

Comments for Effluent Limit Development Guidance (ELDG)

Meeting Date	Comment Date	Commenter	Comment No.	Section	Page	Topic	Comment
8/30/2017	9/8/2017	U.S. EPA Region 10	1	3.5.1.2	119	Calculate Long-Term Average (LTA) Concentration for each WLA	In equation 33, "n" should be defined as the averaging period for the chronic water quality criterion (not the number of samples analyzed each month). For most chronic water quality criteria, this averaging period is 4 days.
8/30/2017	9/8/2017	U.S. EPA Region 10	2	3.7.1.6.2	139-140	Altered TSD Statistical Method to Accommodate Nutrients	<p>The new first paragraph of this section seems to assume that a nutrient limit is being established because the receiving water is impaired by nutrients. It is not clear why the modified TSD approach described in this section should be specific to nutrient-impaired waters. As explained in Section 3.7.1.5, an RP analysis should be performed for nutrients even if the receiving water is not impaired, and that analysis may show that a WQBEL is necessary for nutrients.</p> <p>This section's description of the use of a modified TSD method to calculate nutrient limits is unclear. It would be helpful if the first full paragraph on Page 140 referenced the section of the ELDG that describes how a long-term average (LTA) is calculated from a WLA (3.5.1.2 and equation 33). This section should also point out that, once a long-term average is calculated, then average monthly and maximum daily limits should be calculated from the LTA in the same way as for WQBELs for toxics (Section 3.5.1.4).</p> <p>The calculation of the WLA on Page 140 produces a WLA that is less than the in-stream target, which is not logical. This is because the upstream TP concentration is higher than the water quality target. In this situation, dilution should not be considered, and the concentration WLA should be set equal to the in-stream target.</p> <p>As stated in our comments on the July 2017 version of the ELDG, the statistical derivation procedure presented in the TSD for calculating effluent limits based on acute and chronic aquatic life water quality criteria is not applicable to exposure periods more than 30 days, because it can result in limits which exceed the WLA (see the TSD at Page 105). Thus, the ELDG should recommend this modified TSD procedure only in cases where the nutrient target or WLA is averaged over a period of 30 days or less.</p>