

Response to Public Comments

The Amalgamated Sugar Company LLC (TASCO)

Nampa Factory

Nampa, Idaho

Facility ID No. 027-00010

Tier II Operating Permit No. T2-2009.0105 Project 60867

December 23, 2011

Morrie Lewis 

Permit Writer

BACKGROUND

As deemed appropriate by the Director, the Idaho Department of Environmental Quality (DEQ) provided for public comment on the proposed permit from October 31, 2011 through November 30, 2011 in accordance with IDAPA 58.01.01.404.01.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. Comments with a common theme have been grouped together and responded to as one comment. All comments submitted in response to DEQ's proposed action are included in the appendix to this document.

Additional information concerning this permitting action, the BART and BART Alternative determinations, and the Regional Haze program and its requirements can be found in the following documents:

- Tier II Operating Permit No. T2-2009.0105 Project 60867 and Statement of Basis (proposed for issuance)
- Tier II Operating Permit No. T2-2009.0105 and Statement of Basis, issued September 7, 2010
- State of Idaho Regional Haze State Implementation Plan (Regional Haze SIP) and Interstate Transport Plan, Final and Proposed Rules
- www.deq.idaho.gov/air/prog_issues/pollutants/haze_overview.can
- www.epa.gov/visibility/program.html

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 analyses, or the proposed permit have not been addressed. For reference purposes, a copy of the Rules for the Control of Air Pollution in Idaho can be found at:

<http://adm.idaho.gov/adminrules/rules/idapa58/0101.pdf>.

Comment 1: **Will the project or the proposed controls address odors? (Freeman)**
Is this project mainly about plant efficiency, to reduce NO_x emissions, or to reduce ozone formation? (Johnson)

Response: The primary focus of this project is to reduce visibility impacts and to reduce regional haze to meet Regional Haze program requirements.

Odors were not the primary focus of this project, and impacts were not assessed. Although the project reduces combustion emissions from the boilers at the Nampa Factory, the process equipment and the emissions from these processes are not expected to change. So with regard to odors, a change may or may not be noticeable.

Although the implementation of BART controls will result in the reduction of NO_x emissions and thereby reduce ozone formation, this additional environmental benefit was incidental to meeting the requirements of the Regional Haze program, and was not a BART requirement. Nevertheless, as part of an ongoing effort to be proactive in addressing Treasure Valley summer ozone conditions, DEQ assessed the ozone impacts of this project. The NO_x emission reductions achieved by the BART Alternative represent the greatest NO_x reduction of any control measures that DEQ has evaluated to date, and may help to avoid non-attainment designation over the next few years (see the "Additional Environmental Benefits in Reducing Ozone" section in Appendix B to the Statement of Basis for additional discussion).

Similarly, any change in plant efficiency resulting from this project would also be incidental. It may be noted that an application for permit modification will be required if this project results in a significant increase in emissions in accordance with IDAPA 58.01.01.200-228.

Comment 2: Why will it take until 2016 to implement this project? (Quignon)

Response: The Regional Haze program allows five years to install and operate Best Available Retrofit Technologies (BART). In accordance with 40 CFR 51.308(e)(1)(iv) and IDAPA 58.01.01.668.04:

Each source subject to BART shall be required to install and operate BART as expeditiously as practicable, but in no event later than 5 years after approval of the implementation plan revision.

This schedule includes time for federal BART approval and incorporation into the Regional Haze State Implementation Plan (RH SIP), and time necessary to install BART controls.

Comment 3: Can you absolutely prove that the pollutants from TASC0 are impacting Hells Canyon? (Johnson)

Response: DEQ has determined that the Amalgamated Sugar Company's (TASCO) Riley Boiler has caused significant contribution to haze at Eagle Cap, Strawberry Mountain, and Hells Canyon areas. These determinations were based on modeling analyses which predicted elevated haze impacts on days when elevated impacts were also measured in these areas, and when upper level transport winds were flowing from the Nampa area toward these areas. Such conditions occurred during wintertime stagnant air periods. In addition, the patterns of fine particle chemical composition measured at these wilderness areas closely parallel the patterns expected from the chemical composition of emissions from the Riley Boiler at the Nampa Factory when combined with the other emission sources in the Nampa-Boise area.

In the modeling analyses, DEQ utilized modeling approaches which have been used nationwide and developed by several federal agencies, including the EPA, National Park Service, and U.S. Forest Service. The analyses used appropriate inputs developed jointly by modeling experts at the Idaho DEQ, EPA Region 10, Washington Department of Ecology, and Oregon DEQ. The modeling system used has undergone extensive testing by its developer and the EPA, and is identified in Appendix W to 40 CFR Part 51, the Guideline on Air Quality Modeling, as the recommended model for long-range transport based on validation studies in which it was compared to measured values.

In summary, the measurements and modeling methods which demonstrate that emissions from the TASCO Nampa Factory are impacting Hells Canyon are accepted as the best science available by scientists, agencies, and the regulated community within our region and nationwide. As a result, these methods were selected by EPA and utilized by DEQ to implement Regional Haze program requirements.

Comment 4: Does the BART Alternative result in a greater reduction in haze at the affected Class I areas as compared with the EPA-approved BART determination for the Riley Boiler? (Forsgren, USFS)

Response: During and subsequent to issuance of the initial BART Tier II operating permit and EPA partial approval of the Regional Haze SIP, substantive comments and information were provided by TASCO which supported the position that certain control technologies would not be feasible to implement at the Nampa Factory, and that reconsideration of the NO_x BART determination was warranted. Specifically, selective catalytic reduction (SCR) and over-fired air (OFA) technologies were determined to be technically infeasible in the revised BART determinations (Step 2 in the top-down BART determination; see Tables 4 and 5 of the Statement of Basis).

DEQ believes it is therefore inappropriate to compare the visibility impacts of the revised BART determination to the initial BART NO_x determination (which included infeasible control technologies), and that such comparison is not required by the Regional Haze program.

Comment 5: What are the regulatory hurdles and policy implications that need to be addressed when including the non-BART units (i.e., the B&W boilers and pulp driers) in an alternative to BART determination? (Forsgren, USFS)

Response: DEQ believes that inclusion of non-BART emission units in the evaluation of the BART Alternative does not require new regulatory interpretations nor introduce new policy implications. DEQ agrees with the commenter that once a source-by-source BART determination has been made for a BART-subject unit, emission reductions from other sources may then be considered as part of a BART Alternative.

