

Comments for Effluent Limit Development Guidance (ELDG)

Meeting Date	Comment Date	Commenter	Comment No.	Section	Page	Topic	Comment
4/26/2017	14-Mar-17	KC Harvey Environmental	1	4.4.1	74	Define Reasonable Potential	Recommend deleting the statement "or using a non-quantitative approach". This approach is not defined as stated in the next sentence. The basis for using an undefined approach is concerning.
4/26/2017	14-Mar-17	KC Harvey Environmental	2	4.4.3	79 and 82	Establish an Appropriate Mixing Zone	Table 23 and statement on p. 82 - Both state the mixing zone cannot exceed 25% of the low flow volume or width of the receiving water yet IDAPA 58.01.02.060.01i state that the Department may authorize a mixing zone that varies from these limits if a discharger does not cause unreasonable interference with or danger the beneficial uses of the receiving water. The Department should define the minimum requirements in this guidance for the mixing zone analysis to demonstrate a larger mixing zone. Source specific information should be used in this analysis to establish a mixing zone greater than 25%.
4/26/2017	14-Mar-17	KC Harvey Environmental	3	4.4.3.2.1	84	Toxicity to Aquatic Organisms	Determining toxicity to aquatic organisms and essentially the need for WQBELs should be solely based on Idaho state regulations for aquatic life water quality criteria (WQC) and not based on thresholds in the EPA ECOTOX databases. Recommend deleting sentence, "Further toxicity data can be found in EPA's ECOTOX databases."
4/26/2017	14-Mar-17	KC Harvey Environmental	4	4.4.3.4.1.1	92	Flow Requirements	Table 26- Region 10 EPA recommends using the 30Q10 critical low flow specifically for ammonia in reasonable potential and effluent limit evaluations for chronic aquatic life.
4/26/2017	14-Mar-17	KC Harvey Environmental	5	4.4.3.8	98	Mixing Zone Approval Process	No. 1- Same comment as above in reference to critical low flow values used in evaluating ammonia toxicity for chronic aquatic life conditions (30Q10 critical low flow specifically for ammonia).