

## Drabek, John

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**From:** Lauri.Monnot@deq.idaho.gov  
**Sent:** Thursday, May 16, 2013 8:57 AM  
**To:** Drabek, John  
**Subject:** RE: City of Homedale Final 401 certification  
**Attachments:** City of Homedale NPDES ID-002042-7 Permit 401 Certification Response to comments.docx;  
TMDL based Phosphorus effluent limits calculations.xlsx

Looks correct to me. I am consulting with our attorney, Doug Conde, and also sending this back to Marti Bridges to be certain.

Attached is our response to comments and the spreadsheet I used to verify the rounding up to 17. I don't think Justin's real question is 16.5 or 17, I think it is 11 or 17.

*Lauri Monnot*

Lauri Monnot  
Watershed Coordinator  
DEQ Boise Regional Office  
1445 N Orchard  
Boise, ID 83706  
(208) 373-0461

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**From:** Drabek, John [mailto:Drabek.John@epa.gov]  
**Sent:** Thursday, May 16, 2013 9:47 AM  
**To:** Lauri Monnot  
**Subject:** RE: City of Homedale Final 401 certification

Lauri,

Is this part of the administrative record is wrote correct?

John Drabek, PE  
USEPA Region 10  
NPDES Permits Unit  
206-553-8257  
[drabek.john@epa.gov](mailto:drabek.john@epa.gov)

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**From:** [Lauri.Monnot@deq.idaho.gov](mailto:Lauri.Monnot@deq.idaho.gov) [mailto:Lauri.Monnot@deq.idaho.gov]  
**Sent:** Thursday, May 16, 2013 5:54 AM  
**To:** Drabek, John  
**Subject:** FW: City of Homedale Final 401 certification

FYI – see comment below. I have not responded to this email yet, awaiting guidance.

*Lauri Monnot*

Lauri Monnot  
Watershed Coordinator  
DEQ Boise Regional Office  
1445 N Orchard  
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**From:** Justin Hayes [<mailto:jhayes@idahoconservation.org>]  
**Sent:** Wednesday, May 15, 2013 3:22 PM  
**To:** Lauri Monnot  
**Subject:** Re: City of Homedale Final 401 certification

Lauri — thanks for passing this on, I've not seen the final permit form EPA. I'm disappointed to hear that EPA made now changes based on public comment. I'm not sure what we will do about that. We did not agree with their weekly limit of 17 lbs/day. We see that as counter to the TMDL's DAILY limit of 11 lbs day. This might prove an opportune permit to challenge, if indeed they did not amend the limit to be consistent with the TMDL.

- Justin

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**Justin Hayes**  
Program Director  
Idaho Conservation League  
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**From:** <[Lauri.Monnot@deq.idaho.gov](mailto:Lauri.Monnot@deq.idaho.gov)>  
**Date:** Wednesday, May 15, 2013 8:24 AM  
**To:** Justin Hayes <[jhayes@idahoconservation.org](mailto:jhayes@idahoconservation.org)>  
**Subject:** FW: City of Homedale Final 401 certification

Hi Justin,

I apologize for not copying you when our final certification for the City of Homedale WWTP was sent to EPA last week. I have been out of the office on sick leave for a few days and this omission occurred to me while I was out.

There were no changes made to the final permit or our 401 certification as a result of public comments received by DEQ or EPA during the public comment period. If you have any questions about DEQs response to comments submitted by ICL, please contact me.

Thanks,  
Lauri

*Lauri Monnot*  
Lauri Monnot  
Watershed Coordinator  
DEQ Boise Regional Office  
1445 N Orchard  
Boise, ID 83706

(208) 373-0461

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**From:** Lauri Monnot  
**Sent:** Wednesday, May 08, 2013 10:46 AM  
**To:** [Lidgard.Michael@epamail.epa.gov](mailto:Lidgard.Michael@epamail.epa.gov); John Drabek ([Drabek.John@epamail.epa.gov](mailto:Drabek.John@epamail.epa.gov))  
**Cc:** Lance Holloway; Miranda Adams  
**Subject:** City of Homedale Final 401 certification

Dear Mr. Lidgard:

On April 12, 2013, EPA provided DEQ with a proposed final draft of the above-referenced permit and requested DEQ provide a final §401 certification of the permits pursuant to section 401 of the Clean Water Act. Upon review of the proposed final permit DEQ prepared and now submits the enclosed final §401 certification for the permit. You should also receive a hard copy in the mail in the next few days.

*Lauri Monnot*

Lauri Monnot  
Watershed Coordinator  
DEQ Boise Regional Office  
1445 N Orchard  
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kg/day	lb/day monthly	lb/day weekly
5	11.0231131	16.53466965
5	11	17

**RESPONSE TO COMMENTS**  
**City of Homedale Wastewater Treatment Facility**  
**NPDES Permit # ID-002042-7**

Idaho Department of Environmental Quality

1. ICL commented that the total phosphorus limits are not consistent with TMDL wasteload allocations.

Response: The TP wasteload allocation in the *Mid-Snake River/Succor Creek TMDL* (2003) is based on operation at facility design capacity and monthly monitoring of total phosphorus. Therefore this is a monthly allocation. Using 1.5 times the monthly limit is standard protocol for EPA permit writer's and is based on EPA's Technical Support Document for Water Quality Based Toxics Control. The effluent limit may vary over the week and month but must average less than 17 lbs/day for each week **and** 11/lbs/day for each month.

2. ICL commented that the average weekly limit for total phosphorus is inappropriately rounded up.

Response: The average weekly limit for total phosphorus was calculated using 1.5 times the monthly limit which is standard procedure for NPDES permit writers. The calculation is properly rounded up, even though all decimal places do not appear in the Fact Sheet. See equation:

$$5 \text{ kg/day} = 11.02 \text{ lb/day} \times 1.5 + 16.53 \text{ lb/day}$$

Since converting kilograms per day to results in a value slightly greater than 11 lbs per day and multiplying this by 1.5 results in greater than 16.5 rounding up to 17 lbs/day is appropriate.