Non-BART units were included only with respect to the BART Alternative analysis and determination, and included only those units participating in the proposed alternative. Specifically, the “BART Alternative” scenario included the three pulp dryers (for which shutdown was proposed), the B&W Boilers (for which installation of Low NO_x Burners was proposed), and the Riley Boiler (the BART-subject unit).

In accordance with 40 CFR 51.308(e)(2) and IDAPA 58.01.01.668.06, DEQ may approve:

...an alternative measure rather than to require sources subject to BART to install, operate, and maintain BART. Such...alternative measure must achieve greater reasonable progress than would be achieved through the installation and operation of BART.

For the unique circumstances of this project, DEQ chose not to adopt the SO₂ emission control limits indicated by the BART analyses for SO₂ emissions, but instead adopted BART Alternative NO_x emission limits for the B&W Boilers and shutdown requirements for the pulp dryers. These combined measures were predicted to result in greater projected emission reductions and in greater visibility improvement.

In accordance with 40 CFR 51.308(e)(3) and as provided in the BART Guidelines (Appendix Y to 40 CFR 51), the BART Alternative meets the “better-than-BART test”:

If the distribution of emissions is significantly different, the State must conduct dispersion modeling to determine differences in visibility between BART and the trading program for each impacted Class I area, for the worst and best 20 percent of days. The modeling would demonstrate “greater reasonable progress” if both of the following two criteria are met:

(i) Visibility does not decline in any Class I area, and

(ii) There is an overall improvement in visibility, determined by comparing the average differences between BART and the alternative over all affected Class I areas.

Because the distribution of emissions could be construed to be “significantly” different in the “BART Alternative” scenario than in the “BART” scenario (in terms of trading SO₂ emission reductions for NO_x emission reductions), dispersion modeling was conducted to demonstrate that the BART Alternative will not result in a decline in visibility in any Class I area and will result in an overall improvement in visibility.

The “BART Alternative” scenario did not result in a decline in visibility at any Class I area, and on the balance resulted in greater improvement than the “BART” scenario across the seven Class I areas evaluated (see Table 9 in the Statement of Basis). The site-specific technical demonstration relied on both speciation and dispersion modeling to demonstrate that the net air quality benefits of the BART alternative will result in greater reasonable progress.

Table 1 GREATER REASONABLE PROGRESS DETERMINATION^(a)

Reasonable Progress Criteria	Benchmark	BART	BART Alternative	“Better-than-Baseline” Improvement	“Better-than-BART” Improvement
<i>Visibility-Impairing Emissions (PM₁₀ + NO_x + SO₂) – Rate in lb/hr</i>				<i>Reductions in lb/hr</i>	
BART Alternative Emission Units	1,929.2	1,277.6	1,276.6		+ 1.0 ^(b)
<i>Class I Area Visibility – Number of Days Above 0.5 Adv</i>				<i>Number of Days Improved to Less Than 0.5 Adv</i>	
Eagle Cap	195	149	126	+ 69 ^(c)	+ 41 ^(d)
Craters of the Moon	10	4	3	+ 7 ^(c)	
Hells Canyon	129	87	80	+ 49 ^(c)	
Jarbidge	8	5	5	+ 3 ^(c)	
Sawtooth	18	6	6	+ 12 ^(c)	
Selway-Bitterroot	15	3	4	+ 11 ^(c)	
Strawberry Mountain	80	62	51	+ 29 ^(c)	
Result				<i>No degradation in any Class I area^(c)</i>	Overall improvement in visibility and Greater Reasonable Progress^(b,d)

- (a) This table contains a summary of results from the Statement of Basis (see Tables 6, 7, and 9).
- (b) BART Alternative results in greater emission reductions as described under 40 CFR 51.308(e)(3).
- (c) For the BART Alternative, visibility does not decline in any Class I area, meeting the criteria in 40 CFR 51.308(e)(3)(i).
- (d) For the BART Alternative, there is an overall improvement in visibility, determined by comparing the average differences between BART and the alternative over all affected Class I areas, meeting the criteria in 40 CFR 51.308(e)(3)(ii).

As summarized in Table 1, the BART Alternative satisfies the “Better-than-BART” test criteria in 40 CFR 51.308(e)(3); the BART Alternative results in greater emission reductions, does not result in a decline in visibility in any Class I area, and results in an overall improvement in visibility when the average differences between BART and the BART alternative over all affected Class I areas are compared.

These demonstrations fulfill 40 CFR 51.308(e)(2) and (e)(3), and IDAPA 58.01.01.668.06, and the overarching statutory requirement in 42 U.S.C. § 7491(b)(2) that States make reasonable progress toward the national visibility goal.

Comment 6: **Citing an EPA letter to the Colorado Air Pollution Control Division,¹ the use of an Alternative-to-BART approach within a source's fence line may not be appropriate. Although 40 CFR 51.308(e)(2) is silent on the applicability of an Alternative-to-BART occurring within a fenceline, it could be reasonably construed that Section V of the BART guidelines would govern such a situation. (Silva, FWS)**

Response: In the letter and guidelines cited, concern is raised that although “averaging across BART emission units within a source’s fenceline” was contemplated in making BART determinations, that this was not explicitly characterized as a BART alternative. Citing Section V:

You should consider allowing sources to "average" emissions across any set of BART-eligible emission units within a fenceline, so long as the emission reductions from each pollutant being controlled for BART would be equal to those reductions that would be obtained by simply controlling each of the BART-eligible units that constitute BART-eligible source.

¹ Letter from EPA Region 8 to Paul Tourangeau, Colorado Department of Public Health and Environment, “EPA Region 8 Comments on Draft BART Analyses,” Cynthia Cody, EPA, February 16, 2007.

DEQ believes it is important to distinguish that this guidance is directed toward the BART determination process, and is not controlling of BART alternative measures. While EPA does not characterize an inside-the-fenceline approach as a BART alternative, such an approach was also not expressly excluded from consideration.

As described in the response to Comment 5 and in accordance with the requirements of 40 CFR 51.308(e)(2) and (e)(3) and IDAPA 58.01.01.668.06, DEQ has the discretion to adopt implementation plan provisions other than those provided by BART analyses in situations where it has reasonably concluded that more “reasonable progress” will thereby be attained. Beyond meeting these requirements, it may also be argued that the trading of emission reductions inside-the-fenceline in accordance with 40 CFR 51.308(e)(3) is more narrow in focus than the implementation of a cap-and-trade program allowable under 40 CFR 51.308(e)(4), which implicitly allows trading of emissions beyond the fenceline and across different source categories.

