Laidlaw, Tina

From: Suplee, Mike <msuplee@mt.gov>
Sent: Monday, December 16, 2013 10:40 AM
To: Laidlaw, Tina
Subject: FW: Need advise of best definition for LOT

From: Suplee, Mike
Sent: Friday, December 13, 2013 5:35 PM
To: North, John
Subject: Need advise of best definition for LOT

Hi John;

Based on our conversation today, which of the following do you think is a better definition for Limits of Technology (LOT) in our Guidance Document? One (1) was crafted by me based on our meeting today, while (2) was recommended by EPA to DEQ about a year ago, and might work equally well.

1. **Limits of technology** means wastewater treatment processes for the removal of nitrogen and phosphorus compounds from wastewater that can consistently achieve the more stringent of the following: (1) a concentration of 70 µg TP/L and 4,000 µg TN/L, or (2) the best demonstrated control technology, processes, or operating methods available at the time the Department grants a permittee a limits of technology variance.
2. **Limits of technology** means wastewater treatment processes for the removal of nitrogen and phosphorus compounds from wastewater that can consistently achieve a concentration of 70 µg TP/L and 4,000 µg TN/L. These numbers are presumptive values that would be re-evaluated for any variance related to limits of technology.

I will use whichever one you think best fits our purposes.

Mike