



Air Quality Permitting Response to Public Comments

July 27, 2018

Permit to Construct No. P-2009.0043

Project No. 61536

**Blackfoot Facility of Basic American Foods
Blackfoot, Idaho**

Facility ID No. 011-00012

Prepared by:
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AIR QUALITY DIVISION

Final

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BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the proposed permit to construct for Blackfoot Facility of Basic American Foods from May 3, 2018 through June 4, 2018 in accordance with IDAPA 58.01.01.209.01.c. 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 proposed 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 proposed 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: Reading this morning of Basic American's proposed permit to remove its "Facility Emissions Cap Requirements" has prompted me to contact you.

Having lived just NW of this expanding plant for the past 30+ years I ask why are these caps going to be allowed to be removed now? The potato dust and flakes heavily saturated the homes and property surrounding this plant prior to the requirement that they be put on. The dust literally settled on everything outside. The newspaper article says that "DEQ has reviewed the permit application . . . will not cause or contribute to a violation of any ambient air quality standard and will not injure OR UNREASONABLY AFFECT HUMAN OR ANIMAL LIFE OR VEGETATION."

The definition of "unreasonable" is: not guided by or based on good sense

I have engaged with the DEQ in Pocatello several times in the past, to no avail to our standard of life. A slaughter house built just to the West of our property remained in business despite complaints made to DEQ and our County Commissioners. It was finally torn down. Two (2) grain mills also just West of our property (on Highway 26) also were built and remain in business despite complaints made to DEQ.

A public hearing will do me no good. As the old saying goes, been there - done that. I just wanted to be of record and state that our standard of living is, in fact, being affected by the surrounding industries because the DEQ allows the growth of these industries without taking into effect the reasonable affect on human and animal life and vegetation.

Response 1: As Basic American Foods has done in the case of this permitting project, under Idaho Code (IDAPA 58.01.01.178.04) a facility may request to terminate their Facility Emissions Cap (FEC). A FEC permit is an optional permitting scenario that gives a facility operational flexibility by creating a facility wide cap on any potential criteria or hazardous air pollutants. Under a FEC permit, the facility may make certain modifications to their operations and increase emissions from a current level with streamlined permit modification procedures, as long as total facility wide emissions stay below cap levels. It should be noted that the removal of the FEC does not absolve the facility from any other applicable State and Federal regulations or the need to hold a Permit to Construct. As such, through this permitting project, new emission limits have been placed on the facility for applicable pollutants that are in fact below that of the previous FEC and represent current operational levels. The associated Statement of Basis for this permit outlines the factors and reasoning for which pollutants have enforceable emission limits and to what degree. DEQ encourages all those interested in the facility's air emissions and associated permit to review that document.

Comment 2: Suggest revising language in permit conditions 3.8.1, 4.8.1, and 5.9.1 for better clarity.

Current language: "In order to demonstrate compliance with PM10 and PM2.5 emission limits contained in Table 3.2 the permittee shall calculate PM10 and PM2.5 emissions by multiplying an approved production based emission factor by the associated throughput, in accordance with the following formula:"

Suggested language: "In order to demonstrate compliance with the daily and yearly PM10 and PM2.5 emission limits contained in Table 3.2, the permittee shall calculate PM10 and PM2.5 emissions by multiplying an approved production based emission factor by the associated throughput, in accordance with the following formula:"

Response 2: DEQ agrees the proposed revision adds clarity to the current language. Permit Conditions 3.8.1, 4.8.1, and 5.9.1 have been revised accordingly.

Appendix
Public Comments Submitted for
PTC Modification
P-2009.0043

Comment 1:

From: [REDACTED]
Sent: Monday, May 07, 2018 10:22 AM
To: Tanya Chin
Subject: Basic American air quality permit

May 7, 2018

Reading this morning of Basic American's proposed permit to remove its "Facility Emissions Cap Requirements" has prompted me to contact you.

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Comment 2:

From: Webmaster
Sent: Wednesday, May 30, 2018 11:03 AM
To: Tanya Chin
Subject: Draft Air Quality Permit - Basic American Foods - Blackfoot

Name: Steve Brockett
Email: sbrockett@baf.com

Affiliation: Basic American Foods

Comments: Suggest revising language in permit conditions 3.8.1, 4.8.1, and 5.9.1 for better clarity.

Current language: "In order to demonstrate compliance with PM10 and PM2.5 emission limits contained in Table 3.2 the permittee shall calculate PM10 and PM2.5 emissions by multiplying an approved production based emission factor by the associated throughput, in accordance with the following formula:"

Suggested language: "In order to demonstrate compliance with the daily and yearly PM10 and PM2.5 emission limits contained in Table 3.2, the permittee shall calculate PM10 and PM2.5 emissions by multiplying an approved production based emission factor by the associated throughput, in accordance with the following formula:"

Thank you.