Furthermore, there are other notable differences between the TASCO BART Alternative and Public Service Company’s (PSCo) BART alternatives for the Hayden 1 and 2 and Comanche 1 and 2 facilities:

- The TASCO BART Alternative meets the recommended criteria under 40 CFR 51.308(e)(3) for demonstrating that the alternative achieves greater reasonable progress (see response to Comment 5), as compared to the use of a “weight-of-evidence” approach under 40 CFR 51.308(e)(2)(i)(E) in PSCo BART alternative demonstrations.
- The TASCO BART uses a conventional top-down and case-by-case approach to determining BART, as compared to the use of presumptive emission limits for 750 MW coal-fired power plants in PSCo BART determinations.
- The TASCO BART Alternative emission limits were specified on a basis consistent with the maximum hourly emission rates used in the BART analyses, as compared to limits specified with a longer (less stringent) averaging period in PSCo BART Alternative demonstrations.
- The TASCO BART and BART Alternative were compared using both emission reductions and modeling analyses to demonstrate greater visibility improvement, as compared to the use of emission reductions alone in PSCo BART Alternative determinations.

The purpose of the BART analyses was to identify existing, older stationary emission sources that contribute to haze at Class I areas and could be retrofit to reduce emissions. The B&W Boilers participating in the BART Alternative share similar characteristics with the Riley Boiler – these units predate the 1977 Clean Air Act Amendments, derive from the same emission source category, and share in purpose and function at the Nampa Factory. Boiler steam load is presently distributed across all three of the boilers at the Nampa Factory according to process needs, and requiring BART controls on a single boiler could preferentially shift load distribution and shift emissions toward the uncontrolled (B&W) non-BART boilers under certain boiler operating scenarios. Beyond meeting Regional Haze program requirements, these characteristics further support inclusion of non-BART units and use of an inside-the-fenceline approach in the BART Alternative in order to achieve greater reasonable progress.

Comment 7: **Can credit for emission reductions achieved by the shutdown of the pulp driers be applied under the Regional Haze Rule if these units were shutdown as a result of another regulatory action under the Clean Air Act (i.e., compliance with the NAAQS for PM₁₀)? Discussion in Attachment #2 to the application states that shutdown was required to support the PM₁₀ NAAQS Maintenance Plan for Ada County. (Forsgren, USFS)(Silva, FWS)**

Response: In approving the proposed BART Alternative, DEQ credited TASCO with emissions reductions resulting from shutdown of all three pulp dryers - the North Pulp Dryer, the Center Pulp Dryer, and the South Pulp Dryer. DEQ believes it was reasonable to credit TASCO with these emission reductions.

The Center Pulp Dryer (S-D2) and the North Pulp Dryer (S-D3) were required to be shut down by September 30, 2007 as part of a compliance schedule,² which included conditions established to ensure that emissions (and modeled impacts) will not cause or significantly contribute to a violation of PM₁₀ National Air Quality Standards (NAAQS) in areas surrounding the Nampa Factory and as part of the Northern Ada County PM₁₀ SIP Maintenance Plan and Redesignation Request. An enforceable requirement to shut down the remaining coal-fired pulp dryer, the South Pulp Dryer (S-D1), was included as BART Alternative requirement in the proposed permit (Permit Condition 4.1).

In accordance with 40 CFR 51.308(e)(2)(iv), a BART alternative measure must achieve greater reasonable progress than would be achieved through the installation and operation of BART, and DEQ must submit an implementation plan including:

A demonstration that the emission reductions resulting from the emissions trading program or other alternative measure will be surplus to those reductions resulting from measures adopted to meet requirements of the CAA as of the baseline date of the SIP.

The five-year average of emissions (statewide baseline emission inventory) over years 2000 through 2004 established the baseline against which reasonable progress will be measured (see the Regional Haze SIP, cited in the “Background” section above, for additional information). Similarly, emissions over years 2003 through 2005 (Nampa Factory BART inventories) were used to determine the baseline visibility modeling scenario against which TASC BART visibility improvement was measured (“Alternative Benchmark” scenario; see Table 8 of the Statement of Basis). Thus the emission reductions associated with shutdown of the pulp dryers were not included nor accounted for within these baseline scenarios (i.e., the baseline modeling analyses included full operation of the pulp dryers).

Because the pulp dryer emission reductions were implemented following the baseline period, DEQ believes that including the emission reductions from shutdown of the pulp dryers as part of the BART Alternative is acceptable under the rule.

Comment 8: **The proposed BART Alternative does not address each pollutant because there will be no control of SO₂ at the BART-eligible Riley Boiler. Although under the proposed Alternative scenario SO₂ will not be controlled, limits should still be established to ensure compliance with the 0.75% sulfur content used in the emissions used in the modeling, rather than relying upon the 1.0% limit under IDAPA. (Silva, FWS)**

Response: As described in the response to Comment 5 and in accordance with the requirements of 40 CFR 51.308(e)(2) and (e)(3) and IDAPA 58.01.01.668.06, DEQ has the discretion to adopt implementation plan provisions other than those provided by BART analyses in situations where it has reasonably concluded that more “reasonable progress” will thereby be attained.

EPA guidance further supports that “inter-pollutant trading” was contemplated and is supported when greater reasonable progress will be attained:³

... a State could demonstrate that a trading program that addresses one or two visibility-impairing pollutants under an alternative program would provide greater reasonable progress than would case-by-case BART applied to all visibility-impairing pollutants.

The actual average coal sulfur content level over the baseline years (2003-2005) was used in the BART analyses and modeling in accordance with BART protocol, which was achieved by TASC compliance with the 1.0% coal sulfur content limit required by IDAPA 58.01.01.725.

² Required in Permit Condition 13.8 of Tier II Operating Permit No. T2-050021, final, revised March 8, 2006.

³ Regional Haze Regulations; Revisions to Provisions Governing Alternative to Source-Specific Best Available Retrofit Technology (BART) Determinations, 71 FR 60612-60634, Final, October 13, 2006. See also response to Regional Progress Question #5, “Additional Regional Haze Questions,” EPA Q&A document, revised September 27, 2006.

