

AIR QUALITY PERMIT

Issued To: The Western Sugar Cooperative Permit: #2912-02
7555 E. Hampden Ave., Suite 600 Administrative Amendment Request Received: 06/23/03
Denver, Colorado 80231 Department Decision on Administrative Amendment: 07/17/03
Permit Final: 08/02/03
AFS: #111-0007

An air quality permit, with conditions, is hereby granted to The Western Sugar Cooperative (Western Sugar), pursuant to Sections 75-2-204 and 211 of the Montana Code Annotated (MCA), as amended, and Administrative Rules of Montana (ARM) 17.8.740, *et seq.*, as amended, for the following:

SECTION I: Permitted Facilities

A. Plant Location

Western Sugar operates a sugar beet processing facility in Billings, Montana. The legal description of the facility is the Northeast $\frac{1}{4}$ of Section 10, Township 1 South, Range 26 East, in Yellowstone County, Montana.

B. Current Permit Action

On June 23, 2003, the Department of Environmental Quality (Department) received a de minimis notification from Western Sugar. The change involved replacing the wet scrubber on the second sugar cooling granulator with a more efficient baghouse. The current permit action updates the permit analysis to reflect the change and updates the facility's mailing address. In addition, the permit format, language, and rule references were updated to reflect the Department's current permit format, language, and rule references.

SECTION II. Conditions and Limitations

A. Emission Limitations

1. Western Sugar 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 6 consecutive minutes (ARM 17.8.304).
2. Western Sugar 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 6 consecutive minutes (ARM 17.8.304).
3. Western Sugar 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 (ARM 17.8.308).
4. Western Sugar shall treat all unpaved portions of the haul roads, access roads, parking lots, or general plant area with water and/or chemical dust suppressant as necessary to maintain compliance with the reasonable precautions limitation in Section II.A.3 (ARM 17.8.749).

5. Combined emissions of sulfur dioxide (SO₂) from the east dryer stack and west dryer stack shall not exceed 88.5 pounds per 3-hour period (Stipulation agreement between the Department and Western Sugar).
6. Combined emissions of SO₂ from the east dryer stack and west dryer stack shall not exceed 708.0 pounds per calendar day (Stipulation agreement between the Department and Western Sugar).
7. Combined emissions of SO₂ from the east dryer stack and west dryer stack shall not exceed 148,680 pounds per calendar year (Stipulation agreement between the Department and Western Sugar).
8. Emissions of SO₂ from the boiler house stack shall not exceed 856.2 pounds per 3-hour period (Stipulation agreement between the Department and Western Sugar).
9. Emissions of SO₂ from the boiler house stack shall not exceed 6,849.6 pounds per calendar day (Stipulation agreement between the Department and Western Sugar).
10. Emissions of SO₂ from the boiler house stack shall not exceed 1,438,416 pounds per calendar year (Stipulation agreement between the Department and Western Sugar).

B. Testing Requirements

1. All compliance source tests shall conform to the requirements of the Montana Source Test Protocol and Procedures Manual (ARM 17.8.106).
2. The Department may require testing (ARM 17.8.105).

C. Operational Reporting Requirements

1. Western Sugar shall supply the Department with annual production information for all emission points, as required by the Department in the annual emission inventory request. The request will include, but is not limited to, all sources of emissions identified in the emission inventory contained in the permit analysis.

Production information shall be gathered on a calendar-year basis and submitted to the Department by the date required in the emission inventory request. Information shall be in the units required by the Department. This information may be used to calculate operating fees, based on actual emissions from the facility, and/or to verify compliance with permit limitations (ARM 17.8.505).

2. Western Sugar shall notify the Department of any construction or improvement project conducted pursuant to ARM 17.8.745(1), that 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)(d) (ARM 17.8.745).

