PERMIT NO.: 027-00010

1. PERMITTEE
   The Amalgamated Sugar Company LLC

2. PROJECT
   Tier II Operating Permit

3. MAILING ADDRESS
   P.O. Box 8787
   CITY: Nampa
   STATE: ID
   ZIP: 83686-8787

4. FACILITY CONTACT
   Joe Huff
   TITLE: Nampa Plant Manager
   TELEPHONE: (208) 466-3541

5. RESPONSIBLE OFFICIAL
   Joe Huff
   TITLE: Nampa Plant Manager
   TELEPHONE: (208) 466-3541

6. EXACT PLANT LOCATION
   138 W. Karcher Road, Nampa, Idaho
   COUNTY: Canyon

7. GENERAL NATURE OF BUSINESS & KINDS OF PRODUCTS
   Beet Sugar Manufacturing

8. PERMIT AUTHORITY

   This permit is issued according to the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.400, and pertains only to emissions of air contaminants regulated by the state of Idaho and to the sources specifically allowed to be operated by this permit.

   This permit has been granted on the basis of design information presented in the application and the Idaho Department of Environmental Quality's technical analysis of the supplied information. Changes in design or equipment that result in any change in the nature or amount of emissions may be considered a modification. Modifications are subject to Department review in accordance with IDAPA 58.01.01.200 of the Rules for the Control of Air Pollution in Idaho.

DATE ISSUED: September 30, 2002
DATE EXPIRES: September 30, 2007
# TABLE OF CONTENTS

1. TIER II OPERATING PERMIT SCOPE ........................................................................... 3
2. FACILITY-WIDE CONDITIONS ............................................................................... 4
3. EMISSIONS UNIT - B&W NO. 1, B&W NO. 2, AND RILEY BOILERS (S-B1, S-B2, S-B3) ......................................................... 5
4. EMISSIONS UNIT - UNION BOILER (S-B4) ............................................................. 13
5. EMISSIONS UNIT - PULP DRYERS (S-D1, S-D2, S-D3) ........................................ 16
6. EMISSIONS UNIT - PELLET MILLS (S-D4, S-D5, S-D6, S-D7, S-D8) ................. 18
7. EMISSIONS UNIT - A AND B LINE KILNS (S-K1-S-K2) ........................................ 21
8. EMISSIONS UNIT - PROCESS SLAKERS (S-K4) ..................................................... 23
9. EMISSIONS UNIT - DRYING GRANULATOR (S-W1) ............................................... 25
10. EMISSIONS UNIT - NO. 1 AND NO. 2 COOLING GRANULATORS (S-W2, S-W3) ................................................................. 27
11. EMISSIONS UNIT - PROCESS NO. 2, SPECIALTIES, AND PACKAGING-LINE SUGAR HANDLING SYSTEMS (S-W4, S-W6, S-W7) .................................................................................................................. 29
12. EMISSIONS UNIT - LIME KILN BUILDING (S-K3) .................................................. 31
13. COMPLIANCE SCHEDULE .................................................................................... 33
14. SUMMARY OF EMISSIONS RATE LIMITS ............................................................... 35
15. FACILITY-WIDE EMISSIONS INVENTORY ............................................................. 37
16. OTHER SOURCES ................................................................................................. 39
17. TIER II PERMIT GENERAL PROVISIONS ............................................................... 41

Page 2 of 43
ACRONYMS, UNITS, AND CHEMICAL NOMENCLATURE

AQCR
Air Quality Control Region

CFR
Code of Federal Regulations

CO
carbon monoxide

CSB
concentrated separator byproducts

Department
Department of Environmental Quality

EPA
U.S. Environmental Protection Agency

gr/dscf
grain per dry standard cubic foot

IDAPA
a numbering designation for all administrative rules in Idaho; promulgated in accordance with the Idaho Administrative Procedure Act

km
kilometer

t/hr
pound per hour

MMscf
million standard cubic feet

MMscf/hr
million standard cubic feet per hour

NAAGB
National Ambient Air Quality Standards

NOx
nitrogen oxides

NSPS
New Source Performance Standards

O&M
operations and maintenance

PM
particulate matter

PM_{10}
particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers

PTC
permit to construct

SIC
Standard Industrial Classification

SIP
State Implementation Plan

SOx
sulfur dioxide

TASCO
The Amalgamated Sugar Co. LLC

TDS
Total dissolved solids

TEOM
Tapered Element Oscillating Microbalance Ambient Air Monitor

Tpd, Tphr, Tpyr
tons per day, tons per hour, and tons per year, respectively

UTM
Universal Transverse Mercator

VOC
volatile organic compound
1. **TIER II OPERATING PERMIT SCOPE**

**Purpose**

1.1 In accordance with Idaho SS 61-04-403.02, the Tier II operating permit establishes facility-wide requirements necessary to ensure that all emissions from the TASCO facility do not exceed or significantly contribute to a violation of the NAAQS. The Tier II project was originally initiated to establish enforceable emission limits in support of the Idaho Adap County RMG SIP control strategy.

1.2 This Tier II operating permit incorporates all applicable permit terms from the following permits:

- Air Pollution Source Permit No. 13-0400-0010, dated March 19, 1984
- Air Pollution Source Permit No. 0400-0010, dated January 4, 1984

**Regulated Sources**

2.3 Table 1.1 below lists sources of emissions that are specifically regulated in this Tier II operating permit.

<table>
<thead>
<tr>
<th>Source Decisions</th>
<th>Source Description</th>
<th>Emissions Control(s)</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.1</td>
<td>Fugitive Dust Sources</td>
<td>Fugitive Dust Control</td>
</tr>
<tr>
<td>1.2</td>
<td>Three Dry Steam Gas-Fired Boilers (5M1, 5M2, 5M3)</td>
<td>Siphon, A, B, C, and A/V</td>
</tr>
<tr>
<td>1.3</td>
<td>Gas Natural Gas-Fired Boiler (G-214)</td>
<td>Siphon</td>
</tr>
<tr>
<td>1.4</td>
<td>Three pulp dryers (G-517, G-529, G-95)</td>
<td>Siphon A, B, C, and A/V, FGD, Siphon A, B, C, and A/V</td>
</tr>
<tr>
<td>1.6</td>
<td>Two lime kilns (S-41, S-42)</td>
<td>Lime Kiln Building A, B, C, and A/V</td>
</tr>
<tr>
<td>1.7</td>
<td>Two recirculators (S-414)</td>
<td>Scrubber A/B/C</td>
</tr>
<tr>
<td>1.8</td>
<td>One drying-gasifier (S-174)</td>
<td>Scrubber A/B/C</td>
</tr>
<tr>
<td>1.9</td>
<td>Two cooling-gasifiers (S-415, S-415)</td>
<td>Scrubber A/B/C, A/V</td>
</tr>
<tr>
<td>1.10</td>
<td>Three pulp handling systems (S-416, S-416, S-416)</td>
<td>Pulp Mill A, Pulp Mill A/V</td>
</tr>
<tr>
<td>1.11</td>
<td>Lime kiln buildings (S-413)</td>
<td>Lime Kiln Building A, B, C, and A/V</td>
</tr>
</tbody>
</table>

Note: Six additional units will be installed within one year of issuance of the Tier II operating permit, refer to Permit Conditions.
2. FACILITY-WIDE CONDITIONS

Table 2.1 below contains a summary of requirements that apply generally to emissions units at the facility.

<table>
<thead>
<tr>
<th>Source Conditions</th>
<th>Parameter</th>
<th>Permit Limit/Standard Summary</th>
<th>Applicable Requirements</th>
<th>Operating and Monitoring Requirements</th>
</tr>
</thead>
<tbody>
<tr>
<td>Fugitive</td>
<td>Fugitive</td>
<td>Reasonable control of fugitive dust management plan</td>
<td>IDAPA 58.01.01.040.001 (24)</td>
<td>E.J. 25, 27</td>
</tr>
<tr>
<td></td>
<td></td>
<td>Ambient monitoring requirements; the source or significant contribution to a high dust region</td>
<td>IDAPA 58.01.04.040.02 (24)</td>
<td>2.4, 2.27</td>
</tr>
<tr>
<td></td>
<td>Gritty</td>
<td>Performance testing requirements</td>
<td>IDAPA 58.01.04.060.00 (24)</td>
<td>2.1, 2.10</td>
</tr>
</tbody>
</table>

**Fugitive Emissions Requirements**

2.1 All reasonable precautions shall be taken to prevent fugitive dust from becoming airborne in accordance with IDAPA 58.01.01.040.001. In determining what is reasonable, considerations will be given to factors such as the possibility of dust arising from operations to human health and/or the adverse effects on atmospheric conditions that might affect the air quality of IDAP. Some of the reasonable precautions include, but are not limited to the following:

- Use, where practical, of water or sprayed water for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads, or the clearing of lands.
- Application, where practicable, of liquid or dry chemical dust control sprays or coverings on dirt roads, material stockpiles, and other surfaces which can create dust.
- Installation and use, where practical, of hoods, fans, and wet dust collectors in processes to reduce and control the handling of dust materials. Adequate containment methods should be employed during the handling or storage of dust materials.
- Wiping down, where practicable, of open-top trucks transporting materials likely to give rise to silo dusts.
- Removal of equipment and their maintenance in clean or dust-free conditions, where practicable.
- Receipt removal of earth or other loose materials from streets, where practicable.

