

From: [Belinda Breidenbach](#)
To: [Aislinn Johns](#)
Subject: Comments on the two proposed rulemakings: Fees and the General Minor Permit
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After attending the negotiated rulemaking for Fees and the General Minor Permit, I have a few thoughts to share.

Fees

I understand that DEQ air permitting fees have not changed since 2002, and the long timeframe requires significant changes. Implementing an annual fee will be an adjustment for some small businesses.

To provide small businesses with the stability of predictable permit fee increases I suggest that you tie all permit fees to an economic indicator of inflation. The annual Consumer Price Index (CPI) is published in January. Fees could increase annually by that percentage starting the first day of July, the beginning of the new fiscal year.

The processing fee remaining tied to the actual emissions is good for small businesses. This keeps the fee lower for small businesses that as expected have less of an environmental impact.

The fee for exemption concurrences raises a few complications. Will there be an associated timeline in which an exemption concurrence will be processed?

General Minor Permit

This is a well chosen vehicle that will simplify permitting for small businesses as well as simplifying DEQ review. It is a win win.

Industry specific General Minor Permits will provide a simple method for small businesses to apply for a permit without complicated emissions inventories and the need to hire a consultant. The General Minor Permit will be valuable to a wide range of small businesses from auto body and bed lining to concrete batch plants to structural steel manufacturers.

Some small businesses may choose a General Minor Permit over an exemption concurrence. The fees would be the same, but the General Minor Permit application would be much simpler.

I will attend the follow-up rulemakings in May and am happy to assist.

Belinda

Belinda Breidenbach

Environmental Solutions Program Director

Idaho Small Business Development Center
[2360 W University Drive](#), MBEB 2nd floor
Boise, Idaho 83725
[IdahoSBDC.org](#)
[Facebook](#)
[YouTube](#)