SECTION III: General Conditions

- A. Inspection – Western Sugar shall allow the Department’s representatives access to the source at all reasonable times for the purpose of making inspections or surveys, collecting samples, obtaining data, auditing any monitoring equipment (CEMS, CERMS) or observing any monitoring or testing, and otherwise conducting all necessary functions related to this permit.
- B. Waiver – The permit and the terms, conditions, and matters stated herein shall be deemed accepted if Western Sugar fails to appeal as indicated below.
- C. Compliance with Statutes and Regulations – Nothing in this permit shall be construed as relieving Western Sugar of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.* (ARM 17.8.756).
- D. Enforcement – Violations of limitations, conditions and requirements contained herein may constitute grounds for permit revocation, penalties or other enforcement action as specified in Section 75-2-401, *et seq.*, MCA.
- E. Appeals – Any person or persons jointly or severally adversely affected by the Department’s decision may request, within 15 days after the Department renders it’s decision, upon affidavit setting forth the grounds therefore, a hearing before the Board of Environmental Review (Board). A hearing shall be held under the provisions of the Montana Administrative Procedures Act. The Department’s decision on the application is not final unless 15 days have elapsed and there is no request for a hearing under this section. The filing of a request for a hearing postpones the effective date of the Department’s decision until conclusion of the hearing and issuance of a final decision by the Board.
- F. Permit Inspection – As required by ARM 17.8.755, Inspection of Permit, a copy the air quality permit shall be made available for inspection by the Department at the location of the source.
- G. Permit Fee – Pursuant to Section 75-2-220, MCA, as amended by the 1991 Legislature, failure to pay the annual operation fee by Western Sugar may be grounds for revocation of this permit, as required by that section and rules adopted thereunder by the Board.

Permit Analysis
The Western Sugar Cooperative
Permit #2912-02

I. Introduction/Process Description

A. Permitted Equipment

The Western Sugar Cooperative (Western Sugar) processes sugar beets into refined sugar, molasses, pulp, and pellets. Western Sugar’s sugar beet processing facility is located at 3020 State Avenue, Billings, Montana. A summary of the facility equipment and pollution control devices is contained in Table 1.

Table 1	
Description	Pollution Control Device/Practice
132 MMBtu/hr Erie City Boiler #1	Natural Gas Fuel Only
Boiler House Stack, (148 MMBtu/hr Riley Boilers; #2, #3, and #4)	Wet Scrubber, Mist Eliminator, Multicyclones
17 MMBtu/hr Clever Brooks Boiler #5	Natural Gas Fuel Only
26.6 MMBtu/hr Pulp Dryers	Wet Scrubber, Mist Eliminator, Multicyclones
Pellet Mills/ Conveyor	Multiple Cyclones
Pelletizer-Cooler	Multiple Cyclones
(2) Air Dryers	Wet Scrubber
(1) Steam Sugar Granulator	Baghouse
(1) Steam Sugar Granulator	Baghouse
Lime Slaker Vent	Wet Scrubber
Burnt Lime Collector	Baghouse
Truck Hauling-Fugitives	Water Spray
Warehouse Sugar Dust Collector	Dust Collector is Control Device

B. Source Description

Western Sugar processes sugar beets into refined sugar, molasses, pulp, and pellets. Sugar beets are received at the plant by truck and are screened and washed to remove materials such as dirt, mud, rocks, and leaves. The beets are then either fed into the plant for processing or stockpiled for future use. Processing of the beets begins by slicing them into long thin strips, referred to as cossettes. The cossettes are conveyed into a diffuser where the beet sugar is removed using heated water. When the sugar solution leaves the lower end of the diffuser it is known as “raw juice.” However, when the cossettes reach the upper end of the diffuser, it is free of most sugar and the cossettes become beet pulp, which is used for livestock feed. Upon leaving the diffuser, the “raw juice” goes through several purification and filtration stages to remove impurities and other non-sugars and is sent to evaporators to remove excess water. This concentrated juice is crystallized and separated into pure sugar and molasses. The two by-products of this process, molasses and pulp, are mixed together to create pellets and are sold as livestock feed. Shipment of the products is performed using both rail and truck.

C. Permit History

On May 11, 1971, Permit #**286-073071** was issued to The Western Sugar Company to install a 2000-gallon per minute (gal/min) wet scrubbing system on the existing cyclone dryer stacks.

On July 10, 1972, Permit #**485-092672** was issued to The Western Sugar Company to install a wet scrubber system on the west drum pulp dryer cyclone.

On June 29, 1976, Permit #913 was issued to Western Sugar for the conversion of 3 Riley 100,000 pound per hour (lb/hr) natural gas fired steam generators (Riley #2, Riley #3, and Riley #4) to coal stoker firing.

On July 26, 1978, Permit #1227 was issued to Western Sugar to install Multi-cyclones on the 3 coal fired boilers (Riley #2, Riley #3, and Riley #4).

