



Montana Department of
ENVIRONMENTAL QUALITY

Brian Schweitzer, Governor

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July 27, 2011

Steven Sing
East Holly Street
35140 County Road 125
Sidney, MT 59270

RE: Final Title V Operating Permit #OP1826-08

Dear Mr. Sing:

The Department of Environmental Quality has prepared the enclosed Final Operating Permit #OP1826-08, for Sidney Sugars Incorporated, located in Sidney, Montana. Please review the cover page of the attached permit for information pertaining to the action taking place on Permit #OP1826-08.

If you have any questions, please contact Whitney Walsh, the permit writer, at (406) 782-2689 ext. 208 or by email at WWalsh2@mt.gov.

Sincerely,

Vickie Walsh
Air Permitting Program Supervisor
Air Resources Management Bureau
(406) 444-9741

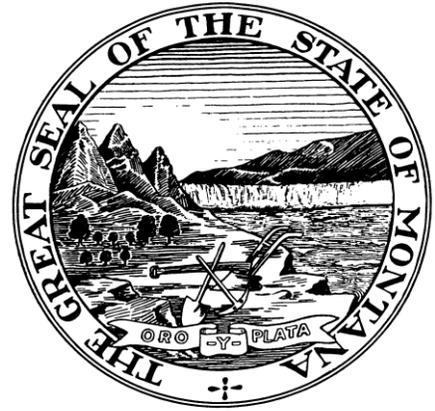
Whitney Walsh
Environmental Engineer Intern
Air Resources Management Bureau
(406) 782-2689 ext. 208

VW:WW

Enclosure

cc: Christopher Ajayi, US EPA Region VIII 8P-AR
Carson Coate, US EPA Region VIII, Montana Office

STATE OF MONTANA
Department of Environmental Quality
Helena, Montana 59620



AIR QUALITY OPERATING PERMIT OP1826-08

Issued to: **Sidney Sugars Incorporated**
East Holly Street
35140 County Road 125
Sidney, MT 59270

Final Date: **July 27, 2011**
Expiration Date: **April 11, 2011**

Effective Date: **July 27, 2011**
Date of Decision: **June 24, 2011**

Application Deemed Technically Complete: **May 27, 2011**
Application Deemed Administratively Complete: **May 27, 2011**
Insignificant Modification Application Received: **May 27, 2011**
AFS Number: **030-083-0022A**

Permit Issuance and Appeal Processes: In accordance with Montana Code Annotated (MCA) Sections 75-2-217 and 218 and the Administrative Rules of Montana (ARM), ARM Title 17, Chapter 8, Subchapter 12, Operating Permit Program, this operating permit is hereby issued by the Department of Environmental Quality (Department) as effective and final on July 27, 2011. This permit must be kept on-site at the above named facility.

**Montana Air Quality Operating Permit
Department of Environmental Quality**

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Terms not otherwise defined in this permit or in the Definitions and Abbreviations Appendix of this permit have the meaning assigned to them in the referenced regulations.

SECTION I. GENERAL INFORMATION

The following general information is provided pursuant to ARM 17.8.1210(1).

Company Name: **Sidney Sugars Incorporated**

Mailing Address: **RR1, Box 3011**

City: **Sidney**

State: **MT**

Zip: **59270**

Plant Location: **NW ¼, NW ¼, Section 34, Township 23 North, Range 59 East, Richland County, Montana**

Responsible Official: **Steve Sing**

Phone: **(406) 433-3303**

Facility Contact Person: **Steve Sing**

Phone: **(406) 433-3303**

Primary SIC Code: **2063**

Nature of Business: **Sugar Beet processing/sugar production**

Description of Process: Sugar beets are trucked to the plant, screened for dirt and rock, and either fed into the plant or moved to storage. Additional dirt is removed in a washing process. The beets enter the plant and are sliced into long thin strips, referred to as cosettes. The cosettes are run into a diffuser where the beet sugar is removed with water and heat. The juice is then purified, followed by evaporation of a portion of the entrainment liquid, and finally crystallized. The remaining liquid (molasses) is removed in a centrifuge. Crystallized sugar is then sized, packaged and shipped, and the molasses is sold primarily as a feed supplement or combined with the pulp in a pelletizing process, and sold as livestock feed. Approximately 80% of the final product (sugar) is shipped by rail with the remaining shipped by truck.

SECTION II. SUMMARY OF EMISSION UNITS

The emission units regulated by this permit are the following [ARM 17.8.1211]:

Emission Unit ID	Description	Pollution Control Device/Practice
EU001	#1 combustion engineering (CE) lignite coal-fired boiler	Anderson 2000 Inc. Venturi scrubber and separator
EU002	#2 combustion engineering (CE) lignite coal-fired boiler	Anderson 2000 Inc. Venturi scrubber and separator
EU003	100,000 lb of steam/hr Union Pacific natural gas/fuel oil-fired boiler #3	None
EU005	60,000 lb of steam/hr Union Pacific natural gas/fuel oil-fired boiler #4	None
EU007	Superior Mohawk natural gas-fired boiler	None
EU022	Coal Handling and Storage - Coal Belt Feeders (2) - Coal Screw Conveyors (4) - Crusher - Coal Elevator - Coal Bunker	Pulse jet bag house
EU024A&B	#1 Stearns-Roger Pulp Dryer 95 MMBtu/hr	Cyclones
EU025A&B	#2 Stearns-Roger Pulp Dryer 95 MMBtu/hr	Cyclones
EU026A&B	Dry Pulp Handling Screw Conveyors (18)	Dry Cyclone Separator
EU030	Pellet Mills and Cooler - Pellet Mills (4) - Pellet Cooler	Cyclone
EU031	Pellet Tank Exhaust Fan - Mechanical Conveyors (3) - Oscillating Pellet Screen - Pneumatic Conveyors (2) - Pellet Tank	None
EU043A	Slaker Building Vent - Pebble Lime Hopper - Lime Kiln Pan Feeder	Baghouse
EU020	Granulators	Wet Scrubber
EU027	Weibul Conditioner System	Fabric Filter
EU028	Reclaiming sugar from silos and packaging (Hoffman Vent)	Cyclone and Bag Filter
EU047-056	Sugar Silos (#7- #16)	Filter Vents
EU101	Beet Unloading and Handling - Wet Flume Hopper (2) Beet Pilers (on site)	None
EU102	Coal Unloading Truck Hoppers (2)	None
EU103	Coke Unloading and Handling Railcar Unloader (belt conveyor) Bucket Elevator Coke Vibrating Feeder	None
EU104	Lime Unloading and Handling Railcar Unloader (belt conveyor) Limerock Reciprocating Feeder Limerock Covered Belt Conveyor Limerock Scalping Screen Limerock Vibrating Feeder Belt Conveyors (2)	None
EU500	Haul Roads	Water

SECTION III PERMIT CONDITIONS

The following requirements and conditions are applicable to the facility or to specific emission units located at the facility [ARM 17.8.1211,1212, and 1213].

A. Facility-Wide

Conditions	Rule Citation	Rule Description	Pollutant/Parameter	Limit
A.1	ARM 17.8.105	Testing Requirements	Testing Requirements	-----
A.2	ARM 17.8.304(1)	Visible Air Contaminants	Opacity	40%
A.3	ARM 17.8.304(2)	Visible Air Contaminants	Opacity	20%
A.4	ARM 17.8.308(1)	Particulate Matter, Airborne	Fugitive Opacity	20%
A.5	ARM 17.8.308(2)	Particulate Matter, Airborne	Reasonable Precautions	-----
A.6	ARM 17.8.308	Particulate Matter, Airborne	Reasonable Precaution, Construction	20%
A.7	ARM 17.8.309	Particulate Matter, Fuel Burning Equipment	Particulate Matter	$E = 0.882 * H^{-0.1664}$ Or $E = 1.026 * H^{-0.233}$
A.8	ARM 17.8.310	Particulate Matter, Industrial Processes	Particulate Matter	$E = 4.10 * P^{0.67}$ or $E = 55 * P^{0.11} - 40$
A.9	ARM 17.8.322(4)	Sulfur Oxide Emissions, Sulfur in Fuel	Sulfur in Fuel (liquid or solid fuels)	1 lb/MMBtu fired
A.10	ARM 17.8.322(5)	Sulfur Oxide Emissions, Sulfur in Fuel	Sulfur in Fuel (gaseous)	50 gr/100 CF
A.11	ARM 17.8.324(3)	Hydrocarbon Emissions, Petroleum Products	Gasoline Storage Tanks	-----
A.12	ARM 17.8.324	Hydrocarbon Emissions, Petroleum Products	65,000 Gallon Capacity	-----
A.13	ARM 17.8.324	Hydrocarbon Emissions, Petroleum Products	Oil-effluent Water Separator	-----
A.14	ARM 17.8.342	NESHAPs General Provisions	SSM Plans	Submittal
A.15	ARM 17.8.1212	Reporting Requirements	Compliance Monitoring	-----
A.16	ARM 17.8.1207	Reporting Requirements	Annual Certification	-----
A.17	ARM 17-4-336	Asbestos Abatement	Asbestos	-----

Conditions

- A.1. Pursuant to ARM 17.8.105, any person or persons responsible for the emission of any air contaminant into the outdoor atmosphere shall, upon written request of the Department, provide the facilities and necessary equipment (including instruments and sensing devices) and shall conduct test, emission or ambient, for such periods of time as may be necessary using methods approved by the Department.

Compliance demonstration frequencies that list “as required by the Department” refer to ARM 17.8.105. In addition, for such sources, compliance with limits and conditions listing “as required by the Department” as the frequency, is verified annually using emission factors and engineering calculations by the Department’s compliance inspectors during the annual emission inventory review; in the case of Method 9 tests, compliance is monitored during the annual inspection by the compliance inspector.

- A.2. Pursuant to ARM 17.8.304(1), Sidney Sugars shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed on or before November 23, 1968, that exhibit an opacity of 40% or greater averaged over six consecutive minutes unless otherwise specified by rule or in this permit.
- A.3. Pursuant to ARM 17.8.304(2), Sidney Sugars shall not cause or authorize emissions to be discharged into the outdoor atmosphere from any source installed after November 23, 1968, that exhibit an opacity of 20% or greater averaged over six consecutive minutes unless otherwise specified by rule or in this permit.
- A.4. Pursuant to ARM 17.8.308(1), Sidney Sugars shall not cause or authorize the production, handling, transportation, or storage of any material unless reasonable precautions to control emissions of particulate matter are taken. Such emissions of airborne particulate matter from any stationary source shall not exhibit an opacity of 20% or greater averaged over six consecutive minutes unless otherwise specified by rule or in this permit.
- A.5. Pursuant to ARM 17.8.308(2), Sidney Sugars shall not cause or authorize the use of any street, road or parking lot without taking reasonable precautions to control emissions of airborne particulate matter, unless otherwise specified by rule or in this permit.
- A.6. Pursuant to ARM 17.8.308, Sidney Sugars shall not operate a construction site or demolition project unless reasonable precautions are taken to control emissions of airborne particulate matter. Such emissions of airborne particulate matter from any stationary source shall not exhibit an opacity of 20% or greater averaged over six consecutive minutes, unless otherwise specified by rule or in this permit.
- A.7. Pursuant to ARM 17.8.309, unless otherwise specified by rule or in this permit, Sidney Sugars shall not cause or authorize particulate matter caused by the combustion of fuel to be discharged from any stack or chimney into the outdoor atmosphere in excess of the maximum allowable emissions of particulate matter for existing fuel burning equipment and new fuel burning equipment calculated using the following equations:
- For existing fuel burning equipment (installed before November 23, 1968): $E = 0.882 * H^{-0.1664}$
- For new fuel burning equipment (installed on or after November 23, 1968): $E = 1.026 * H^{-0.233}$
- Where H is the heat input capacity in million BTU (MMBtu) per hour and E is the maximum allowable particulate emission rate in pounds per MMBtu.
- A.8. Pursuant to ARM 17.8.310, unless otherwise specified by rule or in this permit, Sidney Sugars shall not cause or authorize particulate matter to be discharged from any operation, process, or activity into the outdoor atmosphere in excess of the maximum hourly allowable emissions of particulate matter calculated using the following equations:
- For process weight rates up to 30 tons per hour: $E = 4.10 * P^{0.67}$
- For process weight rates in excess of 30 tons per hour: $E = 55.0 * P^{0.11} - 40$
- Where E is the rate of emissions in pounds per hour and P is the process weight rate in tons per hour.
- A.9. Pursuant to ARM 17.8.322(4), Sidney Sugars shall not burn liquid or solid fuels containing sulfur in excess of 1 pound per million BTU fired, unless otherwise specified by rule or in this permit.
- A.10. Pursuant to ARM 17.8.322(5), Sidney Sugars shall not burn any gaseous fuel containing sulfur compounds in excess of 50 grains per 100 cubic feet of gaseous fuel, calculated as hydrogen sulfide at standard conditions, unless otherwise specified by rule or in this permit.

