



**Association of Idaho Cities**  
3100 South Vista, Suite 201, Boise, Idaho 83705  
Telephone (208) 344-8594  
Fax (208) 344-8677  
[www.idahocities.org](http://www.idahocities.org)

---

October 12, 2018

Troy Smith, IPDES Rules Coordinator  
Idaho Department of Environmental Quality  
1410 N Hilton  
Boise, ID 83705

Re: IPDES Effluent Limit Development Guidance (ELDG) – Permit Writer Supplemental;  
Discussion Held on September 25<sup>th</sup>, 2018

Dear Mr. Smith/Troy,

The Association of Idaho Cities (AIC) serves to advance the interests of the cities of Idaho through legislative advocacy, technical assistance, training, and research. Idaho cities play important roles as primary implementers of the Clean Water Act, representing over 70% of all Idaho residents. These stakeholders have a significant interest in the development of water quality standards, rules, and guidance related to the protection of human and aquatic life. AIC is actively engaged in water quality issues through the work of our Environment Committee, chaired by Boise City Council President Pro Tem Elaine Clegg and our Municipal Water Users Group, chaired by Jerome City Council President Bob Culver.

The Idaho Department of Environmental Quality (DEQ) is developing a program to address water pollution by regulating point sources that discharge pollutants to waters of the United States. DEQ is in the process of developing a supplemental document (i.e., IPDES Permit Writer Supplemental, or Supplemental) that provides permit writers details about contemporary permitting concepts for use in writing Idaho permits. AIC has provided working drafts of the Supplemental over this past year and appreciate the opportunity to provide the following comments on the current public review draft as presented during the September 25<sup>th</sup> stakeholder meeting.


AIC is concerned with two things as they pertain to PCBs: First, the “source tracing” emphasis - What most of the entities who have participated, found, and shared through the Spokane River Regional Toxics Task Force (SRRTTF) is that despite thousands, or in one case over a million, dollars of testing and effort, they have found the source to be, generally, everywhere. Second, the last sentence in Section 4.3, top of page 13, is troubling as there may not be a source of great concern or concentration, which is typically the case. This paragraph would encourage the issuance of a permit with an effluent limit potentially millions of times lower than the detection level of the approved method. The trouble AIC sees is that the limit would have been developed using data and methods which may or may not be reliable (especially at very low, ppq levels.) However, because the assumption is that it’s not actually the limit, that conversation could be glossed over. AIC’s preferred approach would be the BMPs (discussed above) in lieu of a numerical limit.

Therefore, AIC's comments are to:

- (1) revise paragraph 2 of Section 4.3 to be "Where the presence of Aroclors or total PCBs at concentrations are above detection levels of the currently approved EPA laboratory method for total PCB analysis under 40 CFR Part 136 (Method 608), a toxics management plan may be warranted. As part of the plan, the permit writer should work with the applicant to identify whether or not source tracing is worthwhile. When legacy sources of Aroclor PCBs are present, source tracing and reduction may be a useful element of the plan. However, if legacy sources of Aroclor PCBs are known not to be present, it is unlikely that source tracing will be effective in reducing the presence of influent wastewater PCBs and source tracing efforts are unlikely to be worthwhile. This is because many currently available commercial products (paint, caulking, inks, dyes, etc.) contain some PCB congeners that are likely to be detected in municipal wastewater at very low concentrations when using advanced congener laboratory analysis (Method 1668). These very low concentrations are due to the ubiquitous nature of PCBs in currently available commercial products noted above and control of these PCB congener sources is not feasible." and,
- (2) delete the last paragraph of Section 4.3, at the top of page 13.

AIC appreciates the opportunity to comment on the development of the IPDES program and looks forward to working with our state and other partners in the development of these important resources for city officials. Should you have questions concerning our attached comments, please feel free to contact me.

Sincerely,



Jess Harrison, Executive Director

cc: Elaine Clegg, AIC Environment Committee Chair  
Bob Culver, AIC Municipal Water Users Group Chair  
Johanna Bell, AIC Policy Analyst  
Tom Dupuis, AIC Environmental Consultant

Meeting Date	Comment Date	Commenter	Comment No.	Section	Page	Topic	Comment
9/25/2018	12-Oct-18	AIC	1	4.3	12	PCBs	<p>AIC is concerned with two things as they pertain to PCBs:</p> <p>First, the "source tracing" emphasis - What most of the entities who have participated, found, and shared through the Spokane River Regional Toxics Task Force (SRRTTF) is that despite thousands, or in one case over a million, dollars of testing and effort, they have found the source to be, generally, everywhere. Second, the last sentence in Section 4.3, top of page 13, is troubling as there may not be a source of great concern or concentration, which is typically the case. This paragraph would encourage the issuance of a permit with an effluent limit potentially millions of times lower than the detection level of the approved method. The trouble AIC sees is that the limit would have been developed using data and methods which may or may not be reliable (especially at very low, ppq levels.) However, because the assumption is that it's not actually the limit, that conversation could be glossed over. AIC's preferred approach would be the BMPs (discussed above) in lieu of a numerical limit.</p> <p>Therefore, AIC's comment is to (1) revise paragraph 2 of Section 4.3 to be "Where the presence of Aroclors or total PCBs at concentrations are above detection levels of the currently approved EPA laboratory method for total PCB analysis under 40 CFR Part 136 (Method 608), a toxics management plan may be warranted. As part of the plan, the permit writer should work with the applicant to identify whether or not source tracing is worthwhile. When legacy sources of Aroclor PCBs are present, source tracing and reduction may be a useful element of the plan. However, if legacy sources of Aroclor PCBs are known not to be present, it is unlikely that source tracing will be effective in reducing the presence of influent wastewater PCBs and source tracing efforts are unlikely to be worthwhile. This is because many currently available commercial products (paint, caulking, inks, dyes, etc.) contain some PCB congeners that are likely to be detected in municipal wastewater at very low concentrations when using advanced congener laboratory analysis (Method 1668). These very low concentrations are due to the ubiquitous nature of PCBs in currently available commercial products noted above and control of these PCB congener sources is not feasible." and (2) delete the last paragraph of Section 4.3, at the top of page 13.</p>