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U.S. EPA Region 10  
1200 Sixth Avenue (OWW-191)  
Seattle, WA 98101

June Bergquist  
Idaho DEQ Cd'A Regional Office  
2110 Ironwood Parkway  
Coeur d'Alene, ID 83814

*Submitted via email to: [wu.jennifer@epa.gov](mailto:wu.jennifer@epa.gov) and [june.bergquist@deq.idaho.gov](mailto:june.bergquist@deq.idaho.gov)*

June 11, 2018

**RE: Draft Permit for City of Harrison WWTP and 401 Cert. of Same**

Dear Ms. Wu and Ms. Bergquist:

Since 1973, the Idaho Conservation League has been Idaho's leading voice for clean water, clean air and wilderness—values that are the foundation for Idaho's extraordinary quality of life. The Idaho Conservation League works to protect these values through public education, outreach, advocacy and policy development. As Idaho's largest state-based conservation organization, we represent over 25,000 supporters, many of whom have a deep personal interest in protecting Idaho's human health and environment.

Attached, please find my comments on behalf of the Idaho Conservation League regarding the draft NPDES permit for the City of Harrison WWTP and 401 Cert. of same.

Please do not hesitate to contact me at (208) 265-9565 or [mnykiel@idahoconservation.org](mailto:mnykiel@idahoconservation.org) if you have any questions regarding our comments or if we can provide you with any additional information on this matter.

Thank you for your time and consideration.

Sincerely,

Matthew Nykiel  
Conservation Associate

## **ICL Comments**

### **Receiving Water**

We request EPA include a map identifying the outfall location of the permittee's facility and Anderson Slough. At page 12 of the Fact Sheet, EPA states that Highway 97 separates Anderson Slough from Anderson Lake and the wetlands northwest of Anderson Slough. We are unsure how Highway 97 can separate Anderson Slough from Anderson Lake and the wetlands northwest of the slough given the location of Highway 97 and Anderson Lake. We request EPA clarify this in the Fact Sheet and include more precise coordinates for the permittee's outfall location. We also request EPA provide the precise coordinates of where the permittee samples the receiving water quality.

### **Comparison of Current and Proposed Effluent Limits**

We request DEQ revise Table I in the 401 Certification to reflect an increase from the current permit to the proposed permit for Total Residual Chlorine. Currently Table I states there was no change between the permits. However, the average monthly limit increased from 0.007 mg/L to 0.009 mg/L.

### **Tier II Analysis**

We request DEQ issue a determination as to whether the permittee's discharge of total residual chlorine (as proposed in the draft permit) will cause degradation and, subsequently, analyze the impact of increased average monthly discharges of total residual chlorine (as proposed in the draft permit) on the assimilative capacity of Anderson Slough.

DEQ is required to conduct a Tier II analysis for Anderson Slough's high quality cold water aquatic life and recreation uses. It appears that the proposed effluent limit increase for total residual chlorine will cause degradation. Accordingly, DEQ must determine whether the degradation is insignificant. DEQ failed to make this determination, and we request DEQ revise its 401 Certification so as to properly comply with the Tier II analysis requirements of Idaho's Water Quality Standards. IDAPA 58.01.02.052.08.