- A.11. Pursuant to ARM 17.8.324(3), Sidney Sugars shall not load or permit the loading of gasoline into any stationary tank with a capacity of 250 gallons or more from any tank truck or trailer, except through a permanent submerged fill pipe, unless such tank is equipped with a vapor loss control device or is a pressure tank as described in ARM 17.8.324(1), unless otherwise specified by rule or in this permit.
- A.12. Pursuant to ARM 17.8.324, unless otherwise specified by rule or in this permit, Sidney Sugars shall not place, store, or hold in any stationary tank, reservoir, or other container of more than 65,000-gallon capacity, any crude oil, gasoline or petroleum distillate having a vapor pressure of 2.5 pounds per square inch absolute or greater under actual storage conditions, unless such tank, reservoir, or other container is a pressure tank maintaining working pressure sufficient at all times to prevent hydrocarbon vapor or gas loss to the atmosphere, or is designed and equipped with a vapor loss control device, properly installed, in good working order and in operation.
- A.13. Pursuant to ARM 17.8.324, unless otherwise specified by rule or in this permit, Sidney Sugars shall not use any compartment of any single or multiple-compartment oil-effluent water separator, which compartment receives effluent water containing 200 gallons a day or more of any petroleum product from any equipment processing, refining, treating, storing or handling kerosene or other petroleum product of equal or greater volatility than kerosene, unless such compartment is equipped with a vapor loss control device, constructed so as to prevent emission of hydrocarbon vapors to the atmosphere, properly installed, in good working order and in operation.
- A.14. Pursuant to ARM 17.8.342 and 40 CFR 63.6, Sidney Sugars shall submit to the Department a copy of any startup, shutdown, and malfunction (SSM) plan required under 40 CFR 63.6(e)(3) within 30 days of the effective date of this operating permit (if not previously submitted), within 30 days of the compliance date of any new National Emission Standard for Hazardous Air Pollutants (NESHAPs) or Maximum Achievable Control Technology (MACT) standard, and within 30 days of the revision of any such SSM plan, when applicable. The Department requests submittal of such plans in electronic form, when possible.
- A.15. On or before February 15 and August 15 of each year, Sidney Sugars shall submit to the Department the compliance monitoring reports required by Section V.D. These reports must contain all information required by Section V.D, as well as the information required by each individual emissions unit. For the reports due by February 15 of each year, Sidney Sugars may submit a single report, provided that it contains all the information required by Section V.B & V.D. Per ARM 17.8.1207,

any application form, report, or compliance certification submitted pursuant to ARM Title 17, Chapter 8, Subchapter 12 (including semiannual monitoring reports), shall contain certification by a responsible official of truth, accuracy and completeness. This certification and any other certification required under ARM Title 17, Chapter 8, Subchapter 12, shall state that, “based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.”

- A.16. By February 15 of each year, Sidney Sugars shall submit to the Department the compliance certification required by Section V.B. The annual certification required by Section V.B must include a statement of compliance based on the information available that identifies any observed, documented or otherwise known instance of noncompliance for each applicable requirement. Per ARM 17.8.1207,

any application form, report, or compliance certification submitted pursuant to ARM Title 17, Chapter 8, Subchapter 12 (including annual certifications), shall contain certification by a responsible official of truth, accuracy and completeness. This certification and any other certification required under ARM Title 17, Chapter 8, Subchapter 12, shall state that, “based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.”

A.17. Pursuant to ARM 17.74.336, Sidney Sugars shall comply with all the limitations and requirements of their Asbestos Abatement Annual Permit #MTF0005.

B. EU001 and EU002: Combustion Engineering (CE) Boilers

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration Method	Frequency	Reporting Requirements
B.1, B.11, B.18, B.25, B.26	Venturi Scrubber with Wetted Elbow and Vertical Entrainment Separator	Operate and Maintain	Log	Daily and During Any Maintenance	Semiannual
B.2, B.12, B.19, B.25, B.26	Fuel Sulfur Content	0.63% by Weight	Coal Sampling and Analysis	Monthly	
B.3, B.13, B.18, B.20, B.25, B.26	Fuel Consumption	17.4 ton/hr	Log and Calculations	Daily	
B.4, B.14, B.21, B.25, B.26	Hours of Operation	4320 hr/yr	Log	Daily	
B.5, B.15, B.22, B.24, B.25, B.26	Opacity	20%	Method 9	Once During Each Campaign	
B.6, B.7, B.16, B.22, B.24, B.25, b.26	Particulate Matter	0.10 lb/MMBtu, 0.046 gr/dscf 23 lb/hr	Method 5	Every 4 yrs	
B.8, B.16, B.24, B.25, B.26	SO ₂	0.43 lb/MMBtu, 106.8 ton/yr	Method 6/6C	Every 4 yrs	
B.9, B.16, B.24, B.25, B.26	SO ₂	70% Removal Efficiency	Method 6/6C	Every 4 yrs	
B.10, B.17, B.23, B.26	SO ₂ and PM CAM Plan	ARM 17.8.1506	CAM Plan Appendix E	Ongoing	

Conditions

- B.1 Sidney Sugars shall install, operate, and maintain an Anderson 2000, Inc. Model WAV-162 wetted approach venturi scrubber with wetted elbow and an Anderson 2000, Inc. Model VES-162 vertical cyclonic entrainment separator on each CE boiler (ARM 17.8.752).
- B.2 The sulfur content of the coal fired in the CE boilers shall not exceed 0.63% by weight, determined on a monthly average (ARM 17.8.749).
- B.3 The fuel consumption by the CE boilers shall not exceed 17.4 tons/hour of coal (ARM 17.8.749).
- B.4 Total annual hours of operation of each CE boiler shall not exceed 4320 hours/year (ARM 17.8.749).
- B.5 Sidney Sugars may not cause or authorize to be discharged into the atmosphere from either CE boiler, emissions that exhibit an opacity of 20% or greater averaged over 6 consecutive minutes (ARM 17.8.304).
- B.6 Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from each CE boiler particulate matter in excess of the following (ARM 17.8.752):
 - a. 0.10 lb/MMBtu heat input
 - b. 0.046 gr/dscf

- B.7. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from both CE boiler stacks particulate matter in excess of 23 lb/hr (ARM 17.8.752).
- B.8. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere, for either CE boiler, SO₂ emissions in excess of the following (ARM 17.8.752):
 - a. 0.43 lb/MMBtu heat input
 - b. 106.8 ton/yr
- B.9. Sidney Sugars shall maintain a minimum SO₂ removal efficiency of 70% by the control device on the CE boilers. Removal efficiency, in this case, shall be determined based on stack emissions from the CE boilers as a percentage of total sulfur in the coal fired boilers (ARM 17.8.752).
- B.10. Sidney Sugars shall provide a reasonable assurance of compliance with emission limitations or standards for the anticipated range of operations of the CE Boilers for SO₂ and PM (ARM 17.8.1504).

Compliance Demonstration

- B.11. The Anderson 2000, Inc. Model WAV-162 wetted approach venturi scrubber with wetted elbow and Anderson 2000, Inc. Model VES-162 vertical cyclonic entrainment separator shall be maintained and operated in accordance with proper operating procedures to minimize emissions and monitor compliance with the particulate, SO₂, and opacity standards. Log entries shall occur daily and during any maintenance activity or corrective action. A log of the following parameters shall be maintained on site and submitted to the Department upon request (ARM 17.8.1213):
 - a. Date of entry
 - b. Time of entry
 - c. Initials of individual entering information in the log
 - d. Pressure readings (inlet, venturi, separator, mist eliminator, etc.) shall be measured and recorded
 - e. The inlet/outlet temperature of each scrubber shall be measured and recorded
 - f. Records of control equipment and associated piping/ducts maintenance shall be kept
- B.12. The heat content (Btu/ton) and sulfur content of the coal used to fuel the boilers shall be determined by sampling coal on a weekly basis. The heat and sulfur sampling and analysis shall be performed using Department-approved methods. At the end of each calendar month, Sidney Sugars shall calculate the monthly average of sulfur content (in weight percentage) in the shipments received for that month (ARM 17.8.1213).
- B.13. Fuel consumption for each boiler shall be determined by calculating fuel required to produce enough heat that processed the tons of beets for that day. The following equation shall be used for each boiler to make this determination (ARM 17.8.1213).
 - a. Tons of coal = pounds of steam * X * 1/24

Where pounds of steam is equal to the total pounds of steam generated in the previous 24 hours.

Where X is the coal-to-steam ratio from the previous year; tons of coal purchased/pounds of steam generated by both boilers.

Where 1/24 is equal to 1 day per 24 hours.

Sidney Sugars shall maintain these calculations in a log on site. The log shall contain date and time as well as the calculations. This will be used to monitor compliance with the hourly fuel consumption limit in Section III.B.3.

- B.14. Sidney Sugars log the daily hours of operation and daily cumulative hours of operation on a rolling 12-month basis for the CE boilers. The log shall include the date, number of hours operated for that day, and keep a cumulative total for the number of hours operated during the previous 12 months (ARM 17.8.1213).
- B.15. Once during each campaign, a Method 9 test must be performed in accordance with the Montana Source Test Protocol and Procedures Manual on each CE boiler to monitor compliance with Section III.B.5. The Method 9 test must be used to monitor compliance with the 20% opacity limit (ARM 17.8.106 and ARM 17.8.1213).
- B.16. Sidney Sugars shall perform Method 5 and Method 6 tests or other approved test methods in accordance with the Montana Source Test Protocol and Procedures Manual, on each CE boiler every 4 years to monitor compliance with Section III.B.6, III.B.7, III.B.8 and III.B.9. (ARM 17.8.1213).
- B.17. Sidney Sugars shall monitor compliance for PM and SO₂ by following the Compliance Assurance Monitoring (CAM) Plan (Appendix E). The CAM Plan, written by Sidney Sugars in accordance with ARM 17.8.1504, is summarize in Appendix E and is available upon request by the Department or facility (ARM 17.8.1503 and ARM 17.8.1213).

Recordkeeping

- B.18. Sidney Sugars shall maintain a log on site of all maintenance activities performed on the venturi scrubber and vertical entrainment separator as required by Section III.B.11 (ARM 17.8.1212).
- B.19. Sidney Sugars shall maintain records on site of sulfur content as required by Section III.B.12 (ARM 17.8.1212).
- B.20. Sidney Sugars shall maintain a log on site of daily fuel consumption calculations as required by Section III.B.13 (ARM 17.8.1212).
- B.21. Sidney Sugars shall maintain a log on site of daily hours of operation for the CE boilers and 12-month cumulative total hours of operation as required by Section III.B.14 (ARM 17.8.1212).
- B.22. All compliance test records shall be maintained on site and submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.1212).
- B.23. Records shall be prepared and data kept in accordance with 40 CFR Part 64 and the CAM Plan contained in Appendix E of this permit (ARM 17.8.1212 and 40 CFR Part 64).

Reporting

- B.24. All source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).
- B.25. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

B.26. The semiannual monitoring report shall provide (ARM 17.8.1212):

- a. Certification of compliance with logging requirements as required by Section III.B.11, III.B.13, and III.B.14;
- b. Certification that the coal consumption did not exceed the limit specified in Section III.B.3;
- c. A summary of maintenance activities and corrective action performed during the period as required by Section III.B.11;
- d. Certification that sulfur sampling and analysis was performed as required by Section III.B.12, and provide the monthly averages of the weekly samples;
- e. The number of hours of operation of each boiler during the period;
- f. A summary of results from any Method 5, 6, and 9 testing performed during the period as required in Section III.B.15 and III.B.16; and
- g. Certification of compliance with 40 CFR 64 (CAM), Appendix E.

C. EU003 and EU005: Union Pacific Boilers

Conditions	Pollutant/ Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
C.1, C.6, C.11, C.13, C.14, C.16	Natural Gas Sulfur Content	50 Grains/100 Cubic Feet	Certify Pipeline Quality Natural Gas or Supplier's Certification	Annual	Semiannual
C.2, C.7, C.12, C.13, C.14, C.16	Fuel Oil Sulfur Content	1 lb of Sulfur/MMBtu	Certified By Lab or Supplier's Certification	As Necessary During Fuel Oil Usage	
			Log and Method 6/6C		
C.3, C.8, C.13, C.15, C.16	Particulate Matter	$E = 0.882 * H^{-0.1664}$ or $E = 1.026 * H^{-0.233}$	Method 5	As Required by Department	
C.4, C.9, C.13, C.14, C.15, C.16	Opacity	40%	Method 9	As Required by Department	
C.5, C.10, C.13, C.14, C.15, C.16	Opacity	20%	Method 9	As Required by Department	

Conditions

- C.1. The sulfur content of the natural gas fired in the Union Pacific Boilers shall not exceed 50 grains per 100 cubic feet of gaseous fuel (ARM 17.8.322)
- C.2. The sulfur content of the fuel oil fired in the Union Pacific Boilers shall not exceed 1 pound of sulfur per million Btu fired (ARM 17.8.322).
- C.3. Unless otherwise specified by rule or in this permit, Sidney Sugars shall not cause or authorize particulate matter caused by the combustion of fuel to be discharged from any stack or chimney into the outdoor atmosphere in excess of the maximum allowable emissions of particulate matter for existing fuel burning equipment and new fuel burning equipment calculated using the following equations (ARM 17.8.309):

For existing fuel burning equipment (installed before November 23, 1968) (Union Pacific Boiler #3 (EU003)): $E = 0.882 * H^{0.1664}$

For new fuel burning equipment (installed on or after November 23, 1968) (Union Pacific Boiler #4 (EU005)): $E = 1.026 * H^{0.233}$

Where H is the heat input capacity in million BTU (MMBtu) per hour and E is the maximum allowable particulate emissions rate in pounds per MMBtu.

- C.4. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the 100,000-lb steam/hr Union Pacific Boiler #3 (EU003), emissions that exhibit an opacity of 40% or greater averaged over six consecutive minutes (ARM 17.8.304).
- C.5. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the 60,000-lb steam/hr Union Pacific Boiler #4 (EU005), emissions that exhibit an opacity of 20% or greater averaged over six consecutive minutes (ARM 17.8.304).

Compliance Demonstration

- C.6. Monitoring compliance with Section III.C.1 may be satisfied by certifying that pipeline quality natural gas is fired or obtaining a supplier's certification that sulfur content does not exceed 50 grains per 100 cubic feet of natural gas fired. The certification shall be renewed on an annual basis (ARM 17.8.749 and ARM 17.8.1213).
- C.7. If Sidney Sugars combusts fuel oil in the Union Pacific Boilers in excess of 432 hours per year during any year of the permit term, then Sidney Sugars must perform Method 6/6C testing while burning fuel oil to monitor compliance with Section III.C.2. Sidney Sugars shall obtain a supplier's certification or shall have a laboratory analysis performed on each shipment of fuel oil that sulfur content does not exceed 1 pound per million Btu of fuel oil burned (ARM 17.8.749 and ARM 17.8.1213).
- C.8. As required by the Department and Section III.A.1, Sidney Sugars shall perform a Method 5 or other approved test to monitor compliance with Section III.C.3 (ARM 17.8.749 and ARM 17.8.1213).
- C.9. As required by the Department and Section III.A.1, a Method 9 test must be performed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with the 40% opacity limit (ARM 17.8.106 and ARM 17.8.1213).
- C.10. As required by the Department and Section III.A.1, a Method 9 test must be performed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with the 20% opacity limit (ARM 17.8.106 and ARM 17.8.1213).