[IDAPA 58.01.01.01.060.001 (24)]

2.2 Within 60 days of the issuance of the Tier II operating permit, the permittee shall implement the following fugitive dust management plans to control fugitive emissions. The permittee shall monitor and maintain weekly records of any and all actions taken to comply with the measures, including, but not limited to, the frequency of application or observation and the type and quantity of equipment applied; the extent and degree of any deviation from any provision of Facility-wide Condition 2.1 and corrective actions implemented to correct any deviation(s).

(IDAPA 58.01.01.060.001 (24))
AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010

Permittee: The American Sugar Co., LLC
Location: Nampa, Idaho
Date Issued: September 30, 2002

- Operate atomizing sprays at the coal unloading station (Emissor shield No. 1-84) during any material-moving activities at the unloading station.
- Install and operate fugitive dust suppression systems on all railing stock, with the exception of the coal rolling/packer and temporary rental equipment, associated with operations in the vicinity of the coal storage area.
- Inspect and maintain the berm and fences at the eastern boundary of the facility as necessary, but not less than annually.
- Apply water or a water/CSB dust suppressant at all facility roads, coal and coke haul roads, and coal unloading areas as necessary, but not less than weekly from May 1 through October 31 of each year.
- Apply water to the coal pile, at least biweekly during unloading and transfer activities.
- Apply a surfactant to the coal pile, at least once per year once the coal storage area has reached final grade.

2.3 - The permittee shall maintain and record all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The reports shall include, at a minimum, the date the complaint was received and a description of the following: the complaint; the permittee's assessment of the validity of the complaint; any corrective action taken; and the date the corrective action was taken.

2.4 - Unless specified otherwise in this permit, the permittee shall conduct a monthly facilitywide inspection of potential sources of fugitive emissions, during daylight hours and under normal operating conditions to ensure that the methods used to reasonably control fugitive emissions are effective. Fugitive emissions are not being reasonably controlled, the permittee shall take corrective action as expeditiously as practicable. The permittee shall maintain records of results of each monthly fugitive emissions inspection. The records shall include, at a minimum, the date of each inspection and a description of the following: the permittee's assessment of the conditions existing at the time fugitive emissions were present (if observed), any corrective action taken in response to the fugitive emissions, and the date the corrective action was taken.

Ambient Monitoring Requirements

2.5 - Within 12 months of Tier II operating permit issuance, the permittee shall install, maintain, and operate reference PM10 (one TEQ-M and one high-volume) and reference SO2 and meteorological monitoring equipment at a location(s) approved by the Department. Ambient air quality monitoring shall be performed to collect data on meteorological parameters and ambient concentrations of PM10 and SO2, as follows:

2.5.1 - The permittee shall submit an ambient monitoring protocol to the Department for approval within 120 days of Tier II operating permit issuance. The protocol shall provide the specifications for the monitoring equipment and define the operating parameters for conducting the monitoring. The protocol shall remain part of the terms and conditions of the Tier II operating permit.
7.4.2 The permittee shall notify the Department of any changes to the approved monitoring program at least 15 days before the change is to be implemented. The permittee shall file an annual updated monitoring program with the Department 30 days before the start of each monitoring period. The Department may require the maintenance of a quality assurance/quality control (QA/QC) program as part of the permittee's monitoring program. The Department may require the implementation of a corrective action program if deficiencies are identified during the program implementation. The Department may require that the permittee provide a QA/QC program to ensure the accuracy and reliability of the monitoring data.

7.4.3 The permittee shall notify the Department of any changes to the approved operating procedures at least 15 days before the change is to be implemented. The permittee shall file an annual updated operating procedure with the Department 30 days before the start of each operating period. The Department may require the maintenance of a quality assurance/quality control (QA/QC) program as part of the permittee's operating procedure. The Department may require the implementation of a corrective action program if deficiencies are identified during the program implementation. The Department may require that the permittee provide a QA/QC program to ensure the accuracy and reliability of the operating procedures.

Performance Testing Requirements

7.4.4 The permittee shall perform the performance testing at least once every six months, or more frequently as the Department may require. The Department may require the performance testing to be conducted during a permit condition. The Department may require the performance testing to be conducted during a permit condition.

Analytical Methodology:

Analytical methods shall be used in accordance with the procedures set forth in the Department's Analytical Methodology Manual. The Department may require the performance of analytical tests for any permit condition. The Department may require the performance of analytical tests for any permit condition.

Monitoring Period:

Monitoring periods shall be conducted during the permit period. The Department may require the performance of monitoring periods for any permit condition. The Department may require the performance of monitoring periods for any permit condition.

The proposed test date(s) must be specified in the monitoring plan. The Department may require the performance of monitoring periods for any permit condition. The Department may require the performance of monitoring periods for any permit condition.

Within 30 days following the test date, the permittee shall submit a written report to the Department summarizing the results of the testing. The report shall include a description of the methods used to perform the tests, the results of the tests, and any corrective actions taken as a result of the tests. The Department may require the performance of testing for any permit condition. The Department may require the performance of testing for any permit condition.
AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010

Permittee: The Anzalagme Sugar Co, LLC
Location: Nampa, Idaho
Date Issued: September 30, 2002
Date Expires: September 30, 2009

For all required performance testing, the permittee shall use the test methods described in Table 2.1 to measure the pollutant emissions.

Table 2.1: APPROVED TEST METHODS

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Test Method*</th>
<th>Special Conditions</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM10</td>
<td>EPA Method 201a and Method 202</td>
<td></td>
</tr>
<tr>
<td>PM2.5</td>
<td>EPA Method 202</td>
<td></td>
</tr>
<tr>
<td>NOx</td>
<td>EPA Method 214</td>
<td></td>
</tr>
<tr>
<td>SO2</td>
<td>EPA Method 204</td>
<td></td>
</tr>
<tr>
<td>CO</td>
<td>EPA Method 204</td>
<td></td>
</tr>
<tr>
<td>VOCs</td>
<td>EPA Method 206</td>
<td></td>
</tr>
<tr>
<td>Hexane</td>
<td>EPA Method 206</td>
<td></td>
</tr>
</tbody>
</table>

*Or Department-approved alternative in accordance with IDAPA 58.01.01.167

2.10 Within 120 days of issuance of the Tier II operating permit and before the end of the 2002/2003 best campaign, the permittee shall conduct performance tests as required in Facility-wide Condition 2.10.1.

2.10.1 Performance tests shall be conducted on the South, Center and North dryers to demonstrate compliance with the emissions limits for PM10 in Permit Condition 13.2. The dryer shall be tested with coal as the exclusive fuel. The permittee shall monitor and record the throughput of the dryer, coal feed rate in tons per hour, and scrubber differential pressure of the scrubbers during each test. Throughout the dryer shall be represented by the sum of the masses of coal, wet pulp, and CFB fed to the dryer. The permittee shall collect a representative sample of recirculated water from the scrubber during each test. The concentration of TDS in the sample water shall be analyzed, recorded, and expressed in milligrams of solids per liter of water.
2.10.2 If the PM\textsubscript{10} emissions rate measured in the performance test conducted in accordance with Facility-wide Condition 2.10.1 is less than or equal to 75% of the PM\textsubscript{10} emissions standard in Facility-wide Condition 13.2, no further testing shall be required. If the PM\textsubscript{10} emissions rate measured during the performance test conducted in accordance with Facility-wide Condition 2.10.1 is greater than 75%, but less than or equal to 90% of the PM\textsubscript{10} emissions standards in Facility-wide Condition 13.2, a second test shall be required in the third year of the permit term. If the PM\textsubscript{10} emissions rate measured during the performance test conducted in accordance with Facility-wide Condition 2.10.1 is greater than 90% of the PM\textsubscript{10} emissions standard in Facility-wide Condition 13.2, the permittee shall conduct a compliance test annually.

2.11 The permittee shall conduct performance tests as required in Facility-wide Conditions 2.11.1 through 2.11.5 during the first best campaign following fulfillment of the provisions of Permit Condition 13.4.

