From: June.Bergquist@deq.idaho.gov
To: Nickel, Brian
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Subject: Sandpoint WWTP meeting followup
Date: Monday, December 08, 2014 3:31:21 PM

Hi Brian,

We discussed the following topics with Sandpoint:

1. Concern about design flow was expressed in that they believe that their design flow is 5.17MGD. The issue of concern related to this is that they don't want to do another facility plan until they reach 85% capacity of that flow, not the 3.62MGD. Could this be changed in part II.D. of the permit? They understood from previous conversations and meetings with DEQ that although they want the extra capacity, they knew that TP was going to be held to the amount in their existing discharge.
2. They want to challenge the Cormix model results and perform a dye test to determine how their effluent mixes. Along with this they will need to propose what they will do if any provision of the mixing zone rules are still exceeded. We are open to alternative ideas that meet WQS. They are considering land application in cooperation with Kootenai Ponderay WWTP, facility relocation or pipe relocation. They understand that even with removal of concerns with mixing that a design flow increase will trigger an alternatives analysis and socioeconomic justification for increases of TP and Hg. Because the PDO River is at a tipping point from full support to impaired due to TP and that immediately upstream is impaired due to Hg an increase in these would be very difficult to justify.
3. They would like a June – September TP limit and a seasonal average for the remainder of the year (like Spokane River permits). We are open to this approach. They would also like 100% of their effluent data used to calculate their TP limit so they don't exceed it. We are not supportive of this approach. As I understand the permit uses 99th percentile and increases their TP monitoring to 8 times per month which should be sufficient to smooth out any spikes in the data. They were also interested in flow weighted limits but there were also problems with this approach along with a lack of data.
4. They felt their monitoring requirements were excessive, particularly mercury and PCBs. DEQ's suggestion was to propose fish tissue monitoring only for the in-river sampling for both PCBs and mercury. Also, if all the PDO dischargers had similar monitoring requirements that they should send a letter to the DEQ Director suggesting consolidation of monitoring done by one entity (Sandpoint suggested the State take this on) so results are accurate, consistent and economical.

Sandpoint indicated that they are meeting with you also to discuss the permit and that we will be invited to that meeting also. It would be helpful to discuss each of these items to ensure consistency.

June

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