Recordkeeping

- C.11. Sidney Sugars shall maintain certification documentation on site as required in Section III.C.6 (ARM 17.8.1212).
- C.12. Sidney Sugars shall record in a log on site anytime fuel oil is combusted in either of the Union Pacific Boilers. The log must contain the date, time, type and quantity of fuel oil fed into either of the boilers. Also included in the log shall be the number of hours fuel oil was burned in the Union Pacific Boilers. Fuel oil sulfur content certification documentation shall be kept on site. The fuel oil log and the certification documentation shall be submitted to the Department upon request (ARM 17.8.1213).

Reporting

- C.13. All source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

- C.14. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).
- C.15. The semiannual monitoring report shall provide (ARM 17.8.1212):
- Certification that only certified natural gas and fuel oil were burned in the boilers as required by Section III.C.6 and III.C.7;
 - A summary of the time periods and reason why fuel oil was used, the quantity consumed during the period, and the average sulfur content; and
 - A summary of the results from any source testing conducted during the period.

D. EU007: Superior Mohawk Boiler

Condition(s)	Pollutant/ Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
D.1, D.4, D.7, D.9	Natural Gas Sulfur Content	50 Grains/100 Cubic Feet	Certify Pipeline Quality Natural Gas or Supplier's Certification	Annual	Semiannual
D.2, D.5, D.8, D.9	Particulate Matter	$E = 0.882 * H^{-0.1664}$	Method 5	As Required by Department	
D.3, D.6, D.8, D.9	Opacity	40%	Method 9	As Required by Department	

Conditions

- D.1. The sulfur content of the natural gas fired in the Superior Mohawk boiler shall not exceed 50 grains per 100 cubic feet of gaseous fuel (ARM 17.8.749).
- D.2. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the Superior Mohawk boiler, particulate matter in excess of that allowed by $E = 0.882 * H^{-0.1664}$, where H is the heat input capacity in MMBtu per hour and E is the maximum allowable particulate emissions rate in pounds per MMBtu (ARM 17.8.309).
- D.3. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the Superior Mohawk boiler, emissions that exhibit an opacity of 40% or greater averaged over six consecutive minutes (ARM 17.8.304).

Compliance Demonstration

- D.4. Monitoring compliance with Section III.D.1 may be satisfied by certifying that pipeline quality natural gas is fired or obtaining supplier's certification that sulfur content does not exceed 50 grains per 100 cubic feet of natural gas fired. The certification shall be renewed on an annual basis (ARM 17.8.1213).
- D.5. As required by the Department and Section III.A.1, Sidney Sugars shall perform a Method 5 or other approved test on the Superior Mohawk boiler, to monitor compliance with Section III.D.2 (ARM 17.8.1213).
- D.6. As required by the Department and Section III.A.1, a Method 9 test must be performed in accordance with the Montana Source Test Protocol and Procedures Manual to monitor compliance with the 40% opacity limit. Each observation period shall be a minimum of six minutes unless any one reading is greater than 40%, then the observation period shall be a minimum of 20 minutes or until a violation of the standard has been documented, whichever is a shorter period of time (ARM 17.8.106 and ARM 17.8.1213).

Recordkeeping

D.7. Sidney Sugars shall maintain certification documents required in Section III.D.4 on site (ARM 17.8.1212).

Reporting

D.8. All source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

D.9. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements. The semiannual monitoring report shall certify that only natural gas was burned as directed in Section III.D.4 and provide a summary of the results of any source testing (ARM 17.8.1212).

E. EU022: Coal Handling and Storage

Condition(s)	Pollutant/Parameter	Permit Limit	Compliance Demonstration		Reporting Requirements
			Method	Frequency	
E.1, E.5, E.6, E.9, E.11	Baghouse	Operate and Maintain	Inspection	Weekly During Each Campaign and Anytime System is Operated	Semiannual
E.2, E.5, E.6, E.9, E.11	Covered External Conveyors				
E.3, E.7, E.10, E.11	Particulate Matter	0.01 gr/dscf	Method 5	As Required by Department	
E.4, E.8, E.9, E.11	Opacity	20%	Method 9	As Required by the Department	

Conditions

E.1. Sidney Sugars shall install, operate and maintain pulse jet baghouses on the coal handling, conveying, screening and crushing system (ARM 17.8.752).

E.2. Sidney Sugars shall cover external coal conveyors (ARM 17.8.752).

E.3. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the baghouse controlling the coal handling, conveying, screening and crushing system, particulate matter in excess of 0.01 gr/dscf (ARM 17.8.749).

E.4. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the baghouse controlling the coal handling and storage, emissions that exhibit an opacity of 20% or greater averaged over six consecutive minutes (40 CFR 60, Subpart Y and ARM 17.8.304).

Compliance Demonstration

E.5. The pulse jet baghouse shall be maintained and operated in accordance with proper operating procedures to minimize emissions and monitor compliance with the particulate and opacity standards. All external covering of the coal conveyors shall be maintained and operated to provide complete capture of any emissions from the conveyors (ARM 17.8.1213).

E.6. Sidney Sugars shall conduct weekly inspections during each campaign and anytime the system is operated for the Coal Handling Baghouse and the Covered External Conveyors. The inspections shall include checking parameters associated with the baghouse and covered conveyors. Parameters to be checked shall be those suggested by the manufacture and/or condition of bags, condition of conveyor

coverings and if any visible emissions above the 20% opacity limit are visible. If deterioration of bags or coverings on the conveyor, or if a source of excessive emissions is identified, Sidney Sugars shall contain or minimize the source of emissions and perform any corrective action necessary (ARM 17.8.1213).

- E.7. As required by the Department and Section III.A.1, Sidney Sugars shall perform a Method 5 or other approved testing, in accordance with the Montana Source Test Protocol and Procedures Manual, on the baghouse to monitor compliance with Section III.E.3 (ARM 17.8.1213).
- E.8. As required by the Department, Sidney Sugars shall perform a Method 9 or other approved testing in accordance with the Montana Source Test Protocol and Procedures Manual on the baghouse to monitor compliance with 40 CFR 60, Subpart Y requirements to monitor compliance with Section III.E.4. Initial testing was conducted on September 27, 2000 (ARM 17.8.1213).

Recordkeeping

- E.9. When inspections are performed, Sidney Sugars shall maintain a log on site to verify the inspections were performed as specified in Section III.E.5 and III.E.6. Each log entry must include the date, time, results of the inspection, and the inspector's initials. If any corrective action is required, the time, date, inspector's initials, and any preventative or corrective action taken must be recorded in the log (ARM 17.8.1212).

Reporting

- E.10. All source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).
- E.11. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).
- E.12. The semiannual monitoring report shall provide (ARM 17.8.1212):
 - a. Certification that the log required by Section III.E.9 were maintained;
 - b. A summary of all maintenance activities and corrective action performed during the period; and
 - c. A summary of any source testing that has been performed.

F. EU024A&B and EU025A&B: Stearns-Roger Pulp Dryers

Condition(s)	Pollutant/ Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
F.1, F.8, F.19, F.21	Fuel	Natural Gas, Except During Emergency Curtailment	Log, Curtailment Fuel Used	As Necessary	Semiannual
F.2, F.9, F.18, F.21	Natural Gas Sulfur Content	50 gr/100 Cubic Feet	Certify Pipeline Quality Natural Gas or Supplier's Certification	Annual	
F.3, F.10, F.19, F.21	Fuel Oil Sulfur Content	11b/MMBtu Fired	Certified By Lab or Supplier's Certification	As Necessary	
			Log		
F.4, F.11, F.12, F.13, F.17, F.20, F.21	Opacity	40%	Method 9	Once During Each Campaign	
			Visual Survey	Weekly During Each Campaign	

Condition(s)	Pollutant/ Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
F.5, F.14, F.19, F.21	Weigh Device	Install, Operate and Maintain	Log	Daily and During Any Maintenance	
F.6, F.15, F.19, F.21	Process Rate	114,192 ton/Campaign	Log	Daily	
			Weigh Device	Continuous	
F.7, F.11, F.16, F.20, F.21	Particulate Matter	$E = 4.10 * P^{0.67}$ or $E = 55 * P^{0.11} - 40$	Method 5	Every 4 Years	

Conditions

- F.1. Each dryer is limited to burning natural gas only, except during emergency curtailment situations (ARM 17.8.749).
- F.2. The sulfur content of the natural gas fired in the dryers shall not exceed 50 grains per 100 cubic feet of gaseous fuel (ARM 17.8.322).
- F.3. The sulfur content of the fuel oil fired in the dryers shall not exceed one pound of sulfur per million Btu of fuel oil fired (ARM 17.8.322).
- F.4. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the pulp dryers, emissions that exhibit an opacity of 40% or greater, averaged over six consecutive minutes (ARM 17.8.304).
- F.5. Sidney Sugars shall install, operate and maintain a weighing device on each dryer to verify the process rate and to monitor compliance with the process rate limitation. In the event of weigh device malfunction, Sidney Sugars shall use an alternative monitoring method approved by the Department (ARM 17.8.749).
- F.6. Each dryer process rate (to include molasses) shall not exceed 114,192 tons during any one campaign (ARM 17.8.749).
- F.7. Sidney Sugars shall not cause, suffer, allow or permit to be discharged into the atmosphere, from each pulp dryer (#1 and #2), particulate matter in excess of the amount calculated using the following equations (ARM 17.8.310):

For process weight rates greater than 60,000 lb/hr: $E = 55 * P^{0.11} - 40$

For process weight rates up to 60,000 lb/hr: $E = 4.10 * P^{0.67}$

Where E is the emission rate in pounds per hour and P is the process weight in tons per hour.

Compliance Demonstration

- F.8. Sidney Sugars shall record in a log anytime fuel other than natural gas is combusted in the dryers. The log must be maintained on site, contain the date, time, type, and quantity of fuel fed into the dryers, and must be submitted to the Department upon request (ARM 17.8.1213).
- F.9. Monitoring compliance with Section III.F.2 may be satisfied by certifying that only pipeline quality natural gas is fired or obtaining supplier's certification on an annual basis (or whenever sulfur levels change) that sulfur content of the natural gas does not exceed 50 grains per 100 cubic feet of natural gas fired (ARM 17.8.1213).

- F.10. Monitoring compliance with Section III.F.3 may be satisfied by obtaining supplier's certification with each shipment of fuel oil or obtaining a laboratory analysis for each shipment of fuel oil that sulfur content of the fuel oil does not exceed one pound per million Btu of fuel oil burned (ARM 17.8.1213).
- F.11. The Stearn-Roger, Inc. and MAC Equipment cyclones shall be maintained and operated in accordance with proper operating procedures to minimize emissions and monitor compliance with the particulate and opacity standards (ARM 17.8.1213).
- F.12. Once per calendar week during daylight hours, Sidney Sugars shall visually survey the cyclone stack for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous two years of the visual survey being performed. If sources of excessive emissions are identified, Sidney Sugars shall immediately conduct a Method 9 or take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Sidney Sugars shall immediately conduct a subsequent visual survey to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Sidney Sugars of a liability for a violation determined using Method 9 (ARM 17.8.1213).
- F.13. Once during each campaign, a Method 9 test must be performed in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106) to monitor compliance with Section III.F.4. The Method 9 test must be used to monitor compliance with the 40% opacity limit (ARM 17.8.1213).
- F.14. Monitoring compliance with Section III.F.5 may be satisfied by daily inspections and maintenance as necessary of the weigh device. Maintenance shall include, but is not limited to, performing annual certification of accuracy on the weigh device. Sidney Sugars shall document daily inspections and all maintenance in a log. The log shall be maintained on site and submitted to the Department upon request (ARM 17.8.1213).
- F.15. Sidney Sugars shall maintain a daily summary log of the amount of pulp processed in the dryers. This number shall be determined using the weigh device. In the event of weigh device malfunction, Sidney Sugars shall use an alternative monitoring method approved by the Department. The daily summary log shall be totaled every month and added to the previous months of the campaign to monitor compliance with the campaign process rate limitation as stated in Section III.F.6 (ARM 17.8.1213).
- F.16. Sidney Sugars shall conduct a Method 5 source test or other Department approved test method in accordance with the Montana Source Test Protocol and Procedures Manual, for particulate on the pulp dryers to monitor compliance with the emission limitations in Section III.F.7. The test shall be conducted on an every 4-year basis or according to another testing schedule approved by the Department (ARM 17.8.106 and ARM 17.8.1213).

Recordkeeping

- F.17. When visual surveys are performed, Sidney Sugars shall maintain a log on site to verify that the visual surveys were performed as specified in Section III.F.12. Each log entry must include the date, time, results of the survey, and the observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventative or corrective action taken must be recorded in the log. This log shall be maintained on site and submitted to the Department upon request (ARM 17.8.1212).
- F.18. Sidney Sugars shall maintain certification documents, required in Section III.F.9 and III.F.10, on site (Arm 17.8.1212).

F.19. Sidney Sugars shall maintain the fuel log, inspection log, and process rate log (ARM 17.8.1212).