2.11.1 Performance tests shall be conducted on the B&W No. 1 boiler, the B&W No. 2 boiler, and the Riley boiler to demonstrate compliance with the emissions limits for PM\textsubscript{10} and CO in Permit Condition 3.3. The performance test shall be conducted after the requirements of Permit Condition 13.4.2 have been satisfied. For the PM\textsubscript{10} performance test, the boilers shall be tested with coal as the exclusive fuel. For the CO performance test, the boilers shall be tested with natural gas as the exclusive fuel. The permittee shall monitor and record the steam production rate of each boiler; coal feed rate to each boiler in tons per hour; or natural gas firing rate in MCF/hr; the highest heating value and analysis results, including ash content, for the performance test with coal; and pressure drop across each baghouse during each test.

2.11.2 Performance tests shall be conducted on the B&W No. 1, B&W No. 2, and Riley boilers to demonstrate compliance with the emissions limits for PM\textsubscript{10} in Permit Condition 3.4. The performance test shall be conducted after the requirements of Permit Condition 13.4.2 have been satisfied. The tests shall be conducted with coal as the exclusive fuel in the boilers. The permittee shall monitor and record the steam production rate of each boiler; coal feed rate to each boiler in tons per hour; the highest heating value and analysis results, including ash content; for the coal; and pressure drop across the baghouse during each test.

2.11.3 Performance tests shall be conducted on the petiol mills to demonstrate compliance with the emissions limits for PM\textsubscript{10} and CO in Permit Condition 6.3. The performance test shall be conducted after the requirements of Permit Condition 6.6 have been satisfied. The permittee shall monitor and record the steam production rate of each boiler; coal feed rate to each boiler in tons per hour; the highest heating value and analysis results, including ash content; for the coal; and pressure drop across the baghouse during each test. Total throughput of the mills will be determined by the dry shredd weight-m-timer.

2.11.4 Performance tests shall be conducted on the lime kilns to demonstrate compliance with the emissions limits for PM\textsubscript{10} and CO in Permit Condition 7.3. The permittee shall monitor and record the lime rock throughout of each kiln and the pressure drop across the baghouse during each test.

2.11.5 If an emissions rate measured in the initial performance test conducted pursuant to Permit Condition 2.11.1 is less than or equal to 75% of an applicable emissions standard in Permit Condition 3.3, no further testing shall be required. If an emissions rate measured during the performance test conducted pursuant to Permit Condition 2.11.1 is greater than 75%, but less than or equal to 90% of an applicable emissions standard in Permit Condition 3.3, a second test shall be required in the third year of the permit term. If an emissions rate measured during the performance test conducted pursuant to Permit Condition 2.11.1 is greater than 90% of an applicable emissions standard in Permit Conditions 3.3, the permittee shall conduct a performance test annually.
2.12 The permittee shall conduct performance tests as required in Facility-wide Conditions 2.12.1 through 2.12.3 during the second beet campaign following fulfillment of the provisions of Permit Condition 13.4.

2.12.1 Performance tests shall be conducted on the Union boiler to demonstrate compliance with the emissions limits for PM_{10} and CO in Permit Condition 4.3. The permittee shall monitor and record the steam production rate of the boiler and the natural gas-firing rate of the boiler during each test.

2.12.2 Performance tests shall be conducted on the process sumpers to demonstrate compliance with the emissions limits for PM_{10} in Permit Condition 9.3 and the emissions limit for PM in Permit Condition 8.4. The permittee shall monitor and record the calcium oxide rock throughput of each process sump and the scrubber nozzle header pressure during each test.

2.12.3 Performance tests shall be conducted on the drying granulator to demonstrate compliance with the emissions limits for PM_{10} in Permit Condition 9.3 and the emissions limits for PM in Permit Condition 8.4. The permittee shall monitor and record the throughput of the drying granulator and the brix of the scrubber fluid during each test.

2.13 The permittee shall conduct performance tests as required in Facility-wide Conditions 2.13.1 through 2.13.3 during the third beet campaign following fulfillment of the provisions of Permit Condition 13.4.

2.13.1 Performance tests shall be conducted on the No. 1 cooling granulator to demonstrate compliance with the emissions limits for PM_{10} in Permit Condition 10.3. The permittee shall monitor and record the throughput of the granulator and the pressure drop across the baghouse during each test.

2.13.2 Performance tests shall be conducted on the process No. 2, specialties, and packaging line sugar handling systems to demonstrate compliance with the emissions limits for PM_{10} in Permit Condition 11.3 and the applicable emissions limit for PM in Permit Conditions 11.4 or 11.5. The permittee shall monitor and record the throughput of the sugar handling system and the pressure drop across the baghouse during each test.

2.13.3 Performance tests shall be conducted on the lime kiln building baghouse during the third year of the permit term to demonstrate compliance with the emissions limit for PM_{10} in Permit Condition 12.3. The permittee shall monitor and record the total throughput of lime rock to the kilns and the pressure drop across the lime kiln building baghouse during each test.

2.14 The permittee shall conduct performance tests as required in Facility-wide Conditions 2.14.1 through 2.14.2 during the first beet campaign following fulfillment of the provisions of Permit Condition 13.8.

2.14.1 Performance tests shall be conducted on the South dryer to demonstrate compliance with the emissions limits for PM_{10} and CO in Permit Condition 5.3. For the PM_{10} performance test, the dryer shall be tested with coal as the exclusive fuel. For the CO performance test, the dryer shall be tested with natural gas as the exclusive fuel. The performance test shall be conducted after the requirements of Permit Condition 13.8 have been satisfied. The permittee shall monitor and record the rate of wet pulp and CGB fed to the dryer, coal feed rate in tons per hour or natural gas-firing rate in MMscf/h, and scrubber differential pressure of the samplers during each test. The permittee shall collect a representative sample of recirculated water from the scrubber during each test. The concentration of TDS in the samples shall be analyzed, recorded, and expressed in milligrams of solids per liter of water.
2.14.2 Performance tests shall be conducted on the South dryer to demonstrate compliance with the emissions limit for PM in Permit Condition 5.4. The tests shall be conducted with coal as the exclusive fuel in the dryer. The performance test shall be conducted after the requirements of Permit Condition 13.8 have been satisfied. The permittee shall monitor and record the tons of wet pulp and CSB fed to the dryer, coal feed rate in tons per hour, and scrubber differential pressure of the scrubbers during each test. The permittee shall collect a representative sample of recirculated water from the scrubber during each test. The concentration of TDS in the sample water shall be analyzed, recorded, and expressed in milligrams of solids per liter of water.
AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho

Date Issued: September 30, 2002
Date Expiration: September 30, 2007

Section 2.16 Monitoring and Recordkeeping Requirements

The permittee shall maintain sufficient recordkeeping to assure compliance with all of the terms and conditions of this operating permit. Records of monitoring information 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 Department representatives upon request.

Section 2.17 Reporting and Certification Requirements

Any reporting required by this permit, including, but not limited to, records, monitoring data, supporting information, request for extension, wetlands studies, wetlands certification, or any other affidavit, shall be submitted to the department in final form after final written approval by the department. The department shall issue an information bulletin, formal order, or notice of approval, if applicable. Any reporting required by this permit shall be submitted to the following:

Air Quality Docket Compliance
Department of Environmental Quality
Boise Regional Office
1446 N. Grandview
Boise, ID 83706-2210
Telephone: (208) 373-0500, Fax: (208) 373-0287

Obligation to Comply

The Tier II operating permit shall not relieve any person or party of the responsibility to comply with all applicable local, state, and federal laws and regulations.

Page 12 of 43
AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-000010

Emitters: The Amalgamated Sugar Co. LLC

Date Issued: September 30, 2002

Location: Nampa, Idaho

Date Engineered: September 05, 2007

3. EMISSIONS UNIT – B&W NO. 1, B&W NO. 2, AND RILEY BOILERS (S-B1, S-B2, S-B3)

3.1 Process Description

The boilers are permitted in this section are fired by powdered coal and coal mixtures and are heated by supply steam for processes at the facility. Table 3.1 contains a description of operating conditions.

<table>
<thead>
<tr>
<th>Boiler</th>
<th>Unit Number</th>
<th>Installation Date</th>
<th>Rated Steam Capacity (Tph)</th>
</tr>
</thead>
<tbody>
<tr>
<td>B&amp;W No. 1 Boiler</td>
<td>S-B1</td>
<td>04/01</td>
<td>400</td>
</tr>
<tr>
<td>B&amp;W No. 2 Boiler</td>
<td>S-B2</td>
<td>04/01</td>
<td>400</td>
</tr>
<tr>
<td>Riley boiler</td>
<td>S-B3</td>
<td>04/01</td>
<td>400</td>
</tr>
</tbody>
</table>

3.2 Control Description

Emissions from the B&W No. 1 and 2 boilers are controlled by a single baghouse (Unit No. A-B1A), manufactured by Western Designation Systems. Emissions from the Riley boiler are controlled by a baghouse (Unit No. A-B2), manufactured by Environment Corp.

