/hr		1974
Lime Kiln (S–K1) Manufacturer: Model: Manufacture date: Maximum capacity: Maximum operation: Fuel: Fuel consumption:	 Eberhardt KR 8.0 (forced draft, vertical) 2011 770 T/day lime rock 146,300 T/yr lime rock anthracite coal and/or coke 55.2 T/day, 59 MMBtu/hr	Gas Washer First Carbonation Tank Second Carbonation Tank (A–K1)	2012
Process Slaker (S–K2) – Eberhardt Process Manufacturer: Model: Manufacture date: Maximum capacity: Maximum operation:	 May Foundry Eberhardt KR 8.0 2011 394 T/day CaO 74,860 T/yr CaO	None	2012

Source Description	Control Equipment	Installation Date
Drying Granulator (S–W1) Operational capacity: 73 T/hr wet sugar	Scrubber (A–W1)	Pre 1952
Cooling Granulator No. 1 (S–W2) Operational capacity: 73 T/hr wet sugar	Baghouse (A–W2)	Pre 1952
Cooling Granulator No. 2 (S–W3) Manufacturer/Model: BMA FCP 16/6/6 Operational capacity: 85 T/hr wet sugar	Baghouse (A–W3)	2012
Process Sugar Handling System (S–W4)	Process Sugar Baghouses (A–W4)	1967
Bulk Loadout Sugar Handling System (S–W5)	Bulk Loadout Baghouses (A–W5)	1994

Emissions Inventories

This permitting action is a DEQ initiated permit revision to correct NSPS requirements. Air pollutant emissions from this facility do not increase as a result of this action, therefore, a revised emissions inventory (EI) was not developed and a technical analysis was not conducted. Please see the Statement of Basis for P-2017.0012 issued October 18, 2018.

Ambient Air Quality Impact Analyses

This permitting action does not increase the impact to ambient air quality because there is no increase of any regulated air pollutant; therefore, an ambient air quality impact analysis was not required for this permitting action.

REGULATORY ANALYSIS

Attainment Designation (40 CFR 81.313)

The facility is located in Minidoka County, which is designated as attainment or unclassifiable for $PM_{2.5}$, PM_{10}, SO_2, NO_2, CO, and Ozone. Refer to 40 CFR 81.313 for additional information.

Facility Classification

The AIRS/AFS facility classification codes are as follows:

For HAPs (Hazardous Air Pollutants) Only:

A = Use when any one HAP has permitted emissions > 10 T/yr or if the aggregate of all HAPS (Total HAPs) has permitted emissions > 25 T/yr.

SM80 = Use if a synthetic minor (uncontrolled HAPs emissions are > 10 T/yr or if the aggregate of all uncontrolled HAPs (Total HAPs) emissions are > 25 T/yr and permitted emissions fall below applicable major source thresholds) and the permit sets limits > 8 T/yr of a single HAP or ≥ 20 T/yr of Total HAPs.

SM = Use if a synthetic minor (uncontrolled HAPs emissions are > 10 T/yr or if the aggregate of all uncontrolled HAPs (Total HAPs) emissions are > 25 T/yr and permitted emissions fall below applicable major source thresholds) and the permit sets limits < 8 T/yr of a single HAP and/or < 20 T/yr of Total HAPs.

B = Use when the potential to emit (i.e. uncontrolled emissions and permitted emissions) are below the 10 and 25 T/yr HAP major source thresholds.

UNK = Class is unknown.

For All Other Pollutants:

A = Use when permitted emissions of a pollutant are > 100 T/yr.

SM80 = Use if a synthetic minor for the applicable pollutant (uncontrolled emissions are > 100 T/yr and permitted emissions fall below 100 T/yr) and permitted emissions of the pollutant are ≥ 80 T/yr.

SM = Use if a synthetic minor for the applicable pollutant (uncontrolled emissions are > 100 T/yr and permitted emissions fall below 100 T/yr) and permitted emissions of the pollutant are < 80 T/yr.

B = Use when the potential to emit (i.e. uncontrolled emissions and permitted emissions) are below the 100 T/yr major source threshold.

UNK = Class is unknown.

