TIMBER CREEK
RECYCLING

October 28, 2026

Idaho Department of Environmental Quality
1410 N Hilton St,
Boise, ID 83706

To Whom May Concern:

Thank you for the opportunity to ask questions and provide feedback and comments to the Department on the proposed Solid Waste rulemaking. We appreciate the time and attention to this rule and our concerns.

Timber Creek Recycling (TCR) is a Treasure Valley owned and operated small business focused on sustainability and safe outcomes by using cutting edge recycling technology and operations. TCR strives to operate in the region by being a responsible actor in the industry and working collaboratively with all parties involved.

In this spirit, we have seen new issues and challenges emerge across the region, state and nation as it relates to sewage and waste-activated sludge - specifically the mishandling of these materials. TCR seeks to ensure that sludge is being disposed solely to municipal solid waste landfills and the appropriate tiered facilities.

Our facility currently receives a variety of materials, from apple sauce to production cheese byproducts, just to name a few. The list of acceptable foods stocks is ever changing and requires a certain level of flexibly that we believe is missing from this rule. The concern here is whether a major modification would trigger any change in the approved operations plan. Additionally, given how broad the scope is for major modification, there is potential for creating significant challenges for operators acting in good faith. Our hope is for these rules is to not create a high regulatory burden on good actors while still finding the balance to protecting the health and safety of the public.

Simply put, opening up and amending the TCR operation plan any time we need to add a new food stock would be extremely problematic. Paying a major modification fee for a change to the operations plan would also be burdensome, as well as financial issues for any small business in Idaho.

Finally, the definition and lack of clarity surrounding what could be construed as a pilot project is also cause for our concern. Starting these changes off as a pilot project could potentially cause delays, confusion, and inconsistency. TCR encourages the Department to define pilot projects in clear and concise language that poses the least possible burden for small businesses like TCR.

Thank you again for allowing us to comment on these proposed changes and please feel free to contact me if you have any questions on our feedback.

Respectfully,

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