



**Association of Idaho Cities**  
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December 16, 2015

Paula Wilson  
Idaho Department of Environmental Quality  
1410 N. Hilton  
Boise, ID 83706

(filed by email to [paula.wilson@deq.idaho.gov](mailto:paula.wilson@deq.idaho.gov))

RE: Association of Idaho Cities Comments on IPDES Permit Writers Guidance Document Content and Priorities

Dear Ms. Wilson,

The Association of Idaho Cities (AIC) was founded in 1947 and is a nonpartisan, nonprofit corporation owned, organized, and operated by Idaho's city governments. The organization serves to advance the interests of the cities of Idaho through legislative advocacy, technical assistance, training and research. AIC is actively engaged in water quality issues through the work of our Environment Committee, chaired by Boise City Councilmember Elaine Clegg.

Idaho cities play an important role as the primary implementers of the Clean Water Act and have a significant interest in the development of the IPDES Guidance Document and methods and procedures used in the derivation of technology and water quality limits and monitoring requirements necessary for protection of human health and the environment. AIC recognizes that IPDES Guidance development is an important component of Idaho's application for NPDES authorization by EPA and is pleased to participate with Idaho Department of Environmental Quality (IDEQ), the Environmental Protection Agency (EPA), and the other stakeholders to develop appropriate IPDES Guidance. AIC has developed a prioritized list of IPDES Guidance topics that we believe should be included in the IPDES Permit Writers Guidance document.

AIC appreciates the opportunity to comment on various components of the IPDES negotiated rulemaking process and looks forward to working with our state and federal partners to develop and implement a successful IPDES permitting program to protect the environment and human health. Should you have questions concerning our comments, please feel free to contact me.

Sincerely,

Sincerely,

Seth Grigg  
Executive Director  
Association of Idaho Cities

Cc: Elaine Clegg, AIC Environment Committee Chair

## Association of Idaho Cities IPDES Guidance Content and Priority Recommendations

December 15, 2015

### Issue:

IDEQ held the initial IPDES Guidance development meeting on December 2, 2015. IDEQ requested that permittees provide a prioritized list of guidance topics the IPDES Permit Writers/User manual should include.

### AIC Input on IPDES Guidance Content and Priorities:

IPDES Guidance Topic	Priority	Discussion
<b>Mixing Zones Determination</b>	1	Technical feasibility and socioeconomic factors included
<b>Critical Condition Determination</b>	1	1Q10, 7Q10, 30Q10, harmonic mean...
<b>Reasonable Potential Analysis/WQBELs Calcs</b> <ul style="list-style-type: none"> <li>- Minimum required data v data collection</li> <li>- RPE/WQBEL data analysis method</li> <li>- Harmonic Mean/90/95/99%</li> </ul>	1	RPE and WQBEL determination process
<b>Point Source Temperature</b> <ul style="list-style-type: none"> <li>- Limitations,</li> <li>- Integrated Report listing, and</li> <li>- Temperature TMDL Development</li> </ul>	1	316(a), 40CFR130.7, Integrated Report
<b>Evaluation of Compliance with Downstream WQS</b>	1	Permit by permit evaluation
<b>Monitoring Requirements</b> <ul style="list-style-type: none"> <li>- non-regulated discharge parameters,</li> <li>- receiving water monitoring;</li> <li>- use of non-promulgated methods</li> </ul>	1	What monitoring is needed associated with issuance of IPDES permit.
<b>MS4s</b> <ul style="list-style-type: none"> <li>- Single General Permit for state</li> <li>- TMDL allocations as MEP</li> <li>- Next gen permit considerations</li> <li>- Minimum Control Measure Implementation</li> <li>- Public Notification Requirements?</li> <li>- Program Evaluation (i.e. Audit)</li> </ul>	1	Combined GP for Phase 1 and 2 permits 402(p) requires MEP
<b>Pretreatment</b>	1	Pretreatment program requirements
<b>Biosolids</b>	1	Biosolids program requirements
<b>IPDES Affordability</b> Guidance should include section on: <ul style="list-style-type: none"> <li>- CWA/State affordability framework, thresholds and process</li> </ul>	2	CWA includes socioeconomic upper threshold for PSs
<b>Implementation Tools for Unattainable Criteria</b> <ul style="list-style-type: none"> <li>- UAAs, SOCs, variances, multi-discharger variances, intake credits, PMPs...</li> </ul>	2	Alternative approaches to permit limits that are unattainable due to technology or socioeconomic factors
<b>Water Quality Trading/Offsets</b> <ul style="list-style-type: none"> <li>- PS/PS and PS/NPS</li> <li>- Bubble permits</li> </ul>	3	Willing seller, willing buyer transaction to help meet discharge limitations
<b>2014 WRRDA Requirements for State Revolving Loan Funds</b>	3	Energy efficiency, resource recovery, reuse evaluation