Air Quality

TIER I OPERATING PERMIT

Permittee	Amalgamated Sugar Company - Paul
Permit Number	T1-2019.0020
Project ID	62725
Facility ID	067-00001
Facility Location	50 South 500 West Paul, ID 83347

Permit Authority

This permit (a) is issued according to the "Rules for the Control of Air Pollution in Idaho" (Rules) (IDAPA 58.01.01.300–386) (b) incorporates all applicable terms and conditions of prior air quality permits issued by the Idaho Department of Environmental Quality (DEQ) for the permitted source, unless the permittee emits toxic pollutants subject to state-only requirements pursuant to IDAPA 58.01.01.210 and the permittee elects not to incorporate those terms and conditions into this operating permit.

The permittee shall comply with the terms and conditions of this permit. The effective date of this permit is the date of signature by DEQ on this cover page.

Date Issued	November 5, 2021
Date Expires	April 30, 2025

Aaron Hoberg, Permit Writer

Mike Simon, Stationary Source Bureau Chief

Pages 2 - 23 redacted -- outside the scope of the SIP

~~corrected to the oxygen concentration shown. The B&W, Rentech, and Nebraska boilers are fuel-burning equipment as defined in IDAPA 58.01.01.006.~~

~~Table 4.3 Fuel-Burning Equipment Grain-Loading Standards~~

~~Fuel Type~~	~~Allowable Particulate Emissions (gr/dscf)~~	~~Oxygen~~
~~Natural Gas~~	~~0.015 gr/dscf~~	~~3%~~

~~[IDAPA 58.01.01.676, 5/1/1994]~~

4.2 ~~NO_x Emission Limit~~

~~In accordance with 40 CFR 60.44b(a), the NO_x emissions from the Nebraska boiler stack shall not exceed 0.10 lb/MMBtu.~~

~~[40 CFR 60.44b(a)]~~

4.3 NO_x Emission Limit

In accordance with 40 CFR 60.44b(a), the NO_x emissions from the Rentech boiler stack shall not exceed 0.10 lb/MMBtu.

[40 CFR 60.44b(a)]

4.4 Emissions Limits

The emissions from the B&W, Rentech, and Nebraska boiler stacks shall not exceed any corresponding emissions rate limits listed in Table 4.4.

Table 4.4 B&W, Rentech, and Nebraska Boiler Emission Limits[a]

Source Description	PM_{10} [b]	SO_2	NO_X	CO	VOC
	T/yr [c]	T/yr [c]	T/yr [c]	T/yr [c]	T/yr [c]
B&W boiler	14.4	1.20	132.0	156.4	10.4
Rentech boiler					
Nebraska boiler					

a) In absence of any other credible evidence, compliance is ensured by complying with permit operating, monitoring, and record keeping requirements.
b) Particulate matter with an aerodynamic diameter less than or equal to a nominal ten (10) micrometers, including condensable particulate as defined in IDAPA 58.01.01.006.
c) Tons per campaign year, as defined in Permit Condition 3.1.

[PTC No. P-2017.0012, 11/05/2021]

Operating Requirements

4.5 Fuel

The B&W boiler, Rentech boiler, and Nebraska boiler shall combust natural gas only.

[PTC No. P-2017.0012, 11/05/2021]

4.6 ~~Boiler Operating Requirements~~

~~Following the shutdown of the Erie City boiler, the permittee shall not operate more than two of the three boilers (B&W, Rentech, and Nebraska boilers) simultaneously, except during periods of start-up and shut down of a boiler when the three boilers may be partially operated.~~

~~[PTC No. P-2017.0012, 11/05/2021]~~

4.7 Boiler Operating Limits

To demonstrate compliance with the Emissions Limits permit condition, operation of the B&W boiler, Rentech boiler, and Nebraska boiler shall not exceed 40,000,000 therms (for all boilers combined) for the campaign year as defined in Permit Condition 3.1.

[PTC No. P-2017.0012, 11/05/2021]

~~**4.8 Nebraska Boiler Maximum Heat Input Capacity**~~

~~The maximum heat input capacity of the Nebraska boiler shall not exceed 250 MMBtu/hr.~~

~~**[PTC No. P-2017.0012, 11/05/2021]**~~

4.9 Rentech Boiler Maximum Heat Input Capacity

The maximum heat input capacity of the Rentech boiler shall not exceed 385 MMBtu/hr.

[PTC No. P-2017.0012, 11/05/2021]

Monitoring and Recordkeeping Requirements

4.10 Boiler Operation Recordkeeping

The permittee shall monitor and record the amount of fuel used in therms per month in the B&W, Rentech, and Nebraska boilers to demonstrate compliance with operating limits permit condition. Annual fuel used shall be determined by summing the monthly operations in the boilers for the campaign year to demonstrate compliance with Permit Condition 4.7.

