



Air Quality Permitting Response to Public Comments

January 26, 2017

Permit to Construct No. P-2016.0042

Project No. 61755

**Fabri-Kal
Burley, Idaho**

Facility ID No. 031-00057

Prepared by:
Darrin Pampaian, Permit Writer
AIR QUALITY DIVISION

A handwritten signature in black ink, appearing to be "D. P.", is located to the right of the typed name.

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 for Fabri-Kal from November 30, 2016 through December 30, 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: The proposed permit is for a new facility to be located at 2457 Washington Avenue in Burley, ID. This location happens to be located adjacent to Burley Senior High School, located roughly 1,000 ft. to the east and home to a potentially sensitive population of young adults. Given this proximity, we believe extra precautions are warranted to ensure emissions of criteria air pollutants and TAPs do not negatively affect these students.

According to the modeling memorandum (memo) included in DEQ's Statement of Basis (SOB), the property boundary for this site was used as the delineator for ambient air conditions when assessing pre-construction compliance required by IDAPA 58.01.01.203.02-.03. The memo concludes with a finding that the application has demonstrated to DEQ's satisfaction that emissions from Fabri-Kal's facility will not cause or significantly contribute to a violation of any ambient air quality standard at the property boundary.

We are pleased to see that modeling has not predicted violations of any air quality standards; however, we note that the modeling analyses relied upon certain key assumptions, some of which were listed in Table 1 of the memo and some of which are inherent in the models utilized (i.e. – the mathematical operations utilized to perform the model analyses).

To that end, we believe it would be appropriate to install monitoring equipment on Burley Senior High School to collect air quality data at regular intervals. While the modeling suggests compliance with regulatory standards, public health is paramount and deserves the highest level of assurance possible. Installing and operating air quality monitoring equipment at the school would provide this assurance.

Response 1: Modeling was conducted on facility emissions which demonstrate compliance with the National Ambient Air Quality Standards (NAAQS) as required by State and Federal Law. Because of the conservative nature of the modeling analysis, DEQ is confident that NAAQS protection is provided at and beyond the fence line of the facility. In addition, pre-construction ambient air monitoring is required for certain permitting projects at facilities that will be a Prevention of Significant Deterioration (PSD) Major Source of air emissions. As this project is at a facility that will be a minor source of air emissions (not a PSD major source), air monitoring is not required.

Comment 2: Lastly, according to the U.S. Census Bureau's 2010-2014 American Community Survey, 45 homes within a 1-mile radius of the proposed location are Spanish-speaking households. For reference, this is in the 79th percentile relative to the rest of Idaho. Given this relatively large Spanish-speaking population, we encourage DEQ and Fabri-Kal to produce bilingual material when providing information or soliciting engagement opportunities. Doing so will ensure that all parties potentially affected by construction and operation of this facility receive an equal opportunity to provide input on the matter.

Response 2: DEQ thanks Idaho Conservation League for the comment and we are reviewing our options to provide such a service in the future.

Appendix

Public Comments Submitted for

Permit to Construct

P-2016.0042



201416910 • PO Box 844 Boz, ID 83702 • www.idahocconservation.org

12/21/2016

Anne Drier
Air Quality Division
DEQ State Office
1410 N. Hilton
Boise, ID 83706

Craig Woodruff
Air Quality Division
DEQ State Office
1410 N. Hilton
Boise, ID 83706

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

RE: Proposed Permit to Construct No. P-2016.0042 for Fabri-Kal

Dear Ms. Drier and Mr. Woodruff,

Thank you for the opportunity to comment on the proposed air quality permit to construct for Fabri-Kal in Burley, 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.

The proposed permit is for a new facility to be located at 2457 Washington Avenue in Burley, ID. This location happens to be located adjacent to Burley Senior High School, located roughly 1,000 ft. to the east and home to a potentially sensitive population of young adults. Given this proximity, we believe extra precautions are warranted to ensure emissions of criteria air pollutants and TAPs do not negatively affect these students.

According to the modeling memorandum (memo) included in DEQ's Statement of Basis (SOB), the property boundary for this site was used as the delineator for ambient air conditions when assessing pre-construction compliance required by IDAPA 58.01.01.203.02-.03. The memo concludes with a finding that the application has demonstrated to DEQ's satisfaction that emissions from Fabri-Kal's facility will not cause or significantly contribute to a violation of any ambient air quality standard at the property boundary.

We are pleased to see that modeling has not predicted violations of any air quality standards; however, we note that the modeling analyses relied upon certain key assumptions, some of which were listed in Table 1 of the memo and some of which are

RE: Idaho Conservation League comments on proposed permit to construct No. P-2016.0042 for Fabri-Kal

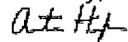
Page 1 of 2

inherent in the models utilized (i.e. – the mathematical operations utilized to perform the model analyses).

To that end, we believe it would be appropriate to install monitoring equipment on Burley Senior High School to collect air quality data at regular intervals. While the modeling suggests compliance with regulatory standards, public health is paramount and deserves the highest level of assurance possible. Installing and operating air quality monitoring equipment at the school would provide this assurance.

Lastly, according to the U.S. Census Bureau's 2010-2014 American Community Survey¹, 45 homes within a 1-mile radius of the proposed location are Spanish-speaking households. For reference, this is in the 79th percentile relative to the rest of Idaho. Given this relatively large Spanish-speaking population, we encourage DEQ and Fabri-Kal to produce bilingual material when providing information or soliciting engagement opportunities. Doing so will ensure that all parties potentially affected by construction and operation of this facility receive an equal opportunity to provide input on the matter.

Please do not hesitate to contact me at 208-345-6933 ext. 23 or ahopkins@idahoconservation.org if you have any questions regarding our comments or if we can provide you with any additional information on this matter.

Sincerely,

Austin Hopkins
Conservation Assistant

¹ Data accessed via the EPA's Environmental Justice Screen tool, available online:
<https://www.epa.gov/ejscreen>

RE: Idaho Conservation League comments on proposed permit to construct No. P-2016.0042 for Fabri-Kal

Page 2 of 2