



## **IDAHO MINING ASSOCIATION**

P.O. Box 1660 • Boise, ID 83701  
208.342.0031 • [ima@idahominig.org](mailto:ima@idahominig.org)

April 30, 2018

Paula Wilson  
DEQ State Office  
1410 N. Hilton  
Boise, ID 83706

Submitted via email: [paula.wilson@deq.idaho.gov](mailto:paula.wilson@deq.idaho.gov)

**Re: Docket No. 58-0102-1801, Water Quality/Arsenic**

Dear Ms. Wilson:

The Idaho Mining Association (IMA) appreciates the opportunity to provide the following comments on the DEQ Rulemaking regarding the arsenic human health water quality criteria.

Since 1903, IMA has represented miners and mining companies engaged in mineral exploration, mineral developments, and land reclamation throughout the state of Idaho. Our membership also consists of companies and industries that provide services to the mining industry within the state. IMA and its members are committed to responsible and sustainable mineral withdrawal in Idaho and our member companies continue to utilize and explore more innovative and science backed methods to extract minerals needed for everyday life while protecting and preserving the environment in Idaho for future generations.

We have seen the arsenic toxicity thresholds move considerably in response to the ongoing debate for over two decades. We have serious questions with regards to the EPA having one standard for the Clean Water Act (0.018 µg/L), while having a completely separate arsenic standard for the Safe Drinking Water Act (10 µg/L). This is particularly concerning given that in most of the waters in Idaho, the naturally occurring arsenic concentration is significantly greater than 0.018 µg/L.

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Given that Idaho's background levels of arsenic are higher than the recommended standard in the Clean Water Act, combined with the comments made by the EPA at the meeting on April 19<sup>th</sup>, regarding the work needing to be completed on revisions to IRIS, it would be very difficult for the IMA or its member companies to support any new standard lower than the existing standard of 10 µg/L.

Again, we appreciate the opportunity to comment and look forward to participating with more detail as the rulemaking progresses.

Kindest Regards,

A handwritten signature in blue ink, appearing to read "BJD", with a large, sweeping flourish above the letters.

Benjamin J. Davenport,  
Executive V.P., Idaho Mining Association