



Amalgamated Sugar

Pure. Sweet. Grower-Owned.

May 14, 2019

Ms. Paula Wilson
Hearing Coordinator
Idaho Department of Environmental Quality
1410 North Hilton
Boise, ID 83706
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. The Amalgamated Sugar Company LLC (TASCO) operates three sugarbeet facilities in Idaho that are Title V operating sources. TASCO 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, however, TASCO observes that the top seven largest emissions sources will absorb approximately 60% of the funding supplement. TASCO anticipates an increase in fees in excess of \$75,000 annually for the company. The most significant change is the increase in our facilities' fixed fee amounts, an increase in excess of 100%. TASCO requests that the Department consider redistributing this increase more evenly to all Title V sources.

With respect to the two other components of the fee calculation, TASCO will continue to identify opportunities to reduce actual emissions and the related emissions fees; and TASCO urges the Department to manage the program efficiently to reduce fees for services. Specifically, TASCO supports the Department's improvements to streamline application renewal reviews, and to streamline permit drafting to incorporate federal rules by reference, in lieu of time-consuming drafting of language to mirror the federal requirements. TASCO is committed to work with the Department and other major Title V sources to identify efficiencies in compliance reporting and records evaluations that can reduce Title V program expenses.

With respect to the redrafted rules, TASC0 offers the following comments:

- TASC0 agrees with the deletion of the radionuclide registration in IDAPA 58.01.01.389.05.
- TASC0 agrees with the replacement of text in IDAPA 58.01.01.390 with tables for clarity.
- TASC0 agrees with the deletion of the IDAPA 58.01.01.390.03 radionuclide registration fee.
- TASC0 recommends preserving IDAPA 58.01.01.397 and revising the minimum amount in IDAPA 58.01.01.397.02 to \$200,000.

Finally, TASC0 encourages the Department to continue to explore funding frameworks that can give the stakeholders future stability and certainty.

Sincerely,



Dean Delorey
Director of Environmental Affairs