Table 2 REGULATED AIR POLLUTANT FACILITY CLASSIFICATION

Pollutant	Permitted PTE (T/yr)	Major Source Thresholds (T/yr)	AIRS/AFS Classification
PM	210.4	**100**	A
$PM_{10}/PM_{2.5}$	226.1	**100**	A
SO_2	133.6	**100**	A
NO_X	486.8	**100**	A
CO	2928.0	**100**	A
VOC	166.4	**100**	A
HAP (single)	92.37	**10**	A
Total HAPs	111.19	**25**	A

Permit to Construct (IDAPA 58.01.01.201)

IDAPA 58.01.01.201..... Permit to Construct Required

The permittee has requested that a PTC be issued to the facility for the revision. Therefore, a permit to construct is required to be issued in accordance with IDAPA 58.01.01.220. This permitting action was processed in accordance with the procedures of IDAPA 58.01.01.200-228.

Tier II Operating Permit (IDAPA 58.01.01.401)

IDAPA 58.01.01.401..... Tier II Operating Permit

The application was submitted for a permit to construct (refer to the Permit to Construct section), and an optional Tier II operating permit has not been requested. Therefore, the procedures of IDAPA 58.01.01.400–410 were not applicable to this permitting action.

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

IDAPA 58.01.01.301..... Requirement to Obtain Tier I Operating Permit

The Amalgamated Sugar Company LLC (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;
- 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.

Amalgamated Sugar (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 are required to be included when determining the major facility classification in accordance with IDAPA 58.01.01.008.10.c.i, and when determining project net emissions increases in accordance with IDAPA 58.01.01.007 and 40 CFR 52.21(b)(48)(ii).

This PTC was processed in accordance with IDAPA 58.01.01.209.05.b; the applicable requirements contained in this PTC will be incorporated into the Tier I operating permit renewal pursuant to IDAPA 58.01.01.300–399.

PSD Classification (40 CFR 52.21)

40 CFR 52.21 ..... Prevention of Significant Deterioration of Air Quality

The facility is classified as an existing major stationary source, because the estimated emissions of PM_{10}, SO_2, NO_X, CO, VOC, and HAP have the potential to exceed major stationary source thresholds. The facility is a designated facility as defined in 40 CFR 52.21(b)(1)(i)(a).

NSPS Applicability (40 CFR 60)

The Nebraska boiler and the Rentech boiler are subject to 40 CFR 60 Subpart Db requirements. DEQ is delegated this Subpart. A complete analysis of NSPS Subpart Db can be seen in the Statement of Basis of P-2017.0012 issued October 18, 2018 with some minor differences noted as follows. Permit condition 4.14 in the Tier I renewal (T1-2019.0020) regarding the Nebraska and Rentech boilers performance test requirements has been modified to remove the restriction of conducting the performance test one year after the PTC issuance and 40 CFR 60.46b(e)(3) has been added to the condition for the Rentech boiler. 40 CFR 60.46b(e)(4) has also been clarified to be relevant only to the Nebraska boiler.

NESHAP Applicability (40 CFR 61)

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

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. DEQ is delegated this Subpart. A complete breakdown of Subpart DDDDD for the three affected boilers at the facility can be seen in the Statement of Basis of T1-2017.0057 issued February 23, 2018.

Permit Conditions Review

This section describes only those permit conditions that have been added, revised, modified or deleted as a result of this permitting action.

Old Permit Conditions 3.4 and 3.5 were deleted as they are NO_x emission limits for the Nebraska and Rentech boilers in accordance with 40 CFR 60 Subpart Db. These limits will be included in the Tier I with only a high level citation that the permittee shall comply with the applicable requirements of 40 CFR 60, Subparts A and Db remaining in the PTC.

Old Permit Conditions 3.14 through 3.24 were deleted as they are requirements for the boiler in accordance with 40 CFR 60 Subpart Db. These requirements will be included in the Tier I with only a high level citation that the permittee shall comply with the applicable requirements of 40 CFR 60, Subparts A and Db remaining in the PTC.

Added Permit Condition 3.12 was included as a high level citation that the permittee shall comply with the applicable requirements of 40 CFR 60, Subparts A and Db.

PUBLIC REVIEW

Public Comment Period

A public comment period was made available to the public in accordance with IDAPA 58.01.01.209.01.c. During this time, comments were not submitted in response to DEQ's proposed action. Refer to the chronology for public comment period dates.

EPA REVIEW OF PROPOSED PERMIT

As required by IDAPA 58.01.01.209.05.b.v, DEQ provided the proposed permit to EPA Region 10 for its review and comment on April 14, 2020, via the online the Electronic Permit System (EPS). On April 24, 2020, EPA Region 10 responded to DEQ via e-mail indicating that EPA would not be reviewing the permit and would not object to the permit issuance.

APPENDIX A – FACILITY DRAFT COMMENTS

The facility had no comments on the draft PTC on February 21, 2020.