Because actual emissions have been effectively regulated by compliance with this sulfur content limit, and after a review of TASCOS compliance history, DEQ does not believe a more stringent limit is supported at this time.

Existing sulfur content limits corresponding to the baseline case (1% sulfur content by weight) and supporting monitoring requirements were relied upon from TASCOS Tier I operating permit⁴ to address concerns regarding the inclusion of an enforceable emission limit.

Comment 9: Should 90% control efficiency be applied to Spray Dry FGD in lieu of 80%? Would the conclusion of greater reasonable progress be reached in this instance? Development of the Spray Dry FGD costs using the EPA Control Cost Manual should be available for public review. (Silva, FWS)

Response: The initial BART determination for SO₂ approved by EPA has not been revised as a result of this permitting action, and therefore DEQ believes revisiting the elements and results of the initial BART SO₂ determination is not supported.

As provided in the Statement of Basis for Tier II Operating Permit No. T2-2009.0105, issued September 7, 2010, due to concerns related to protecting the integrity and performance of the baghouse (BART) control device, a conservative adiabatic approach temperature of 40°F above the adiabatic saturation temperature was assumed for the Spray Dry Flue Gas Desulfurization (Spray Dry FGD) control device. This corresponded to estimated performance of 80% removal efficiency, which fell within the range of 80-90% control efficiencies typically cited for Spray Dry FGD.⁵ Cost estimates were also reviewed in the initial BART determination.

Comment 10: Cost justification in terms of cost per deciview of visibility improvement/cumulative visibility impact should be considered. (Silva, FWS)

Response: Consistent with the response to Comment 9, DEQ's regulatory approach to making the BART determinations is not being reconsidered at this time, and the ranking methodology used in comparing control technologies has not been altered since approval of the Regional Haze SIP. Introducing a cost-per-deciview metric (in lieu of or in addition to ranking by dollars-per-ton) at this time would be inconsistent with the methodology used in the initial BART determinations.

Use of dollars-per-ton of emission reduction in ranking control technologies is an accepted convention and recommended by EPA in Appendix Y to 40 CFR 51, and it has been used extensively in the Regional Haze and Prevention of Significant Deterioration programs under the Clean Air Act (CAA). Use of dollars-per-deciview is a relatively new approach without established guidance, and it has been used only in a limited number of determinations.

Comment 11: Additional clarification is recommended to assist the public in further understanding the complexities of regional haze predictions. (DeLorey, TASCOS)

Response: DEQ does not interpret the comments provided by TASCOS as requesting or supporting any change to the BART analyses or to the BART determinations as proposed. Information concerning visibility monitoring and measurement, the modeling protocol, and the approach toward evaluating BART emissions and impacts is addressed within the Statement of Basis and within the references cited in the "Background" section (see above).

Without endorsement, the comments and information provided by TASCOS (and all other commenters) have been included in Appendix A for the record and for public review.

⁴ Permit Conditions 2.14 and 2.15 of Tier I Operating Permit No. T1-050020, final, revised May 23, 2006. See additional discussion provided concerning Permit Conditions 3.11 and 3.13 in the "Permit Conditions Review" section of the Statement of Basis.

⁵ Air Pollution Control Technology Fact Sheet, EPA-452/F-03-034.

APPENDIX A

PUBLIC COMMENTS RECEIVED

Name: Dennis Freeman
Email Address: dlfreeman50@gmail.com
Sent: Tuesday, November 01, 2011 5:48 AM
To: Martin Bauer
Subject: Amalgamated Sugar Plant – Nampa

In today's issue of Idaho Press Tribune, \$8 million in upgrades were announced for air quality improvements.

Will any of the improvements address the obnoxious odor that residents for miles around have to endure from October thru March during the processing period?

Please let me know what is being done to address this issue.

Name: Bonnie Quignon
Email Address: bfquignon@hotmail.com
Affiliation: None
Sent: Tuesday, November 01, 2011 2:05 PM
To: Tessa Stevens
Subject: Public Comment

I think this is a very positive step, but why will it take till 2016 to accomplish it? It could be done in their off season and be finished in one year. Those around them who suffer with their pollution would thank you.

RECEIVED

NOV 29 2011

DEPARTMENT OF ENVIRONMENTAL QUALITY
STATE A Q PROGRAM

COMMENT ON TEIR2 PERMIT AMALGAMATED SUGAR/ NAMPA 11-28-11

WHEN DEQ BROUGHT THIS UP A YEAR AGO COST WOULD BE \$18 MILLION

IVE VISITED WITH DEAN DELOREY ABOUT THIS, AND IT IS A CAPITOL

INVESTMENT OF \$8 MILLION , WHICH JOHN MCCREEDY AGREES WITH

MY POINT BEING ITS ABOUT PLANT EFFICECY, AS A SIDE EFFECT THIS

PROJECT WILL REDUCE NOX FROM 1100 T/Y TO ABOUT HALF BT 2016

WHAT I DISAGREE WITHDEQ IS THEIR CONSTANT ACT OF NOT TELLING THE TRUTH
ABOUT AIR QUALITY #1 DEQ SAID EPA REQUIORED VEHICLE I/M INCANYON CO.

THATS A LIE #2 DEQ SAID EPA REQUIRED SMALL SERVICE STATIONS TO DO

VAPOUR RECOVERY THATS A LIE #3 DEQ SAID EPA REQUIRED AMALGAMATED
TO REDUCE NOX NO THEY DID NOT SHOW ME THE EVIDENCE.

DESERT INSTITUTE RESEARCH FOR DEQ 2007 ,SAYS THAT THE STOCKWELL

STUDY 2003 AGREES WITH THEIR FINDINS REDUCE NOX INCREASES OZONE

DEQ DOESNT ACEPT PEER review SCIENCE AND COINTUUES TO LIE ABOUT THE
THE AIR

I AM CHARLES A. JOHNSON 67 N. HAPPY VALLEY RD. NAMPA IDAHO 83687
466-4993

Charles Johnson



RECEIVED

NOV 29 2011

DEPARTMENT OF ENVIRONMENTAL QUALITY
STATE A/C PROGRAM

Comments on the deq plan required by the federal haze rule due from the states in a 2003-2008 timeframe its 2010 whats your hurry

deq says that nitrate and sulfate emissions hamper haze in hells canyon wilderness area, which we share with oregon, idaho has 25,000 acres less than oregon.

