

Comments for the User's Guide Volume 2 (DEQ Note: These are actually for the ELDG Supplemental)

Meeting Date	Comment Date	Commenter	Comment No.	Section	Page	Topic	Comment
9/26/2018	10-Oct-18	EPA Region 10	1	2	4-6	Nutrients	We appreciate the added references to EPA guidance documents in this section. However, as per our previous comments, we remain concerned that adjustments to nutrient limits based on a certain fraction of nutrients being "refractory" could fail to adequately protect water quality, particularly in the far field.
9/26/2018	10-Oct-18	EPA Region 10	2	3	6-10	316(a)	The ELDG supplemental refers to a demonstration that temperature effluent limits are more stringent than necessary to assure the protection and propagation of a "balanced indigenous community" (BIC) of fish, shellfish and wildlife. The language used in Section 316(a) of the Clean Water Act is "balanced indigenous population." We recommend using the same language as the statute.
9/26/2018	10-Oct-18	EPA Region 10	3	4.3	13	Chlorinated Hydrocarbons	The EPA agrees that, when a water quality-based effluent limit is less than the concentration that can be quantified using EPA analytical methods, the permitting authority should use the minimum level of the most sensitive EPA-approved analytical method. We recommend that IDEQ support this recommendation by referencing 40 CFR 122.44(i)(1)(iv), which requires the use of "sufficiently sensitive" analytical methods, and Section 5.7.3 of the Technical Support Document for Water Quality-based Toxics Control (TSD), where the EPA articulates the recommendation to use the minimum level as the compliance level. Since laboratories use a variety of terms to describe the concentration that can be quantified, we also recommend that the ELDG supplemental point out that EPA considers the terms "reporting limit," "quantitation limit," and "minimum level" to be synonymous (see EPA Method 608.3 at Section 15.6.2). We also recommend changing the term "effective limit" to "compliance level," as per the TSD, since the water quality-based effluent limit is still valid even though it cannot be enforced using approved analytical methods. We also recommend pointing out that, if the pollutant being limited is more concentrated at locations internal to the facility (e.g., in a process wastewater stream prior to combining with cooling water), it may be appropriate to establish effluent limits at internal monitoring locations, as per 40 CFR 122.45(h)(2) and Section 8.1.2.2 of the U.S. EPA NPDES Permit Writers' Manual.