3.3 Emissions Limits

Total emissions of PM10 and CO from the B&W No. 1, B&W No. 2, and Riley boilers shall not exceed any corresponding emissions rate limits listed in the following table:

<table>
<thead>
<tr>
<th>Source Description</th>
<th>PM10</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>B&amp;W No. 1 boiler / S-B1</td>
<td>38.1</td>
<td>604.3</td>
</tr>
<tr>
<td>B&amp;W No. 2 boiler / S-B2</td>
<td>38.1</td>
<td>604.3</td>
</tr>
<tr>
<td>Riley boiler / S-B3</td>
<td>38.1</td>
<td>604.3</td>
</tr>
</tbody>
</table>

Table 3.2: EMISSIONS LIMITS FOR COAL/NATURAL GAS BOILERS
AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010

Permittee: The Amalgamated Sugar Co., LLC  Date issued: September 30, 2002
Location: Nampa, Idaho  Date Expires: September 30, 2007

4.4 Gas Flaring Limit

The permittee shall not discharge CH4 to the atmosphere from the BBM burner, BSA burner, or utility boiler in excess of the concentrations shown in Table 3.3. Whence two or more boilers are fired concurrently, the allowable emissions shall be determined by proportioning the gross fuel input and emissions standards for each boiler. The effluent gas volume shall be corrected to the oxygen concentration shown.

<table>
<thead>
<tr>
<th>Fuel Type</th>
<th>Allowable Particulate Emissions (percent)</th>
<th>Percent</th>
<th>Oxygen</th>
</tr>
</thead>
<tbody>
<tr>
<td>Natural gas</td>
<td>0.01%</td>
<td>0.004%</td>
<td></td>
</tr>
<tr>
<td>Coal</td>
<td>0.10%</td>
<td>0.014%</td>
<td>10.0%</td>
</tr>
</tbody>
</table>

Operating Requirements

3.5 Throughout Limits

For each boiler, the maximum allowable coal feeding rate and natural gas-firing rate shall be limited to 120% of the average feed and firing rate attained during the most recent performance test conducted pursuant to Facility-wide Conditions 2.11.1 or 2.11.2, for which Department approval has been granted, which demonstrated compliance with applicable pollutants emissions limit(s), unless such a feed or firing rate would cause emissions to exceed any emissions limit(s) set forth in this permit.

3.6 Coal Limits

The permittee shall not mix coal with a sulfur content greater than 4% by weight.

3.7 Baghouse Operating Requirements

The baghouses shall be operated and maintained at all times during boiler operation. The pressure drop across each of the baghouses shall be maintained within manufacturer or O&M manual specifications.

Monitoring and Recordkeeping Requirements

3.8 Boiler Monitoring Requirements

The permittee shall monitor and record the information listed in Permit Conditions 3.8.1-3.8.8 for each boiler. The records shall be maintained in accordance with Facility-wide Condition 2.18.
3.8.1 The average daily coal feed rate in tons per hour.

3.8.2 The coal feed rate for each consecutive 12-month period in tons per year.

3.8.3 The daily hours of operation with coal.

3.8.4 The heat input rate expressed in millions of British thermal units per hour by correlating the coal feed rate with the coal high-heating value.

3.8.5 The average daily natural gas-firing rate in millions of standard cubic feet per hour.

3.8.6 The natural gas-firing rate for each consecutive 12-month period in millions of standard cubic feet per year.

3.8.7 The daily hours of operation with natural gas.

3.8.8 The fuel type whenever the fuel type is changed. Fuel type in this section means natural gas only, coal only, or the combination of natural gas and coal.

3.9 Bishouse Monitoring Requirements

The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the pressure drop across each of the beghouses. The pressure drop shall be recorded once per week while the boilers are in operation. In the event the measuring device becomes inoperative, it shall be repaired or replaced as soon as practicable. The record shall be maintained in accordance with Facility-wide Condition 2.16.
4. EMISSIONS UNIT – UNION BOILER (S-B4)

4.1 Source Description
The Union boiler is fired exclusively by natural gas and is used to supply steam to processing and facilities. This boiler was installed in 1987 and has a steam capacity of 60,000 lb/hr.

4.2 Control Description
Emissions from the Union boiler are uncontrolled.

4.3 Emissions Limits
Emissions of PM₁₀ and CO from the Union boiler shall not exceed any corresponding emissions rate limits listed in Table 4.1.

Table 4.1: EMISSIONS LIMITS FOR UNION BOILER

<table>
<thead>
<tr>
<th>Source Description / Unit Number</th>
<th>PM₁₀</th>
<th>SO₂</th>
</tr>
</thead>
<tbody>
<tr>
<td>Union boiler / S-B4</td>
<td>1.6</td>
<td>6.8</td>
</tr>
</tbody>
</table>

4.4 Operation Limit
The maximum allowable natural gas-firing rate of the Union boiler shall be limited to 120% of the average firing rate attained during the most recent performance test conducted pursuant to Facility-wide Condition 2.12.1, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emissions limit(s), unless such a firing rate would cause emissions to exceed any emissions limit(s) set forth in this permit.

4.5 Thru Limit
The Union boiler shall be fired exclusively by natural gas.

Page 18 of 43
4.7 Boiler Monitoring Requirements

The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the natural gas-firing rate of the boiler. The daily hours of operation shall be recorded and the average daily firing rate shall be recorded in millions of standard cubic feet per hour. The natural gas-firing rate for each consecutive 12-month period shall be recorded in millions of standard cubic feet per year. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Facility-wide Condition 2.16.
5. EMISSIONS UNIT - PULP DRYERS (S-D1, S-D2, S-D3)

5.1 Process Description

The three direct condenser pulp dryers are used to dry processed wood pulp and SSF for production of unbleached paper. The dryers are preheated on end and neutral gas fired. Table 5.1 contains a description of each dryer.

<table>
<thead>
<tr>
<th>Source</th>
<th>Unit Number</th>
<th>Installation Date</th>
<th>Gross Design Capacity (T/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>South</td>
<td>6-D1</td>
<td>1970</td>
<td>85</td>
</tr>
<tr>
<td>Center</td>
<td>6-D2</td>
<td>1969</td>
<td>83</td>
</tr>
<tr>
<td>North</td>
<td>6-D3</td>
<td>1953</td>
<td>85</td>
</tr>
</tbody>
</table>

Within the first year of this permit term, the Center and North dryers will be replaced by a steam dryer system (refer to Permit Condition 13.5 of the Compliance Schedule in this permit).

5.2 Control Description

Each exhaust stream from the South and Center dryers is collected in two chimneys. The exhaust stream from central dryers are the distilled by a cyclone and a spray settling-type scrubber tower. Emissions from the North dryer are controlled by a scrubber and a spray impingement-type scrubber inlets.

<table>
<thead>
<tr>
<th>Source Description</th>
<th>Emissions Control Device and Unit Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>South pulp dryer/6-D1</td>
<td>Cyclone and spray impingement-type scrubber inlets (16th Avenue, 6404)</td>
</tr>
<tr>
<td>Center pulp dryer/6-D2</td>
<td>Cyclone and spray impingement-type scrubber inlets (16th Avenue, 6404)</td>
</tr>
<tr>
<td>North pulp dryer/6-D3</td>
<td>Cyclone and spray impingement-type scrubber inlets (16th Avenue, 6404)</td>
</tr>
</tbody>
</table>

5.3 Emissions Limits

Upon fulfillment of the requirements of Permit Condition 13.8, emissions of PM10 and CO from the South dryer shall not exceed any corresponding emissions rate limits listed in Table 5.3.

Table 5.3: EMISSIONS LIMITS FOR SOUTH DRYER

<table>
<thead>
<tr>
<th>Source Description / Unit Number</th>
<th>PM10</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>South pulp dryer / 6-D1</td>
<td>18.7</td>
<td>5.0</td>
</tr>
</tbody>
</table>
AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00013

Issuance: The Amalgamated Sugar Co. LLC
Location: Nampa, Idaho
Date Issued: September 30, 2002
Date Expires: September 30, 2009

Section 5.5 Throughout Limits

The maximum allowable throughput, coal feed rate, and natural gas-firing rate of the dryers shall be limited to the average rate attained during the most recent performance test conducted pursuant to Facility-wide Conditions 2.10 or 2.14, for which Department approval has been granted, which demonstrates compliance with applicable pollutant emissions limit(s), unless such rate would cause emissions to exceed any emissions limit(s) set forth in this permit. Throughput of each dryer shall be represented by the sum of the masses of coal, if applicable, wet pulp, and CSB fed to the dryer, and shall in no case exceed 65 tons per hour or either the South or Center dryer, nor 25 tons per hour for the North dryer.