Reporting

F.20. Method 5 and 9 test reports shall be submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

F.21. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

F.22. The semiannual monitoring report shall provide (ARM 17.8.1212):

- a. Certification that only certified natural gas was burned in the dryers as required by Section III.F.1;
- b. A summary of any time periods which required burning fuel oil in the dryers, the quantity consumed during the periods and the average sulfur content;
- c. Certification that the weigh device was inspected and maintained daily, and results were recorded in a log;
- d. Results of any certification of accuracy performed on the weigh device that may have been performed during the period;
- e. Certification of compliance with the process rate limitation, and certify that the daily process rates were recorded in a log;
- f. Certification of compliance with the particulate matter limitations as specified in Section III.F.7;
- g. Certification that visual survey log was maintained and provide a summary of any corrective action taken as a result of the visual surveys; and
- h. A summary of any results from any testing that may have been performed during the period.

G. EU026A&B: Dry Pulp Handling Cyclone

Condition(s)	Pollutant/ Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
G.1, G.3, G.4, G.5, G.6, G.7, G.8	Opacity	20%	Method 9	As Required by Department	Semiannual
			Visual Surveys	Weekly During Each Campaign	
G.2, G.3, G.4, G.5, G.6, G.7, G.8	Particulate Matter	E = 4.10 * P ^{0.67} or E = 55 * P ^{0.11} - 40	Method 5	As Required by Department	
			Visual Surveys	Weekly During Each Campaign	

Conditions

G.1. Sidney Sugars shall not cause or authorize the production, handling, transportation, or storage of any material unless reasonable precautions to control emissions of particulate matter are taken. Such emissions of airborne particulate matter from any stationary source shall not exhibit an opacity of 20% or greater averaged over six consecutive minutes (ARM 17.8.308).

- G.2. Sidney Sugars shall not cause, suffer, allow, or permit to be discharged into the atmosphere, from the dry pulp handling cyclone, particulate matter in excess of the amount calculated using the following equations (ARM 17.8.310):

For process weight rates greater than 60,000 lb/hr: $E = 55 * P^{0.11} - 40$

For process weight rates up to 60,000 lb/hr: $E = 4.10 * P^{0.67}$

Where E is the emission rate in pounds per hour and P is the process weight in tons per hour.

Compliance Demonstration

- G.3. The MAC Equipment dry pulp handling cyclone shall be maintained and operated in accordance with proper operating procedures to minimize emissions and monitor compliance with the particulate and opacity standards (ARM 17.8.1213).
- G.4. Once per calendar week during daylight hours, Sidney Sugars shall visually survey the cyclone stack for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous two years of the visual survey being performed. If sources of excessive emissions are identified, Sidney Sugars shall immediately conduct a Method 9 or take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Sidney Sugars shall immediately conduct a subsequent visual survey to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Sidney Sugars of a liability for a violation determined using Method 9 (ARM 17.8.1213).
- G.5. As required by the Department and Section III.A.1, Sidney Sugars shall perform a Method 5 and Method 9 or other approved test in accordance with the Montana Source Test Protocol and Procedures Manual, on the dry pulp handling cyclone stack to monitor compliance with Section III.G.1 and III.G.2 (ARM 17.8.106 and ARM 17.8.1213).

Recordkeeping

- G.6. When visual surveys are performed, Sidney Sugars shall maintain a log on site to verify that the visual surveys were performed as specified in Section III.G.4. Each log entry must include the date, time, results of the survey, and the observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventative or corrective action taken must be recorded in the log. This log shall be maintained on site and submitted to the Department upon request (ARM 17.8.1212).

Reporting

- G.7. Method 5 and Method 9 test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).
- G.8. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).
- G.9. The semiannual monitoring report shall provide (ARM 17.8.1212):
- a. Certification that the visual surveys were performed and logged as specified by Section III.G.4; and
 - b. A summary of any results from testing that may have been performed during the period.

H. EU030: Pellet Mills and Cooler Cyclone

Condition(s)	Pollutant/ Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
H.1, H.3, H.4, H.5, H.6, H.7, H.8	Opacity	20%	Method 9	As Required by Department	Semiannual
			Visual Surveys	Weekly During Each Campaign	
H.2, H.3, H.4, H.5, H.6, H.7, H.8	Particulate Matter	E = 4.10 * P ^{0.67} or E = 55 * P ^{0.11} - 40	Method 5	As Required by Department	
			Visual Surveys	Weekly During Each Campaign	

Conditions

- H.1. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the pellet mills and cooler, emissions that exhibit an opacity of 20% or greater averaged over six consecutive minutes (ARM 17.8.304).
- H.2. Sidney Sugars shall not cause, suffer, allow or permit to be discharged into the atmosphere, from the pellet mills and cooler cyclone, particulate matter in excess of the amount calculated using the following equations (ARM 17.8.310):

For process weight rates greater than 60,000 lb/hr: $E = 55 * P^{0.11} - 40$

For process weight rates up to 60,000 lb/hr: $E = 4.10 * P^{0.67}$

Where E is the emission rate in pounds per hour and P is the process weight in tons per hour.

Compliance Demonstration

- H.3. The MAC Equipment pellet mills and cooler cyclone shall be maintained and operated in accordance with proper operating procedures to minimize emissions and monitor compliance with the particulate and opacity standards (ARM 17.8.1213).
- H.4. Once per calendar week during daylight hours, Sidney Sugars shall visually survey the cyclone stack for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous two years of the visual survey being performed. If sources of excessive emissions are identified, Sidney Sugars shall immediately conduct a Method 9 or take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Sidney Sugars shall immediately conduct a subsequent visual survey to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Sidney Sugars of a liability for a violation determined using Method 9 (ARM 17.8.1213).
- H.5. As required by the Department and Section III.A.1, Sidney Sugars shall perform a Method 5 and Method 9 or other Department approved test, in accordance with the Montana Source Test Protocol and Procedures Manual, on the pellet mills and cooler cyclone stack to monitor compliance with Section III.H.1 and III.H.2 (ARM 17.8.1213).

Recordkeeping

H.6. When visual surveys are performed, Sidney Sugars shall maintain a log on site to verify that the visual surveys were performed as specified in Section III.H.4. Each log entry must include the date, time, results of the survey, and the observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventative or corrective action taken must be recorded in the log. This log shall be maintained on site and submitted to the Department upon request (ARM 17.8.1212).

Reporting

H.7. All source test reports shall be submitted in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

H.8. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

H.9. The semiannual monitoring report shall provide (ARM 17.8.1212):

- a. Certification that the visual surveys were performed and logged as required by Section III.H.4; and
- b. A summary of any results from testing that may have been performed.

I. EU031: Pellet Tank Exhaust Fan

Condition(s)	Pollutant/ Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
I.1, I.3, I.5, I.7	Opacity	20%	Visual Surveys	Weekly During Each Campaign	Semiannual
I.2, I.4, I.6, I.7	Particulate Matter	$E = 4.10 * P^{0.67}$ or $E = 55 * P^{0.11} - 40$	Method 5	As Required by Department	

Conditions

I.1. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the pellet tank exhaust fan, emissions that exhibit an opacity of 20% or greater averaged over six consecutive minutes (ARM 17.8.304).

I.2. Sidney Sugars shall not cause, suffer, allow or permit to be discharged into the atmosphere, from the pellet tank exhaust fan, particulate matter in excess of the amount calculated using the following equations (ARM 17.8.310):

For process weight rates greater than 60,000 lb/hr: $E = 55 * P^{0.11} - 40$

For process weight rates up to 60,000 lb/hr: $E = 4.10 * P^{0.67}$

Where E is the emission rate in pounds per hour and P is the process weight in tons per hour.

Compliance Demonstration

I.3. Once per calendar week during daylight hours, Sidney Sugars shall visually survey the cyclone stack for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous two years of the visual survey being performed. If sources of excessive emissions are identified, Sidney Sugars shall immediately conduct a Method 9 or take corrective action to contain or minimize the source of emissions. If corrective

actions are taken, then Sidney Sugars shall immediately conduct a subsequent visual survey to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Sidney Sugars of a liability for a violation determined using Method 9 (ARM 17.8.1213).

- I.4. As required by the Department and Section III.A.1, Sidney Sugars shall perform a Method 5 test or other approved test method on the pellet tank exhaust fan to monitor compliance with Section III.I.2 (ARM 17.8.1213).

Recordkeeping

- I.5. When visual surveys are performed, Sidney Sugars shall maintain a log to verify that the visual surveys were performed as specified in Section III.I.3. Each log entry must include the date, time, results of the survey, and the observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventative or corrective action taken must be recorded in the log. This log shall be maintained on site and submitted to the Department upon request (ARM 17.8.1212).

Reporting

- I.6. All source test reports shall be submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).
- I.7. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).
- I.8. The semiannual monitoring report shall (ARM 17.8.1212):
- a. Certification of the visual surveys were performed and logged as required by Section III.I.3;
 - b. Certification that a log of corrective action was maintained as specified in Section III.I.5; and
 - c. A summary of any result for testing that may have been performed.

J. EU043A: Slaker Building Vent

Condition(s)	Pollutant/ Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
J.1, J.6, J.10, J.13	Pebble Lime Hopper	400 ton/day	Log	Each Shipment	Semiannual
J.2, J.7, J.10, J.13	Pebble Lime Hopper	MAC Equipment Baghouse	Log	Daily and During Any Maintenance	
J.3, J.7, J.10, J.13	Hopper Loading	Operate Pneumatic Loading Device	Log	Daily or During Any Loading	
J.4, J.8, J.11, J.13	Opacity	20%	Visual Surveys	Weekly During Each Campaign	
J.5, J.9, J.12, J.13	Particulate Matter	$E = 4.10 * P^{0.67}$ or $E = 55 * P^{0.11} - 40$	Method 5	As Required by Department	

Conditions

- J.1. The pebble lime hopper throughput shall not exceed 400 ton/day (ARM 17.8.752).
- J.2. Sidney Sugars shall vent all emissions from the loading of the pebble lime hopper to the existing MAC Equipment 72-avw baghouse (ARM 17.8.752).
- J.3. A pneumatic loading device shall be used when loading the pebble lime hopper (ARM 17.8.752).

- J.4. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the slaker building vent, emissions that exhibit an opacity of 20% or greater averaged over six consecutive minutes (ARM 17.8.304).
- J.5. Sidney Sugars shall not cause, suffer, allow or permit to be discharged into the atmosphere, from the slaker building vent, particulate matter in excess of the amount calculated using the following equations (ARM 17.8.310):

For process weight rates greater than 60,000 lb/hr: $E = 55 * P^{0.11} - 40$

For process weight rates up to 60,000 lb/hr: $E = 4.10 * P^{0.67}$

Where E is the emission rate in pounds per hour and P is the process weight in tons per hour.

Compliance Demonstration

- J.6. Sidney Sugars shall maintain a log on site recording each delivery of pebble lime. The log shall contain the date, time, quantity of pebble lime being delivered, and initials of individual observing the delivery (ARM 17.8.1213).
- J.7. Sidney Sugars shall inspect and maintain the venting of emissions from the pebble lime hopper to the baghouse and any associated ductwork to monitor compliance with Section III.J.2. Sidney Sugars shall observe each pebble lime delivery truck to ensure use of a pneumatic loading device during any loading of the pebble lime hopper, to monitor compliance with Section III.J.3. The inspections of venting system and observations of delivery trucks shall be recorded in a log on site containing the date, time, results of inspections and observations, and inspector/observer's initials (ARM 17.8.1213).
- J.8. Once per calendar week during daylight hours, Sidney Sugars shall visually survey the cyclone stack for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous two years of the visual survey being performed. If sources of excessive emissions are identified, Sidney Sugars shall immediately conduct a Method 9 or take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Sidney Sugars shall immediately conduct a subsequent visual survey to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Sidney Sugars of a liability for a violation determined using Method 9 (ARM 17.8.1213).
- J.9. As required by the Department and Section III.A.1, Sidney Sugars shall perform a Method 5 or other approved test, in accordance with the Montana Source Test Protocol and Procedures Manual, on the slaker building vent to monitor compliance with Section III.J.5 (ARM 17.8.1213).

Recordkeeping

- J.10. Delivery logs, inspection and maintenance logs, and observation logs shall be maintained on site and must be submitted to the Department upon request (ARM 17.8.1212).
- J.11. When visual surveys are performed, Sidney Sugars shall maintain a log on site to verify that the visual surveys were performed as specified in Section III.J.8. Each log entry must include the date, time, results of the survey, and the observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventative or corrective action taken must be recorded in a log. This log shall be maintained on site and submitted to the Department upon request (ARM 17.8.1212).

Reporting

- J.12. Method 5 or other approved test reports shall be submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).
- J.13. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).
- J.14. The semiannual monitoring report shall provide (ARM 17.8.1212):
- Certification of compliance with Section III.J.1;
 - Certification that a log of all deliveries of pebble lime were recorded as specified by Section III.J.6;
 - Certification that inspection and maintenance logs were maintained as specified by Section III.J.7;
 - Certification that the visual surveys were performed and logged as required by Section III.J.8; and
 - A summary of any results from testing that may have been performed during the period.

K. EU020: Granulators

Condition(s)	Pollutant/ Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
K.1, K.3, K.4, K.6, K.8	Opacity	20%	Operate and Maintain Wet Scrubber	Continuous	Semiannual
K.2, K.3, K.4, K.5, K.7, K.8	Particulate Matter	E = 4.10 * P ^{0.67} or E = 55 * P ^{0.11} - 40	Method 5	As Required by Department	
			Operate and Maintain Wet Scrubber	Continuous	

Conditions

- K.1. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the granulator-wet scrubbers, emissions that exhibit an opacity of 20% or greater averaged over six consecutive minutes (ARM 17.8.304).
- K.2. Sidney Sugars shall not cause, suffer, allow, or permit to be discharged into the atmosphere, from the granulator-wet scrubbers, particulate matter in excess of the amount allowed by ARM 17.8.310. The following equations shall be used to calculate the values.

For process weight rates greater than 60,000 lb/hr: $E = 55 * P^{0.11} - 40$

For process weight rates up to 60,000 lb/hr: $E = 4.10 * P^{0.67}$

Where E is the emission rate in pounds per hour and P is the process weight in tons per hour.