On June 9, 1996, Western Sugar was issued Permit #2912-00 to construct the boiler house stack extension that would extend the stack to at least 51.8 meters above ground level (Permit #2912-00 replaced Permit #286, #485, #913, and #1227). However, during a routine site visit, the Montana Department of Environmental Quality (Department) noted an economizer on the boiler house stack that was put there by Western Sugar in an effort to minimize the amount of heat that was vented through the stack. The economizer influenced the characteristics of the plume emitted from the stack and was installed without notifying the Department. As a result, the stipulation agreement between the Department and Western Sugar was readjusted to account for the changed characteristics of the exit gas plume. The changed conditions of the stipulation were as follows: the boiler house stack must be raised to a minimum height of 54.9 meters instead of the original 51.8 meters. Originally, the boiler house stack was 120 feet tall and the extension would add another 60 feet that would produce a total stack height of 180 feet (54.9 meters) above ground level. As part of the 1995 proposed Billings/Laurel SO₂ State Implementation Plan, Western Sugar and the Department stipulated that Western Sugar shall extend the height of the boiler house stack to at least 54.9 meters to receive Good Engineering Practices (GEP). In addition to the boiler house stack extension, Western Sugar agreed to accept lower emission limitations for sulfur dioxide (SO₂) as follows:

1. Combined 3-hour emissions of SO₂ from the east dryer stack and west dryer stack shall not exceed 88.5 pounds per 3-hour period;
2. Combined daily emissions of SO₂ from the east dryer stack and west dryer stack shall not exceed 708.0 pounds per calendar day; and
3. Combined annual emissions of SO₂ from the east dryer stack and west dryer stack shall not exceed 148,680 pounds per calendar year.

On June 12, 1998, an agreement between the Department and Western Sugar was completed. The June 12, 1998, Stipulation (STIP) identifies specific emission limitations, monitoring, and reporting requirements that were established through the agreement. Permit #2912-00 replaced Permit #286, #485, #913, and #1227.

On May 17, 2002, the Department received a request from Western Sugar to modify Permit #2912-00. The Western Sugar proposal requested that Permit #2912-00 be updated to reflect the name change from Western Sugar Company to Western Sugar. In addition, the permit analysis was updated to reflect the de minimis change of replacing a wet scrubber on one of the two cooling sugar granulators with a more efficient baghouse. Further, the permit was updated to reflect the most up-to-date permit language. On August 2, 2002, Permit #2912-01 replaced Permit #2912-00.

D. Current Permit Action

On June 23, 2003, the Department received a de minimis notification from Western Sugar. The change involved replacing the wet scrubber on the second cooling sugar granulator with a more efficient baghouse. The current permit action updates the permit analysis to reflect the change

and updates the facility's mailing address. In addition, the permit format, language, and rule references were updated to reflect the Department's current permit format, language, and rule references.

E. Additional Information

Additional information, such as applicable rules and regulations, Best Available Control Technology (BACT)/Reasonably Available Control Technology (RACT) determinations, air quality impacts, and environmental assessments, is included in the analysis associated with each change to the permit.

II. Applicable Rules and Regulations

The following are partial explanations of some applicable rules and regulations that apply to the facility. The complete rules are stated in the Administrative Rules of Montana (ARM) and are available, upon request, from the Department. Upon request, the Department will provide references for location of complete copies of all applicable rules and regulations or copies where appropriate.

A. ARM 17.8, Subchapter 1 – General Provisions, including but not limited to:

1. ARM 17.8.101 Definitions. This rule includes a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.105 Testing Requirements. 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 tests, emission or ambient, for such periods of time as may be necessary using methods approved by the Department.
3. ARM 17.8.106 Source Testing Protocol. The requirements of this rule apply to any emission source testing conducted by the Department, any source or other entity as required by any rule in this chapter, or any permit or order issued pursuant to this chapter, or the provisions of the Clean Air Act of Montana, 75-2-101, *et seq.*, Montana Code Annotated (MCA).

Western Sugar shall comply with the requirements contained in the Montana Source Test Protocol and Procedures Manual, including, but not limited, using the proper test methods and supplying the required reports. A copy of the Montana Source Test Protocol and Procedures Manual is available from the Department upon request.

4. ARM 17.8.110 Malfunctions. (2) The Department must be notified promptly by telephone whenever a malfunction occurs that can be expected to create emissions in excess of any applicable emission limitation or to continue for a period greater than 4 hours.
5. ARM 17.8.111 Circumvention. (1) No person shall cause or permit the installation or use of any device or any means that, without resulting in reduction of the total amount of air contaminant emitted, conceals or dilutes an emission of air contaminant that would otherwise violate an air pollution control regulation. (2) No equipment that may produce emissions shall be operated or maintained in such a manner as to create a public nuisance.