Section 5.6 Coals Limit

The permittee shall not use a coal with a sulfur content greater than 4% by weight.

5.7 Dryers, and Conveyors, Operating Requirements

The dryers and conveyors shall be operated and maintained at temperatures during dryer operation. The temperature differential, pressure and the acceleration shall be monitored within manufacturer's QQM-approved specifications.

5.8 Condenser Water Recirculate

The concentration of TDS in the condenser water shall be maintained within manufacturer's QQM-approved specifications.
Monitoring and Recordkeeping Requirements

5.9 Dryer Monitoring Requirements

The permittee shall monitor and record the information in Permit Conditions 5.9.1-5.9.5 for each dryer. The records shall be maintained in accordance with Facility-wide Condition 2.16.

5.9.1 The average daily coal feed rate in tons per hour.

5.9.2 The coal feed rate for each consecutive 12-month period in tons per year.

5.9.3 The daily hours of operation with coal.

5.9.4 The average daily natural gas-firing rate in millions of standard cubic feet per hour.

5.9.5 The natural gas-firing rate for each consecutive 12-month period in millions of standard cubic feet per year.

5.9.6 The daily hours of operation with natural gas.

5.9.7 The average daily throughput in tons per hour.

5.9.8 The throughput rate for each consecutive 12-month period in tons per year.

5.9.9 The dryer fuel type whenever the fuel type is changed. Fuel type in this section means natural gas only, coal only, or the combination of natural gas and coal.

5.10 Scrubber Monitoring Requirements

The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the scrubber differential pressure of the scrubbers. The scrubber differential pressure shall be recorded once per week while the dryers are in operation. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Facility-wide Condition 2.16.

5.11 Scrubber Water Monitoring Requirements

The permittee shall collect a representative sample of recirculated water from the scrubber biweekly from the start through the end of the campaign. The concentration of TDS in the sample water shall be analyzed and recorded in milligrams of solids per liter of water. The records shall be maintained in accordance with Facility-wide Condition 2.16.
6. EMISSIONS UNIT – PELLET MILLS (S-D4, S-D5, S-D6, S-D7, S-D8)

6.1 Process Description

Pellet mills No. 1, 2, 3, and 4 (Unit Nos. S-D4, S-D5, S-D6, S-D7, and S-D8, respectively) are issued permits to operate until 2020. The pellets are produced by a process involving the mixing of wood chips and glues, followed by the adhesion of the mixture to the pellets. The pellets are then dried and cooled before being packaged and shipped. The pellets are used primarily for fuel.

6.2 Control Description

Emissions from the pellet mills are controlled by the installation of scrubbers and emission controls on the exhaust systems. The pellet mills have installed advanced emission control systems to reduce emissions to below the permit limits. The mills are operated in a manner to minimize emissions.

6.3 Emissions Limits

Upon commencement of operations, the total emissions of PM$_{10}$ from the pellet mills shall not exceed any corresponding emissions rate limits listed in Table 6.1.

<table>
<thead>
<tr>
<th>Source Description / Unit Number</th>
<th>PM$_{10}$ Rate Limit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pellet mill No. 1 / S-D4</td>
<td></td>
</tr>
<tr>
<td>Pellet mill No. 2 / S-D5</td>
<td></td>
</tr>
<tr>
<td>Pellet mill No. 3 / S-D6</td>
<td>0.5</td>
</tr>
<tr>
<td>Pellet mill No. 4 / S-D7</td>
<td>3.1</td>
</tr>
<tr>
<td>Pellet mill No. 5 / S-D8</td>
<td></td>
</tr>
</tbody>
</table>

6.4 Process Uptake Data Limit

The processes should take up PM$_{10}$ from the atmosphere from the pellet mills in excess of the amounts shown in the following equations, where $E$ is the total rate of emissions from the emission points, $M$ is the mass of pellets produced per hour, and $C$ is the process weight of pounds per hour.

- For pellets: $E = 0.04M$ (PM$_{10}$)
- For pellets: $E = 0.04C$ (PM$_{10}$)

Page 21 of 43
6.5 Throughput Limits

The total, combined pellet throughput of the mills shall be limited to the average, total throughput rate attained for the pellet mills during the most recent performance test conducted pursuant to Facility-wide Conditions 2.11.3, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emissions limit(s), unless such a throughput rate would cause emissions to exceed any emissions limit(s) set forth in this permit.

6.6 Baghouse Operating Requirements

Within the first year of the permit term, a baghouse shall be installed on the pellet mills' exhaust stream(s) prior to release to the atmosphere. The baghouse shall be operated and maintained at all times during pellet mill operation. The pressure drop across the baghouse shall be maintained within manufacturer or O&M manual specifications.

6.7 Pellet Mill Monitoring Requirements

The permittee shall monitor and record the information in Permit Conditions 6.7.1 and 6.7.2 for the pellet mills. The records shall be maintained in accordance with Facility-wide Condition 2.15.

6.7.1 The average daily throughput in T/hr;

6.7.2 The throughput for each consecutive 12-month period in T/yr.

6.8 Baghouse Monitoring Requirements

Within the first year of the permit term, the permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the pressure drop across the baghouse. The pressure drop shall be recorded once per week while the pellet mills are in operation. In the event that any measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Facility-wide Condition 2.16.
7. EMISSIONS UNIT - A AND B LIME KILNS (S-K1, S-K2)

7.1 Process Description

The Lime Kilns (Unit No. S-K1 and S-K2, respectively) are used to produce lime, either from a mixture of stone and lime rock or from stone alone. The raw material is heated in a rotating kiln. The lime kiln facility is located in 1942 and has a rated capacity of 1400 tons of lime (as CaO) per day.

7.2 Contact Description

Approximately 10% of the emissions from each kiln are controlled by a baghouse (Unit No. A-WG). Emissions are only directed to the baghouse during kiln loading events. The remaining emissions from the lime kiln pass through two gas scrubber systems (Units No. A-KAS and A-2KAS) before cleaning systems (Units No. A-WAS). The remaining emissions (i.e., between loading events) from the lime kilns pass through the two gas scrubber systems (Units No. A-KAS and A-2KAS) in case. After the gas scrubber systems, any excess SO2 emissions are counted in the atmosphere.

Emission Limits

7.3 Emission Limit

Emissions of PM10 and CO from the lime kilns shall not exceed any corresponding emission rate limits listed in Table 7.1.

Table 7.1: EMISSION LIMITS FOR LIME KILNS

<table>
<thead>
<tr>
<th>Source Description</th>
<th>PM10</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unit Number</td>
<td>Lbf/yr</td>
<td>Tpy</td>
</tr>
<tr>
<td>A lime kiln / S-K1</td>
<td>0.1</td>
<td>0.1</td>
</tr>
<tr>
<td>B lime kiln / S-K2</td>
<td>0.1</td>
<td>0.1</td>
</tr>
</tbody>
</table>

7.4 Process Weight Rate Limit

The emissions shall result from PM10 in the atmosphere from either of the lime kilns. Any excess of the amount shown in the following equation, where E is the total rate of emissions from the specified point on the source, x pounds per hour, and PM10 is the process weight in pounds per hour.

- If PM10 is less than 13,000 lbs/hr,
  \[ E = 0.046 \times (\text{PM}10) \text{lbs/hr} \]
- If PM10 is equal to or greater than 13,000 lbs/hr,
  \[ E = 1.12 \times (\text{PM}10) \text{lbs/hr} \]
Operating Requirements

7.5 Throughput Limits

The maximum allowable lime rock throughput of each kiln shall be limited to 120% of the average throughput rates attained during the most recent performance test conducted pursuant to Facility-wide Condition 2.11.4, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emissions limit(s), unless such a throughput rate would cause emissions to exceed any emissions limit(s) set forth in this permit.

- Baghouse Operating Requirements
  - The baghouse shall be operated and maintained at all times during kiln operation. The pressure drop across the baghouse shall be maintained within manufacturer or 50% removal specifications.

Monitoring and Recordkeeping Requirements

7.7 Lime Kiln Monitoring Requirements

The permittee shall monitor and record the information in Permit Conditions 7.7.1 and 7.7.2 for each lime kiln. The records shall be maintained in accordance with Facility-wide Condition 2.16.

- 7.7.1 The average daily lime rock throughput in tons per hour.
- 7.7.2 The lime rock throughput for each consecutive 12-month period in tons per year.

