



# **Air Quality Permitting Response to Public Comments**

**March 22, 2018**

**Tier I Operating Permit No. T1-2017.0040**

**Project No. 61916**

**Spunstrand Inc  
Wallace, Idaho**

**Facility ID No. 079-00038**

Prepared by:  
Tom Burnham, Permit Writer  
AIR QUALITY DIVISION

**Final**

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## BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the draft Tier I operating permit to Spunstrand Inc from December 27, 2017 through January 26, 2018, in accordance with IDAPA 58.01.01.364. During this period, comments were submitted in response to DEQ's proposed action. Each comment and DEQ's response is provided in the following section. All comments submitted in response to DEQ's proposed action are included in the appendix of this document.

## 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:** Spunstrand Inc. has held a long standing record of compliance with DEQ air quality regulations. As a lifelong resident of the Wallace community and having the understanding that there has been zero complaints made to the fabrication plant about its air quality, I would hope that IDEQ would grant the permit renewal. Spunstrand Inc of Wallace is one of few remaining employer's we have whose workforce generates revenues much needed to keep our community alive. They operate well within the Tier 1 Air Quality conservative regulations directed from IDEQ for FRP operations and therefore should have the opportunity to renew and continue producing quality products economic stability for the Silver Valley.

**Response 1:** DEQ acknowledges the positive comment for the facility and is moving the permit forward for EPA review.

**Comment 2:** Help me understand...in regard to Spunstrand re-upping their permit every 5-years. What do they need the permit for exactly? Do any other businesses around here file these permits as well? How do they effect air quality in the area?

**Response 2:** DEQ responded to this press inquiry with the following:  
Title V of the federal Clean Air Act (CAA) Amendments of 1990 requires states to develop programs for issuing operating permits to major stationary sources of air pollutants. The Tier I operating permit (also known as a Title V operating permit) brings together all of the applicable federal, state, and local air requirements for an air pollution source into one federally enforceable document. This permit summarizes all of the requirements that the source is responsible for under the CAA and under Idaho Rules, and aids the source and DEQ inspectors with compliance and inspection. It also requires the source to certify compliance with the permit requirements. Since these State and Federal requirements change from time to time, and the facility may modify its operations during the five year permit term, the Tier 1 operating permit is required to be renewed every five years.

There are other businesses in your area with these types of permit. They are listed at <http://www.deq.idaho.gov>.

**Appendix**  
**Public Comments Submitted for**  
**Tier I Operating Permit**  
**T1-2017.0040**

# Comment 1

From: Tessa Stevens  
To: Tanya Chan  
Cc:  
Subject: FW: Public comment/permit renewal/Spunstrand of Wallace

Sent: Wed 1/24/2018 3:5

From: [REDACTED]  
Sent: Wednesday, January 24, 2018 3:56 PM  
To: Tessa Stevens  
Subject: Public comment/permit renewal/Spunstrand of Wallace

To whom it may concern;

We would like to take this opportunity to give public comment on the Renewal Permitting Process for Spunstrand of Wallace, Idaho. Spunstrand Inc. has held a long standing record of compliance with DEQ air quality regulations. As a life long resident of the Wallace community and having the understanding that there has been zero complaints made to the fabrication plant about it's air quality, I would hope that IDEQ would grant the permit renewal. Spunstrand Inc of Wallace is one of few remaining employer's we have whose workforce generates revenues much needed to keep our community alive. They operate well within the Tier 1 Air Quality conservative regulations directed from IDEQ for FRP operations and therefore should have the opportunity to renew and continue producing quality products economic stability for the Silver Valley.

Yours truly,

Kathy Zanetti; Silver Valley Economic Development Corp, Board Member  
Herb Zanetti; Zanetti Bros Inc.; Business Owner

# Comment 2

From: Josh McDonald [REDACTED]  
Sent: Thursday, January 04, 2018 1:32 PM  
To: Ralph Paul  
Subject: Re: FW: Help me understand

Hey Ralph, How are you?

Dan Smith told me to contact you in regard to Spunstrand re-upping their permit every 5-years.

What do they need the permit for exactly?

Do any other businesses around here file these permits as well?

How do they effect air quality in the area?