



Amalgamated Sugar

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June 7, 2018

Paula Wilson
Department of Environmental Quality
1410 N. Hilton St
Boise, ID 83706

Re: Air Quality Docket No. 58-0101-1802
Negotiated Rulemaking Significant Rate for Ammonia

Dear Ms. Wilson:

The Department of Environmental Quality (DEQ) has initiated a rulemaking to establish a significant rate for ammonia for regulated sources that is intended to be applied in areas designated nonattainment for PM_{2.5}. The following questions and comments are provided on this proposed rulemaking.

1. Has DEQ fully surveyed and evaluated options used in other regions or states for managing precursors to PM_{2.5}? Is the basis for proposing the significant threshold for ammonia at 40 tons per year consistent with federal regulations and reasonable in comparison with all other approaches, not just AK and CA? What are other States proposing?
2. Air emissions inventories in the Treasure Valley suggest that unregulated sources contribute more than 90 percent of the total ammonia emissions. A threshold of 40 tons per year for modified, regulated sources may not be reasonable considering the relatively low contribution of regulated ammonia emissions in comparison to unregulated sources of ammonia. Such a low threshold could require regulated sources to install costly emission control technology, with potentially little or no benefit to air quality. How will DEQ approach such situations? Has DEQ considered a higher threshold to better address the contributors in the Treasure Valley?
3. DEQ has indicated that there either are or will soon be no areas in Idaho designated nonattainment for PM_{2.5}. However, at the same time there is concern that the Treasure Valley, including portions of Ada and Canyon Counties, is at risk for this designation. TASCOS is interested in the status of air quality in the Treasure Valley with regard to PM_{2.5} air quality criteria and attainment status. TASCOS requests that DEQ provide information concerning the status of air quality in the Treasure Valley and the potential for a nonattainment determination for PM_{2.5}? Please include projected timelines for such a determination and efforts in place to prevent a nonattainment designation, if available.

4. DEQ has mentioned that it may reserve the discretion under this proposed rule to address situations in which either ammonia or a particular regulated source is not the primary contributor to nonattainment. Where in the language of the proposed rule does DEQ retain this discretion? Under what circumstances will this discretion be utilized?

Thank you for this opportunity to comment on the proposed rule. TASC0 looks forward to additional discussion concerning this proposed rulemaking.

Sincerely,



Dean C. DeLorey
Director of Environmental Affairs
The Amalgamated Sugar Company LLC

Cc: Scott Blickenstaff, Bob Braun, Krista McIntyre