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Subject: For June 12
Date: Friday, June 8, 2018 5:31:26 PM

Lisa, I lost the business hours of the day to other business, but wanted to get this to you. I saw the second draft for June 12, and have spoken with IACI reps. We're still concerned that the 210.20 revision is clunky and confusing and still doesn't really say what DEQ tells us is the intent. So we propose to just start fresh and get clarity. See the suggestion below. We think this is what DEQ is saying to industry that you intend the exemption to cover.

We can talk Tuesday about this approach. Happy weekend. KKM

210. DEMONSTRATION OF COMPLIANCE WITH TAPS
IDAPA 210.20 NSPS and NESHAP Sources

No demonstration of compliance with the toxic air pollutant provisions is required to obtain a preconstruction permit, or demonstrate PTC exemption criteria, for a new source or for modification of an existing source, if the toxic air pollutant is also a listed hazardous air pollutant under the Clean Air Act, and:

- a. The equipment or activity is covered by a NSPS or NESHAP; or
- b. The category of equipment or activity is addressed by a NSPS or NESHAP, even if the equipment or activity is not subject to compliance requirements under the federal rule. (e.g. an area source when NSPS or NESHAP only applies to a major source).