

From: [Stephen Freiburger](#)
To: [Paula Wilson](#)
Cc: "[Rachele Klein \(rklein@republicservices.com\)](#)"; [Norman Ricks](#); "[Nate Francisco](#)"
Subject: ISWA: IDEQ Negotiated Rulemaking Comments re Title V Fee Increase
Date: Tuesday, May 14, 2019 10:45:51 PM

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

Dear Ms. Wilson:

The Idaho Solid Waste Association (ISWA) appreciates the opportunity to comment on the Idaho Department of Environmental Quality's (IDEQ) negotiated rulemaking process to address a future funding shortfall to the air quality Title V (Tier I Air Operating Permits) fund due to the Idaho National Laboratory no longer being a Title V source.

ISWA represents the Solid Waste Industry in Idaho and represents both public and private solid waste professionals throughout the state.

ISWA understands the funding challenge facing IDEQ and applauds your efforts to maintain reasonable costs associated with the Title V Permitting program.

However, ISWA strongly encourages IDEQ to also look at additional opportunities to reduce the costs associated with the program rather than only looking for a fee increase.

For example:

- Costs can be reduced if the permitting program is simplified. It should not take two separate divisions within the air group (permit writers and modelers) to review and approve an application especially on the small and minor sources that make up the bulk of the solid waste facilities in Idaho. The technical rigor could be built into some templates that would be simple to complete, review and audit compliance.
- With some preliminary scoping, it would be possible to make the permitting process something that any manager with a team can self-perform.
- IDEQ could also provide a checklist permit application with template appendices to substantiate each response. In addition, the modeling protocol could be converted into a checklist that can be a descriptive protocol.
- Considering that the T1 permit is an umbrella permit, IDEQ should only reference each of the PTC conditions within the T1 (and include the PTC as an attachment to the T1 permit), rather than perform the laborious effort to copy the PTC language into each T1 Permit.

Again, thank you for the opportunity to participate in this rulemaking process.

Sincerely,

S.
Stephen F. Freiburger, PE

ISWA Past President and Legislative Awareness Board Liaison
(208) 921-8491