Compliance Demonstration

- K.3. The granulator-wet scrubbers shall be maintained and operated in accordance with proper operating procedures to minimize emissions and monitor compliance with the particulate and opacity standards. A log shall be maintained on site and submitted to the Department upon request. Log entries shall be recorded daily and during any maintenance activities. The log shall contain the following parameters (ARM 17.8.1213):

- a. Date of log entry
- b. Time of log entry
- c. Initials of individual entering information in the log
- d. Any maintenance activities occurring
- e. Records of control equipment and associated piping/ducts maintenance shall be kept

K.4. As required by the Department and Section III.A.1, Sidney Sugars shall perform a Method 5 or other approved test, in accordance with the Montana Source Test Protocol and Procedures Manual, on the granulator wet scrubber stacks to monitor compliance with Section III.K.2 (ARM 17.8.106 and ARM 17.8.1213).

Recordkeeping

K.5. Sidney Sugars shall maintain a log on site as required by Section III.K.3 (ARM 17.8.1212).

Reporting

K.6. Method 5 or other Department approved test method reports shall be submitted to the Department in accordance with the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106 and ARM 17.8.1212).

K.7. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).

K.8. The semiannual monitoring report shall provide (ARM 17.8.1212):

- a. Certification of compliance with logging requirement as required by Section III.K.3 and provide a summary of any corrective action taken; and
- b. A summary of results from any testing that may have been performed during the period.

L. EU027: Weibul Conditioner System

Condition(s)	Pollutant/ Parameter	Permit Limit	Compliance Demonstration Method	Frequency	Reporting Requirement
L.1, L.3, L.4, L.5, L.6	Opacity	20%	Inspection and Maintenance of Fabric Filter	Daily	Semiannual
L.2, L.3, L.4, L.5, L.6	Particulate Matter	E = 4.10 * P ^{0.67} or E = 55 * P ^{0.11} - 40			

Conditions

L.1 Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the Weibul conditioner vent, emissions that exhibit an opacity of 20% or greater averaged over six consecutive minutes (ARM 17.8.304).

L.2 Sidney Sugars shall not cause, suffer, allow or permit to be discharged into the atmosphere, from the Weibul conditioner vent, particulate matter in excess of the amount calculated using the following equations (ARM 17.8.310):

For process weight rates greater than 60,000 lb/hr: $E = 55 * P^{0.11} - 40$

For process weight rates up to 60,000 lb/hr: $E = 4.10 * P^{0.67}$

Where E is the emission rate in pounds per hour and P is the process weight in tons per hour.

Compliance Demonstration

- L.3 Sidney Sugars shall operate and maintain the low temperature fabric filter on the Weibul conditioner system. Monitoring compliance with Section III.L.1 and III.M.2 may be satisfied by daily inspection and maintenance of the fabric filter on the Weibul conditioner system (ARM 17.8.1213).
- L.4. The low temperature fabric filter shall be maintained and operated in accordance with proper operating procedures to minimize emissions and monitor compliance with the particulate and opacity standards. A log shall be maintained on site and submitted to the Department upon request. Log entries shall be recorded daily and during any maintenance activities. The log shall contain the following parameters (ARM 17.8.1213):
 - a. Date of the log entry
 - b. Time of the log entry
 - c. Initials of the individual entering information in the log
 - d. Results of inspection (i.e. condition of control device, filters, etc.)
 - e. Any maintenance activities occurring
 - f. Records of control equipment and associated piping/ducts maintenance shall be kept

Recordkeeping

- L.5. Sidney Sugars shall maintain a log on site as required by Section III.L.4 (ARM 17.8.1212).

Reporting

- L.6. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).
- L.7. The semiannual monitoring report shall provide (ARM 17.8.1212):
 - a. Certification of compliance with logging requirements as required by Section III.L.4 and provide a summary of any corrective action taken; and
 - b. Certification that the fabric filter was inspected and maintained as required by Section III.L.3 and provide a summary of inspections and maintenance.

M. EU028: Hoffman Vent

Condition(s)	Pollutant/ Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
M.1, M.3, M.4, M.5	Opacity	20%	Visual Surveys	Weekly	Semiannual
M.2, M.3, M.4, M.5	Particulate Matter	$E = 4.10 * P^{0.67}$ or $E = 55 * P^{0.11} - 40$			

Conditions

- M.1. Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from the Hoffman vent, emissions that exhibit an opacity of 20% or greater averaged over six consecutive minutes (ARM 17.8.304).
- M.2. Sidney Sugars shall not cause, suffer, allow or permit to be discharged into the atmosphere, from the Hoffman vent, particulate matter in excess of the amount calculated using the following equations (ARM 17.8.310):

For process weight rates greater than 60,000 lb/hr: $E = 55 * P^{0.11} - 40$

For process weight rates up to 60,000 lb/hr: $E = 4.10 * P^{0.67}$

Where E is the emission rate in pounds per hour and P is the process weight in tons per hour.

Compliance Demonstration

- M.3. Once per calendar week during daylight hours, Sidney Sugars shall visually survey the cyclone stack for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous two years of the visual survey being performed. If sources of excessive emissions are identified, Sidney Sugars shall immediately conduct a Method 9 or take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Sidney Sugars shall immediately conduct a subsequent visual survey to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Sidney Sugars of a liability for a violation determined using Method 9 (ARM 17.8.1213).

Recordkeeping

- M.4. When visual surveys are performed, Sidney Sugars shall maintain a log on site to verify that the visual surveys were performed as specified in Section III.M.3. Each log entry must include the date, time, results of the survey, and the observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventative or corrective action taken must be recorded in the log. This log shall be maintained on site and submitted to the Department upon request (ARM 17.8.1212).

Reporting

- M.5. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements (ARM 17.8.1212).
- M.6. The semiannual monitoring report must provide verification that visual surveys were performed and provide a summary of any corrective action taken (ARM 17.8.1212).

N. EU047-056: Sugar Silos (#7 through #16)

Condition(s)	Pollutant/ Parameter	Permit Limit	Compliance Demonstration Method	Frequency	Reporting Requirement
N.1, N.6, N.7, N.8	Filter Vent	Operate and Maintain	Inspect and Maintain Filter Vent, Connectors and Enclosures, and Log Inspection	Monthly and During Any Maintenance	Semiannual
N.2, N.6, N.7, N.8	Connection Between Silo #6 and #7	Operate and Maintain			

Condition(s)	Pollutant/ Parameter	Permit Limit	Compliance Demonstration Method	Frequency	Reporting Requirement
N.3, N.6, N.7, N.8	Screw Conveyors and Bucket Elevators	Enclosed			
N.4, N.6, N.7, N.8	Opacity	10%			
N.5, N.6, N.7, N.8	Particulate Matter	$E = 4.10 * P^{0.67}$ or $E = 55 * P^{0.11} - 40$			

Conditions

- N.1 Sidney Sugars shall install, operate and maintain a filter vent on sugar silos #7 through #16 (ARM 17.8.752).
- N.2 Sidney Sugars shall install, operate and maintain a connection between conditioner silo #6 and silo #9 to control emissions from silo #6 through silo #9 filter vent (ARM 17.8.752).
- N.3 Sidney Sugars shall install, operate and maintain enclosed screw conveyors and enclosed bucket elevators used to transfer sugar (ARM 17.8.752).
- N.4 Sidney Sugars shall not cause or authorize to be discharged into the atmosphere from each of the sugar silos (#7 through #16), visible emissions in excess of 10% opacity averaged over six consecutive minutes (ARM 17.8.752).
- N.5 Sidney Sugars shall not cause, suffer, allow or permit to be discharged into the atmosphere, from the sugar silo vents, particulate matter in excess of the amount calculated using the following equations (ARM 17.8.310):

For process weight rates greater than 60,000 lb/hr: $E = 55 * P^{0.11} - 40$

For process weight rates up to 60,000 lb/hr: $E = 4.10 * P^{0.67}$

Where E is the emission rate in pounds per hour and P is the process weight in tons per hour.

Compliance Demonstration

- N.6 Monitoring compliance with Section III.N.1, III.N.2, III.N.3, III.N.4 and III.N.5 may be satisfied by monthly inspecting and maintaining the filter vents, the connectors between silo #6 and #9, and the enclosed conveyors and bucket elevators. Filter vents, connectors between silo #6 and #9, and the enclosed conveyors and bucket elevators on the silos shall be maintained and operated in accordance with proper operating procedures to minimize emissions and monitor compliance with the particulate and opacity standards. A log shall be maintained on site and submitted to the Department upon request. Log entries shall be recorded monthly and during any maintenance activities. The log shall contain the following parameters (ARM 17.8.1213):
- Date of log entry
 - Time of log entry
 - Initials of individual entering information in the log
 - Inspection analysis of filter vents, connectors between silo #6 and #9, and the enclosed conveyors and bucket elevators
 - Any maintenance activities occurring

f. Records of control equipment and associated piping/ducts maintenance shall be kept
Recordkeeping

N.7. Sidney Sugars shall maintain a log as required by Section III.N.6 on site (ARM 17.8.1212).

Reporting

N.8. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements.

N.9. The semiannual monitoring report shall provide (ARM 17.8.1212):

- a. Certification of compliance with logging requirements as required by Section III.N.6 and provide a summary of any corrective action taken; and
- b. Certification that the filter vents, connectors, and elevators were inspected and maintained as required by Section III.N.6 and provide a summary of inspections and maintenance.

O. EU101: Beet Unloading and Handling, EU102: Coal Unloading, EU103: Coke Unloading and Handling, and EU104: Lime Unloading and Handling

Condition(s)	Pollutant/ Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
O.1, O.3, O.4, O.5	Opacity	20%	Visual Surveys	Weekly	Semiannual
O.2, O.3, O.4, O.5	Opacity	Reasonable Precaution	Preventative or Corrective Action	As Necessary	

Conditions

- O.1. Sidney Sugars shall not cause or authorize the production, handling, transportation, or storage of any material unless reasonable precautions to control emissions of particulate matter are taken. Such emissions of airborne particulate from any stationary source shall not exhibit an opacity of 20% or greater averaged over six consecutive minutes (ARM 17.8.308).
- O.2. Sidney Sugars shall treat all unpaved portions of the access roads, parking lots, and the general plant area with fresh water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precaution limitation (ARM 17.8.749).

Compliance Demonstration

- O.3. Once per calendar week during daylight hours, Sidney Sugars shall visually survey the cyclone stack for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous two years of the visual survey being performed. If sources of excessive emissions are identified, Sidney Sugars shall immediately conduct a Method 9 or take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Sidney Sugars shall immediately conduct a subsequent visual survey to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Sidney Sugars of a liability for a violation determined using Method 9 (ARM 17.8.1213).

Recordkeeping

O.4. When visual surveys are performed, Sidney Sugars shall maintain a log on site to verify that the visual surveys were performed as specified in Section III.O.4. Each log entry must include the date, time, results of the survey, and the observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventative or corrective action taken must be recorded in the log. This log shall be maintained on site and submitted to the Department upon request (ARM 17.8.1212).

Reporting

O.5. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements.

O.6. The semiannual monitoring reports shall provide (ARM 17.8.1212):

- a. Certification that the visual surveys were performed and logged as specified by Section III.O.4; and
- b. Identification of any instances of excessive fugitive emissions and provide a summary of any corrective action taken.

P. EU500: Haul Roads

Condition(s)	Pollutant/ Parameter	Permit Limit	Compliance Demonstration		Reporting Requirement
			Method	Frequency	
P.1, P.3, P.4, P.5	Opacity	20%	Visual Surveys	Weekly	Semiannual
P.2, P.4, P.5	Opacity	Reasonable Precaution	Preventative or Corrective Action	As Necessary	

Conditions

P.1. Sidney Sugars shall not cause or authorize the production, handling, transportation, or storage of any material unless reasonable precautions to control emissions of particulate matter are taken. Such emissions of airborne particulate from any stationary source shall not exhibit an opacity of 20% or greater averaged over six consecutive minutes (ARM 17.8.308).

P.2. Sidney Sugars shall treat all unpaved portions of the access roads, parking lots, and the general plant area with fresh water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions limitation (ARM 17.8.749).

Compliance Demonstration

P.3. Once per calendar week during daylight hours, Sidney Sugars shall visually survey the cyclone stack for any sources of excessive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions, which meet or exceed 15% opacity. The person conducting the survey does not have to be an EPA Method 9 certified observer. However, the individual must have been certified as a Method 9 observer within the previous two years of the visual survey being performed. If sources of excessive emissions are identified, Sidney Sugars shall immediately conduct a Method 9 or take corrective action to contain or minimize the source of emissions. If corrective actions are taken, then Sidney Sugars shall immediately conduct a subsequent visual survey to monitor compliance. The person conducting the visual survey shall record the results of the survey in a log, including any corrective action taken. Conducting a visual survey does not relieve Sidney Sugars of a liability for a violation determined using Method 9 (ARM 17.8.1213).

Recordkeeping

- P.4. When visual surveys are performed, Sidney Sugars shall maintain a log on site to verify that the visual surveys were performed as specified in Section III.Q.3. Each log entry must include the date, time, results of survey, and observer's initials. If any corrective action is required, the time, date, observer's initials, and any preventative or corrective action taken must be recorded in the log. This log shall be maintained on site and submitted to the Department upon request (ARM 17.8.1212).

Reporting

- P.5. The annual compliance certification required by Section V.B must contain a certification statement for the above applicable requirements.
- P.6. The semiannual monitoring report shall provide (ARM 17.8.1212):
- a. Certification that the visual surveys were performed and logged as specified by Section III.Q.;
 - b. Certification that the log of corrective actions was maintained as specified by Section III.Q.4;
and
 - c. Identification of any instances of excessive fugitive emissions and provide a summary of any corrective action taken.

SECTION IV NON-APPLICABLE REQUIREMENTS

Air Quality Administrative Rules of Montana (ARM) and Federal Regulations identified as not applicable to the facility or to a specific emission unit at the time of the permit issuance are listed below (ARM 17.8.1214). The following list does not preclude the need to comply with any new requirements that may become applicable during the permit term.