Desert research institute of nevada verifies this is a winter problem during inversions they also verify that vegetation and wildland fires are the main summer problems

Please note dri study on ozone for deq identified the highest readings on ozone monitors July and August of 2007 were from wildland fires impacting them. In the valley deq did not ask epa to excuse them, thus producing the vehicle emission testing scam.

After saying visibility problems in hells canyon are caused by amalgamated sugar, deq says overall visibility in parks and wilderness areas not a major problem, adding most of idahos class 1 areas are in comparison really clean areas

Make up your mind are they a problem or is the problem deq?

Tourist info on hells canyon besides reminding us it is the deepest canyon in america, descriptions that might rival the garden of eden say THE SCENIC VISTAS THAT ARE FOUND HERE RIVAL ANY FOUND ON THE CONTINENT

we fully support amalgamated on this issue, although we have disagreed with their corporate office on other matters

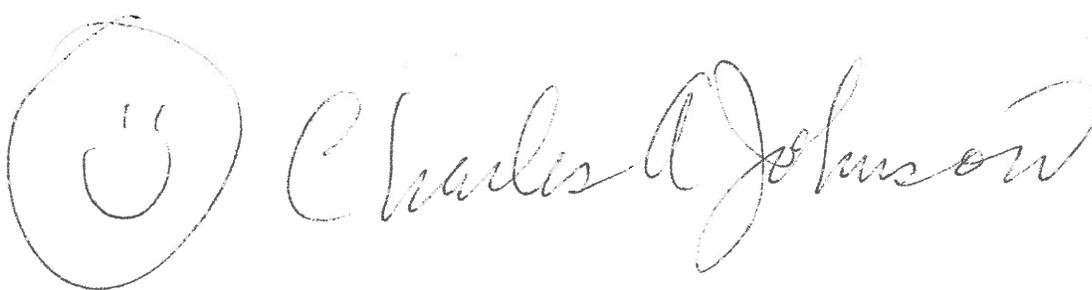
can you absolutely prove that the pollutants from their plant are impacting hells canyon?

Transport of pollutants from asia or fires in siberia can and do impact the bad air problems here they come in on the stratus winds

epa also states that 58% of haze is from bigenics like the blues in the summer or the great smokey mountains

amalgamated has supported deqs agenda for at least 6 years as they demand keeping useless vehicle emission testing in ada and extending to canyon with mcCreedy on deqs rump air quality council and roy eugerin writing the testing laws Now you turn on them and say your pollution will cost you \$18 million HAVE YOU NO SHAME?

I am charles a. johnson 67 n. happy valley rd. nampa, idaho 83687 466-4993

A handwritten signature in cursive that reads "Charles A. Johnson". To the left of the signature is a large, hand-drawn circle containing a simple smiley face "☺".

copy: Joe Huff ASC



RECEIVED

NOV 22 2011

File Code: 2580

Date: NOV 14 2011

DEPARTMENT OF ENVIRONMENTAL QUALITY
STATE A Q PROGRAM

Tessa Stevens
Department of Environmental Quality
1410 N. Hilton
Boise, ID 83706-1255

Dear Ms. Stevens:

The USDA Forest Service appreciates the opportunity to consult with the Idaho Department of Environmental Quality (DEQ) on the proposed alternative plan to reduce emissions of haze-causing pollutants from the Amalgamated Sugar Company (TASCO) facility in Nampa, Idaho. The U.S. Environmental Protection Agency (EPA) has already approved portions of Idaho's State Implementation Plan (SIP) to reduce regional haze (FR, June 22, 2011), which includes the Best Available Retrofit Technology (BART) determination for the Riley Boiler associated with TASCO's sugar beet processing facility at Nampa. About the same time (June 2010), the Forest Service received notice from Idaho DEQ of a proposed "alternative to the BART" determination for the same emission source. Since that time, the Forest Service has been in consultation with Idaho DEQ on this proposed alternative and provided some initial feedback. Our detailed comments on the proposed alternative to BART are enclosed.

The proposed "alternative to BART" will result in a total decrease of 18 lbs/hr of SO₂ and 542 lbs/hr of NO_x emissions, as compared with a decrease of 418 lbs/hr of SO₂ and 227 lbs/hr of NO_x resulting from the BART determination.

This alternative raises three key questions:

1. What are the regulatory hurdles and policy implications, if any, that need to be addressed when including the non-BART units (i.e., the B&W boilers and pulp driers) in an alternative to BART determination?
2. Can credit for emission reductions achieved by the shutdown of the pulp driers be applied under the Regional Haze Rule if these units were shutdown as a result of another regulatory action under the Clean Air Act (i.e., compliance with the NAAQS for PM10)?
3. Does this alternative result in a greater reduction in haze at the affected Class I areas as compared with the EPA-approved BART determination for the Riley Boiler?

The Forest Service defers to the EPA to answer the first two questions; however if the EPA allows the non-BART units and shut-down of the pulp driers to be included in the "alternative to BART" determination, the Forest Service is in support of this scenario. Support is based on information provided by Idaho DEQ in the *BART Alternative Visibility Modeling for the Riley Boiler at TASCO- Nampa Facility, (October 19, 2011 Facility Draft)*.



The Forest Service believes that Idaho DEQ has demonstrated that greater reductions in haze will be achieved through the proposed "alternative to BART" than the EPA-approved BART determination.

We appreciate your consideration of our comments. Please contact Jeff Sorkin, Resource Program Manager, at 303-275-5759 if you have questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Harv Forsgren". The signature is fluid and cursive, with a long horizontal stroke at the end.

HARV FORSGREN
Regional Forester

Enclosure

US Forest Service Detailed Comments
TASCO-Nampa, "Alternative to BART" proposal
November, 1, 2011

Background:

The EPA-approved BART determination for the Riley Boiler required installation and operation of a Spray Dry Flue Gas Desulfurization (FGD) system to reduce SO₂ emissions by 80% and installation of Low NO_x Burners (LNB) with Over-Fire Air (OFA) to reduce NO_x by 65%, and use of the existing baghouse to control emissions of particulate matter by 99.0%. The BART determination also required that TASCO accept permit limits for shutting down all the pulp dryers at the Nampa facility.

