From:	Nickel, Brian
To:	"Tanner Weisgram"
Cc:	June Bergquist
Subject:	RE: NPDES Questions
Date:	Wednesday, June 29, 2016 10:07:00 AM

Tanner:
I agree that the extending the outfall into the lake is something that would be worth discussing. However, Idaho DEQ should be involved in any such discussions. I have copied June Bergquist at DEQ in Coeur d'Alene.
The discharge would have more water available for dilution if it were located in the lake. However, in order for the District to take advantage of that, Idaho DEQ would need to authorize a mixing zone for the new outfall. The EPA does not have the authority to authorize mixing zones in Idaho; only DEQ can do that. In order to obtain a mixing zone for a discharge to a non-flowing water, Idaho's mixing zone policy requires outfalls to be equipped with a diffuser, and shore-hugging plumes are not allowed. The mixing zone could extend no farther than 100 meters from the point of discharge, and DEQ may find that the mixing zone needs to be smaller than that in order to avoid unreasonable interference with beneficial uses.
Idaho DEQ was considering including an option in the City of Sandpoint 401 certification (which would have, in turn, been included in the permit) for an outfall extension. They may be able to do so for KPSD.
There are some questions that would need to be answered before EPA and the State could fully evaluate this, including:

- Exactly where will the new outfall be located?
- What will be the design characteristics of the new diffuser (number, size, and angles of the discharge ports)?
- How deep will the outfall be?

If this option continues to look promising, then I agree that an update to the permit application, providing the details of the proposed new outfall, would be a good way to document this for the record. However, I think that's premature until we can discuss the District's plans with DEQ.
Thanks,
Brian Nickel, E.I.T.
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http://epa.gov/r10earth/waterpermits.htm
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From: Tanner Weisgram [mailto:TannerW@NCTV.com]
Sent: Monday, June 27, 2016 7:33 AM
To: Nickel, Brian
Subject: NPDES Questions
Hi Brian:
Regarding the pending draft permit: ID-0021229; Kootenai-Ponderay Sewer Treatment Plant
I have been reviewing the draft 401 certification and proposed limits and what treatment technologies and improvement will be needed to meet those limits. We have put some rough costs

to the alternatives and all of them are expensive. A potential management option is to extend the outfall past Boyer Slough into the lake which would eliminate several issues. I am wondering if the application for permit renewal should have some language included stating that moving the outfall may be needed to comply with future limits. Or if our planning effort points us toward and outfall extension after the permit has been renewed, we can go about requesting and extension at that time.

Thank you

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