

# IPDES Guidance Development Meeting



April 26, 2017



# General Housekeeping

- **Everyone sign in**
- **Cell phones off/muted**
- **Mute phones/microphones**
- **Speak into a microphone**
- **One speaker at a time – be respectful**
- **Participation encouraged!**

# Meeting Agenda

1. Introductions and meeting objectives
2. User's Guide Volume 1 (v2)—complete
  - a. Revisions to sections 9 (Compliance Monitoring Activities) and 10 (Enforcement)
  - b. New section 12 (Data Analysis and Considerations)
3. Enforcement Response Guide (v2)—revisions
  - a. Section 3 (Technical Assistance as a Conjunctive Tool)
  - b. Section 4.3.1 (Compliance Assistance)
  - c. Section 4.3.3 (Notice of No Further Action)
  - d. Attachment A (Noncompliance events, circumstances, and range of responses)
4. ELDG
  - a. Revised sections 1 (Introduction)—3.4 (Determine the Need for WQBELs)
  - b. New sections 3.5 (Calculate Pollutant-specific WQBELs) and 3.6 (Calculate RPA and WQBELs for WET)
  - c. Incorporation of proposed workgroup content
  - d. ELDG proposed outline
5. User's Guide Volume 2
  - a. New section 2.1 (Application Content)
  - b. Proposed outline section 2.2 (Understanding Your Permit)—2.2.4.4 (Nondomestic Waste Management)
6. Action items and schedule
  - a. **May 3**—end of comment period
    - i. ELDG—revised sections 1–3.4 and new sections 3.5 and 3.6
    - ii. User's Guide Volume 2—revised section 1 and new section 2.1
  - b. **May 10**—end of comment period for Enforcement Response Guide (v2)—revised sections 3, 4.3.1, 4.3.3, and Attachment A
  - c. **June 7**—next IPDES guidance meeting

# User's Guide Volume 1 (Final v2)

- **Revised Sections**
  - 9 (Compliance Monitoring Activities)
  - 10 (Enforcement)
- **New Section**
  - 12 (Data Analysis and Considerations)
- **Written comments received**
  - KC Harvey Environmental
- **Posted on IPDES guidance webpage**

# User's Guide Volume 1 (Final v2)



# Enforcement Response Guide (v2)

- **Completed in 2016**
- **Revising**
  - **Section 3 (Tech. Assist. as a Conjunctive Tool)**
  - **Section 4.3.1 (Compliance Assistance)**
  - **...and 4.3.2.3 (Notice of Intent to Enforce)**
  - **Section 4.3.3 (Notice of No Further Action)**
  - **Attachment A**

# Enforcement Response Guide (v2)

- **Comments due COB, May 10**

# Enforcement Response Guide (v2)





# **Effluent Limit Development Guidance (ELDG)**

- 1. Introduction**
  - 2. Determining Technology-Based Effluent Limits (TBELs)**
  - 3. Determining Water Quality-Based Effluent Limits (WQBELs)**
- Appendix A**
  - Appendix B**
  - References, Key Terms**

# Effluent Limit Development Guidance (ELDG)

1. Introduction
  2. Determining Technology-Based Effluent Limits (TBELs)
  3. Determining Water Quality-Based Effluent Limits (WQBELs)
    - Calculate Pollutant-specific WQBELs
    - Calculate RPA and WQBELs for WET
- Appendix A
  - **Appendix B**
  - Appendix C
  - References, Key Terms

# ELDG – Revisions

- **Sections 1 – 3.4 & Appendix A**
- **Committee Discussion**
  - **Changes based on March committee meeting**
  - **Written comments received**
    - **Association of Idaho Cities**
    - **Idaho Conservation League**
    - **KC Harvey Environmental**

# ELDG – New Content

- **Sections**
  - 3.5 (Calculate Pollutant-specific WQBELs)
  - 3.6 (Calculate RPA and WQBELs for WET)
- **Proposed Outline**
  - Special Considerations
  - Final Effluent Limits and Antibacksliding

# ELDG – Public Comments

- **Comments due COB, May 3**

# ELDG



# **User's Guide Volume 2—Sector Specific -POTWs-**

## **1. Introduction**

- **References, Key Terms, Endnotes**

# User's Guide Volume 2—Sector Specific -POTWs-

## 1. Introduction

## 2. Publicly Owned Treatment Works (POTW)

- Application Content
- References, Key Terms, Endnotes



# **User's Guide Volume 2—Sector Specific -POTWs-**

- **New Content**

- **Sections 2.1 (Application Content)**

- **Committee discussion and comments received**

- **Idaho Conservation League**

- **KC Harvey Environmental**

- **Proposed Outline**

- **Section 2.2 (Understanding Your Permit) – 2.2.4.4  
(Nondomestic Waste Management)**

# **User's Guide Volume 2—Sector Specific -POTWs-**

- **Comments due COB, May 3**

# User's Guide Volume 2



# Guidance Schedule

- **May 3 (COB) Comments Due:**
  - ELDG and outline
  - User's Guide Volume 2 and outline
- **May 10 (COB) Comments Due:**
  - Enforcement Response Guide (v2)
- **Comments to:**  
**[IPDESGuidance@deq.idaho.gov](mailto:IPDESGuidance@deq.idaho.gov)**
- **June 7: Next Meeting**

# Questions or Comments