A. Facility-Wide

The following table contains non-applicable requirements that are administrated by the Air Resources Management Bureau of the Department of Environmental Quality.

Rule Citation	Reason
40 CFR 60.7 40 CFR 60.8 40 CFR 60.11 40 CFR 60.13 40 CFR 60.14 40 CFR 60.15 40 CFR 60.18	These rules do not apply because no changes have been made at the facility that would trigger these requirements.
40 CFR 60, Subpart C, Ca, Cb 40 CFR 60, Subpart D, Da, Db, Dc 40 CFR 60, Subpart E-J 40 CFR 60, Subpart K, Ka, Kb 40 CFR 60, Subpart L-X 40 CFR 60, Subpart Z 40 CFR 60, Subpart AA-EE 40 CFR 60, Subpart GG-HH 40 CFR 60, Subpart KK-NN 40 CFR 60, Subpart PP-XX 40 CFR 60, Subpart AAA-BBB 40 CFR 60, Subpart DDD 40 CFR 60, Subpart FFF-LLL 40 CFR 60, Subpart NNN-QQQ 40 CFR 60, Subpart SSS-VVV 40 CFR 61, Subpart B-F 40 CFR 61, Subpart H-L 40 CFR 61, Subpart N-R 40 CFR 61, Subpart T 40 CFR 61, Subpart V-W 40 CFR 61, Subpart Y 40 CFR 61, Subpart BB 40 CFR 61, Subpart FF	These requirements are not applicable because the facility is not an affected source as defined in these regulations.
40 CFR 63 40 CFR 68	These requirements are not applicable because this facility does not have emission units or regulated substance as defined in these regulations.
40 CFR 72-78	These requirements are not applicable because this facility is not in this source category.
ARM 17.8.809-824 ARM 17.8.827	These rules do not apply because no changes have been made at the facility that would trigger these procedural requirements.
ARM 17.8.610 ARM 17.8.323 ARM 17.8.321	These rules do not apply because this facility is not in this source category.
ARM 17.8.316 ARM 17.8.320 & 324	These rules do not apply because facility does not have these emission units.

B. Emission Units

The permit application identified applicable requirements; non-applicable requirements for individual or specific emission units were not listed. The Department has listed all non-applicable requirements in Section IV.A; these requirements relate to each specific unit as well as facility wide.

SECTION V GENERAL PERMIT CONDITIONS

A. COMPLIANCE REQUIREMENTS

ARM 17.8, Subchapter 12, Operating Permit Program, §1210(2)(a)-(c)&(e), §1206(6)(b)&(c)

1. Sidney Sugars must comply with all conditions of the permit. Any noncompliance with the terms or conditions of the permit constitutes a violation of the Montana Clean Air Act, and may result in enforcement action, permit modification, revocation and reissuance, or termination, or denial of a permit renewal application under ARM Title 17, Chapter 8, Subchapter 12.
2. The filing of a request by Sidney Sugars for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
3. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit. If appropriate, this factor may be considered as a mitigating factor in assessing a penalty for noncompliance with an applicable requirement if the source demonstrates that both the health, safety or environmental impacts of halting or reducing operations would be more serious than the impacts of continuing operations, and that such health, safety or environmental impacts were unforeseeable and could not have otherwise been avoided.
4. Sidney Sugars shall furnish to the Department, within a reasonable time set by the Department (not to be less than 15 days), any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, Sidney Sugars shall also furnish to the Department copies of those records that are required to be kept pursuant to the terms of the permit. This subsection does not impair or otherwise limit the right of Sidney Sugars to assert the confidentiality of the information requested by the Department, as provided in 75-2-105, MCA.
5. Any schedule of compliance for applicable requirements with which the source is not in compliance with at the time of permit issuance shall be supplemental to, and shall not sanction noncompliance with, the applicable requirements on which it was based.
6. For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis unless a more detailed plan or schedule is required by the applicable requirement or the Department.

B. CERTIFICATION REQUIREMENTS

ARM 17.8, Subchapter 12, Operating Permit Program, §1207 and §1213(7)(a)&(c)-(e)

1. Any application form, report, or compliance certification submitted pursuant to ARM Title 17, Chapter 8, Subchapter 12, shall contain certification by a responsible official of truth, accuracy and completeness. This certification and any other certification required under ARM Title 17, Chapter 8, Subchapter 12, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate and complete.
2. Compliance certifications shall be submitted by February 15 of each year, or more frequently if otherwise specified in an applicable requirement or elsewhere in the permit. Each certification must include the required information for the previous calendar year (i.e., January 1 – December 31).
3. Compliance certifications shall include the following:
 - a. The identification of each term or condition of the permit that is the basis of the certification;

- b. The identification of the method(s) or other means used by the owner or operator for determining the status of compliance with each term and condition during the certification period, consistent with ARM 17.8.1212;
 - c. The status of compliance with each term and condition for the period covered by the certification, including whether compliance during the period was continuous or intermittent (based on the method or means identified in ARM 17.8.1213(7)(c)(ii), as described above); and
 - d. Such other facts as the Department may require to determine the compliance status of the source.
4. All compliance certifications must be submitted to the Environmental Protection Agency, as well as to the Department, at the addresses listed in the Notification Addresses Appendix of this permit.

C. PERMIT SHIELD

ARM 17.8, Subchapter 12, Operating Permit Program, §1214(1)-(4)

- 1. The applicable requirements and non-federally enforceable requirements are included and specifically identified in this permit and the permit includes a concise summary of the requirements not applicable to the source. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements and any non-federally enforceable requirements as of the date of permit issuance.
- 2. The permit shield described in 1 above shall remain in effect during the appeal of any permit action (renewal, revision, reopening, revocation or re-issuance) to the Board of Environmental Review (Board) until such time as the Board renders its final decision.
- 3. Nothing in this permit alters or affects the following:
 - a. The provisions of Sec. 7603 of the FCAA, including the authority of the administrator under the section.
 - b. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance.
 - c. The applicable requirements of the Acid Rain Program, consistent with Sec. 7651g(a) of the FCAA.
 - d. The ability of the administrator to obtain information from a source pursuant to Sec. 7414 of the FCAA.
 - e. The ability of the Department to obtain information from a source pursuant to the Montana Clean Air Act, Title 75, Chapter 2, MCA.
 - f. The emergency powers of the Department under the Montana Clean Air Act, Title 75, Chapter 2, MCA.
 - g. The ability of the Department to establish or revise requirements for the use of Reasonably Available Control Technology (RACT) as defined in ARM Title 17, Chapter 8. However, if the inclusion of a RACT into the permit pursuant to ARM Title 17, Chapter 8, Subchapter 12 is appealed to the Board, the permit shield as it applies to the source's existing permit shall remain in effect until such time as the Board has rendered its final decision.
- 4. Nothing in this permit alters or affects the ability of the Department to take enforcement action for a violation demonstrated pursuant to ARM 17.8.106, "Source Testing Protocol."
- 5. Determinations of compliance, or noncompliance, are not restricted to the monitoring requirements listed in this permit; other available information may be used as allowed by Sec. 113(a) of the FCAA.

6. The permit shield will not extend to minor permit modifications or changes not requiring a permit revision (see sections I & J).
7. The permit shield will extend to significant permit modifications and transfer or assignment of ownership (see Sections K & N).

D. MONITORING, RECORDKEEPING, AND REPORTING REQUIREMENTS

ARM 17.8, Subchapter 12, Operating Permit Program, §1212(2)&(3)

1. Unless otherwise provided in this permit, Sidney Sugars shall maintain compliance monitoring records that include the following information:
 - a. The date, place as defined in the permit, and time of sampling or measurements
 - b. The date(s) analyses were performed
 - c. The company or entity that performed the analyses
 - d. The analytical techniques or methods used
 - e. The results of such analysis
 - f. The operating conditions at the time of sampling or measurement
2. Sidney Sugars shall retain records of all required monitoring data and support information for a period of at least 5 years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records, all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. All monitoring data, support information, and required reports and summaries may be maintained in a computerized form at the plant site if the information is made available to Department personnel upon request, which may be for either hard copies or computerized format. Strip-charts must be retained in their original form at the plant site and shall be made available to Department personnel upon request.
3. The permittee shall submit to the Department, at the addresses located in the Notification Addresses Appendix of this permit, reports of any required monitoring by February 15 and August 15 of each year, or more frequently if otherwise specified in an applicable requirement or elsewhere in the permit. The monitoring report submitted on February 15 of each year must include the required monitoring information for the period of July 1 through December 31 of the previous year. The monitoring report submitted on August 15 of each year must include the required monitoring information for the period of January 1 through June 30 of the current year. All instances of deviations from the permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official, consistent with ARM 17.8.1207.

E. PROMPT DEVIATION REPORTING

ARM 17.8, Subchapter 12, Operating Permit Program, §1212(3)(c)

Sidney Sugars shall promptly report deviations from permit requirements, including those attributable to upset conditions as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. To be considered prompt, deviations shall be reported as part of the routine reporting requirements under ARM 17.8.1212(3)(b) and, if applicable, in accordance with the malfunction reporting requirements under ARM 17.8.110, unless otherwise specified in an applicable requirement.

F. EMERGENCY PROVISIONS

ARM 17.8, Subchapter 12, Operating Permit Program, §1201(13) and §1214(5), (6)&(8)

1. An "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of the source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under this permit due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of reasonable preventative maintenance, careless or improper operation, or operator error.
2. An emergency constitutes an affirmative defense to an action brought for noncompliance with a technology-based emission limitation if Sidney Sugars demonstrates through properly signed, contemporaneous operating logs or other relevant evidence that:
 - a. An emergency occurred and Sidney Sugars can identify the cause(s) of the emergency
 - b. The permitted facility was at the time being properly operated
 - c. During the period of the emergency Sidney Sugars took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in the permit
 - d. Sidney Sugars submitted notice of the emergency to the Department within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice fulfills the requirements of ARM 17.8.1212(3)(c). This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken.
3. These emergency provisions are in addition to any emergency, malfunction or upset provision contained in any applicable requirement.

G. INSPECTION AND ENTRY

ARM 17.8, Subchapter 12, Operating Permit Program, §1213(3)&(4)

1. Upon presentation of credentials and other documents as may be required by law, Sidney Sugars shall allow the Department, the administrator or an authorized representative (including an authorized contractor acting as a representative of the Department or the administrator) to perform the following:
 - a. Enter the premises where a source required to obtain a permit is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit
 - c. Inspect at reasonable times any facilities, emission units, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit
 - d. As authorized by the Montana Clean Air Act and rules promulgated thereunder, sample or monitor at reasonable times any substances or parameters at any location for the purpose of ensuring compliance with permit or applicable requirements
2. Sidney Sugars shall inform the inspector of all applicable workplace safety rules or requirements at the time of the inspection. This section shall not limit in any manner the Department's statutory right of entry and inspection as provided for in 75-2-403, MCA.

H. FEE PAYMENT

ARM 17.8, Subchapter 12, Operating Permit Program, §1210(2)(f), and ARM 17.8, Subchapter 5, Air Quality Permit Application, Operation and Open Burning Fees, §505(3)-(5) (STATE ONLY)

1. Sidney Sugars must pay application and operating fees, pursuant to ARM Title 17, Chapter 8, Subchapter 5.
2. Annually, the Department shall provide Sidney Sugars with written notice of the amount of the fee and the basis for the fee assessment. The air quality operation fee is due 30 days after receipt of the notice, unless the fee assessment is appealed pursuant to ARM 17.8.511. If any portion of the fee is not appealed, that portion of the fee that is not appealed is due 30 days after receipt of the notice. Any remaining fee, which may be due after completion of an appeal, is due immediately upon issuance of the Board's decision or upon completion of any judicial review of the Board's decision.
3. If Sidney Sugars fails to pay the required fee (or any required portion of an appealed fee) within 90 days after the due date of the fee, the Department may impose an additional assessment of 15% of the fee (or any required portion of an appealed fee) or \$100, whichever is greater, plus interest on the fee (or any required portion of an appealed fee) computed at the interest rate established under 15-31-510(3), MCA.

I. MINOR PERMIT MODIFICATIONS

ARM 17.8, Subchapter 12, Operating Permit Program, §1226(3)&(11)

1. An application for a minor permit modification need only address in detail those portions of the permit application that require revision, updating, supplementation, or deletion, and may reference any required information that has been previously submitted.
2. The permit shield under ARM 17.8.1214 will not extend to any minor modifications processed pursuant to ARM 17.8.1226.

J. CHANGES NOT REQUIRING PERMIT REVISION

ARM 17.8, Subchapter 12, Operating Permit Program, 1224(1)-(3), (5)&(6)

1. Sidney Sugars is authorized to make changes within the facility as described below, providing the following conditions are met:
 - a. The proposed changes do not require Sidney Sugars to obtain an air quality preconstruction permit under ARM Title 17, Chapter 8, Subchapter 7
 - b. The proposed changes are not modifications under Title I of the FCAA, or as defined in ARM Title 17, Chapter 8, Subchapters 8, 9, or 10
 - c. The emissions resulting from the proposed changes do not exceed the emissions allowable under the permit, whether expressed as a rate of emissions or in total emissions
 - d. The proposed changes do not alter permit terms that are necessary to enforce applicable emission limitations on emission units covered by the permit
 - e. The facility provides the administrator and the Department with written notification at least 7 days prior to making the proposed changes
2. Sidney Sugars and the Department shall attach each notice provided pursuant to 1.e, above, to their respective copies of this permit.

