

From: [John Goetze](#)
To: [Paula Wilson](#)
Subject: Air Quality: Docket No. 58-0101-2101
Date: Monday, November 8, 2021 9:19:39 PM
Attachments: [image001.png](#)

Hello,

Following up on [Air Quality: Docket No. 58-0101-2101](#), this comment is in regards to the removal of TAPS interpollutant trading provisions for preconstruction compliance (§210.17-19). These procedures have never been used according to current DEQ staff. Increasingly refined techniques are currently being used to demonstrate preconstruction compliance in light of evolving air quality conditions and new industrial technologies. It is possible that future facilities may use the TAPS interpollutant trading provisions to demonstrate preconstruction compliance. DEQ has proposed to remove the §210.17-19 provisions at this time. DEQ staff proposed (During the 10/28 webinar discussing the rule change) that TAPS interpollutant trading could be reevaluated and readded to IDAPA 58.0.01 as a proposed rulemaking in the future if conditions warranted as such.

EO 2020-01 explicitly states: “excessive regulation at all levels of government can impose high costs on businesses, inhibit job growth, and impede private sector investment”. The ability for industrial facilities to expand in Idaho depends on demonstrating preconstruction compliance with air regulations. An efficient path to preconstruction compliance means an efficient path to facility expansion and associated job growth and private sector investment. We are concerned that eliminating TAPS interpollutant trading eliminates a path to preconstruction compliance for potential future facilities, thus inhibiting economic growth. We are also concerned that relying on a potential future rulemaking to re-add the TAPS interpollutant trading rules (if conditions warranted as such) could slow down the preconstruction compliance process in contrast to using the rule as currently written, thus slowing down economic growth.

Thank you,

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