From: Nickel, Brian
To: June Bergquist
Subject: Kootenai-Ponderay Sewer District permit changes
Date: Wednesday, September 25, 2013 12:09:00 PM

June:

The day after the Spokane River public meeting at the end of August, I went up to Sandpoint to visit the two WWTPs I'm permitting up there.

As a result of my site visit to the Kootenai-Ponderay Sewer District (KPSD) and some subsequent internal discussion, we intend to make some changes to that permit.

Most significantly, we plan to change the phosphorus limit to apply only during the season that the Lake Pend Oreille nearshore nutrient TMDL applies (June – September). We also intend to change the phosphorus limit to be based on the TMDL's concentration target of 9 µg/L instead of the Gold Book's recommendation of 50 µg/L. While the numbers are different, this approach of using a nearby or downstream TMDL to interpret narrative nutrient criteria is consistent with our permitting for nutrients in the lower Boise River watershed, where we have used the concentration target/load allocation from the Snake River Hells Canyon TMDL to establish TP limits for discharges to the Boise River.

We remain concerned that October – May discharges of nutrients may be causing or contributing to impairment in Boyer Slough and/or Kootenai Bay. However, we don't have enough data to demonstrate that definitively. So, we intend to require receiving water monitoring for nutrients and response variables (e.g., chlorophyll a, dissolved oxygen) in Boyer Slough. If these data show that there are nutrient issues during October – May, we will address this with additional nutrient limits when the permit is reissued.

The issue of seasonal as opposed to year-round limits has significant implications for the City, since they could "comply" with a seasonal TP limit by expanding their storage and land application system, instead of building a new plant with tertiary treatment or eliminating their discharge to Boyer Slough by regionalizing with Sandpoint.

Because the district will most likely address the low seasonal TP limits with seasonal storage and land application, I should also change the ammonia limits. Ammonia limits will be necessary year-round, but October – May limits can probably be somewhat less stringent due to lower temperatures.

Do you have any concerns about the changes I've described to the phosphorus and ammonia limits for KPSD?

How would you like to handle this administratively? Would you like us to send to you a revised preliminary draft permit?

Thanks,

Brian Nickel, E.I.T.

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