



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

**October 25, 2016**

**Tier I Operating Permit No. T1-2015.0038**

**Project No. 61569**

**Kootenai County Farm Landfill  
Coeur d'Alene, Idaho**

**Facility ID No. 055-00044**

Prepared by:  
Dan Pitman, Permit Writer  
AIR QUALITY DIVISION

**Final**

## Table of Contents

|  |   |
|--|---|
| 1. BACKGROUND .....                    | 3 |
| 2. PUBLIC COMMENTS AND RESPONSES ..... | 3 |
| APPENDIX .....                         | 4 |

## BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the proposed draft Tier I operating permit to Kootenai County Farm Landfill from September 12, 2016 through October 12, 2016, in accordance with IDAPA 58.01.01.364. 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 draft Tier I 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 draft Tier I 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:** The Kootenai County Farm Landfill (Facility ID No. 055-00044) Draft Tier I Operating Permit mentions applying a synthetic daily cover on pages 4 and 20. We urge Kootenai County Farms Landfill to work with its service area municipalities to utilize glass as a landfill cover or road aggregate to extend the life of the landfill and reduce the need for a synthetic spray cover.

**Response 1:** **Page 4 of the permit provides a description of the landfill and describes that daily cover is applied. The description does not require that a synthetic daily cover be applied.**

**Page 20 of the permit simply recites the requirements of 40 CFR 60 Subpart WWW, the New Source Performance Standards for Municipal Solid Waste Landfills. This subpart does not require the application of a synthetic cover. Rather the subpart specifies operating requirements if the source elects to apply a synthetic cover.**

**Appendix**

**Public Comments Submitted for**

**Tier I Operating Permit No. T1-2015.0038**

**From:** [Webmaster](#)  
**To:** [Anne Drier](#)  
**Date:** Tuesday, October 04, 2016 3:20:39 PM

---

**Name:**  
Adrienne Cronebaugh, Director

**Email:**  
[kea@kealliance.org](mailto:kea@kealliance.org)

**Affiliation:**  
Kootenai Environmental Alliance

**Comments:**  
Kootenai Environmental Alliance (KEA) is the oldest nonprofit conservation organization in Idaho. It is our mission to conserve, protect and restore the environment with particular emphasis on the Coeur d'Alene Basin and the Idaho Panhandle.

The large majority of KEA members live and work in Kootenai County and rely on the municipal solid waste service that the Kootenai County Landfill provides. Residents in Kootenai County have an ever increasing desire to increase the life of the landfill by reducing waste. Citizens of Kootenai County are committed to improving recycling and reuse efforts. This is clearly evident in the ever increasing residential participation rate and municipalities like Coeur d'Alene committing to expanding the number of items that qualify for recycling and reuse. Most recently, the City of Coeur d'Alene adopted glass recycling/reuse as part of their new solid waste contract.

KEA recommends that Kootenai County Farms Landfill consider a mutually beneficial partnership with the City and other municipalities to utilize glass cullet as its daily cover. Crushed glass is used in many landfills across the country as cover material placed on the surface of the landfill to prevent contact between the waste and air.

The Kootenai County Farm Landfill (Facility ID No. 055-00044) Draft Tier I Operating Permit mentions applying a synthetic daily cover on pages 4 and 20.

Crushed glass can provide the same daily cover requirements of preventing particulate matter from becoming airborne while also providing a local outlet for glass reuse.

We urge Kootenai County Farms Landfill to work with its service area municipalities to utilize glass as a landfill cover or road aggregate to extend the life of the landfill and reduce the need for a synthetic spray cover.

Thank you for your consideration of these comments.

Looking forward,  
Adrienne Cronebaugh  
Executive Director  
Kootenai Environmental Alliance  
PO Box 1598  
Coeur d'Alene, ID 83816

**Thank you:**