[PTC No. P-2017.0012, 11/05/2021]

4.11 Nebraska Boiler and Rentech Boiler CEMS Emission Monitoring

In accordance with 40 CFR 60.48b (b through f), the permittee shall install, calibrate, maintain and operate CEMS (continuous emission monitoring system) or approved alternative for measuring NO_x and O_2 (or CO_2) emissions discharged to the atmosphere from the Nebraska boiler and the Rentech boiler and shall record the output of the systems.

- The CEMS shall be operated and data recorded during all periods of operation of the affected facility except for CEMS breakdowns and repairs. Data shall be recorded during calibration checks, and zero and span adjustments.
- The 1-hour average NO_X emission rates measured by the continuous NO_X monitor shall be expressed as lb/MMBtu heat input and shall be used to calculate the average emission rates.
- The procedures under §60.13 shall be followed for installation, evaluation, and operation of the continuous monitoring system. The NO_x span value shall be 500 ppm or the permittee may elect to use the NO_x span values determined according to section 2.1.2 in appendix A to part 75.
- When NO_X emission data are not obtained because of CEMS breakdowns, repairs, calibration checks and zero and span adjustments, emission data will be obtained by using standby monitoring systems, Method 7 of appendix A, Method 7A of appendix A, or other approved reference methods to provide emission data for a minimum of 75 percent of the operating hours in each steam generating unit operating day, in at least 22 out of 30 successive steam generating unit operating days.

[40 CFR 60.48b(b-f)]

4.12 Nebraska Boiler and Rentech Boiler Recordkeeping

In accordance with 40 CFR 60.49b(g), the permittee shall maintain records of the following information for both the Nebraska boiler and Rentech boiler each operating day:

- Calendar date;
- The average hourly NO_x emission rates (expressed as NO_2) (ng/J or lb/MMBtu heat input) measured or predicted;
- The 30-day average NO_x emission rates (ng/J or lb/MMBtu heat input) calculated at the end of each boiler operating day from the measured or predicted hourly nitrogen oxide emission rates for the preceding 30 steam generating unit operating days;
- Identification of the boiler operating days when the calculated 30-day average NO_x emission rates are in excess of the NO_x emissions standards under §60.44b, with the reasons for such excess emissions as well as a description of corrective actions taken;
- Identification of the boiler operating days for which pollutant data have not been obtained, including reasons for not obtaining sufficient data and a description of corrective actions taken;
- Identification of the times when emission data have been excluded from the calculation of average emission rates and the reasons for excluding data;
- Identification of "F" factor used for calculations, method of determination, and type of fuel combusted;
- Identification of the times when the pollutant concentration exceeded full span of the CEMS;
- Description of any modifications to the CEMS or approved alternative that could affect the ability of the CEMS or approved alternative to comply with the average hourly NO_x emission rates and 30-day average NO_x emission rates; and
- Results of daily CEMS drift tests and quarterly accuracy assessments as required under appendix F, Procedure 1 of 40 CFR 60.49b**.**

[40 CFR 60.49b(g)]

~~4.13 Record Retention~~

~~In accordance with 40 CFR 60.49b(o), all records required by Permit Conditions 4.11, 4.12, and 4.14 through 4.18 shall be maintained by the permittee for a period of 2 years following the date of such record.~~

~~[40 CFR 60.49b(o)]~~

Performance Testing Requirements

~~4.14 Nebraska Boiler and Rentech Boiler Performance Test Requirements~~

~~In accordance with 40 CFR 60.46b(e), to determine compliance with the emission limit for NO_x, the permittee shall conduct a performance test on the Rentech boiler using the continuous system for monitoring NO_x as specified in Permit Condition 4.11, within 60 days of 90% full-rated capacity operation. Results of the performance test shall be submitted to DEQ within 60 days of completion of the test.~~

- ~~In accordance with 40 CFR 60.46b(e)(1), for the initial compliance test the permittee shall monitor NO_x from the Rentech boiler for 30 successive operating days and use the 30-day average emission rate to determine compliance with the NO_x emission limit in Permit Condition 4.3. The 30-day emission rate shall be calculated as the average of all hourly emissions data recorded by the monitoring system during the 30-day test period.~~

- ~~In accordance with 40 CFR 60.46b(e)(3), following the date on which the initial performance test is completed or is required to be completed under §60.8, whichever date comes first, the permittee shall determine compliance with the NO_x standards under §60.44b on a continuous basis through the use of a 30-day rolling average emission rate for the Rentech boiler. A new 30-day rolling average emission rate is calculated each steam generating unit operating day as the average of all of the hourly NO_x emission data for the preceding 30 steam generating unit operating days.~~