B. ARM 17.8, Subchapter 2 – Ambient Air Quality, including, but not limited to the following:

1. ARM 17.8.210 Ambient Air Quality Standards for Sulfur Dioxide
2. ARM 17.8.211 Ambient Air Quality Standards for Nitrogen Dioxide
3. ARM 17.8.212 Ambient Air Quality Standards for Carbon Monoxide
4. ARM 17.8.220 Ambient Air Quality Standard for Settled Particulate Matter
5. ARM 17.8.223 Ambient Air Quality Standard for PM₁₀

Western Sugar must maintain compliance with the applicable ambient air quality standards.

C. ARM 17.8, Subchapter 3 – Emission Standards, including, but not limited to:

1. ARM 17.8.304 Visible Air Contaminants. (1) This rule requires that no person may 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 6 consecutive minutes. (2) This rule requires that no person may 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 6 consecutive minutes.
2. ARM 17.8.308 Particulate Matter, Airborne. (1) This rule requires an opacity limitation of 20% for all fugitive emission sources and that reasonable precautions be taken to control emissions of airborne particulate matter. (2) Under this rule, Western Sugar 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.
3. ARM 17.8.309 Particulate Matter, Fuel Burning Equipment. This rule requires that no person shall cause, allow or permit to be discharged into the atmosphere particulate matter caused by the combustion of fuel in excess of the amount determined by this rule.
4. ARM 17.8.310 Particulate Matter, Industrial Process. This rule requires that no person shall cause, allow or permit to be discharged into the atmosphere particulate matter in excess of the amount set forth in this rule.
5. ARM 17.8.322 Sulfur Oxide Emissions--Sulfur in Fuel. This rule requires that no person shall burn liquid, solid, or gaseous fuel in excess of the amount set forth in this rule.

ARM 17.8.340 Standard of Performance for New Stationary Sources and Emission Guidelines for Existing Sources. This rule incorporates, by reference, 40 CFR 60, Standards of Performance for New Stationary Sources (NSPS). The Western Sugar facility is not an NSPS affected source because the steam generation boilers were installed prior to the applicability dates of 40 CFR 60, Subparts D, Da, Db, and Dc. In addition, the heat input rates for the steam generation units are less than the applicable requirements in 40 CFR 60, Subparts D, and Da.

D. ARM 17.8, Subchapter 5 – Air Quality Permit Application, Operation and Open Burning Fees, including, but not limited to:

1. ARM 17.8.504 Air Quality Permit Application Fees. This rule requires that an applicant submit an air quality permit application fee concurrent with the submittal of an air quality permit application. A permit application is incomplete until the proper application fee is paid to the Department. The current permit action replaces an existing wet scrubber on a

sugar cooling granulator with a more efficient baghouse according to the provisions of ARM 17.8.745(1); therefore, the current permit action is considered an administrative action and Western Sugar was not required to submit an air quality permit application fee.

2. ARM 17.8.505 When Permit Required--Exclusions. An annual air quality operation fee must, as a condition of continued operation, be submitted to the Department by each source of air contaminants holding an air quality permit (excluding an open burning permit) issued by the Department. The air quality operation fee is based on the actual or estimated actual amount of air pollutants emitted during the previous calendar year.

An air quality operation fee is separate and distinct from an air quality permit application fee. The annual assessment and collection of the air quality operation fee, described above, shall take place on a calendar-year basis. The Department may insert into any final permit issued after the effective date of these rules, such conditions as may be necessary to require the payment of an air quality operation fee on a calendar-year basis, including provisions that prorate the required fee amount.

- E. ARM 17.8, Subchapter 7 – Permit, Construction and Operation of Air Contaminant Sources, including, but not limited to:

