



Air Quality Permitting Response to Public Comments

June 3, 2016

Permit to Construct No. P-2015.0058 Project 61634

**Great Western Malting Co.
Pocatello, Idaho**

Facility ID No. 005-00035

Prepared by:
Shawnee Chen, P.E., Senior Air Quality Engineer
AIR QUALITY DIVISION

Final

Table of Contents

1. BACKGROUND	3
2. PUBLIC COMMENTS AND RESPONSES	3
APPENDIX	5

BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the proposed permit to construct the Great Western Malting Co. from April 26 through May 26, 2016 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>.

Comments on the proposed permit:

Comment 1: P. 6, Table 1.1: New Malt Conveyor 3, NMC3F (S36), should be corrected to NMC2F (S36).

Response 1: The change is made.

Comment 2: Table 1.1: Update the boiler model number from CFW-700-1500-125HW to CFW-700-2000-125HW. The emission performance data sheet provided to Idaho DEQ (email 4/10/16) is for the CFW-700-2000-125HW boiler model.

Response 2: The change is made.

Comment 3: P.15, Condition 2.14.4-5. GWM requests that these be replaced with: Facility wide Great Western Malting chlorine HAPs will be less than 10 tons/year and total HAPs combined will be less than 25 tons/year.

Comment 4: Appendix A, p. 27, replace the two lines chlorine limit for "S19-S26 Germination Vessels 1 to 4 (GV1-GV4) and GBE 1-6 Germination Beds Exhaust 1 to 6" to be "less than 10 tons Cl₂/year facility wide".

Comment 5: The permittee will record the quantity of sodium hypochlorite received and log it each month on a spreadsheet.

Responses 3, 4 & 5: Appendix A is revised. The facility-wide chlorine limit of less than 10 T/yr is added to keep the facility as a minor source for hazardous air pollutants (HAP). The combined HAP PTE is well below 25 T/yr according to the information in Table 7 of the statement of basis, and a limit of 25 T/yr of facility-wide combined HAP is not added to the permit.

The daily Cl₂ limit for germination vessel cleaning in Appendix A is for compliance with the short-term Cl₂ increment standard; it cannot be replaced with an annual limit and is kept as it is.

Permit Conditions 2.14.4 and 2.14.5 are revised. The monitoring requirements in Permit Conditions 2.14.4 and 2.14.5 are for demonstrating compliance with the annual facility-wide chlorine emissions limit in Appendix A. Chemicals are not specified in the permit because besides sodium hypochlorite, other chemicals are also used, such as calcium hypochlorite as mentioned in the facility's correspondence to DEQ.

Appendix

Public Comments Submitted for

Permit to Construct No. P-2015.0058 Project 61634

From: Webmaster
To: Anne Drier
Subject: Proposed Air Quality Permit to Construct - Great Western Malting - Pocatello
Date: Wednesday, May 25, 2016 2:21:17 PM

Name:

Amy Mercy

Email:

amy.mercy@greatwesternmalting.com

Affiliation:

Mgr. Safety, Corporate Sustainability/Social Responsibility

Comments:

Great Western Malting Pocatello Air Permit comments:

1. P. 6, Table 1.1: New Malt Conveyor 3 (NMC3F (S36)), should be corrected to NMC2F (S36).
2. P.7, Table 1.1: Update the boiler model number from CFW-700-1500-125HW to CFW-700-2000-125HW. The emission performance data sheet provided to Idaho DEQ (email 4/10/16) is for the CFW-700-2000-125HW boiler model.
3. P.15, Condition 2.14.4-5. GWM requests that these be replaced with: Facility wide Great Western Malting chlorine HAPs will be less than 10 tons/year and total HAPs combined will be less than 25 tons/year.
4. Appendix A, p. 27, replace the two lines chlorine limit for "S19-S26 Germination Vessels 1 to 4 (GV1-GV4) and GBE 1-6 Germination Beds Exhaust 1 to 6" to be "less than 10 tons Cl₂/year facility wide".
5. The permittee will record the quantity of sodium hypochlorite received and log it each month on a spreadsheet.

Thank you: