



Air Quality Permitting Response to Public Comments

August 20, 2008

Permit to Construct No. P-2008.0049

Hoku Materials, Inc.

Facility ID No. 005-00058

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AIR QUALITY DIVISION

Final

1. BACKGROUND

As required by the *Rules for the Control of Air Pollution in Idaho* (IDAPA 58.01.01.209), the Idaho Department of Environmental Quality (DEQ) provided for public comment on the proposed modification to Permit to Construct (PTC) P-2007.0075 for Hoku Materials, Inc. (Hoku), located in Pocatello, Idaho.

The public comment period on the draft modification to the PTC was held from July 17, 2008, to August 15, 2008. One comment was submitted to DEQ via email during the public comment period. The comment was provided by Randy Anderson and was received by DEQ on August 11, 2008. The comment and DEQ's response is provided in the following section.

2. PUBLIC COMMENT AND RESPONSE

Comment: I would prefer to see the combined effects of the Coal Gasification plant that is proposed for American Falls with the Hoku plant on our winter air quality during stable air conditions (especially night time inversions) before considering upgrading production capacity to 4,000 tons/yr.

Response: Through air pollutant dispersion modeling and protocols, criteria air pollutant (PM₁₀, NO₂, SO₂, CO, Pb) emissions from Southeast Idaho Energy's proposed coal Gasification plant near American Falls have been determined to cause an insignificant contribution to air quality at all locations which the Hoku facility will impact. The air pollution dispersion model uses a meteorological data set to predict ambient concentrations. That data set includes winter conditions as well as stable conditions.

Ambient impacts of toxic air pollutants from both Hoku and the proposed gasification plant have been demonstrated to meet the applicable toxic rules.