We understand that TASCO has submitted information to Idaho DEQ, after it submitted its proposed BART determination to EPA, which argues that LNB with OFA to reduce NO_x emissions by 65% is not feasible because of space constraints in the Riley Boiler. However, in working with their vendor (Riley Power), TASCO now believes they can achieve 60.7% NO_x control using an advanced LNB technology, without OFA. Additionally, TASCO has raised issues associated with the non-air quality impacts of spray dry FGD, mostly associated with waste-water issues. TASCO has since submitted an "alternative to BART" proposal to Idaho DEQ, for which Idaho DEQ is now seeking comments.

Alternative to BART:

The proposed "alternative to BART" would require only low NO_x burners (LNB) for NO_x control on the Riley Boiler (60.7% control), but no additional controls for SO₂ emissions beyond any existing controls. Additionally, LNB for NO_x control would be required on the existing Babcock & Wilcox (B&W) boilers units 1 & 2 (55% control), and permanent shutdown of the three pulp driers would also be required. In all, this alternative will result in a total decrease of 18 lbs/hr of SO₂ and 542 lbs/hr of NO_x emissions, as compared with a decrease of 418 lbs/hr of SO₂ and 227 lbs/hr of NO_x resulting from the BART determination.

When considering an alternative to BART, it does appear that States may consider non-BART sources, once a BART determination has been made. As stated in the Regional Haze Rule, under the section labeled *Alternative Measures in Lieu of BART* (FR/Vol 64, No. 126/Thursday, July 1, 1999, page 35741), EPA indicates:

"States may elect to adopt alternative measures, such as a regional emissions trading program, in lieu of BART, so long as the alternative measures achieve more reasonable progress than would application of source-specific BART." Furthermore, EPA states (on page 35742) that "Whatever methodology is chosen, by the State to evaluate possible emission reductions from BART, the estimate must reflect at least the minimum level of emissions reductions that can be expected. This estimate becomes the point of comparison for determining whether alternative measures, such as an emissions trading program, achieves greater progress toward visibility improvement. Once the State has arrived at an estimate of the emissions that would result from the application of source-specific BART, it should then compare the degree of visibility improvement expected to

be achieved in Class I areas through the application of BART to the degree of visibility improvement projected to be achieved by the alternative measures proposed by the State.”

Given the reference to regional trading programs and emphasis on the end-goal of reducing haze rather than the method used to achieve this goal, it appears that once a source-by-source BART determination is made, EPA would then allow States to consider emission reductions from other non-BART sources.

If, indeed, EPA allows the non-BART units and shut-down of the pulp driers to be included in the “alternative to BART” determination, then the Forest Service is in support of this “alternative to BART” scenario. This statement of support is based upon information provided by Idaho DEQ in the *BART Alternative Visibility Modeling for the Riley Boiler at TASC0- Nampa Facility, (October 19, 2011 Facility Draft)*.

The Forest Service believes that Idaho DEQ has demonstrated that greater reductions in haze will be achieved through the proposed “alternative to BART” than the EPA-approved BART determination. This is clearly documented in the “BART Alternative Visibility Modeling for the Riley Boiler at TASC0 – Nampa Factory (Facility Draft, October 19, 2011), prepared by Idaho DEQ. Briefly, this document presents the following information:

- An evaluation of the IMPROVE monitoring data to determine seasonal variability of haze, and the contributing aerosol species,
- An air quality modeling analysis to determine which Class I areas are affected by the Riley Boiler and emissions sources considered in the alternative proposal, including frequency, magnitude, and contributing pollutants, and
- A comparative evaluation of the visibility improvements expected from the BART determination and the proposed alternative.

The analysis revealed that the alternative to BART would result in greater reductions in magnitude and frequency of haze in the affected Class I areas, as compared with the EPA-approved BART determination. This is primarily because the alternative to BART scenario has greater reductions in NO_x emissions which contribute to nitrate aerosols during the winter, when worst-case haze conditions occur at the most frequently and highly impacted Class I areas (i.e., Eagle Cap, Hells Canyon, and Strawberry Mountain Wilderness areas). Reductions in sulfur are not as effective in reducing haze because sulfates are not a large contributing aerosol to worst-case days. Therefore, the trade-off between spray-dry FGD to reduce SO₂ and addition NO_x reductions from other non-BART sources is of greater benefit to visibility improvement.



United States Department of the Interior



FISH AND WILDLIFE SERVICE
National Wildlife Refuge System
Branch of Air Quality
7333 W. Jefferson Ave., Suite 375
Lakewood, CO 80235-2017

IN REPLY REFER TO:

FWS/ANWS-AR-AQ

November 30, 2011

Ms. Tessa Stevens
Air Quality Division
DEQ State Office
1410 N. Hilton
Boise, ID 83706-1255

Dear Ms. Stevens:

On October 19, 2011, the State of Idaho submitted a proposed Tier II permit for the Amalgamated Sugar Company, LLC – Nampa Factory (TASCO). Additionally, the State proposed analyses to revise Best Available Retrofit Technology (BART) and BART alternative emission standards and requirements for the TASCO Riley Boiler and Nampa Factory in accordance with 40 CFR 51.308(e) and IDAPA 58.01.01.668. We appreciate the opportunity to work closely with the State on regional haze state implementation planning and the subsequent review of this proposal. Cooperative efforts such as these ensure that, together, we will continue to make progress toward the Clean Air Act's goal of natural visibility conditions at all of our most pristine National Parks and Wilderness Areas for future generations.

This letter acknowledges that the U.S. Fish and Wildlife Service, in cooperation with the National Park Service, has received and reviewed your proposal. In general, we support the revised BART determination which identifies specific controls to be applied to the Riley Boiler. However, we have several concerns regarding the applicability of the proposed BART alternative. Specifically, we question whether consideration of non-BART units, swapping pollutants, and crediting emission controls resulting from non-BART, Clean Air Act requirements are appropriate when developing a BART alternative plan. Please see the attached document for our complete comments.

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Again, we appreciate the opportunity to work closely with you on this proposal. For further information, please contact Tim Allen at (303) 914-3802.

