



PETROLEUM STORAGE TANK FUND

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August 30, 2023

Kristi Lowder
Department of Environmental Quality
1410 North Hilton
Boise, Idaho 83706

Via: email - kristi.lowder@deq.idaho.gov

Re: Petroleum Release Corrective Action - Docket No. 58-0124-2401
Idaho Department of Environmental Quality

Dear Ms. Lauder:

The Petroleum Storage Tank Fund (PSTF), through its representative Olympus Technical Services, Inc. (Olympus), attended the Scoping Meeting for IDAPA 58.01.24, Risk Based Corrective Action at Petroleum Release Sites conducted by the Idaho Department of Environmental Quality (IDEQ) on July 23, 2023. In its proposed rulemaking, IDEQ wants to make changes to the Rules for Standards and Procedures for Application of Risk Based Corrective Action at Petroleum Release Sites (IDAPA 58.01.24).

IDEQ is proposing to move Sections 800 and 849-852 from the Water Quality Standards (IDAPA 58.01.02) into Standards and Procedures for Application of Risk Based Corrective Action at Petroleum Release Sites, and retiring IDEQ's risk evaluation software in exchange for utilizing the United States Environmental Protection Agency's (USEPA) Regional Screening Level (RSL) Calculator and Vapor Intrusion Screening Level (VISL) Calculator. Presently, the IDEQ risk evaluation software is outdated and IDEQ does not have the resources to update the software.

PSTF supports IDEQ's proposed rulemaking to retire IDEQ's risk evaluation software and replace it with USEPA's RSL and VISL Calculators. As IDEQ has stated, this rulemaking's process will include revising the current Idaho Risk Evaluation Manual for Petroleum Releases (IDEQ, August 2018). We believe this process should be open to stakeholder participation.

Please contact Michael Backe with Olympus or Danielle Duran with PSTF should you have any questions or comments. You can contact Mr. Backe by telephone at (208) 593-4211 or via email at MBacke@OlyTech.com. You can contact Mrs. Duran at (208)332-8113 or via email at danielle.duran@idahopstf.org .

Sincerely,

Cc: Mike Backe, Olympus Technical Services (via email)
Suzanne Budge, IPMA (via email)