7.8 Baghouse Monitoring Requirements

The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the pressure drop across the baghouse. The pressure drop shall be recorded once per week when the lime kilns are in operation. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Facility-wide Condition 2.16.
8. EMISSIONS UNIT – PROCESS SLAKERS (S-K4)

8.1 Process Description

The facility operates four lime slakers (A and B) to produce milk of lime from chemical calcium oxide rock feed material. The slakers were manufactured by Oconee Iron Works and are operated on batch systems. The slakers were installed in 1999. The total rated capacity of both systems is 180 tons of calcium oxide rock per day.

8.2 Control Description

Emissions from the slakers are controlled by one spray chamber-type scrubber (Unit No. A-K4).

Emissions Limits

8.3 Emissions Limits

Emissions of PM_{10} from the process slakers shall not exceed any corresponding emissions rate limits listed in Table 8.1.

<table>
<thead>
<tr>
<th>Source Description / Unit Number</th>
<th>PM_{10} rate limits</th>
</tr>
</thead>
<tbody>
<tr>
<td>A and B process slakers / S-K4</td>
<td>1.4 lb/hr, 0.1 lb/hr</td>
</tr>
</tbody>
</table>

8.4 Process Weight Limit

The permit limits calcium oxide rock to the atmosphere from the process slakers at a rate of the amount shown in the following equation, where E is the total rate of emissions from all emissions points from the source in pounds per hour and PM_{10} is the process weight in pounds per hour.

\[ E = \frac{S \times M}{1,000} \]

Where:
- \( S \) is the total rate of emissions from all emissions points from the source in pounds per hour.
- \( M \) is the process weight in pounds per hour.

8.5 Throughput Limits

The maximum allowable calcium oxide rock throughput of each process slaker shall be limited to 120% of the average throughput rates attained during the most recent performance test conducted pursuant to Facility-wide Condition 2.12.2, for which Department approval has been granted, which demonstrated compliance with applicable emissions limit(s), unless such a throughput rate would cause emissions to exceed any emissions limit(s) set forth in this permit.

[Page 26 of 43]
8.6 Scrubber Operation Requirements

The scrubber shall be operated and maintained at all times during slaker operation. The scrubber nozzle header pressure shall be maintained within manufacturer or OSHA manual specifications.

Monitoring and Recordkeeping Requirements

8.7 Process Slaker Monitoring Requirements

The permittee shall monitor and record the information in Permit Conditions 8.7.1 and 8.7.2 for each process slaker. The records shall be maintained in accordance with Facility-wide Condition 2.16.

8.7.1 The average daily calcium oxide rock throughput in tons per hour.

8.7.2 The calcium oxide rock throughput for each consecutive 12-month period in tons per year.

8.8 Scrubber Monitoring Requirements

The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the scrubber nozzle header pressure. The scrubber nozzle header pressure shall be recorded once per week when the process slakers are in operation. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Facility-wide Condition 2.16.
9. EMISSIONS UNIT – DRYING GRANULATOR (S-W1)

9.1 Process Description

The facility operates a drying granulator to dry raw sugar. The drying granulator was manufactured by TABCO and installed in 1950 as a replacement for an existing drying granulator. The rated capacity of the granulator is 60 tons of sugar per hour.

9.2 Control Description

Emissions from the drying granulator are controlled by a dust extraction scrubber (4th New LV-1). The scrubber uses the juice as the fluid containing medium.

9.3 Emissions Limits

Emissions of PM₁₀ from the drying granulator shall not exceed any corresponding emissions rate limits listed in Table 9.1.

<table>
<thead>
<tr>
<th>Source Description / Unit Number</th>
<th>PM₁₀</th>
</tr>
</thead>
<tbody>
<tr>
<td>Drying granulator / S-W1</td>
<td>1.1</td>
</tr>
</tbody>
</table>

9.4 Process Weight Limits

The emissions shall not exceed PM₁₀ limits in Table 9.1. If the dry granulator is operated at a rate in excess of the amount shown in the following equation, the emissions from the dry granulator shall be multiplied by the ratio of the process rate to the emission rate shown in the Table 9.1. In any event, the low limit in Table 9.1 shall be the limit.

\[
\text{PM₁₀} = \text{Emission Rate} \times \text{Process Rate}
\]

9.5 Thoroughput Limits

The maximum allowable throughput of the drying granulator shall be limited to 120% of the average throughput rate attained during the most recent performance test conducted pursuant to Facility-wide Condition 2.123, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emissions limits(s), unless such a throughput rate would cause emissions to exceed any emissions limit(s) set forth in this permit.
9.6 Scrubber Operating Requirements

The scrubber shall be operated and maintained at all times during granulator operation. The 
composition of the scrubber fluid shall be maintained within manufacturer's or OEM

9.7 Drying Granulator Monitoring Requirements

The permittee shall monitor and record the information in Permit Conditions 9.7.1 and 9.7.2 for the 
drying granulator. The records shall be maintained in accordance with Facility-wide Condition 2.16.

9.7.1 The average daily throughput in tons per hour.

9.7.2 The throughput for each consecutive 12-month period in tons per year.

9.8 Scrubber Monitoring Requirements

The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the

\[\text{[Equation]}\]

Page 28 of 43
10. EMISSIONS UNIT—NO. 1 AND NO. 2 COOLING GRANULATORS (S-W2, S-W3)

10.1 Process Description

The facility operates two 1-ton and two 3-ton cooling granulators (Units No. 1, S-W2 and S-W3, respectively) to cool hot sugar from the drying process. The No. 1 cooling granulator was manufactured by Great Western Sugar Co. and was installed in 1994. The No. 3 cooling granulator was manufactured by Great Western Sugar Co. and was installed in 1994. The Tier II operating permit application, the rated capacity of each granulator is 4.6 tons of sugar per hour.

10.2 Control Description

Emissions from the No. 1 and 2 cooling granulators are controlled by one of two baghouse (Units No. 1, S-W2 and No. 3, S-W3, respectively). Both baghouses were manufactured by MBB, Inc.

10.3 Emissions Limits

Emissions of PM10 from the cooling granulators shall not exceed any corresponding emissions rate limits listed in Table 10.1.

Table 10.1: EMISSIONS LIMITS FOR COOLING GRANULATORS

<table>
<thead>
<tr>
<th>Source Description / Unit Number</th>
<th>PM10 (lb/hr)</th>
</tr>
</thead>
<tbody>
<tr>
<td>No. 1 cooling granulator / S-W2</td>
<td>0.3</td>
</tr>
<tr>
<td>No. 2 cooling granulator / S-W3</td>
<td>0.3</td>
</tr>
</tbody>
</table>

10.4 Process Weight Rate Limit for Cooling Granulators

The emissions shall not equal PM10 to the atmosphere from No. 1 cooling granulator in excess of the amounts shown in the following equation, where E is the total rate of emissions from all sources, E=PM10, P is the process weight in pounds per hour:

\[ E = \frac{PM10}{W} = \frac{P}{W} \]

where PM10 is the process weight in pounds per hour.

10.5 Process Weight Rate Limit for Cooling No. 3

The emissions shall not equal PM10 to the atmosphere from No. 3 cooling granulator in excess of the amounts shown in the following equation, where E is the total rate of emissions from all sources, E=PM10, P is the process weight in pounds per hour:

\[ E = \frac{PM10}{W} = \frac{P}{W} \]
Operating Requirements

10.8 Throughput Limits

The maximum allowable throughput of each cooling granulator shall be limited to 120% of the average throughput rate attained during the most recent performance test conducted pursuant to Facility-wide Condition 2.13.1, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emissions limit(s), unless such throughput rates would cause emissions to exceed any emissions limit(s) set forth in this permit. The most recent Department-approved performance test conducted on the No. 1 cooling granulator shall be utilized to establish throughput limits for the No. 2 cooling granulator.

10.9 Baghouse Operating Requirements

The baghouses shall be operated and maintained at all times during granulator operation. The pressure drop across the baghouses shall be maintained within manufacturer or OEM manual specifications.

Monitoring and Recordkeeping Requirements

10.8 Cooling Granulator Monitoring Requirements

The permittee shall monitor and record the information in Permit Conditions 10.8.1 and 10.8.2 for each cooling granulator. The records shall be maintained in accordance with Facility-wide Condition 2.18.

10.8.1 The average daily throughput in tons per hour.

10.8.2 The throughput for each consecutive 12-month period in tons per year.

10.9 Baghouse Monitoring Requirements

The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the pressure drop across each of the baghouses. The pressure drops shall be recorded once per week while the cooling granulators are in operation. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Facility-wide Condition 2.18.
11. EMISSIONS UNIT – PROCESS NO. 2, SPECIALTIES, AND PACKAGING-LINE SUGAR HANDLING SYSTEMS (S-W4, S-W6, S-W7)

11.1 Process Description

The emission regulations in this section of the permit are limited to three sugar handling systems. The unit numbers and installation dates of each handling unit are presented in Table 11.1.