- ~~In accordance with 40 CFR 60.46b(e)(4), following the date on which the initial performance test is completed, the permittee shall upon request determine compliance with the NO_x standards in §60.44b through the use of a 30-day performance test for the Nebraska boiler. During periods when performance tests are not requested, NO_x emissions data collected pursuant to §60.48b(g)(1) or §60.48b(g)(2) are used to calculate a 30-day rolling average emission rate on a daily basis and used to prepare excess emission reports, but will not be used to determine compliance with the NO_x emission standards.~~

  ~~A new 30-day rolling average emission rate is calculated each operating day as the average of all of the hourly NO_x emission data for the preceding 30 Nebraska boiler operating days.~~

~~[40 CFR 60.46b(e)]~~

4.15 Rentech Boiler Maximum Heat Input Capacity

In accordance with 40 CFR 60.46b(g), the permittee shall demonstrate the maximum heat input capacity of the Rentech boiler by operating the facility at maximum capacity for 24 hours. The owner or operator of an affected facility shall determine the maximum heat input capacity using the heat loss method or the heat input method described in sections 5 and 7.3 of the ASME *Power Test Codes* 4.1.

[40 CFR 60.46b(g)]

Reporting Requirements

4.16 Rentech Boiler Performance Test and CEMS Data

In accordance with 40 CFR 60.49b(b), the permittee shall submit the performance test data from the initial performance test on the Rentech boiler, and the performance evaluation of the CEMS using the applicable performance specifications in appendix B of 40 CFR 60.49b, no later than 180 days from startup in accordance with §60.8.

[40 CFR 60.49b(b)]

~~4.17 Nebraska Boiler and Rentech Boiler Excess Emissions Reporting~~

~~In accordance with 40 CFR 60.49b(h), the permittee shall submit excess emission reports for any excess emissions that occurred during the reporting period for both the Nebraska boiler and the Rentech boiler. Excess emissions are defined as any calculated 30-day rolling average NO_x emission rate, as determined under §60.46b(e), that exceeds the applicable emission limits in §60.44b.~~

[40 CFR 60.49b(h)]

4.18 Nebraska Boiler and Rentech Boiler Emissions Reporting

In accordance with 40 CFR 60.49b(i), the permittee shall submit reports containing the information recorded under Permit Condition 4.12. In accordance with 40 CFR 60.49b(v through w), the permittee shall submit required reports each 6 month period and shall be postmarked by the 30th day following the end of the reporting period.

[40 CFR 60.49b(i, v-w)]

~~Boiler MACT Requirements~~

~~4.19 Boiler Operations~~

~~In accordance with §63.7500(a)(3), at all times the permittee must operate and maintain any affected source (as defined in §63.7490), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to DEQ that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source.~~

~~[40 CFR 63.7500(a)(3)]~~

~~4.20 Work Practice Standard~~

~~In accordance with §63.7515(d), if the permittee is required to meet an applicable tune-up work practice standard, the permittee must conduct a 5 year performance tune-up according to §63.7540(a)(12). Each 5 year tune-up specified in §63.7540(a)(12) must be no more than 61 months after the previous tune-up.~~

~~[40 CFR 63.7515(d)]~~

~~4.21 Performance Tune-Up Requirements~~

~~In accordance with §63.7540(a)(12), the permittee must conduct a tune-up of the boilers every five (5) years to demonstrate continuous compliance as specified below. The permittee may delay the burner inspection specified in paragraph (a)(10)(i) of this section until the next scheduled or unscheduled unit shutdown, but the permittee must inspect each burner at least once every 72 months.~~

- ~~As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;~~
- ~~Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;~~
- ~~Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection;~~

Pages 29 - 49 redacted -- outside the scope of the SIP

~~construct), IDAPA 58.01.01.382.04 (significant modifications), and IDAPA 58.01.01.384.03 (trading under an emissions cap).~~

- ~~Nothing in this permit shall alter or affect the following:~~
  - ~~Any administrative authority or judicial remedy available to prevent or terminate emergencies or imminent and substantial dangers;~~
  - ~~The liability of a permittee for any violation of applicable requirements prior to or at the time of permit issuance;~~
  - ~~The applicable requirements of the acid rain program, consistent with 42 U.S.C. Section 7651(g)(a); and~~
  - ~~The ability of EPA to obtain information from a source pursuant to Section 114 of the CAA; or the ability of DEQ to obtain information from a source pursuant to Idaho Code §39-108 and IDAPA 58.01.01.122.~~

