



Air Quality Permitting Response to Public Comments

June 29, 2018

Permit to Construct No. P-2009.0091

Project No. 61970

**Gavilon Grain, LLC
Burley, Idaho**

Facility ID No. 031-00038

Prepared by:
Morrie Lewis, Permit Writer 
AIR QUALITY DIVISION

Final

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BACKGROUND

The Idaho Department of Environmental Quality (DEQ) provided for public comment on the proposed permit to construct for Gavilon Grain, LLC from May 24 through June 25, 2018, 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: I am emailing comments on behalf of a mobile home park on West 8th Street in Burley. We would like to be on record voicing our concerns over the air quality permit for Gavilon Grain.

In years past we have had several instances of very heavy grain dust covering tenant's homes, vehicles, and other belongings. We are extremely concerned about this continuing and the possible effects it may have for our properties and the property of our 30 tenants that live near the facility.

Below is a link to a story published in the Times News from 2010.

https://magicvalley.com/news/local/gavilon-complaints-brought-to-cassia-county-sheriff/article_a559b620-47a6-5b61-9f93-2570e42646fb.htm

Response 1: After closer review, Permit Condition 2.25 was updated for consistency with current fugitive dust requirements, by adding a second paragraph addressing fugitive dust complaint response;

The permittee shall maintain records of all fugitive dust complaints received. The permittee shall take appropriate corrective action as expeditiously as practicable after receipt of a valid complaint. The records shall include, at a minimum, the date that each complaint was received and a description of the following: the complaint, the permittee's assessment of the validity of the complaint, any corrective action taken, and the date the corrective action was taken.

Although an increase in the daily hours of operation of the hammermills from 12 to 13 hours per day is authorized by this permitting action, annual operation of the hammermills and annual throughput limits remain unchanged, and facility-wide emissions are not expected to increase. Process particulate matter (PM) emissions are also inherently limited (bottlenecked) by the grain cooling capacity of the flaker coolers, which have not been modified in this permit action. As provided in the Statement of Basis, preconstruction compliance with applicable air quality standards has been demonstrated based on modeled impacts from facility-wide operations and emissions, including for PM_{2.5} and PM₁₀ National Ambient Air Quality Standards (NAAQS). Permitting of the hammermill equipment in the article referenced was addressed in 2010, as described in the Permitting History section of the Statement of Basis.

Fugitive dust emissions are limited by Idaho Air Rules for Reasonable Control of Fugitive Dust (IDAPA 58.01.01.650-651), and these requirements have been incorporated in Permit

Conditions 2.17, 2.25, and 2.26. DEQ encourages anyone with fugitive dust complaints related to this facility to direct these to one or both of the following contacts:

(402) 889-4070 Gavilon Grain, LLC
(208) 736-2190 DEQ Twin Falls Regional Office

As required by the permit, all potential sources of fugitive emissions are required to be inspected on a daily basis by Gavilon Grain, LLC, and corrective action taken whenever any fugitive emissions are detected. All fugitive dust complaints received by Gavilon Grain, LLC are to be assessed and appropriate corrective action taken as expeditiously as practicable. All complaints received by DEQ are investigated and appropriate response determined. Additional information regarding the regulation of fugitive dust can be found at the DEQ website: <http://www.deq.idaho.gov/air-quality/air-pollutants/fugitive-dust>

Appendix
Public Comments Submitted for
Permit to Construct
P-2009.0091

Subject: air quality permit-to-construct for Gavilon Grain

I am emailing comments on the behalf of Waltco LLC, who owns a mobile home park on West 8th Street in Burley, ID. We would like to be on record voicing our concerns over the air-quality permit for Gavilon Grain.

In years past we have had several instances of very heavy grain dust covering tenants homes, vehicles and other belongings. We are extremely concerned about this continuing and the possible effects it may have for our properties and the property of our 30 tenants that live near the facility.

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