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June 21, 2018

Email Transmittal to: paula.wilson@deq.idaho.gov

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

Re: Air Quality: Docket No. 58-0101-1801- Negotiated Rulemaking
Draft No. 3, June 12, 2018

Dear Ms. Wilson:

Following are comments regarding the Department of Environmental Quality's (Draft No. 3) concerning the Negotiated Rulemaking referenced above. These comments address the most recent revisions, highlighted in Draft 3.

1. Proposed Revisions Section 223.03 and 223.04

I support these revisions. The proposed revisions in 223.03 delete rarely used extra stringent provisions in favor of controlled BRC TAP emissions. This revision would benefit regulated facilities that emit very low amounts of TAPs and enable them to qualify for permit exemption. In addition, this is consistent with the permit exemption criteria for criteria pollutants in Section 221.

The revisions in Section 223.04 delete the old Level III Exemption and require that a Toxic Air Pollutant Annual Report reports for a Level I and II continue to be submitted. Draft 3 also includes removing the deadline to submit annual reports. This change was published in Draft 2, published June 8, however, I don't recall discussion about this change in the Negotiated Rulemaking meeting on June 12. Retaining the former May 1 deadline could minimize disagreements between regulated parties and IDEQ. However, I do not oppose the revision.

2. Proposed revisions to Section 210.20 NSPS and NESHAP Sources

I support this revision. The proposed revision clarifies when facilities subject to NESHAP requirements are not required to demonstrate additional TAP compliance to qualify for permit exemption or to obtain a Permit to Construct.

I appreciate the opportunity provide comments.

Very truly yours,
TORF Environmental Management

A handwritten signature in black ink, appearing to read "Mark A. Torf".

Mark A. Torf
Sr. Professional