Sincerely,



Sandra V. Silva
Chief, Branch of Air Quality

Enclosure

cc:

Steve Body
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U.S. EPA Region 10
1200 Sixth Avenue, Suite 900
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Bill West, Refuge Manager
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27650 B South Valley Road
Lima, MT 59739

Comments of the US Fish & Wildlife Service (FWS) Regarding an “Alternative-to-BART” Proposal to Meet Best Available Retrofit Technology (BART) for The Amalgamated Sugar Company LLC (TASCO) Nampa Factory as Proposed by the Idaho Department of Environmental Quality (IDEQ)

The IDEQ determined that the Riley Boiler at the TASCO Nampa Factory is subject to BART under the EPA Guidelines for Best Available Retrofit Technology Determinations¹ and IDEQ provided an original BART determination on July 17, 2009. TASCO objected to the original BART determination and pursued an “Alternative-to-BART” in negotiations with the IDEQ. Subsequently, IDEQ provided to the FWS, “Proposed Revision to ‘Section 10.5 TASCO BART Determination’ of the RH SIP” (Proposed Revision), along with an Air Quality Permit Statement of Basis for the Tier II Operating Permit No. T2-2009.0105 Project 60867 and “BART Alternative Visibility Modeling for the Riley Boiler at TASCO – Nampa Factory” which propose an Alternative-to-BART under 40 CFR Part 51.308(e)(2). The FWS has several questions and comments relating to IDEQ’s proposed Alternative to BART determination for the TASCO Nampa Factory.

The FWS does not believe that IDEQ’s approach should or can be evaluated as an Alternative-to-BART; however, such a determination will ultimately be made by EPA, Region X. In a letter dated February 16, 2007, EPA, Region VIII communicated to the Colorado Air Pollution Control Division that regarding Public Service Company’s Hayden 1 and 2 and Comanche 1 and 2 facilities, use of an Alternative-to-BART approach within a source’s fence line may not be appropriate. The letter discusses that while EPA’s BART guidelines² contemplate that BART determinations may include averaging across BART emissions units within a source’s fence line, EPA does not characterize this as a BART alternative. Also, Section V of the BART guidelines discusses averaging emissions across any set of *BART-eligible emission units* within a fence line *for each pollutant*. The proposed Alternative-to-BART does not address each pollutant because there will be no control of SO₂ at the BART-eligible Riley boiler. Further, Section V seems to contemplate averaging across only BART-eligible emission units without including non-BART-eligible emission units. Since, 40 CFR Part 51.308(e)(2) is silent on the applicability of an Alternative-to-BART occurring within a fence line, it could be reasonably construed that Section V of the BART guidelines would govern such a situation.

This paragraph relates to the inclusion of emissions reduction credits from the permanent shutdown of three coal-fired pulp dryers as part of the Alternative-to-BART demonstration. For purposes of Best Available Control Technology (BACT) under the Prevention of Significant Deterioration (PSD) Program emission credits from the shutdown of emission units cannot be used as credit to meet BACT. We are not aware of any definitive language under the BART program that allows or disallows such shutdown

¹ See “Guidelines for BART Determinations Under the Regional Haze Rule.” 40 CFR Part 51, Appendix Y.

² Ibid., Section V – first paragraph.

credits for purposes of meeting BART, so it remains an open question for EPA, Region X to address in the case of the TASC Alternative-to-BART proposal. In 40 CFR Part 51.308(e)(2)(iv) it is stated that, “. . . emission reductions resulting from the emissions trading program or other alternative measure will be surplus to those reductions resulting from measures adopted to meet requirements of the CAA as of the baseline date of the SIP.” Page 33 in Attachment #2 of the Proposed Revision states that, “. . . shut down of the coal-fired pulp dryers was required to support the PM10 NAAQS Maintenance Plan for Ada County . . .” This issue bears further scrutiny before the Alternative-to-BART proposal is approved.

The underlying requirement for use of an Alternative-to-BART rather than BART for the Riley boiler is that the Alternative achieves greater reasonable progress toward meeting the long term strategy for visibility protection. Table 10-13 in Attachment #1 of the Proposed Revision develops the greater reasonable progress justification for the Eagle Cap Wilderness area using Spray Dryer Flue Gas Desulfurization (FGD) for SO₂ control as the SO₂ BART control (line 2 on the table). In Table 6 of the Statement of Basis for the Tier II Operating Permit, IDEQ presents an 80% emission reduction capability of Spray Dryer FGD for SO₂ control (522.3 lb/hr benchmark emissions vs. 104.0 lb/hr controlled emissions). Spray Dryer FGD can routinely be assumed to attain 90% control efficiency. Some examples for plants using Lime Spray Dryer FGD technology on low sulfur coal are as follows: Newmont Nevada - 93.1%, LS Power – White Pine - 89.8%, LS Power – High Plains - 93.4%, Two Elk Expansion - 89.9%, Basin Electric – Dry Fork - 92.9%, and AES-Colorado - 90.7%. If a modeling input of 90% SO₂ control was used for the BART case instead of 80%, the outcome for greater reasonable progress for the Alternative method would be more muted and possibly not show greater reasonable progress. Since it seems that the 80% control assumption was used for the greater reasonable progress demonstration, then the BART control level was understated, leaving a lower hurdle to demonstrate greater reasonable progress. The modeling should be performed using a 90% control efficiency assumption for the BART case.

It should be noted that the FWS still considers the Spray Dryer FGD SO₂ control alternative to be viable for BART. The IDEQ agreed with a \$2,663 per ton of SO₂ control cost for this alternative, including the costs of non-air quality environmental impacts. This value could be decreased to \$2,367 if the control efficiency were presented as 90%, rather than 80% in the cost development. A control efficiency of 90% for Spray Dryer FGD is certainly attainable as shown above. Either of the above costs should be considered as being reasonable for BART. It was indicated that the EPA Control Cost Manual was used to develop the Spray Dryer FGD costs. This analysis should be available in the record for third-party reviewers.

The following paragraph is moot if IDEQ proceeds with the Alternative-to-BART. However, should the discussion ever revert back to using Spray Dryer FGD as BART for SO₂ control, cost justification in terms of cost per deciview of visibility improvement should use the concept presented below. The concept of cumulative visibility impact reductions at all seven affected Class I areas should be considered. Such considerations have been employed in BART determinations

by Alaska, Oregon and Wyoming. Earlier the IDEQ made judgments on cost per deciview based on only the most impacted Class I area, Eagle Cap Wilderness Area. We continue to believe that it is appropriate to consider both the degree of visibility improvement in a given Class I area as well as the cumulative effects of improving visibility across all of the Class I areas affected. It simply does not make sense to use the same metric to evaluate the effects of reducing emissions from a BART source that impacts only one Class I area as for a BART source that impacts multiple Class I areas. And, it does not make sense to evaluate impacts at one Class I area, while ignoring others that are similarly significantly impaired. If emissions from TASC0 are reduced, the benefits will be spread well beyond only the Eagle Cap Wilderness Area to the other six affected Class I areas.