3. Pursuant to the conditions above, Sidney Sugars is authorized to make Sec. 502(b)(10) changes, as defined in ARM Title 17, Chapter 8, Subchapter 12, without a permit revision. For each such change, the written notification required under 1.e above, shall include a description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.
4. Sidney Sugars may make a change not specifically addressed or prohibited by the permit terms and conditions without requiring a permit revision, provided that the following conditions are met:
 - a. Each proposed change does not weaken the enforceability of any existing permit conditions
 - b. The Department has not objected to such change
 - c. Each proposed change meets all applicable requirements and does not violate any existing permit term or condition
 - d. Sidney Sugars provides contemporaneous written notice to the Department and the administrator of each change that is above the level for insignificant emission units as defined in ARM 17.8.1201(22) and 17.8.1206(3), and the written notice describes each such change, including the date of the change, any change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change
5. The permit shield authorized by ARM 17.8.1214 shall not apply to changes made pursuant to ARM 17.8.1224(3) and ARM 17.8.1224(5), but is applicable to terms and conditions that allow for increases and decreases in emissions pursuant to ARM 17.8.1224(4).

K. SIGNIFICANT PERMIT MODIFICATIONS

ARM 17.8, Subchapter 12, Operating Permit Program, §1227(1), (3)&(4)

1. The modification procedures set forth in 2 below must be used for any application requesting a significant modification of this permit. Significant modifications include the following:
 - a. Any permit modification that does not qualify as either a minor modification or as an administrative permit amendment
 - b. Every significant change in existing permit monitoring terms or conditions
 - c. Every relaxation of permit reporting or recordkeeping terms or conditions that limit the Department's ability to monitor compliance with any applicable rule, consistent with the requirements of the rule or
 - d. Any other change determined by the Department to be significant
2. Significant modifications shall meet all requirements of ARM Title 17, Chapter 8, including those for applications, public participation, and review by affected states and the administrator, as they apply to permit issuance and renewal, except that an application for a significant modification permit need only address in detail those portions of the permit application that require revision, updating, supplementation, or deletion.
3. The permit shield provided for in ARM 17.8.1214 shall extend to significant modifications.

L. REOPENING FOR CAUSE

ARM 17.8, Subchapter 12, Operating Permit Program, §1228(1)&(2)

1. This permit may be reopened and revised under the following circumstances.
 - a. Additional applicable requirements under the FCAA become applicable to the facility when the permit has a remaining term of 3 or more years. Reopening and revision of the permit shall be completed not later than 18 months after promulgation of the applicable requirement. No reopening is required under ARM 17.8.1228(1)(a) if the effective date of the applicable requirement is later than the date on which the permit is due to expire, unless the original permit or any of its terms and conditions have been extended pursuant to ARM 17.8.1220(12) or 17.8.1221(2).
 - b. Additional requirements (including excess emission requirements) become applicable to an affected source under the Acid Rain Program. Upon approval by the administrator, excess emission offset plans shall be deemed to be incorporated into the permit.
 - c. The Department or the administrator determines that the permit contains a material mistake or that inaccurate statements were made in establishing the emission standards or other terms or conditions of the permit.
 - d. The administrator or the Department determines that the permit must be revised or revoked and reissued to monitor compliance with the applicable requirements.

M. PERMIT EXPIRATION AND RENEWAL

ARM 17.8, Subchapter 12, Operating Permit Program, §1210(2)(g), §1220(11)&(12), and §1205(2)(d)

1. This permit is issued for a fixed term of 5 years.
2. Renewal of this permit is subject to the same procedural requirements that apply to permit issuance, including those for applications, content, public participation, and affected state and administrator review.
3. Expiration of this permit terminates Sidney Sugars' right to operate unless a timely and administratively complete permit renewal application has been submitted consistent with ARM 17.8.1221 and 17.8.1205(2)(d). If a timely and administratively complete application has been submitted all terms and conditions of the permit, including the application shield, remain in effect after the permit expires until the permit renewal has been issued or denied.
4. For renewal, Sidney Sugars shall submit a complete air quality operating permit application to the Department not later than 6 months prior to the expiration of this permit, unless otherwise specified. If necessary to ensure that the terms of the existing permit will not lapse before renewal, the Department may specify in writing to Sidney Sugars a longer time period for submission of the renewal application. Such written notification must be provided at least 1 year before the renewal application due date established in the existing permit.

N. SEVERABILITY CLAUSE

ARM 17.8, Subchapter 12, Operating Permit Program, §1210(i)&(l)

1. The administrative appeal or subsequent judicial review of the issuance by the Department of an initial permit under this subchapter shall not impair in any manner the underlying applicability of all applicable requirements, and such requirements continue to apply to the source as if a final permit decision had not been reached by the Department.

2. If any provision of a permit is found to be invalid, all valid parts that are severable from the invalid part remain in effect. If a provision of a permit is invalid in one or more of its applications, the provision remains in effect in all valid applications that are severable from the invalid applications.

O. TRANSFER OR ASSIGNMENT OF OWNERSHIP

ARM 17.8, Subchapter 12, Operating Permit Program, §1225(2)&(4)

1. If an administrative permit amendment involves a change in ownership or operational control, the applicant must include in its request to the Department a written agreement containing a specific date for the transfer of permit responsibility, coverage, and liability between the current and new permittee.
2. The permit shield provided for in ARM 17.8.1214 shall extend to administrative permit amendments.

P. EMISSION TRADING, MARKETABLE PERMITS, ECONOMIC INCENTIVES

ARM 17.8, Subchapter 12, Operating Permit Program, §1226(2)

Notwithstanding ARM 17.8.1226(1) and (7), minor air quality operating permit modification procedures may be used for permit modifications involving the use of economic incentives, marketable permits, emissions trading, and other similar approaches, to the extent that such minor permit modification procedures are explicitly provided for in the Montana State Implementation Plan or in applicable requirements promulgated by the administrator.

Q. NO PROPERTY RIGHTS CONVEYED

ARM 17.8, Subchapter 12, Operating Permit Program, §1210(2)(d)

This permit does not convey any property rights of any sort, or any exclusive privilege.

R. TESTING REQUIREMENTS

ARM 17.8, Subchapter 1, General Provisions, §105

Sidney Sugars shall comply with ARM 17.8.105.

S. SOURCE TESTING PROTOCOL

ARM 17.8, Subchapter 1, General Provisions, §106

Sidney Sugars shall comply with ARM 17.8.106.

T. MALFUNCTIONS

ARM 17.8, Subchapter 1, General Provisions, §110

Sidney Sugars shall comply with ARM 17.8.110.

U. CIRCUMVENTION

ARM 17.8, Subchapter 1, General Provisions, §111

Sidney Sugars shall comply with ARM 17.8.111.

V. MOTOR VEHICLES

ARM 17.8, Subchapter 3, Emission Standards, §325

Sidney Sugars shall comply with ARM 17.8.325.

W. ANNUAL EMISSIONS INVENTORY

ARM 17.8, Subchapter 5, Air Quality Permit Application, Operation and Open Burning Fees, §505 (STATE ONLY)

Sidney Sugars shall supply the Department with annual production and other information for all emission units necessary to calculate actual or estimated actual amount of air pollutants emitted during each calendar year. Information shall be gathered on a calendar-year basis and submitted to the Department by the date required in the emission inventory request, unless otherwise specified in this permit. Information shall be in the units required by the Department.

X. OPEN BURNING

ARM 17.8, Subchapter 6, Open Burning, §604, 605, and 606

Sidney Sugars shall comply with ARM 17.8.604, 605, and 606.

Y. MONTANA AIR QUALITY PERMITS

ARM 17.8, Subchapter 7, Permit, Construction and Operation of Air Contaminant Sources, §745, and 764 (ARM 17.8 745(1), and 764(1)(b) are STATE ENFORCEABLE ONLY until approved by EPA as part of SIP)

1. Except as specified, no person shall construct, install, alter, or use any air contaminant source or stack associated with any source without first obtaining a permit from the Department or Board. A permit is not required for those sources or stacks as specified by ARM 17.8.745(1)(a)-(k).
2. The permittee shall comply with ARM 17.8.743, 744, 745, 748, and 764.
3. ARM 17.8.745(1) specifies de minimis changes as construction or changed conditions of operation at a facility holding an air quality preconstruction permit issued under Chapter 8 that does not increase the facility's potential to emit by more than 15 tons per year of any pollutant except:
 - a. Any construction or changed condition that would violate any condition in the facility's existing air quality preconstruction permit or any applicable rule contained in Chapter 8 is prohibited, except as provided in ARM 17.8.745(2).
 - b. Any construction or changed conditions of operation that would qualify as a major modification under Subchapters 8, 9, or 10 of Chapter 8.
 - c. Any construction or changed condition of operation that would affect the plume rise or dispersion characteristic of emissions that would cause or contribute to a violation of an ambient air quality standard or ambient air increment as defined in ARM 17.8.804.
 - d. Any construction or improvement project with a potential to emit more than 15 tons per year may not be artificially split into smaller projects to avoid air quality preconstruction permitting.
 - e. Emission reductions obtained through offsetting within a facility are not included when determining the potential emission increase from construction or changed conditions of operation, unless such reductions are made federally enforceable.
4. Any facility making a de minimis change pursuant to ARM 17.8.745(1) shall notify the Department if the change would include a change in control equipment, stack height, stack diameter, stack flow, stack gas temperature, source location, or fuel specifications, or would result in an increase in source capacity above its permitted operation or the addition of a new emission unit. The notice must be submitted to the Department, in writing, 10 days prior to start up or use of the proposed de minimis change, or as soon as reasonably practicable in the event of an unanticipated circumstance causing the de minimis change, and must include the information requested in ARM 17.8.745(1) (STATE ENFORCEABLE ONLY until approved by EPA as part of the SIP).

Z. NATIONAL EMISSION STANDARD FOR ASBESTOS

40 CFR Part 61, Subpart M

Sidney Sugars shall not conduct any asbestos abatement activities except in accordance with 40 CFR Part 61, Subpart M (National Emission Standard for Hazardous Air Pollutants for Asbestos).

AA. ASBESTOS

ARM 17.74, Subchapter 3, General Provisions, and Subchapter 4, Fees

Sidney Sugars shall comply with ARM 17.74.301, *et seq.*, and ARM 17.74.401, *et seq.* (STATE ONLY).

BB. STRATOSPHERIC OZONE PROTECTION – SERVICING MOTOR VEHICLE AIR CONDITIONERS

40 CFR Part 82, Subpart B

If Sidney Sugars performs a service on motor vehicles and this service involves ozone-depleting substance/refrigerant in the motor vehicle air conditioner (MVAC), Sidney Sugars is subject to all applicable requirements as specified in 40 CFR Part 82, Subpart B.

CC. STRATOSPHERIC OZONE PROTECTION – RECYCLING AND EMISSION REDUCTIONS

40 CFR Part 82, Subpart F

Sidney Sugars shall comply with the standards for recycling and emission reductions in 40 CFR Part 82, Subpart F, except as provided for MVACs in Subpart B.

1. Persons opening appliances for maintenance, service, repair or disposal must comply with the required practice pursuant to §82.156.
2. Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
3. Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technical certification program pursuant to §82.161.
4. Persons disposing of small appliances, MVACs, and MVAC-like (as defined at §82.152) appliances must comply with recordkeeping requirements pursuant to §82.166.
5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

DD. EMERGENCY EPISODE PLAN

Sidney Sugars shall comply with the requirements contained in Chapter 9.7 of the State of Montana Air Quality Control Implementation Plan.

Each major source emitting 100 tons per year located in a Priority I Air Quality Control Region shall submit to the Department a legally enforceable Emergency Episode Action Plan (EEAP) that details how the source will curtail emissions during an air pollutant emergency episode. The industrial EEAP shall be in accordance with the Department's EEAP and shall be submitted according to a timetable developed by the Department following Priority I reclassification.

EE. DEFINITIONS

Terms not otherwise defined in this permit or in the Definitions and Abbreviations Appendix of this permit shall have the meaning assigned to them in the referenced regulation.

APPENDICES

APPENDIX. A INSIGNIFICANT EMISSION UNITS

Disclaimer: The information in this appendix is not State or Federally enforceable, but is presented to assist Sidney Sugars, the permitting authority, inspectors, and the public.

Pursuant to ARM 17.8.1201(22)(a), an insignificant emission unit means any activity or emission unit located within a source that: (i) has a potential to emit less than 5 tons per year of any regulated pollutant; (ii) has a potential to emit less than 500 pounds per year of lead; (iii) has a potential to emit less than 500 pounds per year of hazardous air pollutants listed pursuant to Sec. 7412 (b) of the FCAA; and (iv) is not regulated by an applicable requirement, other than a generally applicable requirement that applies to all emission units subject to Subchapter 12.

List of Insignificant Activities:

The following table of insignificant sources and/or activities was provided by Sidney Sugars. Because there are no requirements to update such a list, the emission units and/or activities may change from those specified in the table.