~~[Idaho Code §39-108 and 112; IDAPA 58.01.01.122, 4/5/2000; IDAPA 58.01.01.322.15.m, 5/1/1994; IDAPA 58.01.01.325, 3/19/1999; IDAPA 58.01.01.381.04, 382.04, 383.05, 384.03, 385.03, 3/19/1999; 40 CFR 70.6(f)]~~

~~Compliance Schedule and Progress Reports~~

~~11.21~~ ~~The permittee shall comply with the following:~~

- ~~For each applicable requirement for which the source is not in compliance, the permittee shall comply with the compliance schedule incorporated in this permit.~~
- ~~For each applicable requirement that will become effective during the term of this permit and that provides a detailed compliance schedule, the permittee shall comply with such requirements in accordance with the detailed schedule.~~
- ~~For each applicable requirement that will become effective during the term of this permit that does not contain a more detailed schedule, the permittee shall meet such requirements on a timely basis.~~
- ~~For each applicable requirement with which the permittee is in compliance, the permittee shall continue to comply with such requirements.~~

~~[IDAPA 58.01.01.322.10, 4/5/2000; IDAPA 58.01.01.314.9, 5/1/1994; IDAPA 58.01.01.314.10, 4/5/2000; 40 CFR 70.6(c)(3) and (4)]~~

Periodic Compliance Certification

11.22 The permittee shall submit compliance certifications during the term of the permit for each emissions unit to DEQ and the EPA as follows:

- The compliance certifications for all emissions units shall be submitted annually from October 1 to September 30 or more frequently if specified by the underlying applicable requirement or elsewhere in this permit by DEQ.
- The initial compliance certification for each emissions unit shall address all of the terms and conditions contained in the Tier I operating permit that are applicable to such emissions unit, including emissions limitations, standards, and work practices;
- The compliance certification shall be in an itemized form providing the following information (provided that the identification of applicable information may cross-reference the permit or previous reports as applicable):
  - The identification of each term or condition of the Tier I operating permit that is the basis of the certification;
  - The identification of the method(s) or other means used by the permittee for determining the compliance status with each term and condition during the

certification period. Such methods and other means shall include, at a minimum, the methods and means required under Subsections 322.06, 322.07, and 322.08;

- The status of compliance with the terms and conditions of the Tier I operating permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification shall be based on the method or means designated in Subsection 322.11.c.ii above. The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance as defined under 40 CFR Part 64 occurred; and
- Such information as DEQ may require to determine the compliance status of the emissions unit.

11.23 All original compliance certifications shall be submitted to DEQ and a copy of all compliance certifications shall be submitted to the EPA.

[IDAPA 58.01.01.322.11, 4/6/2005; 40 CFR 70.6(c)(5)(iii) as amended, 62 Fed. Reg. 54900, 54946 (10/22/1997); 40 CFR 70.6(c)(5)(iv)]

~~False Statements~~

~~11.24~~ ~~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]~~

~~No Tampering~~

~~11.25~~ ~~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]~~

~~Semiannual Monitoring Reports~~

~~11.26~~ ~~In addition to all applicable reporting requirements identified in this permit, the permittee shall submit reports of any required monitoring at least every six months. The permittee's semiannual reporting periods shall be from October 1 to March 31 and April 1 to September 30. All instances of deviations from this operating permit's requirements must be clearly identified in the report. The semiannual reports shall be submitted to DEQ within 30 days of the end of the specified reporting period.~~

~~[IDAPA 58.01.01.322.15.q, 3/23/1998; IDAPA 58.01.01.322.08.c, 4/5/2000; 40 CFR 70.6(a)(3)(iii)]~~

~~Reporting Deviations and Excess Emissions~~

~~11.27~~ ~~The permittee shall promptly report all deviations from permit requirements including upset conditions, their probable cause, and any corrective actions or preventive measures taken. For excess emissions, the report shall be made in accordance with IDAPA 58.01.01.130–136. For all other deviations, the report shall be made in accordance with IDAPA 58.01.01.322.08.c, unless otherwise specified in this permit.~~

~~[IDAPA 58.01.01.322.15.q, 3/23/1998; IDAPA 58.01.01.135, 4/11/2006; 40 CFR 70.6(a)(3)(iii)]~~

Permit Revision Not Required

11.28 No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit.

[IDAPA 58.01.01.322.05.b, 4/5/2000; 40 CFR 70.6(a)(8)]

Emergency

11.29 In accordance with IDAPA 58.01.01.332, an "emergency", as defined in IDAPA 58.01.01.008, constitutes an affirmative defense to an action brought for noncompliance with such technology-based emissions limitation if the conditions of IDAPA 58.01.01.332.02 are met.

[IDAPA 58.01.01.332.01, 4/5/2000; 40 CFR 70.6(g)]