



Permit Information

Report Year: 2019

NPDES ID: IDR053081

Facility Information

Facility Name: THE AMALGAMATED SUGAR COMPANY LLC

Facility Point of Contact

First Name Middle Initial Last Name: Nathan Walker

Phone: 208-438-2115 Ext.:

Email: nwalker@amalsugar.com

Facility Mailing Address

Address Line 1: 50 SOUTH 500 WEST

Address Line 2: City: PAUL

ZIP/Postal Code: 83347 State: ID

County or Similar Division: MNIDOKA

General Findings

Provide a summary of your past year's routine facility inspection documentation (see Part 3.1.2 of the permit). In addition, if you are an operator of an airport facility (Sector S) that is subject to the airport effluent limitations guidelines, and are complying with the MSGP Part 8.S.8.1 effluent limitation through the use of non-urea-containing deicers, provide a statement certifying that you do not use pavement deicers containing urea (e.g., "Urea was not used at [name of airport] for pavement deicing in the past year and will also not be used in 2015." (Note: Operators of airport facilities that are complying with Part 8.S.8.1 by meeting the numeric effluent limitation for ammonia do not need to include this statement.)

Routine facility inspections for 2019 were performed quarterly or more frequently when rain events occurred. The inspections were conducted March 29, 2019, May 29, 2019, September 30, 2019, and December 27, 2019. Quarterly inspection reports are maintained on file at the factory and utilized to assess stormwater containment activities and recommended improvements at the facility.

Provide a summary of your past year's quarterly visual assessment documentation (see Part 3.2.2 of the permit).

Visual assessments were conducted for 2 stormwater related events for the 1st and 2nd quarter discharge events below. During the 3rd and 4th quarters, no stormwater discharges occurred, therefore visual assessments were not required.

For any four-sample (minimum) average benchmark monitoring exceedance, if after reviewing the selection, design, installation, and implementation of your control measures and considering whether any modifications are necessary to meet the effluent limits in the permit, you determine that no further pollutant reductions are technologically available and economically practicable and achievable in light of best industry practice, provide your rationale for why you believe no further reductions are achievable (see Part 6.2.1.2 of the permit). Enter "NA" if not applicable.

N/A

Provide a summary of your past year's corrective action documentation (See Part 4.4 of the permit). (Note: If corrective action is not yet completed at the time of submission of this annual report, you must describe the status of any outstanding corrective action(s).) Also describe any incidents of noncompliance in the past year or currently ongoing, or if none, provide a statement that you are in compliance with the permit.

There were three discharge events during 2019. For all events, corrective and preventative measures were promptly implemented. For incidents involving non-stormwater discharges, IDEQ and EPA were promptly notified. Based on an evaluation of the discharge loadings, visual observations and sampling of either the Main Drain or irrigation canal, no adverse impacts or a danger to the health or environment were observed. The events and corrective/preventive measures are summarized as follows:

February 14/15, 2019 – A small breach in a containment berm near Outfall 2 resulted in an estimated 2,340 gallon discharge of stormwater along with a very small quantity of high-quality condensate (from a cracked pressure transmitter on a condensate pump). Upon discovery, improvements were immediately employed including repairing the berm leak, enhancement of the berm and elimination of the leak from the pressure transmitter.

May 28/29, 2019 – Almost 3 inches of rain occurred from May 16th to May 28th which eventually flooded a motor control center and pumps were employed to remove the stormwater. The pumped stormwater flowed over 300 feet along a berm adjacent to the Main Drain. During an inspection of this area, a small breach was discovered leading to an estimated stormwater discharge of 62,610 gallons over a 20-hour period. Upon discovery, the pump was immediately turned off and the berm leak was repaired. As a further preventive measure, a pump pit was installed to transfer stormwater from this area into an onsite pond (flume excess pond).

June 21 to 27, 2019 – During this non-stormwater discharge event, it was discovered that high-quality condensate was discharged to an irrigation canal through the irrigation piping system. As required by an IDEQ issued Reuse Permit for land applying condensate (and other excess water) to crops, this canal discharge was reported to IDEQ and also to EPA. The discharge was caused by an improper closure of an irrigation valve. During a 5-day period, it was estimated that approximately 185,250 gallons of condensate was discharged into the Irrigation Canal or approximately 37,000 gal/d. To prevent reoccurrence the irrigation piping system was upgraded including a new isolation valve.

As a result of these events, TASC0 continues to evaluate and update the SWPPP including additional best management practices, corrective actions, and employee training to prevent any discharge to either the Main Drain or irrigation canals.

#### Facility Stormwater Inspection

On December 27, 2019 the facility received an EPA report for a stormwater inspection which occurred on September 25, 2019. A response to EPA's noted areas of concern was submitted to EPA on January 22, 2020. Amalgamated Sugar is awaiting EPA's final compliance determination for the 2019 inspection.

#### Certification Information

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I have no personal knowledge that the information submitted is other than true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

**Certified By:** Stanley D. Case

**Certifier Title:** Plant Manager

**Certifier Email:** scase@amalsugar.com

**Certified On:** 01/28/2020 4:25 PM ET