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October 14, 2016

Troy Smith
Idaho Department of Environmental Quality
1410 North Hilton
Boise, ID 83706

Subject: October 7, 2016 IPDES Guidance Development Meeting Comments

Dear Mr. Smith:

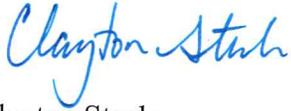
Clearwater Paper is pleased to offer this comment letter on the Idaho Pollutant Discharge Elimination System (IPDES) draft document titled: *Idaho Pollutant Discharge Elimination System Effluent Limit Development Guidance*. We appreciate the Idaho Department of Environmental Quality's (IDEQ) work on this guidance development and look forward to participating throughout the remainder of this process.

During the October 7, 2016 meeting, there was some discussion in section 2.3.2.2 about how to report mass loads when concentrations are below the MDL and ML. It would be burdensome to develop an arbitrary reporting requirement that includes reporting the MDL or ½ of the MDL in the mass calculation. This unnecessary step would likely lead to reporting discrepancies due to the number of chemicals that are reported on a monthly basis and due to the fact that laboratory MDLs and MLs differ across the country and change frequently. If EPA's NetDMR is going to be used for all monthly IPDES reporting, then Clearwater Paper proposes that IDEQ keep the same reporting format that is currently used by EPA. For example, if the measured concentration is below the MDL, then the value would be reported as Below Detection Limits/No Detection.

There was also some brief discussion about significant figures in section 2.6.1. Table 1 specifically lists the number of significant figures based on 5 different examples. In example 3, the number 470,000 is listed to have 2 to 6 significant figures. Clearwater Paper does not agree that it is appropriate for IDEQ to consider the number of significant figures as "ambiguous." There are many different ways to clarify the significance of trailing zeroes with overlines, underlines, and decimal points. This can create ambiguity if a standard guideline is not developed. However, IDEQ's *Effluent Limit Development Guidance* should not be ambiguous and could easily clarify when trailing zeroes are significant. For example, 470,000 or 4.7×10^5 has two significant figures whereas 470,000. or 4.70000×10^5 has six significant figures.

On behalf of Clearwater Paper, we appreciate the opportunity to provide comment on the IPDES guidance development. Please contact me at clayton.steele@clearwaterpaper.com or at (208) 799-4144 with any questions.

Sincerely,



Clayton Steele
Environmental Manager