

Idaho Department of Environmental Quality

IPDES Guidance Development
January 16, 2019



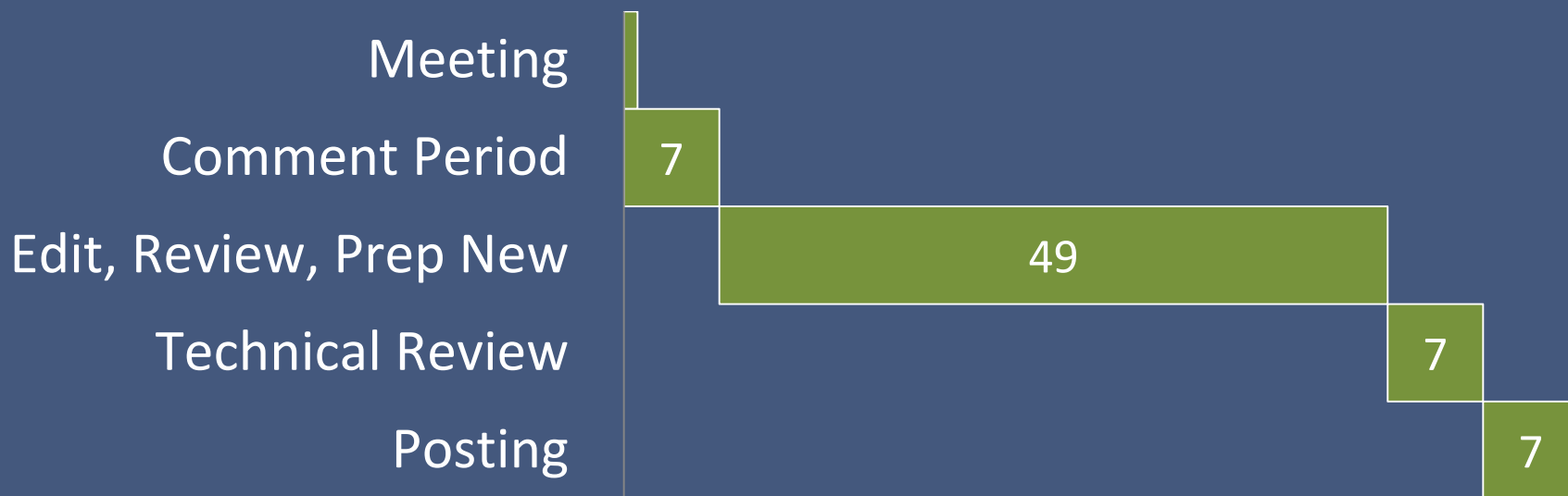
General Housekeeping

- Everyone sign in
- Cell phones off/muted
- Mute phones lines
- Speak into a microphone
- Be precise, be concise, be polite
- Participation encouraged!



Goal and objectives

- Final User's Guide Volume 4 Dec 2019
 - Identify appropriate content
 - Provide draft language for review
 - Accept comments, verbal and written



Meeting Agenda

- Introduction & meeting objectives
- ELDG Supplemental
 - Comments/changes on draft final
 - Preparing final document
- User's Guide Volume 4
 - Goals and objectives
 - Document outline
- Meeting summary and wrap-up



Effluent Limit Development Guidance (ELDG) Supplemental

- Written comments received
 - Association of Idaho Cities
- Draft final
 - Document undergoing technical editing review
 - Present the final at Feb 6, 2019 guidance meeting



Section 1. Introduction

1 Introduction

This Effluent Limit Development Guidance Supplemental (Supplemental) supports the Effluent Limit Development Guidance (ELDG; DEQ 2017) by addressing special topics not covered within the ELDG. The IPDES Program faces challenging issues (e.g., toxics, temperature, and nutrients) and the Supplemental is meant to address some of these challenging issues by providing additional guidance to IPDES permit writers.

Because every circumstance and permit is unique, this Supplemental provides additional tools for permit writers to use when developing effluent limits that appropriately address protection of beneficial uses and comply with the water quality standards. Permit writers may include in permits an approach or approaches described in the Supplemental when:

- Requested by applicants and deemed appropriate for the conditions by DEQ, and/or
- Determined that approaches in the ELDG are insufficient to meet water quality standards.

These tools adhere to Clean Water Act (CWA) requirements and associated state and federal rules, regulations, and implementation policies while providing additional approaches to benefit water quality and Idaho's citizens.

Section 3. Temperature – 316(a)

Thermal discharges also tend to equilibrate to ambient temperatures downstream of the discharge. This is because temperature is a “non-conservative” pollutant. Below is a relevant discussion taken from Washington Department of Ecology guidance (Water Quality Program Guidance Manual, *Procedures to Implement the State’s Temperature Standards through NPDES Permits, Revised October 2010*):

Non-conservative pollutants are defined as those that are mitigated by natural biodegradation or other environmental decay or removal processes in the receiving stream after in-stream mixing and dilution has occurred. The concentration of non-conservative pollutants is reduced after they are discharged into the receiving stream as a result of these removal processes.

The temperature in effluent is considered a non-conservative pollutant and is reduced (i.e., cooled) after it is discharged into a cooler receiving stream. Cooling happens as a result of the transfer of thermal energy from the warmer effluent to the cooler stream and the thermal energy loss associated with evaporation of

¹ Balanced Indigenous Population (BIP) and Balanced Indigenous Community (BIC) can be used interchangeably in regards to 316(a) variation studies and both phrases are encountered in DEQ and EPA rules and guidance documents regarding this topic. (see CFR 40 125.71 (c))

Section 4.3 Chlorinated Hydrocarbons

Where PCBs are present, the permit writer should work with the applicant to explore source tracing through the use of adaptive management and a toxic management plan. In general, for minor facilities (i.e., < 1 MGD) and on case-by-case basis for major facilities, the Department may apply Method 608. When no sufficiently sensitive EPA approved method is available the DEQ will specify a sufficiently sensitive method to monitor pollutants (40 CFR 122.44 (iv)(B)). However, testing for chemicals at low concentrations can be challenging and source tracing efforts are not always successful. Any monitoring plan developed to trace PCB sources will require extensive forethought and account for each system's unique circumstances. Additionally, some industrial facilities have multiple wastewater streams that combine before the monitored outfall. In such cases it may be required to limit PCBs at internal monitoring locations where concentrations are expected to be greatest (IDAPA 58.01.25.303.08). The objective of the permit requirements should be to identify and reduce the sources of greatest concern and concentration.

ELDG Supplemental



User's Guide Volume 4 (General Permits)

- Supplement to User's Guide Volume 1
- Focus on General Permits excluding storm water



2019 Guidance Schedule

- User's Guide Volume 4—General Permits (Non Storm Water)
 - January 16 – Kickoff Meeting
 - February 6
 - April 17
 - June 26
 - September 5
 - December 11 – User's Guide Volume 4—Final



2019 Guidance Schedule

- Comments
 - **IPDESGuidance@deq.idaho.gov**
- Comments on draft outline due January 23



User's Guide Volume 4 (General Permit)



Thank you!



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