UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101-3123

AIR & RADIATION
DIVISION

January 26, 2023

Mr. Mike Simon
Air Quality Section Manager
Idaho Department of Environmental Quality – Air Quality Division
1410 N. Hilton Street
Boise, Idaho 83706

Dear Mr. Simon:

The purpose of this letter is to notify you that the U.S. Environmental Protection Agency, Region 10 plans to perform a third evaluation of the Idaho Department of Environmental Quality – Air Quality Division's title V operating permit program. This letter kicks off the effort by describing the evaluation process and our proposed schedule. We are also requesting information that will assist us in our program evaluation. Your agency will be the third of the third-round program evaluations that Region 10 will undertake.

This program evaluation will focus primarily on the following six areas:

(1) follow-up on concerns identified during our 2004 and 2007 evaluations of your program;

(2) permit issuance progress and resources;

(3) compliance assurance monitoring;

(4) new applicable requirements and rules;

(5) monitoring for synthetic minor source emission limits; and

(6) monitoring for emission limits to protect ambient air quality standards.

We will review a selection of your permits, focusing on those issued most recently. This will likely include permits we've already reviewed and submitted comments on during the public comment period. This program review will require involvement of staff and managers from your permitting, technical and finance groups. Staff and managers from your compliance group are also welcome to participate. The planned meetings will be virtual. We appreciate your cooperation and assistance.

Our tentative schedule is as follows:

Task	**Tentative Date**
Region 10 sends kickoff letter	Today
IDEQ sends requested information	February 27, 2023
Region 10 meets virtually with IDEQ	June 6 & 7, 2023
Region 10 sends draft report	July 28, 2023
IDEQ sends comments to Region 10	August 11, 2023
Region 10 sends final report	August 25, 2023

The enclosure describes the information we would like to receive in advance, so we can be efficient during the interviews with your staff and managers. Please return the information in electronic form as early as possible, but no later than the date in the table above, to Christopher Familiare who will be leading the evaluation. We will contact you if we need any additional information.

We look forward to working with you and your staff. If you have any questions about the program evaluation, please do not hesitate to call me at (206) 553-1778 or Christopher at (206) 553-1250.

Sincerely,

KARL PEPPLE

Digitally signed by KARL PEPPLE
Date: 2023.01.26 14:17:27 -08'00'

Karl Pepple, Manager
Air Permits and Toxics Branch

Enclosure

cc: Mr. Darrin Pampaian
Air Quality Permit Supervisor

Title V Program Evaluation
Idaho Department of Environmental Quality

Information Request

Please send the following information in electronic form as soon as possible, but no later than February 27, 2023, to Christopher Familiare at familiare.christopher@epa.gov.

1. A list of IDEQ staff that work in the title V program, noting their responsibilities and years of experience (e.g., permit writer, rule writer, inspector, etc.).

2. Identification of any title V permits, renewals, or revisions that are recent enough that they are not represented on the IDEQ website.

3. A list and description of any rule changes that have been made to IDEQ's title V regulations (e.g. those that affect applicability, implementation, or fees) since the last revision approved. If any of the rule changes have been submitted to Region 10 for review, note the date of submittal.

4. An update (preferably in tabular format) regarding each of the concerns raised in the 2007 title V program evaluation, noting whether the plan to address the concern was completed and whether IDEQ is approaching any of the concerns differently than previously communicated to Region 10. Provide a narrative explaining the different approach, if applicable.

5. Financial records (preferably from your last complete fiscal year) reflecting revenues and expenses that document IDEQ's ability to fund the operating permit program with title V fees and IDEQ's ability to ensure that title V fees are used only for title V authorized expenses.

6. A list of any actions or steps that IDEQ takes when processing permits to address potential Environmental Justice (EJ) concerns.

7. Any issues or requests that IDEQ would like to raise to Region 10 regarding any aspect of the title V program.