



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

**April 15, 2015**

**Permit to Construct No. P-2009.0001  
Project 61360**

**Ada County Landfill  
Boise, Idaho**

**Facility ID No. 001-00195**

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**Final**

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## **1. BACKGROUND**

As deemed appropriate by the Director, the Department of Environmental Quality (DEQ) provided for public comment regarding the proposed Permit to Construct, P-2009.0001 Project 61360 for Ada County Landfill, from January 28, 2015 through March 30, 2015. A public hearing was held on March 25, 2015. 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.

## **2. PUBLIC COMMENT 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://adm.idaho.gov/adminrules/rules/idapa58/0101.pdf>.

### **Proposed issuance of separate Tier I permits for the landfill gas engines and the landfill facility**

**Comment 1.** The permit application package provides no justification for issuing two separate permits. Because these facilities have been aggregated for modeled air impacts and for the purposes of the PTC, a subsequent Tier I permit should also combine the air quality impacts of these two entities. An aggregated facility would usually have one PTC and one Tier I permit. This is in line with how DEQ has issued other permits of this type.

#### **Response:**

Ada County Landfill (ACL) and Hidden Hollow Energy (HHE) have been combined for air permitting purposes into a single facility under ACL. The ACL facility is requesting the Tier I permit be issued as two operating permits, one for the landfill operations and the other for the landfill gas engines. The request is to help ACL administer and track the many NSPS, NESHAP and operating, monitoring and reporting requirements at the landfill based on the two functional areas of the landfill. Issuing two Tier I permits for a single facility is something that DEQ has done in the past as in the case with the Clearwater Paper Corporation facility located in Lewiston, Idaho. One Tier I operating permit is issued to Clearwater's Consumer Products Division and the other Tier I permit is issued to Clearwater's Pulp & Paper Division. Clearwater's two functional areas: Pulp & Paper and Consumer Products are both part of the same facility, but each is issued their portion of the Tier I operating permit primarily for administrative purposes. As with ACL, issuing multiple Tier I operating permits to a single facility does not separate the emissions as the commenter may suggest.

### **Meteorological data from the Boise Airport**

**Comment 2.** Meteorological data from the Boise Airport is not appropriate for landfill air impact modeling. We urge the department to place a weather station at the landfill site to better inform ambient air impact analysis from this major facility. This is relatively inexpensive and would better inform permitting decision at this and future facilities.

#### **Response:**

DEQ disagrees with the commenter's statement that meteorological data from the Boise Airport is not appropriate for air impact modeling associated with a minor source air permit. DEQ's long-standing policy for minor source permitting has been to use the most representative meteorological data available in model-ready format at the time when DEQ receives a modeling protocol or at permit application receipt. DEQ contends that the Boise Airport data used in the impact analyses for the Ada County Landfill project are the most representative available.

DEQ is not asserting that data from the Boise Airport are perfectly representative of conditions at the landfill or that results of the impact analyses might change somewhat if site-specific data were available. DEQ contends that the uncertainty in the analyses attributed to the uncertainty in the representativeness of the meteorological data is not unreasonable. Considering other uncertainties in the data and methods used to estimate potential air

**Application package missing key information**

**Comment 3.** The Statement of Basis includes appendices that hold key information on project impacts and emission details. In this case, only the title page for each appendix was included in the online-posted package. Although I was able to get the information I needed by calling the permit writer, DEQ should ensure that all content of the appendices are included in full in the posted online permit package. This is especially important given that emission inventories and calculations are included in appendix A.

**Response:**

DEQ acknowledges the comment. In this case the emission inventories and calculations that are included in Appendix A of the Statement of Basis can be found in the emission inventory section of the application that was also posted online as part of the permit package.