



Air Quality Permitting Response to Public Comments

December 8, 2016

Permit to Construct No. P-2009.0023

Project No. 61712

**Sorrento Lactalis Inc. – Swiss Village Plt.
Nampa, Idaho**

Facility ID No. 027-00071

Prepared by:
Craig Woodruff, Permit Writer *cw*
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 permit to construct the Sorrento Lactalis Inc. – Swiss Village Plt. from October 28, 2016 through November 28, 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>.

Comment 1: Why is there a substantial difference between the greenhouse gas emissions presented in the Potential to Emit calculations supplied in the Statement of Basis and the greenhouse gas emissions that were reported to EPA’s Greenhouse Gas Reporting Program?

Response 1: Potential to Emit is defined as the maximum capacity of a facility or stationary source to emit an air pollutant under its physical and operational design, and this was the basis for CO₂e calculations in the PTC application. This facility is a minor source for regulated pollutants with respect to the PSD program, and the CO₂e emissions do not require any further review by DEQ.

Furthermore, the Greenhouse Gas Reporting Program is an EPA requirement and the basis for reporting greenhouse gas emissions to the EPA by the facility is different than what is required in our PTC applications. For additional information regarding the Greenhouse Gas Reporting requirements please contact your local EPA representative, or use the following link:

<https://www.epa.gov/ghgreporting>

Appendix
Public Comments Submitted for
Permit to Construct
P-2009.0023



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11/28/2016

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Craig Woodruff
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Submitted via email: anne.drier@deq.idaho.gov and craig.woodruff@deq.idaho.gov

RE: Proposed Permit to Construct for Sorrento Lactalis

Dear Ms. Drier and Mr. Woodruff:

Thank you for the opportunity to comment on the proposed air quality permit to construct for Sorrento Lactalis' (Sorrento) facility in Nampa, ID. Since 1973, the Idaho Conservation League has been Idaho's leading voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters, many of whom have a deep personal interest in protecting Idaho's air quality.

We are concerned over the significant amount of CO₂ equivalent (CO₂e) emissions from this facility, culminating in a post-project total of 98,778.7 T/yr. Not only is the sheer volume of these emissions concerning, but there also appears to be a discrepancy between what has been reported to DEQ and what has been reported to the EPA's Greenhouse Gas Reporting Program (GHGRP)¹, which lists 38,705.46 tons as the total CO₂e emissions from this facility during 2015.

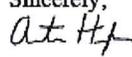
We ask for clarification as to why CO₂e emissions estimates differ between the two sources. Additionally, given the significant amount of CO₂e emissions from Sorrento's facility, we encourage Sorrento to adopt a Greenhouse Gas Emission Reduction Action Plan, guidance for which is available through DEQ's website.² As stated on DEQ's website, potential benefits of adopting such a plan include rebates and tax incentives, saving money, increasing efficiency, enhancing your public image and marketability, and staying ahead of the curve.

¹ Available online: <https://www.epa.gov/ghgreporting>

² <http://www.deq.idaho.gov/pollution-prevention/p2-for-businesses/greenhouse-gas-emissions-toolkit/>

RE: Idaho Conservation League comments on Sorrento Lactalis' Permit to Construct Modification

Page 1 of 2

Sincerely,

Austin Hopkins
Conservation Assistant