In Section 5 of Proposed Revision - Attachment #3, "Redlined Version of the Revised BART Tier II Operating Permit", no SO₂ emission limits are provided for the Riley Boiler or the two Babcock and Wilcox Boilers. Even though under the proposed Alternative scenario they will not be controlled, there should be SO₂ emission limits for these units (e.g., 522 lb/hour for the Riley Boiler and 435 lb/hr for the two B&W boilers). Such emission limits could prevent a future TASC0 transition to a coal that has higher sulfur content than the current average being used (0.75% sulfur) up to the current state limit of 1.0% sulfur. In such a case actual visibility improvement would not likely meet the performance provided in the Alternative-to-BART. A similar situation could exist if the two B&W boilers undergo a BACT analysis for expansion in the future without considering the BART premises being instituted at this time.



THE AMALGAMATED SUGAR COMPANY LLC

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Transmitted via E-mail: Tessa.Stevens@deq.idaho.gov

November 30, 2011

Tessa Stevens
Air Quality Division
IDEQ State Office
Boise, ID 83706

RE: Public Comments on Proposed Tier II Operating Permit
The Amalgamated Sugar Company LLC (TASCO) – Nampa Facility

Dear Ms. Stevens:

The Amalgamated Sugar Company LLC (TASCO) submits these comments on the proposed Tier II Operating Permit made available for public comment by the Idaho Department of Environmental Quality (IDEQ) on October 31, 2011. The Tier II Operating Permit proposes to revise Best Available Retrofit Technology (BART) requirements for the TASCO Riley boiler. The revised permit would require the installation of low NO_x burners on the Riley, #1 B&W (Babcock & Wilcox) and #2 B&W boilers at an estimated capital cost of \$8 million. The revised BART alternative also includes emissions reductions associated with the \$20 million steam pulp dryer project previously completed at the Nampa facility.

TASCO has no comments on the revised draft permit. Regarding the Statement of Basis and supporting documentation, additional clarification is recommended. Addressing these comments may help the public to further understand the complexities of regional haze predictions for Class I areas. The major points are as follows:

- Visibility is not directly measured in Class I areas but is calculated using an empirical equation with numerous assumptions.
- Estimated impacts to Class I areas for the TASCO BART analysis were based on a non-calibrated CALPUFF model with numerous assumptions.
- There are no measurements either locally or in any Class I area suggesting that emissions from the TASCO facility are contributing to regional haze impacts.

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- Most importantly, when evaluating emissions estimates for all regional sources, the Nampa facility accounts for only a small fraction of the overall emissions.

We would like to thank IDEQ for working cooperatively and responsively with TASCO on the revised permit and for reconsidering the original BART determination. The revised BART permit controls are affordable, satisfy regional haze requirements and additionally assist with IDEQ's local air quality improvement plans. If you have any questions or need any further clarification on these comments, feel free to contact me at (208) 383-6532.

Sincerely,

A handwritten signature in cursive script that reads "Dean C. DeLorey".

Dean C. DeLorey
Director of Environmental Affairs

cc: Boise – Joe Huff, John McCreedy, Bob Braun
Nampa – Kent Quinney, Glen Patrick

Comments on the Statement of Basis for the Revised Tier II Operating Permit

Draft Statement of Basis (SOB)

pg. 4 Permitting Action, Scope and Chronology, paragraph 2 – Regarding EPA’s approval of the Regional Haze SIP, TASC0 requests that IDEQ make every effort to work with EPA to ensure that the RH SIP, with these BART revisions, is approved in a timely manner.

pg. 8 Background, paragraph 3 – For clarification purposes please include the state for each Class I Area [e.g. Eagle Cap (Oregon); Hells Canyon (Oregon/Idaho border) and Strawberry Mountain (Oregon)]. In addition, the public must also be aware of the relative location where the model predicts the highest impacts. Therefore, add a sentence as follows: These Class I areas are located over 100 miles northwest of the Nampa facility.

pg. 11 Emissions Reductions, paragraph 2 – LNB’s will only result in a slight increase in CO emissions from the boilers. However, as provided in TASC0’s BART Determination, the shutdown of the pulp dryers has resulted in a significant decrease in CO emissions. Further documentation in support of the net CO decrease will be provided by TASC0 to IDEQ at a later date with a separate submittal and/or permit to construct application (if applicable).

pg. 21 Permit Condition 3.12, paragraph 3 – Change 90 days to 180 days.

Appendix A Revised BART Determination

pg. 30 Paragraph 2, Line 2 – Replace, “primarily during the winter time” with, “short wintertime periods”.

pg. 30 Paragraph 3, Line 2 – Please revise the last sentence as follows: The highest model impacts were predicted to occur during simulated weather conditions when high pressure persisted for three to four days or more and the atmosphere was stagnant with poor dispersion.

pg. 43 Evaluate emission reductions, paragraph 1 – The BART determination needs to recognize that the project cost of the new pulp dryer system was \$20 million. Since one of the BART determination components is cost, it’s important that this capital expenditure be included in the discussion. Therefore, add “\$20 million” before “new pulp dryer system” in line 2 of the first paragraph of this section.

Appendix B – BART Alternative Visibility Modeling

pg. 3 Executive Summary – In paragraph 4, Line 1, please delete “and monitored”. Since visibility in terms of delta deciviews (Δd) and light extinction (b_{ext}) are calculated and not directly measured or monitored, the phrase “and monitored” should be deleted.

In addition, throughout this modeling report, any reference to “extinction” must not include the term monitored or measured. This is misleading and not accurate. As discussed on pg. 10, light extinction (b_{ext}) is calculated using an empirical equation with constants, aerosol concentrations and conservatively estimated relative humidity coefficients.

pg. 10 Figure 3 discussion, paragraph 2 – The comparison of CALPUFF modeling results for the Riley boiler only with the 2004 IMPROVE calculated light extinction values is misleading. The CALPUFF model predicted results in Figure 3 are for the Riley boiler only. In order to verify the magnitude of Riley boiler predicted impacts, modeling results of all regional emissions sources (including mobile sources, power plants, etc.) should also be compared against the calculated light extinction values in Figure 3.