1. ARM 17.8.740 Definitions. This rule is a list of applicable definitions used in this chapter, unless indicated otherwise in a specific subchapter.
2. ARM 17.8.743 Montana Air Quality Permits--When Required. This rule requires a facility to obtain an air quality permit or permit alteration if they construct, alter or use any air contaminant sources that have the potential to emit greater than 25 tons per year of any pollutant. Western Sugar has the potential to emit more than 25 tons per year of PM, PM₁₀, NO_x, CO, VOC, and SO_x; therefore, an air quality permit is required.
3. ARM 17.8.744 Montana Air Quality Permits--General Exclusions. This rule identifies the activities that are not subject to the Montana Air Quality Permit program.
4. ARM 17.8.745 Montana Air Quality Permits—Exclusion for De Minimis Changes. This rule identifies the de minimis changes at permitted facilities that are not subject to the Montana Air Quality Permit Program.
5. ARM 17.8.748 New or Modified Emitting Units--Permit Application Requirements. (1) This rule requires that a permit application be submitted prior to installation, alteration or use of a source. The current permit action replaces an existing wet scrubber on a sugar cooling granulator with a more efficient baghouse according to the provisions of ARM 17.8.745(1); therefore, the current permit action is considered an administrative action and Western Sugar was not required to submit an air quality permit application.
6. ARM 17.8.749 Conditions for Issuance or Denial of Permit. This rule requires that the permits issued by the Department must authorize the construction and operation of the facility or emitting unit subject to the conditions in the permit and the requirements of this subchapter. This rule also requires that the permit must contain any conditions necessary to assure compliance with the Federal Clean Air Act (FCAA), the Clean Air Act of Montana, and rules adopted under those acts.

7. ARM 17.8.752 Emission Control Requirements. This rule requires a source to install the maximum air pollution control capability that is technically practicable and economically feasible, except that BACT shall be utilized. The required BACT analysis is included in Section III of this permit analysis.
 8. ARM 17.8.755 Inspection of Permit. This rule requires that air quality permits shall be made available for inspection by the Department at the location of the source.
 9. ARM 17.8.756 Compliance with Other Requirements. This rule states that nothing in the permit shall be construed as relieving Western Sugar of the responsibility for complying with any applicable federal or Montana statute, rule, or standard, except as specifically provided in ARM 17.8.740, *et seq.*
 10. ARM 17.8.759 Review of Permit Applications. This rule describes the Department's responsibilities for processing permit applications and making permit decisions on those permit applications that do not require the preparation of an environmental impact statement.
 11. ARM 17.8.762 Duration of Permit. An air quality permit shall be valid until revoked or modified, as provided in this subchapter, except that a permit issued prior to construction of a new or altered source may contain a condition providing that the permit will expire unless construction is commenced within the time specified in the permit, which in no event may be less than 1 year after the permit is issued.
 12. ARM 17.8.763 Revocation of Permit. An air quality permit may be revoked upon written request of the permittee, or for violations of any requirement of the Clean Air Act of Montana, rules adopted under the Clean Air Act of Montana, the FCAA, rules adopted under the FCAA, or any applicable requirement contained in the Montana State Implementation Plan (SIP).
 13. ARM 17.8.764 Administrative Amendment to Permit. An air quality permit may be amended for changes in any applicable rules and standards adopted by the Board of Environmental Review (Board) or changed conditions of operation at a source or stack that do not result in an increase of emissions as a result of those changed conditions. The owner or operator of a facility may not increase the facility's emissions beyond permit limits unless the increase meets the criteria in ARM 17.8.745 for a de minimis change not requiring a permit, or unless the owner or operator applies for and receives another permit in accordance with ARM 17.8.748, ARM 17.8.749, ARM 17.8.752, ARM 17.8.755, and ARM 17.8.756, and with all applicable requirements in ARM Title 17, Chapter 8, Subchapters 8, 9, and 10.
 14. ARM 17.8.765 Transfer of Permit. This rule states that an air quality permit may be transferred from one person to another if written notice of Intent to Transfer, including the names of the transferor and the transferee, is sent to the Department.
- F. ARM 17.8, Subchapter 8 – Prevention of Significant Deterioration of Air Quality, including, but not limited to:
1. ARM 17.8.801 Definitions. This rule is a list of applicable definitions used in this subchapter.

2. ARM 17.8.818 Review of Major Stationary Sources and Major Modifications--Source Applicability and Exemptions. The requirements contained in ARM 17.8.819 through ARM 17.8.827 shall apply to any major stationary source and any major modification, with respect to each pollutant subject to regulation under the FCAA that it would emit, except as this subchapter would otherwise allow.

Western Sugar's facility in Billings, Montana is defined as a major stationary source because it is a listed source with the potential to emit more than 100 tons per year of one or more criteria pollutants. However, the current permit action replaces an existing wet scrubber on a sugar cooling granulator with a more efficient baghouse according to the provisions of ARM 17.8.745(1); therefore, the current permit action is considered an administrative action and the requirements contained in this rule do not apply.

