STATE OF IDAHO
DEPARTMENT OF
ENVIRONMENTAL QUALITY

1410 N Hilton Street, Boise, ID 83706
(208) 373-0502

Brad Little, Governor
Jess Byrne, Director

November 1, 2021

Dave Hawk, Plant Manager
Amalgamated Sugar Company - Nampa
138 West Karcher Road
Nampa, ID 83687

RE: Facility ID No. 027-00010, Project No. 62721, Amalgamated Sugar Company, Nampa
Facility Name Change by Permit to Construct Revision

Dear Mr. Hawk:

The Department of Environmental Quality (DEQ) is issuing Permit to Construct (PTC) No. P-2015.0060, Project 62721, to change the name of the facility from The Amalgamated Sugar Company LLC - Nampa to Amalgamated Sugar Company - Nampa. This PTC is issued in accordance with IDAPA 58.01.01.209.04 of the Rules for the Control of Air Pollution in Idaho and is based on the certified information received on October 8, 2021. The facility name change is based on the following information:

Previous Facility Information

Permittee:	The Amalgamated Sugar Company LLC - Nampa
Mailing Address:	138 W. Karcher Rd., Nampa, ID 83687
Facility Location:	138 W. Karcher Rd., Nampa, ID 83687
Facility Contact:	Dave Hawk, Plant Manager
Phone Number:	(208) 468-6826
E-mail Address:	dhawk@amalsugar.com
Responsible Official:	Dave Hawk, Plant Manager
Phone Number:	(208) 468-6826

Updated Facility Information

Permittee:	Amalgamated Sugar Company - Nampa
Mailing Address:	138 W. Karcher Rd., Nampa, ID 83687
Facility Location:	138 W. Karcher Rd., Nampa, ID 83687
Facility Contact:	Dave Hawk, Plant Manager
Phone Number:	(208) 468-6826
E-mail Address:	dhawk@amalsugar.com
Responsible Official:	Dave Hawk, Plant Manager
Phone Number:	(208) 468-6826

This permit is effective immediately and replaces PTC No. P-2015.0060, Project 61639 issued January 9, 2017. This permit does not release Amalgamated Sugar Company from compliance with all other applicable federal, state, or local laws, regulations, permits, or ordinances.

In order to fully understand the compliance requirements of this permit, DEQ highly recommends that you schedule a meeting with David Luft, Air Quality Manager, at (208) 373-0201 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.

If you have any questions, please contact Kelli Wetzel at (208) 373-0575 or kelli.wetzel@deq.idaho.gov.

Sincerely,



Mike Simon
Stationary Source Bureau Chief
Air Quality Division

Attachment

MS/kw

Permit No. P-2015.0060 PROJ 62721

Air Quality

PERMIT TO CONSTRUCT

Permittee	Amalgamated Sugar Company - Nampa
Permit Number	P-2015.0060
Project ID	62721
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 58.01.01.200–228; (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 1, 2021

Kelli Wetzel

Kelli Wetzel, Permit Writer

Mike Simon

Mike Simon, Stationary Source Bureau Chief

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1 Permit Scope

Purpose

1.1 This is a revised permit to construct (PTC) for a facility name change from The Amalgamated Sugar Company LLC – Nampa to Amalgamated Sugar Company – Nampa.

1.2 This PTC replaces Permit to Construct No. P-2015.0060 issued on January 9, 2017.

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	B&W Boiler #1 Operational capacity: 105,000 lb/hr steam Maximum Heat input: 126 MMBtu/hr Fuel: natural gas only	None
2	B&W Boiler #2 Operational capacity: 105,000 lb/hr steam Maximum Heat input: 126 MMBtu/hr Fuel: natural gas only	None

2 B&W Boilers #1 & #2

Boiler Fuel Usage & Conversion

2.1 Fuel Restriction

B&W Boiler #1 and B&W Boiler #2 shall be fired only with natural gas.

Boiler MACT

2.2 40 CFR 63, Subpart DDDDD

The permittee shall comply with the applicable requirements of 40 CFR 63, Subpart DDDDD no later than January 31, 2016, in accordance with 40 CFR 63, Subpart DDDDD and 40 CFR 63.7495(b).

PSD 40 CFR 52.21

2.3 Future New Source Review (NSR) Applicability Determinations

The permittee shall not benefit from emission decreases that result from (or were projected to result from) the elimination of coal as fuel for the two B&W boilers for any future NSR applicability determinations and emissions netting calculations under the PSD program.

- Baseline actual emissions calculated from the two B&W boilers for any future NSR applicability determination shall be adjusted downward, under 40 CFR 52.21(b)(48)(ii)(b), to reflect emissions that would have occurred if the boilers had combusted natural gas, not coal.
- NSR emission decreases from the conversion of the B&W boilers from coal firing to natural gas-firing only are not creditable for the purposes of calculating NSR pollutant net emissions increases under 40 CFR 52.21(b)(3).

Incorporation of Federal Requirements

2.4 Federal Requirements

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:

- Applicable requirements of National Emission Standards for Hazardous Air Pollutants for Source Categories (NESHAP), 40 CFR 63, including Subpart DDDDD

For permit conditions referencing or cited in accordance with any document incorporated by reference (including permit conditions identified as NESHAP), 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.

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, 5/1/1994]

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, 5/1/1994]

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, 5/1/1994]

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, 5/1/1994]

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 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, 4/5/2000 and 4/11/2015]

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, 5/1/1994]

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, 4/5/2000]

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, 5/1/1994]

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, 3/23/1998]

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, 3/23/1998]

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, 4/11/2006]

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, 5/1/1994]