Emission Unit ID	Description
IEU004	Steam Vent Blowdown Tank Vent
IEU006	Boiler Feed Tank Vent
IEU008A, B, & C	Boiler Safety Vents
IEU009	Exhaust Steam Vents
IEU010	Generator Turbine Relief Vents
IEU011, IEU029 A & B, IEU046	Extraction & Purification Ammonia Vents
IEU012A, B, C & D	Pulp Dryer Building Roof Vent
IEU013A, B, C, D & E	Dried Pulp Warehouse Roof Vents
IEU014	Kiln Draft Fan
IEU015A & B	Kiln Building Vent Fans
IEU016	Oliver Building Vent
IEU017A, B, & C	Diffuser Roof Vents
IEU018A & B	Diffuser Vapor Vents
IEU019A, B, & C	Control House Roof Vents
IEU021	Slaker Building Wet Scrubber <ul style="list-style-type: none"> - Main Rotary Slaker - Mini Rotary Slaker - Mini Vibrating Slaker Feeder - Vibrating Milk of Lime Screen - Main Slaker Classifier Screw Conveyor - Mini Slaker Grit Drag Conveyor
IEU032	Maintenance Shop Vent
IEU033	Oliver Vacuum Pump Vent
IEU034	Sidney Carb Vent
IEU035A, B, & C	Benning Vent, Evaporator Supply Tank Vent, and Diffuser Supply Tank
IEU036	Suction for Oliver Air Compressor
IEU037	Second Carb Vent
IEU038	Dorr Tank Vent
IEU039	Press Steam Vapor Vent
IEU040	Oliver Wet Scrubber
IEU041	Wash House Roof Vent
IEU042	Oliver Roof Vent
IEU043B	Slaker Building Vent
IEU044	Tower Duffuser Vapor Vent
IEU045	Mixer Building Roof Vent
IEU046	Silos #1-4 with Sly Filter Baghouse
IEU108, IEU109, IEU110	Pond Unloading and Handling
IEU111	Portable Coal Screen

APPENDIX. B DEFINITIONS and ABBREVIATIONS

"Act" means the Clean Air Act, as amended, 42 U.S. 7401, *et seq.*

"Administrative permit amendment" means an air quality operating permit revision that:

- (a) Corrects typographical errors
- (b) Identifies a change in the name, address or phone number of any person identified in the air quality operating permit, or identifies a similar minor administrative change at the source
- (c) Requires more frequent monitoring or reporting by Sidney Sugars
- (d) Requires changes in monitoring or reporting requirements that the Department deems to be no less stringent than current monitoring or reporting requirements
- (e) Allows for a change in ownership or operational control of a source if the Department has determined that no other change in the air quality operating permit is necessary, consistent with ARM 17.8.1225
- (f) Incorporates any other type of change that the Department has determined to be similar to those revisions set forth in (a)-(e) above

"Applicable requirement" means all of the following as they apply to emission units in a source requiring an air quality operating permit (including requirements that have been promulgated or approved by the Department or the administrator through rule making at the time of issuance of the air quality operating permit, but have future-effective compliance dates, provided that such requirements apply to sources covered under the operating permit).

- (a) Any standard, rule, or other requirement, including any requirement contained in a consent decree or judicial or administrative order entered into or issued by the Department, that is contained in the Montana State Implementation Plan approved or promulgated by the administrator through rule making under Title I of the FCAA
- (b) Any federally enforceable term, condition or other requirement of any air quality preconstruction permit issued by the Department under subchapters 7, 8, 9, and 10 of this chapter, or pursuant to regulations approved or promulgated through rule making under Title I of the FCAA, including parts C and D
- (c) Any standard or other requirement under Sec. 7411 of the FCAA, including Sec. 7411(d)
- (d) Any standard or other requirement under Sec. 7412 of the FCAA, including any requirement concerning accident prevention under Sec. 7412(r)(7), but excluding the contents of any risk management plan required under Sec. 7412(r)
- (e) Any standard or other requirement of the Acid Rain Program under Title IV of the FCAA or regulations promulgated thereunder
- (f) Any requirements established pursuant to Sec. 7661c(b) or Sec. 7414(a)(3) of the FCAA
- (g) Any standard or other requirement governing solid waste incineration, under Sec. 7429 of the FCAA
- (h) Any standard or other requirement for consumer and commercial products, under Sec. 7511b(e) of the FCAA

- (i) Any standard or other requirement for tank vessels, under Sec. 7511b(f) of the FCAA
- (j) Any standard or other requirement of the regulations promulgated to protect stratospheric ozone under Title VI of the FCAA, unless the administrator determines that such requirements need not be contained in an air quality operating permit
- (k) Any national ambient air quality standard or increment or visibility requirement under part C of Title I of the FCAA, but only as it would apply to temporary sources permitted pursuant to Sec. 7661c(e) of the FCAA
- (l) Any federally enforceable term or condition of any air quality open burning permit issued by the Department under subchapter 6

"Campaign" means the operating time it takes to process a years harvest, generally between September and March.

"Department" means the Montana Department of Environmental Quality.

"Emission unit" means any part or activity of a stationary source that emits or has the potential to emit any regulated air pollutant or any pollutant listed under Sec. 7412(b) of the FCAA. This term is not meant to alter or affect the definition of the term "unit" for purposes of Title IV of the FCAA.

"Excess Emissions" means any visible emissions from a stack or source, viewed during the visual surveys, believed to exceed visible emission requirements during normal operating conditions.

"Excess Fugitive Emissions" means any visible emissions that leave the plant site boundaries.

"FCAA" means the Federal Clean Air Act, as amended.

"Federally enforceable" means all limitations and conditions that are enforceable by the administrator, including those requirements developed pursuant to 40 CFR Parts 60 and 61, requirements within the Montana State Implementation Plan, and any permit requirement established pursuant to 40 CFR 52.21 or under regulations approved pursuant to 40 CFR Part 51, Subpart I, including operating permits issued under an EPA approved program that is incorporated into the Montana State Implementation Plan and expressly requires adherence to any permit issued under such program.

"Fugitive emissions" means those emissions that could not reasonably pass through a stack, chimney, vent, or other functionally equivalent opening.

"General air quality operating permit" or **"general permit"** means an air quality operating permit that meets the requirements of ARM 17.8.1222, covers multiple sources in a source category, and is issued in lieu of individual permits being issued to each source.

"Hazardous air pollutant" means any air pollutant listed as a hazardous air pollutant pursuant to Sec. 112(b) of the FCAA.

"Non-federally enforceable requirement" means the following as they apply to emission units in a source requiring an air quality operating permit.

- (a) Any standard, rule, or other requirement, including any requirement contained in a consent decree, or judicial or administrative order entered into or issued by the Department, that is not contained in the Montana state implementation plan approved or promulgated by the administrator through rule making under Title I of the FCAA.

- (b) Any term, condition or other requirement contained in any air quality preconstruction permit issued by the Department under Subchapters 7, 8, 9, and 10 of this chapter that is not federally enforceable.
- (c) Does not include any Montana ambient air quality standard contained in Subchapter 2 of this chapter.

"Permittee" means the owner or operator of any source subject to the permitting requirements of this subchapter, as provided in ARM 17.8.1204, that holds a valid air quality operating permit or has submitted a timely and complete permit application for issuance, renewal, amendment, or modification pursuant to this subchapter.

"Regulated air pollutant" means the following:

- (a) Nitrogen oxides or any volatile organic compounds.
- (b) Any pollutant for which a national ambient air quality standard has been promulgated.
- (c) Any pollutant that is subject to any standard promulgated under Sec. 7411 of the FCAA.
- (d) Any Class I or II substance subject to a standard promulgated under or established by Title VI of the FCAA.
- (e) Any pollutant subject to a standard or other requirement established or promulgated under Sec. 7412 of the FCAA, including but not limited to the following:
 - (i) Any pollutant subject to requirements under Sec. 7412(j) of the FCAA. If the administrator fails to promulgate a standard by the date established in Sec. 7412(e) of the FCAA, any pollutant for which a subject source would be major shall be considered to be regulated on the date 18 months after the applicable date established in Sec. 7412(e) of the FCAA.
 - (ii) Any pollutant for which the requirements of Sec. 7412(g)(2) of the FCAA have been met but only with respect to the individual source subject to Sec. 7412(g)(2) requirement.

"Responsible official" means one of the following:

- (a) For a corporation: a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities applying for or subject to a permit and either:
 - (i) The facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars).
 - (ii) The delegation of authority to such representative is approved in advance by the Department.
- (b) For a partnership or sole proprietorship: a general partner or the proprietor; respectively
- (c) For a municipality, state, federal, or other public agency: either a principal executive officer or ranking elected official. For the purposes of this part, a principal executive officer of a federal agency includes the chief executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., a regional administrator of the environmental protection agency).
- (d) For affected sources: the designated representative in so far as actions, standards, requirements, or prohibitions under Title IV of the FCAA or the regulations promulgated thereunder are concerned, and the designated representative for any other purposes under this subchapter.

Abbreviations:

ARM	Administrative Rules of Montana
ASTM	American Society of Testing Materials
BACT	Best Available Control Technology
BDT	bone dry tons
BTU	British Thermal Unit
CFR	Code of Federal Regulations
CO	carbon monoxide
DEQ	Department of Environmental Quality
dscf	dry standard cubic foot
dscfm	dry standard cubic foot per minute
EPA	U.S. Environmental Protection Agency
EPA Method	Test methods contained in 40 CFR 60, Appendix A
EU	emission unit
FCAA	Federal Clean Air Act
gr	grains
HAP	hazardous air pollutant
IEU	insignificant emission unit
Mbdft	thousand board feet
Method 5	40 CFR 60, Appendix A, Method 5
Method 9	40 CFR 60, Appendix A, Method 9
MMbdft	million board feet
MMBTU	million British Thermal Units
NO _x	oxides of nitrogen
NO ₂	nitrogen dioxide
O ₂	oxygen
Pb	lead
PM	particulate matter
PM ₁₀	particulate matter less than 10 microns in size
psi	pounds per square inch
scf	standard cubic feet
SIC	Source Industrial Classification
SO ₂	sulfur dioxide
SO _x	oxides of sulfur
tpd	tons per day
tpy	tons per year
U.S.C.	United States Code
VE	visible emissions
VOC	volatile organic compound

APPENDIX. C NOTIFICATION ADDRESSES

Compliance Notifications:

Montana Department of Environmental Quality
Permitting and Compliance Division
Air Resources Management Bureau
P.O. Box 200901
Helena, MT 59620-0901

United States EPA
Air Program Coordinator
Region VIII, Montana Office
10W. 15th Suite 3200
Helena, MT 59626

Permit Modifications:

Montana Department of Environmental Quality
Permitting and Compliance Division
Air Resources Management Bureau
P.O. Box 200901
Helena, MT 59620-0901

Office of Partnerships and Regulatory Assistance
Air and Radiation Program
US EPA Region VIII 8P-AR
999 18th Street, Suite 300
Denver, CO 80202-2466

APPENDIX. D AIR QUALITY INSPECTOR INFORMATION

Disclaimer: The information in this appendix is not State or Federally enforceable, but is presented to assist Sidney Sugars, permitting authority, inspectors, and the public.

Direction to Plant:

The Sidney Sugars Sugar Corporation sugar factory is located east of the town of Sidney in Richland County, Montana.

Safety Equipment Required:

Hardhat, steel-toed shoes/boots, and hearing protection (as necessary) are required at the facility. Hair and Beard nets (supplied by Sidney Sugars) shall be worn while occupying the sugar handling and packaging area.

Facility Plot Plan:

The facility plot plan was submitted as part of the application on March 21, 1995.

APPENDIX. E COMPLIANCE ASSURANCE MONITORING (CAM) PLAN

Monitoring Approach for PM and SO2 for the CE Boilers #1 and #2		
	Indicator No. 1	Indicator No. 2
A. General Criteria		
1. Performance Indicator	Steam generation rate	Scrubber differential pressure
2. Measurement Approach	Orifice meter to measure steam flow rate	Differential pressure transducer
3. Indicator Range	An excursion is defined as an hourly average steam generation level of less than 50,000 lb/hr or greater than 100,000 lb/hr. Excursions trigger an inspection, corrective action, and a reporting requirement.	An excursion is defined as a 1-hour average differential pressure below 9.5 inches of water or greater than 12.5 inches of water. Excursions trigger an inspection, corrective action, and a reporting requirement
B. Performance Criteria		
Data Representativeness	The orifice is located in the steam line.	The differential pressure transducer monitors the static pressure upstream and downstream of the scrubber's venturi throat.
Verification of Operational Status	N/A	N/A
QA/QC Practices and Criteria	Calibrated on initial installation	Monthly comparison to a U-tube manometer. Acceptable criteria is 0.5 in. w.c.
Monitoring Frequency	Measured continuously	Measured continuously
Data Collection Procedures	Continuous data is measured and stored on a strip chart from which 1-hour averages can be calculated.	Operator takes readings every 15-minutes and logs readings from which 1-hour averages can be calculated.
Averaging Period	1-hour	1-hour

Enhanced Monitoring Approach for PM and SO2 for the CE Boilers #1 and #2		
	Indicator No. 1-E	Indicator No. 2-E
A. General Criteria		
1. Performance Indicator	Scrubber water recirculation flow rate	Scrubber water pH
2. Measurement Approach	Flow meters to measure scrubber water recirculation flow rate to each scrubber unit	In-line pH meters
3. Indicator Range	An excursion is defined as an hourly average of scrubber water recirculation flow rate of less than 250 gpm. Excursions trigger an inspection, corrective action, and a reporting requirement.	An excursion is defined as a 1-hour average pH below 6.2 units. Excursions trigger an inspection, corrective action, and a reporting requirement.
B. Performance Criteria		
1. Data Representativeness	Flow meters located on scrubber recirculation lines	The in-line pH meters monitor the pH of the scrubber water.
2. Verification of Operational Status	N/A	Daily checks and calibrations with a laboratory pH meter.
3. QA/QC Practices and Criteria	Calibrated on initial installation	Weekly comparison to a laboratory meter. Acceptable criteria is ± 0.2 pH unit variability between in-line meters and laboratory meter
4. Monitoring Frequency	Measured continuously	Measured continuously
Data Collection Procedures	Continuous data is measured and operator takes readings at 2-4 intervals during each hour and logs readings from which 1-hour averages can be calculated	Operator takes readings 2-4 intervals during each hour and logs readings from which 1-hour averages can be calculated, and/or continuous data is measured and stored on a strip chart from which 1-hour averages can be calculated.
Averaging Period	1-hour	1-hour

Although the complete hard copy of Appendix E is not included in the permit, the contents of Appendix E, Sidney Sugar's CAM Plan remain as applicable requirements as stated in the Title V Operating Permit #OP1826-05. To receive a hard copy of this appendix, please contact one of the following:

The Department of Environmental Quality
 Permitting and Compliance Division
 Air Resources Management Bureau
 1520 E. Sixth Ave.
 P.O. Box 200901
 Helena, MT 59620-0901
 Bureau Phone #: (406) 444-3490

OR

Sidney Sugars Incorporated
 R.R. 1, Box 3011
 Sidney, Montana 59270
 Phone #: 406-433-3303