

Comments for Effluent Limit Development Guidance (ELDG)

Meeting Date	Comment Date	Commenter	Comment No.	Section	Page	Topic	Comment
	9-Jun-17	Brian Nickel		3.7.1.1.1	126	Nitrogen	This section should also mention the potential for elevated nitrate to cause methemoglobinemia in bottle-fed infants ("blue baby syndrome"). The national recommended criterion to protect against this effect is 10 mg/L nitrate.
	9-Jun-17	Brian Nickel		3.7.1.1.2	126	Phosphorus	<p>The sentence "IPDES permit writers will address phosphorus bearing nutrients as TP in permits unless sufficient data (scientific evidence) indicate, and the regulations identify a specific phosphorus bearing chemical is a more appropriate measure of phosphorus' detrimental impact on surface water," is vague, particularly the clause about "the regulations identify(ing) a specific phosphorus bearing chemical." It is not clear which "regulations" this refers to, and it should be noted that Idaho currently only has narrative water quality criteria for nutrients and thus does not identify any specific concentrations or species of nitrogen and phosphorus as being protective.</p> <p>Also, analytical methods for phosphorus generally separate phosphorus compounds into categories depending on their solubility and reactivity, as opposed to analyzing for "a specific phosphorus bearing chemical." Refer to Section 4.0 of EPA Method 365.3.</p>
	9-Jun-17	Brian Nickel		3.7.1.2.2	127	Impaired Waters without TMDLs	Revise "Investigate the applicability of EPA Gold Book values" to "Investigate the applicability of EPA-recommended criteria ("304(a) criteria")." Revise "Investigate how the discharge being considered may be limited to prevent contributing to a downstream nutrient limit exceedance" to "Investigate how the discharge being considered may be limited to prevent contributing to a downstream exceedance of criteria for nutrients, pH or dissolved oxygen."
	9-Jun-17	Brian Nickel		3.7.1.2.3	127	Non Impaired Waters	It's not clear what is meant by "deemed to not be nutrient limited." The context suggests it means that the waterbody is not water quality limited, due to nutrients, but this is confusing because, in the broader context of nutrients, the word "limited" also refers to the limiting nutrient (i.e., the nutrient that is in shortest supply). Please rephrase.
	9-Jun-17	Brian Nickel		3.7.1.4	127-128	Nutrient Limits in Permits	All of the bullet points are awkwardly worded. Please revise.
	12-Jun-17	Brian Nickel		Appendix B	150	Metals	This table does not mention site-specific translators as a "consideration" for metals. Site-specific translators were successfully developed and used in the City of Caldwell permit. See the fact sheet at Appendix H. Unlike water effects ratios, site-specific translators do not require a change to the water quality standards.
	12-Jun-17	Brian Nickel		Appendix B	150	PCBs	A "congener-specific approach" is listed as a consideration for "HHC, PCBs, phthalates, plus others." Ostensibly, this refers to PCBs. The PCB water quality criteria for Idaho (both the State-adopted criteria and the Clean Water Act effective criteria) are expressed as total PCBs. It would therefore not be appropriate to control only certain PCB congeners (or Aroclors) unless the criteria were changed.

12-Jun-17	Brian Nickel	3.4.4.1	106	What to do if Data are not Available	Reference section 3.2 of the Technical Support Document for Water Quality-based Toxics Control, "Determining the Need for Permit Limits Without Effluent Monitoring Data for a Specific Facility."
12-Jun-17	Brian Nickel	3.6.2.1	121	Data Quantity and Quality Considerations (WET)	The list of "freshwater organisms used in WET" should state whether the EPA-approved WET tests for the species listed are acute, chronic or both.
14-Jun-17	Karen Burgess	1.4.3.14.5	101	Effluent Characteristics	The statement "[t]he discharger or DEQ should run the mixing zone model using the maximum projected effluent concentration. In addition, the <u>discharger should run a series of mixing zone analyses using a variety of potential effluent limitations</u> to assess the potential mixing zone sizes under different effluent conditions. The discharger should work with DEQ in obtaining a series of possible effluent limitations under different dilution scenarios". Please clarify the meaning since typically it would be the other way around where potential effluent limits would be calculated based on mixing zone e.g. dilution factors.
14-Jun-17	Karen Burgess	3.4.4	101	Conduct a Reasonable Potential Analysis (RPA)	"May work with the permittee to collect data before permit issuance" should read before public notice.
14-Jun-17	Karen Burgess	3.4.4.1	106		Second the the last paragraph, "The permit writer might work with the permittee to obtain data before permit issuance, if sufficient time exists." should be before drafting or public notice.
14-Jun-17	Karen Burgess	3.4.4.2	106	Document RPA	Once the permit writer has shown RPTE, permit writers will document the details of the RPA in the IPDES permit fact sheet. Document must always be provided not just when there is reasonable potential to exceed.
14-Jun-17	Karen Burgess	3.5	103, 105, 110, 112, 113	Tables	Recommend citing/footnote TSD and page numbers as source.
14-Jun-17	Karen Burgess	3.5.3	115	Probabilistic Methods	Since this is rarely done in permitting within R10, it would be helpful to show a complete example of how DEQ intends to implement this approach.
14-Jun-17	Karen Burgess	3.7	125	Special Considerations	This section is helpful in providing general information related to these considerations; however, it would be better if details about DEQ's permitting strategy for these pollutant was provided.
14-Jun-17	Karen Burgess	3.7.1.1.1	126	Nitrogen	States, "The nitrogen gas escapes to the atmosphere, removing nitrogen from the wastewater." However, this happens only if the treatment process was designed to reduce ammonia and/or total nitrogen.
14-Jun-17	Karen Burgess	3.7.1.1.2	126	Phosphorus	Could mention that phosphorus is the limiting nutrient in freshwater aquatic systems.
14-Jun-17	Karen Burgess	3.7.1.2.1	127	Impaired Waters with TMDLs	In receiving waters that have load limits established in a TMDL...Should be wasteload allocations. WLA in TMDLs are used to establish effluent limits in permits.
14-Jun-17	Karen Burgess	3.7.2	128	Temperature	Washington DOE, 2010. appears to be missing from the references.
14-Jun-17	Karen Burgess	3.7.9	131	BLM	Suggest that DEQ and/or EPA BLM guidance be referenced.