



Clearwater Paper Corporation  
601 West Riverside, Suite 1100  
Spokane, WA 99201

May 14, 2019

Ms. Paula Wilson  
Hearing Coordinator  
Idaho Department of Environmental Quality  
1410 North Hilton  
Boise, ID 83706  
[paula.wilson@deq.idaho.gov](mailto:paula.wilson@deq.idaho.gov)

Re: Docket Number 58-0101-1902

Dear Ms. Wilson:

Thank you for the opportunity to comment on the negotiated rulemaking to increase the fees collected from Idaho's Title V operating permit holders. Clearwater Paper operates a pulp and paper facility in Idaho that is a Title V operating source. Clearwater recognizes the need to supplement the Title V operating permit program fund in response to emissions decreases in Idaho, changes in the number of Title V sources, and the loss of a substantial grant historically awarded by the Idaho National Laboratory.

Under the Department's proposal, Clearwater anticipates an increase in fees in excess of \$75,000 annually for the mill, the single largest increase of any major source. Clearwater urges the Department to manage the program efficiently to reduce fees for services and provide additional detail on annual invoices to explain the activities performed for the fees for service (e.g., FCE hours, inspection & inspection reports, compliance activities, source test review report, etc.). This would allow Clearwater to have better line of sight to this work to enable feedback on efficient use of resources. Clearwater will continue to identify opportunities to reduce actual emissions and the related emissions fees.

Clearwater supports the Department's improvements to streamline application renewal reviews. In addition, Clearwater is committed to work with the Department and other major sources to identify efficiencies in compliance reporting and records evaluations that can reduce the Title V program expenses.

With respect to the redrafted rules, Clearwater recommends preserving IDAPA 58.01.01.397 and revising the minimum amount in IDAPA 58.01.01.397.02 to \$200,000.

Finally, Clearwater encourages the Department to continue to explore funding frameworks that can give the stakeholders future stability and certainty.

Sincerely,

A handwritten signature in black ink that reads "Malisa Maynard".

Malisa Maynard  
Corporate Environmental & Sustainability