<table>
<thead>
<tr>
<th>Source</th>
<th>Unit Number</th>
<th>Installation Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Process No. 2 system</td>
<td>S-W4</td>
<td>2000</td>
</tr>
<tr>
<td>Specialties system</td>
<td>S-W6</td>
<td>1998</td>
</tr>
<tr>
<td>Packaging-line system</td>
<td>S-W7</td>
<td>1999</td>
</tr>
</tbody>
</table>

The process No. 2 sugar handling system consists of the elevator, grinder, roller, roaster, screen, refiner, bagging stations, and conveyors. The specialties sugar handling system consists of packaging and loading machines. The packaging-line sugar handling system consists of conveyer, bagging, and loading systems.

11.2 Control Description

Emissions from the process No. 2, specialties, and packaging-line sugar handling systems are controlled by one or more of the following processes (unit No. 2, S-W4, S-W6, S-W7, respectively):

**Emissions Limit**

Emissions of PM₁₀ from the sugar handling systems shall not exceed any corresponding emissions rate limits listed in Table 11.2.

<table>
<thead>
<tr>
<th>Source Description</th>
<th>PM₁₀</th>
<th>Yr</th>
</tr>
</thead>
<tbody>
<tr>
<td>Process No. 2 system / S-W4</td>
<td>0.3</td>
<td>1.2</td>
</tr>
<tr>
<td>Specialties system / S-W6</td>
<td>0.1</td>
<td>0.8</td>
</tr>
<tr>
<td>Packaging-line system / S-W7</td>
<td>0.2</td>
<td>0.8</td>
</tr>
</tbody>
</table>
AIR QUALITY TIER II OPERATING PERMIT NUMBER: 027-00010
Permittee: The Amalgamated Sugar Co., LLC Date issued: September 30, 2002
Location: Nampa, Idaho Date Expires: September 30, 2007

11.4 Process Weight Limit for Non-Sugar and Sweetener Lines

The permittee shall not emit PPM to the atmosphere from the No. 6 process or specialties line in excess of the amounts shown in the following equations, where C is the total rate of emissions from all emissions points from the source in pounds per hour and DM is the process weight in pounds per hour:

\[ \frac{C}{DM} \leq 0.006 \text{ pounds/ton} \]

\[ \frac{C}{DM} \leq 0.003 \text{ pounds/ton} \]

11.5 Process Weight Limit for Dehulling Lines

The permittee shall not emit PPM to the atmosphere from the dehulling line in excess of the amounts shown in the following equations, where C is the total rate of emissions from all emissions points from the source in pounds per hour and DM is the process weight in pounds per hour:

\[ \frac{C}{DM} \leq 0.015 \text{ pounds/ton} \]

\[ \frac{C}{DM} \leq 0.006 \text{ pounds/ton} \]

Operating Requirements

11.5 Throughput Limits

The maximum allowable throughput of each sugar handling system shall be limited to 120% of the average throughput rate attained during the most recent performance test conducted pursuant to Facility-wide Condition 2.13.2, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emissions limit(s), unless such throughput rates would exceed any emissions limit(s) set forth in this permit.

The Security, Operation Requirements

The equipment shall be operated and maintained at all times during the operation of the No. 6 process line, specialties line, or packaging line. The process depressurization equipment shall be maintained within manufacturer's or OSHA matrix specifications.
Monitoring and Recordkeeping Requirements

11.8 Sugar Handling System Monitoring Requirements

The permittee shall monitor and record the information in Permit Conditions 11.8.1 and 11.8.2 for each sugar handling system. The records shall be maintained in accordance with Facility-wide Condition 2.16.

11.8.1 The average daily throughput in tons per hour.

11.8.2 The throughput for each consecutive 12-month period in tons per year.

11.9 Baghouse Monitoring Requirements

The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the pressure drop across each of the baghouses. The pressure drops shall be recorded once per week while the sugar handling systems are in operation. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Facility-wide Condition 2.16.
12. EMISSIONS UNIT – LIME KILN BUILDING (S-K3)

12.1 Process Description

Emissions from the exhaust of the lime kiln building (Unit No. S-K3) are created by the crushing and mixing, limestone, and cement at the lime kiln building. Emissions from the lime kiln building are controlled by the process control-systems in the building, which control the lime production. The total operating permit application, the maximum throughput is 914 tons of lime per day.

12.2 Control Description

Emissions from the lime kiln building are controlled by one Mist Free system (Unit No. S-K3).

12.3 Emissions Limits

Emissions of PM₁₀ from the lime kiln building shall not exceed any corresponding emissions rate limits listed in Table 12.1.

<table>
<thead>
<tr>
<th>Source Description / Unit Number</th>
<th>PM₁₀</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lime kiln building / S-K3</td>
<td>0.8</td>
</tr>
</tbody>
</table>

12.4 Process Weight Rate Limit

The emissions shall not result in the atmosphere from the lime kiln building in excess of the amounts shown in the following equations, where E is the total rate of emissions from all emissions points from the source in pounds per hour and DM is the process weight in pounds per hour.

- If DM is less than 17,000 lb/hr,
  \[ E = 0.005 \times DM \]  \[ (\text{in lb/hr}) \]
- If DM is equal to or greater than 17,000 lb/hr,
  \[ E = 1.14 \times \sqrt{DM} \]  \[ (\text{in lb/hr}) \]

Page 34 of 43
Operating Requirements

12.5 Throughput Limits

The maximum allowable throughput of lime rock to the kilns shall be limited to 120% of the average throughput rates attained during the most recent performance test conducted pursuant to Facility-wide Condition 2.13.3, for which Department approval has been granted, which demonstrated compliance with applicable pollutant emissions limit(s), unless such throughput rates would cause emissions to exceed any emissions limit(s) set forth in this permit.

16.0 Rockhouse Operating Requirements

The lime kiln building baghouse shall be operated and maintained as necessary during operation of the crusher or any coke, lime rock, and calcium oxide-handling processes within the lime kiln building. The pressure drop across the lime kiln building baghouse shall be maintained within manufacturer's O&M requirements.

Monitoring and Recordkeeping Requirements

12.7 Lime Kiln Building Throughput Monitoring Requirements

The permittee shall monitor and record the information in Permit Conditions 12.7.1 and 12.7.2 for the lime kiln building. The records shall be maintained in accordance with Facility-wide Condition 2.16.

12.7.1 The average daily throughput of lime rock to the kilns in tons per hour.

12.7.2 The throughput of lime rock to the kilns for each consecutive 12-month period in tons per year.

12.8 Rockhouse Monitoring Requirements

The permittee shall install, operate, calibrate, and maintain measuring device(s) to continuously monitor the pressure drop across the lime kiln building baghouse. The pressure drop shall be recorded once per week while the crusher and/or any coke, lime rock, or calcium oxide-handling processes are in operation. In the event the measuring device becomes inoperable, it shall be repaired or replaced as soon as practicable. The records shall be maintained in accordance with Facility-wide Condition 2.16.
13. COMPLIANCE SCHEDULE

To ensure compliance with applicable requirements in the Rules for the Control of Air Pollution in Idaho, IDAPA 58.01.01.001 et. seq., the permittee shall implement the compliance schedule presented in Table 13.1. Permit Conditions 13.3-13.9 are necessary to ensure that emissions from the facility do not cause or significantly contribute to a violation of the NAAQS. Any changes in the equipment, control technology, or timeframes specified in this compliance schedule must be approved by the Department.

