



Air Quality Permitting Response to Public Comments

April 10, 2020

Tier I Operating Permit No. T1-2019.0020

Project No. 62215

**The Amalgamated Sugar Company LLC
Paul, Idaho**

Facility ID No. 067-00001

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Final

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BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the proposed Tier I operating permit for The Amalgamated Sugar Company LLC from March 9, 2020 through April 8, 2020, in accordance with IDAPA 58.01.01.364. During this period, comments were submitted in response to DEQ's proposed action. Each applicable comment and DEQ's response is provided in the following section.

PUBLIC COMMENTS AND RESPONSES

Public comments regarding the technical and regulatory analyses and the air quality aspects of the draft permit are summarized below. Questions, comments, and/or suggestions received during the comment period that did not relate to the air quality aspects of the permit application, the Department's technical analysis, or the draft permit are not addressed. For reference purposes, a copy of the Rules for the Control of Air Pollution in Idaho can be found at: <http://adminrules.idaho.gov/rules/current/58/0101.pdf>.

- Comment 1: Table 3.3 NESHAP 40 CFR 63.6 (e) and (f), For natural gas boilers, 63.6(e) does not apply per Subpart DDDDD Table 10. 63.6(f)(1) also does not apply. These bullets should be removed from the Permit.
- Response 1:** Table 3.3 is a summary of the General Provisions of 40 CFR 63, Subpart A for affected sources. Some sources, such as natural gas fired boilers, may not be subject to all of the general provisions. The entire table is included to cover all sources in all Tier I operating permits.
- Comment 2: Table 3.3 NESHAP 40 CFR 63.7, None of the natural gas boilers are required to perform source testing under Part 63. Section 63.7 of the table should be removed from the Permit.
- Response 2:** Table 3.3 is a summary of the General Provisions of 40 CFR 63, Subpart A for affected sources. Some sources, such as natural gas fired boilers, may not be subject to all of the general provisions. The entire table is included to cover all sources in all Tier I operating permits.
- Comment 3: Table 3.3 NESHAP 40 CFR 63.9, None of these requirements are relevant to natural gas boilers. They should be removed from the Permit.
- Response 3:** Table 3.3 is a summary of the General Provisions of 40 CFR 63, Subpart A for affected sources. Some sources, such as natural gas fired boilers, may not be subject to all of the general provisions. The entire table is included to cover all sources in all Tier I operating permits.
- Comment 4: Table 3.3 NESHAP 40 CFR 63.10, This section does not apply to natural gas-fired boilers and should be removed from the Permit.
- Response 4:** Table 3.3 is a summary of the General Provisions of 40 CFR 63, Subpart A for affected sources. Some sources, such as natural gas fired boilers, may not be subject to all of the general provisions. The entire table is included to cover all sources in all Tier I operating permits.
- Comment 5: Permit Condition 4.14, The Nebraska boiler successfully fulfilled its Performance Test Requirements. Please remove "Nebraska" from the heading and related condition bullets or state that this condition has been satisfied in the SOB.
- Response 5:** DEQ acknowledges that the initial performance testing has been completed on the Nebraska boiler, however, the third bullet point taken from 40 CFR 60.46b(e)(4) states that the permittee shall upon request determine compliance with the NO_x standards through the use of a 30-day

performance test for the Nebraska boiler. Therefore, DEQ feels it appropriate to title the condition for both the Nebraska and Rentech boilers.

Comment 6: Permit Condition 4.19, Please delete. This condition likely does not apply to natural gas fired boilers.

Response 6: 40 CFR 63.7500(a)(3) does not exclude natural gas boilers from meeting this condition. This condition applies to all boilers that are subject to the Boiler MACT rule.