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DEPARTMENT OF ENVIRONMENTAL QUALITY
STATE WATER QUALITY PROGRAMS



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January 6, 2016

Paula Wilson
Idaho Department of Environmental Quality
1410 North Hilton
Boise, ID 83706

Subject: January 5, 2016 IPDES Guidance Development Meeting Comments

Dear Ms. Wilson:

Clearwater Paper is pleased to offer this comment letter on the Idaho Pollutant Discharge Elimination System (IPDES) draft document titled: *Public Participation in the Permitting Process*. We appreciate the Idaho Department of Environmental Quality's (IDEQ) work on this guidance development and look forward to participating throughout the remainder of this process.

During the January 5, 2016 meeting, there was some discussion about how many days a permit applicant should have to review preliminary draft permits. During this discussion, IDEQ stated that they would allow a permit applicant up to 10 days to review the preliminary draft permit. Clearwater Paper agrees that 10 days should normally be enough time to review small permits that are not very complicated. However, 10 days is not always enough time for a permit applicant to thoroughly review a large and detailed permit—especially when the permit has been significantly modified or when the permit incorporates several new permit conditions. Clearwater Paper requests that IDEQ allow for up to 30 business days to review preliminary draft permits.

On behalf of Clearwater Paper, we appreciate the opportunity to provide comment on the IPDES guidance development. Please contact me at clayton.steele@clearwaterpaper.com or at (208) 799-4144 with any questions.

Sincerely,

Clayton Steele
Environmental Manager