

**Comments for the Effluent Limit Development Guidance (ELDG)**

Meeting Date	Comment Date	Commenter	Comment No.	Section	Page	Topic	Comment
8/30/2017	8-Sep-17	AIC	1	3.7.1	133-144	Nutrients	AIC believes much of the information in this entire section should be deleted or substantially revised pending further exchange of information and guidance materials between AIC and DEQ regarding permit conditions for nutrients.
8/30/2017	8-Sep-17	AIC	2	3.7.2.4	146	Temperature limits	This section references using Section 3.5 (i.e., standard TSD) procedures for developing temperature limits in the context of "acute" and "chronic" criteria. AIC has made previous comments about this approach for temperature limits (i.e., temperature is not a toxic, and TSD procedures are not appropriate). The temperature section 3.7.2 should be substantially revised pending further exchange of information and guidance materials between AIC and DEQ regarding permit conditions for temperature.
8/30/2017	8-Sep-17	AIC	3	3.7.5	147-149	Emerging Contaminants	This section also should be substantially revised pending further exchange of information and guidance materials between AIC and DEQ regarding specific toxics such as PCBs, phthalates, etc.
8/30/2017	8-Sep-17	AIC	4	3.7.8	150	Mercury guidance	This section cites both EPA and DEQ guidance on implementing the mercury fish tissue criteria. AIC recommends that the reference to DEQ's guidance be the primary approach for implementing criteria in Idaho permits (and thus be listed first) and the EPA guidance reference either be deleted or have the text be clear that DEQ's guidance takes precedence in any area in which the two guidances are inconsistent or conflicting. Also, the ensuing subsections in this section should be consistent with the DEQ guidance if that is not already the case.
8/30/2017	7/26/2017	AIC	5	3.7.9.3	21	Insufficient Data	Relevant and appropriate data are required during the development of site specific water quality effluent limits, water quality based effluent limits, or intake credits when complying with human health criteria. If a POTW or IDEQ does not have these data, and yet there are indications that effluent limits or intake credits may be necessary, AIC strongly recommends implementing a 2-phase effluent limit development approach, where the initial permit require the collection of these data, and the subsequent permit include the appropriate limit, if required.
8/30/2017	8-Sep-17	AIC	6			Effluent Pollutant Concentration	Effluent pollutants do not always follow a lognormal distribution. Recommend providing guidelines for evaluating distribution and methods for calculating statistics on these distributions. There are updated methods and guidelines on statistical analyses with missing data, non parametric datasets, etc. One tool is the US EPA's ProUCL Software (see link). <a href="https://www.epa.gov/land-research/proucl-software">https://www.epa.gov/land-research/proucl-software</a>
8/30/2017	8-Sep-17	AIC	7	3.1.2.2	49	Considerations for WET	The draft text recommends including a facility if it exceeded acute or chronic WET triggers within the last five years. AIC recommend revising this trigger in a way that would take in to account one-time events that are quickly addressed. That is, changing the guidance so that WET triggers include acute (only) or exceeded triggers more than one time where the toxicant wasn't identified.
8/30/2017	8-Sep-17	AIC	8	3.3.2.3.1	61	Zone of Passage	
8/30/2017	8-Sep-17	AIC	8	3.4.3.2.3.	80	Zone of Passage	The avoidance thresholds listed should be deleted because they have not withstood the rigor of scientific review or regulatory due process and could have substantial implications for many permittees in Idaho. While alternate threshold values are allowed to be provided, the development of these are cost prohibitive to Idaho cities of all sizes.
8/30/2017	8-Sep-17	AIC	9			Species of Greatest Conversation Need	
8/30/2017	8-Sep-17	AIC	9	3.4.3.2.6.	83	Species of Greatest Conversation Need	Recommend replace specific names with the generalized statement "currently listed species," because the list of species may change over time.

8/30/2017	8-Sep-17	AIC	10	3.4.3.4. 1.	88	Fourth paragraph from the top: WQS typo.
8/30/2017	8-Sep-17	AIC	11		Mixing Zone Assessment and Process	Second paragraph up from the bottom that begins with "The permit writer will document, in the fact sheet, the end of pipe..." AIC recommends that the end of the first sentence be revised to clarify that this is documented in the fact sheet, not the permit. Further, AIC recommends the two final sentences in the paragraph be deleted because previous revisions to the paragraph make these sentences no longer applicable.
				3.4.3.8.	93	