

May 10, 2017.

## IDAHO COMMENTS

### Abbreviations and Acronyms Section

1. Suggest adding ACR since it's used in the guidance document.
  2. Suggest adding TU since it's used in the guidance.
  3. In the definition of WER "ration" should be changed to "ratio."
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1. Chapter 1, Purpose and Need, 1.1: There's an extraneous underscore in the first sentence of the first paragraph in this section between "and" and "addressing."
  2. Pg. 46 3.2.2 Receiving Water Upstream Pollutant Concentration: The first sentence seems to be missing some words after "derived." Suggest including something like, "from WQS."
  3. Pg. 46 3.2.2 Receiving Water Upstream Pollutant Concentration: It seems like the parenthetical should be closed after "sensitivity of uses."
  4. Pg. 49: Last sentence of the carryover paragraph: The comma after "minimum" should be deleted.
  5. Pg. 53: Considerations for WET, 6<sup>th</sup> bullet: It is not clear what this particular sentence means – is this intended to focus on a scenario where the facility is exceeding its WQBEL or is it a facility without a permit limit that has exceeded the criterion? Suggest rewriting to include more details.
  6. Pg 53: Considerations for WET, 7<sup>th</sup> bullet: Suggest that "damage" be changed to "impacts" or something along those lines. Since the word "damage" implies that the organism would be killed/hurt instead; since WET addresses chronic as well as acute effects, using another word may be better.
  7. Pg. 57: 3.4.1 Define Reasonable Potential: Suggest that the 2<sup>nd</sup> sentence be edited to: "The permit must contain effluent limits in order to control all pollutants that have a **demonstrated** reasonable potential to exceed indicating an excursion of the water quality criteria."
  8. Pg. 57: 3.4.1 Define Reasonable Potential: Last paragraph, last sentence: Suggest changing the language to reflect the requirements in 122.44(d): "After completion, the RPA defines whether a pollutant **will cause, have the reasonable potential to cause or contribute** has the reasonable potential to cause or contribute to an excursion above water quality standards."
  9. Pg. 58: 3.4.3 Establish an Appropriate Mixing Zone, 2<sup>nd</sup> paragraph, 2<sup>nd</sup> sentence: Suggest changing the language to reflect the requirements in 122.44(d): "The RPA must demonstrate ~~reasonable potential for a discharge to cause or contribute to an exceedance~~ **that an effluent discharge will cause, have the reasonable potential to cause or contribute to an excursion** of water quality criteria for the pollutant to be eligible for a mixing zone."
  10. Pg. 62: Table 20. Cross-reference of IDAPA mixing zone rules and ELDG sections: Line 58.01.02.060.01b: Suggest revising to reflect 122.44(d) requirements: "Allows a water quality ~~exceedance~~ **excursion** of chronic water quality criteria within zone of dilution."
  11. Pg. 67: 3.4.3.2.1 Toxicity to Aquatic Organisms, second paragraph: Suggest replacing the word, "exceeding" with "causing an excursion of" in the last sentence of the paragraph that precedes the list of four scenarios.

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12. Pg. 104: 3.6 Calculate RPA and WQBELs for Whole Effluent Toxicity (WET): Suggest deleting sentence, “WET tests are more complicated and expensive than most other types of analyses.” This is not true when you consider that WET allows for not taking a chemical by chemical analytical approach.
13. Pg 108: 3.6.2.1 Data Quantity and Quality Considerations: RPA should be performed using “the most sensitive species.” Suggest revising the second sentence in the first paragraph to reflect that.
14. Pg. 108: 3.6.2.1 Data Quantity and Quality Considerations, second paragraph, first sentence, and 3.6.2.2 RPA Assessment, first paragraph, first sentence: RPA has to be performed even if there are less than 10 data points. EPA’s Technical Support Document for Water Quality-Based Toxics Control outlines how RPA can be performed in these circumstances and even without any data. Suggest revising both of these sentences to reflect that.
15. Pg. 108: 3.6.3 Data Quantity and Quality Considerations, first sentence: should include the expected monitoring frequency. Suggest including the phrase, “that is representative of the effluent discharge,” after the word, “monitoring.”
16. Pg. 110: References Section: Suggest adding the 1999 “Toxicity Reduction Evaluation Guidance for Municipal Wastewater Treatment Plants,” [<https://www3.epa.gov/npdes/pubs/tre.pdf>] the 2000 “Method Guidance and Recommendations for Whole Effluent Toxicity (WET) Testing (40 C.F.R. Part 136)” [<https://nepis.epa.gov/Exe/ZyNET.exe/P10099BC.TXT?ZyActionD=ZyDocument&Client=EPA&Index=2000+Thru+2005&Docs=&Query=&Time=&EndTime=&SearchMethod=1&TocRestrict=n&Toc=&TocEntry=&QField=&QFieldYear=&QFieldMonth=&QFieldDay=&IntQFieldOp=0&ExtQFieldOp=0&XmlQuery=&File=D%3A%5Czyfiles%5CIndex%20Data%5C00thru05%5CTxt%5C00000025%5CP10099BC.txt&User=ANONYMOUS&Password=anonymous&SortMethod=h%7C-&MaximumDocuments=1&FuzzyDegree=0&ImageQuality=r75g8/r75g8/x150y150g16/i425&Display=hpfr&DefSeekPage=x&SearchBack=ZyActionL&Back=ZyActionS&BackDesc=Results%20page&MaximumPages=1&ZyEntry=1&SeekPage=x&ZyPURL> ]

The WET Methods Manuals are also helpful resources:

Acute Toxicity Testing (Freshwater and Marine) [Download the manual](#)

Chronic Freshwater [Download the manual & individual method documents](#)

Chronic Toxicity - Marine and Estuarine WET Methods [Download the manual & individual method documents](#)