### Table 13.1: COMPLIANCE SCHEDULE

<table>
<thead>
<tr>
<th>Permit Conditions</th>
<th>Milestone</th>
<th>Deadline</th>
<th>Documentation/Reporting</th>
</tr>
</thead>
<tbody>
<tr>
<td>13.4</td>
<td>Installation and operation of pellet mill cyclone hoppers</td>
<td>One year after issuance of Tier II operating permit</td>
<td>Permit Conditions 6.7 and 8.4, Facility-wide Condition 2.11.1-2.11.3, Department notification</td>
</tr>
<tr>
<td>46.6</td>
<td>Install transformer-encapsulated mill-heaters</td>
<td>Two years after issuance of Tier II operating permit</td>
<td>Submit PM10 application for steam dryer, Department notification</td>
</tr>
<tr>
<td>13.7</td>
<td>Order and fabricate steam dryer</td>
<td>Four years after issuance of Tier II operating permit</td>
<td>Department notification</td>
</tr>
<tr>
<td>13.8</td>
<td>Installation and operation of steam dryer system</td>
<td>Five years after issuance of Tier II operating permit</td>
<td>Department notification, Facility-wide Condition 2.14, Tier II operating permit application</td>
</tr>
</tbody>
</table>

13.2. Upon issuance of the Tier II operating permit, emissions of PM₁₀ and CO from the South, Center, and North dryers and the No. 1, 2, 3, 4, and 5 pellet mills shall not exceed any corresponding emissions rate limits listed in the following table:

### Table 13.2: EMISSIONS LIMITS FOR DRYERS AND PELLET MILLS

<table>
<thead>
<tr>
<th>Source Description / Unit Number</th>
<th>PM₁₀</th>
<th>CO</th>
</tr>
</thead>
<tbody>
<tr>
<td>South pulp dryer / S-D1</td>
<td>184.0</td>
<td>184.0</td>
</tr>
<tr>
<td>Center pulp dryer / S-C2</td>
<td>184.0</td>
<td>184.0</td>
</tr>
<tr>
<td>North pulp dryer / S-D3</td>
<td>124.4</td>
<td>124.4</td>
</tr>
<tr>
<td>Pellet mill No. 1 / S-D4</td>
<td>7.8</td>
<td>7.8</td>
</tr>
<tr>
<td>Pellet mill No. 2 / S-D6</td>
<td>11.8</td>
<td>11.8</td>
</tr>
<tr>
<td>Pellet mill No. 3 / S-26</td>
<td>11.8</td>
<td>11.8</td>
</tr>
<tr>
<td>Pellet mill No. 4 / S-27</td>
<td>11.8</td>
<td>11.8</td>
</tr>
<tr>
<td>Pellet mill No. 5 / S-D8</td>
<td>7.8</td>
<td>7.8</td>
</tr>
</tbody>
</table>
13.2.1 Upon completion of Permit Condition 13.4.1, emissions of PM₁₀ from the pug mill shall comply with Permit Condition 6.3. Upon completion of Permit Conditions 13.8.1 and 13.8.2, emissions of PM₁₀ and SO₂ from the South dryer shall comply with Permit Condition 5.5.

13.2.2 Within 90 days of the issuance of the Tier II operating permit, TASCO shall comply with the following permit conditions:

13.2.3 When the requirements of Permit Condition 13.3.1 have been fulfilled, the permittee shall notify the Department in writing. The permittee shall notify the Department in writing of any delay or failure to meet the requirements of Permit Condition 13.3.1 expeditiously or reasonably possible.

13.2.4 Within one year of the issuance of the Tier II operating permit, TASCO shall comply with the following permit conditions:

13.4.1 The provisions of Permit Conditions 6.6 and 6.8 shall be fully implemented.

13.4.2 All flue gases from the Riley boiler shall be exhausted to the atmosphere through the B&W boiler stack (Unit No. P-B12) after passing through the existing baghouse (Unit No. A-B3).

13.4.3 When the requirements of Permit Conditions 13.4.1 and 13.4.2 have been fulfilled, the permittee shall notify the Department in writing. The notification provided with respect to Permit Condition 13.4.1 shall include all relevant technical specifications and data from the baghouse manufacturer. The notification provided with respect to Permit Condition 13.4.2 shall include a schematic diagram of the final exhaust system routing for the B&W No. 1, B&W No. 2, and Riley boilers. The permittee shall notify the Department in writing of any delay or failure to meet the requirements of Permit Condition 13.4 as expeditiously as reasonably possible.

14.6 Within two years of the issuance of the Tier II operating permit, TASCO shall comply with the following permit conditions:

15.5.2 Upon receipt of a PFG or exemption determination for the PFG application required by Permit Condition 15.5.1, the permittee shall install the new cooling system required for operation of the steam dryer system.
13.5.3 When the requirements of Permit Condition 13.5.2 have been fulfilled, the permits shall notify the Department in writing. The permits shall notify the Department in writing of any delay or failure to meet the requirements of Permit Condition 13.5.2 as expeditiously as reasonably possible.

13.5.4 Within three years of the issuance of the Tier II operating permit, TASCO shall comply with the following permit conditions:

13.6.1 Upon Department issuance of a PTG or exemption determination for the PTG application required by Permit Condition 13.6.1, the permits shall install the transformer evaporator and mill heaters required for operation of the steam dryer system.

13.6.2 When the requirements of Permit Condition 13.6.1 have been fulfilled, the permits shall notify the Department in writing. The permits shall notify the Department in writing of any delay or failure to meet the requirements of Permit Condition 13.6.2 as expeditiously as reasonably possible.

13.7 Within four years of the issuance of the Tier II operating permit, TASCO shall comply with the following permit conditions:

13.7.1 Upon Department issuance of a PTG or exemption determination for the PTG application required by Permit Condition 13.5.1, the permits shall order and fabricate the steam dryer system.

13.7.2 When the requirements of Permit Condition 13.7.1 have been fulfilled, the permits shall notify the Department in writing. The permits shall notify the Department in writing of any delay or failure to meet the requirements of Permit Condition 13.7 as expeditiously as reasonably possible.

13.8 Within five years of the issuance of the Tier II operating permit, TASCO shall comply with the following permit conditions:

13.8.1 Upon Department issuance of a PTG or exemption determination for the PTG application required by Permit Condition 13.5.1, the permits shall install and operate the steam dryer system.

13.8.2 The Center and North dryers shall permanently cease operation at the TASCO facility located in Nampa, Idaho.

13.8.3 When the requirements of Permit Conditions 13.8.1 and 13.8.2 have been fulfilled, the permits shall notify the Department in writing. The permits shall notify the Department in writing of any delay or failure to meet the requirements of Permit Conditions 13.8 as expeditiously as reasonably possible.

13.9 The permits shall submit a Facility-wide Tier II operating permit application within 60 days of fulfilling the requirements of Permit Condition 13.8. The permit application shall include the minimum, updated process description, including all changes implemented in accordance with Permit Conditions 13.2-13.5, updated information obtained by the performance testing requirements of the Tier II operating permit, and an updated facility-wide modeling analysis of air pollutants. Thirty days prior to submission of the modeling analysis for the Tier II operating permit application, the permits shall submit a modeling protocol for Department approval.
13.10 In the event that this Tier II operating permit should expire before the Department issues a renewed Tier II operating permit or before the requirements of Permit Conditions 13.3-13.7 are met by the permittee, TASCO shall continue to comply with all the requirements contained in this Tier II operating permit until such time as the Department issues an updated Tier II operating permit for the facility.

13.11 Until such time that all of the compliance schedule permit conditions are completed, TASCO shall submit a progress report each calendar quarter to the Department stating when each of the milestones and compliance with each condition in the compliance schedule were or will be achieved, and an explanation of why any dates were not or will not be met and a detailed description of any preventative or corrective measures undertaken by the permittee.
<table>
<thead>
<tr>
<th>Plant</th>
<th>Annual Allowable Emissions: Tons per Year</th>
</tr>
</thead>
<tbody>
<tr>
<td>BW1</td>
<td>500</td>
</tr>
<tr>
<td>BW2</td>
<td>500</td>
</tr>
<tr>
<td>BW3</td>
<td>500</td>
</tr>
<tr>
<td>BW4</td>
<td>500</td>
</tr>
<tr>
<td>BW5</td>
<td>500</td>
</tr>
<tr>
<td>BW6</td>
<td>500</td>
</tr>
<tr>
<td>BW7</td>
<td>500</td>
</tr>
<tr>
<td>BW8</td>
<td>500</td>
</tr>
</tbody>
</table>

Table 14.4.1 includes emissions limits for which the facility must demonstrate compliance.

*Note: Emissions limits are determined by the Department of Environmental Protection based on permit conditions.*
16. OTHER SOURCES

Table 16.1 below identifies other air pollution-emitting sources (included in the Tier II application and Northern Ada County DMEM SIP Plan Emissions Inventory) at the facility that do not require specific permit conditions to demonstrate compliance with applicable air quality standards.

<table>
<thead>
<tr>
<th>Source Description</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main mill / S-01</td>
<td></td>
</tr>
<tr>
<td>A-side sulfur stove / S-02</td>
<td></td>
</tr>
<tr>
<td>B-side sulfur stove / S-03</td>
<td></td>
</tr>
<tr>
<td>Fugitive (coal unloading, pulp and paper loading, rewg, ash bin storage, bulk handling, vehicle traffic on improved roads, lime rock handling, cooling/condensing) / F-09 and F-016, F-010, F-015c, F-012b, F-020c, F-017, F-08, F-09, F-016</td>
<td></td>
</tr>
</tbody>
</table>
No text available from the image.