

June 21, 2018

VIA EMAIL: paula.wilson@deq.idaho.gov

Paula J. Wilson
Hearing Coordinator
Department of Environmental Quality
1410 North Hilton
Boise, Idaho 83706-0481

Re: Idaho DEQ Negotiated Rulemaking Docket No. 58-0101-1801

Dear Ms. Wilson:

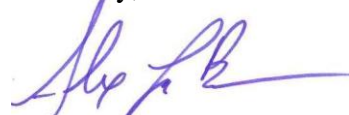
The Idaho Association of Commerce & Industry (IACI) is the leading trade association of Idaho businesses and represents hundreds of members of all sizes engaged in diverse commercial and industrial enterprises throughout the State. IACI appreciates the Idaho Department of Environmental Quality's (DEQ) consideration of its May 18, 2018 comments on negotiated rulemaking, Docket No. 58-0101-1801, and the opportunity to submit additional comments on the latest proposed draft, dated June 15, 2018. The meeting held June 12, 2018 was a constructive negotiated rulemaking session.

DEQ's latest proposed revisions to IDAPA 58.01.01.210.20.a, and the accompanying white paper on the term "addressed," resolve IACI's concerns about clarity and scope in this section. The updated proposed language better reflects current TAPs analysis practices, and allows for the straightforward, streamlined application of this rule. IACI supports the proposed language as now written, and has no further comments on proposed changes to IDAPA 58.01.01.210.20.a.

IACI also supports DEQ's latest proposed revisions to IDAPA 58.01.01.223, which clarifies the required analyses for TAPs exemptions. IACI has no further comments on this section at this time. IACI reiterates its May 18, 2018 comments on all other sections of this proposed rule.

Thank you for your consideration of these comments to clarify and update Idaho Air Quality Regulations. Please do not hesitate to contact us should you have any questions or concerns.

Sincerely,



Alex LaBeau
President

cc: Alan Prouty, Chair
IACI Environment Committee