G. ARM 17.8, Subchapter 12 – Operating Permit Program Applicability, including, but not limited to:

1. ARM 17.8.1201 Definitions. (23) Major Source under Section 7412 of the FCAA is defined as any source having:
 - a. Potential to Emit (PTE) > 100 tons/year of any pollutant;
 - b. PTE > 10 tons/year of any one Hazardous Air Pollutant (HAP), PTE > 25 tons/year of a combination of all HAPs, or lesser quantity as the Department may establish by rule; or
 - c. PTE > 70 tons/year of PM₁₀ in a serious PM₁₀ nonattainment area.
2. ARM 17.8.1204 Air Quality Operating Permit Program. (1) Title V of the FCAA amendments of 1990 requires that all sources, as defined in ARM 17.8.1204(1), obtain a Title V Operating Permit. In reviewing and issuing Air Quality Permit #2912-02 for Western Sugar, the following conclusions were made.
 - a. The facility's PTE is greater than 100 tons/year for PM, PM₁₀, NO_x, CO, and SO_x.
 - b. The facility's PTE is less than 10 tons/year for any one HAP and less than 25 tons/year for all HAPs.
 - c. This source is not located in a serious PM₁₀ nonattainment area.
 - d. This facility is not subject to any current NSPS.
 - e. This facility is not subject to any current NESHAP standards.
 - f. This source is not a Title IV affected source, nor a solid waste combustion unit.
 - g. This source is not an EPA designated Title V source.

Based on these facts, the Department determined that Western Sugar is subject to the Title V Operating Permit program. Western Sugar's Title V Operating Permit #OP2912-01 became final and effective on September 26, 2002. The Department will perform a minor modification to Title V Operating Permit #OP2912-01 to incorporate the de minimis change associated with the current permit action.

III. BACT Determination

A BACT determination is required for each new or altered source. Western Sugar shall install on the new or altered source the maximum air pollution control capability, which is technically feasible and economically practicable, except that BACT shall be utilized. The current permit action replaces an existing wet scrubber on a sugar cooling granulator with a more efficient baghouse according to the provisions of ARM 17.8.745(1); therefore, the current permit action is considered an administrative action and a BACT determination was not required.

IV. Emission Inventory

Source	Pollutants (tons/yr)					
	PM	PM ₁₀	NO _x	VOC	CO	SO _x
Erie City Boiler #1	1.64	1.64	299.99	0.76	21.82	0.33
Boiler Stack	324.77	324.77	879.33	3.21	320.92	709.88
C. B. Boiler #5	0.96	0.96	9.83	0.20	2.46	0.04
Combined East & West Pulp Dryer Stacks	9.50	3.75	99.86	46.47	9.22	74.19
Pellet Mill/Conveyor	10.58	10.58	---	---	---	---
Pelletizer-Cooler	6.09	1.28	---	---	---	---
Steam Heated Sugar Granulators	0.70	0.70	---	---	---	---
(2) Air Drying Sugar Granulators	4.74	4.74	---	---	---	---
Coke or Coal fired Lime Kiln	0.06	0.06	0.01	---	0.02	0.03
Burnt Lime Collector	5.04	5.04	---	---	---	---
Lime Slaker Vent	1.44	1.44	---	---	---	---
Coke Handling	1.31	0.66	---	---	---	---
Coke Coal Handling – Fugitives	1.31	0.66	---	---	---	---
Limestone Handling – Fugitives	1.31	0.66	---	---	---	---
Wind Erosion – Fugitives	5.00	2.50	---	---	---	---
Truck Handling – Fugitives	10.02	4.51	---	---	---	---
Total Emissions	384.47	363.95	1289.02	50.64	354.44	784.47

Source: Title V Air Quality Permit Application

V. Existing Air Quality and Impacts

Western Sugar is located in the Northeast ¼ of Section 10, Township 1 South, Range 26 East, in Yellowstone County, Montana. The airshed in this area is currently unclassified for SO₂ but Montana is in the process of revising the SO₂ SIP. The Department previously conducted air dispersion modeling and the results from the model showed no adverse impact on the air quality in the region. In the view of the Department, the emissions generated by this facility and conditions established in Permit #2912-02 will limit the amount of controlled emissions from this operation and will not cause concentrations of pollutants to exceed the ambient air quality standards.

VI. Taking or Damaging Implication Analysis

As required by 2-10-105, MCA, the Department conducted a private property taking and damaging assessment and determined there are no taking or damaging implications.

VII. Environmental Assessment

This permitting action will not result in an increase of emissions from the facility and is considered an administrative action; therefore, an Environmental Assessment is not required.

Analysis Prepared By: Dave Aguirre
Date: July 2, 2003