From: Don.Essig@deq.idaho.gov
To: Nickel, Brian
Subject: Sandpoint WLA for TP and conservatism
Date: Wednesday, June 15, 2016 12:30:37 PM

Brian,

You no doubt have heard the City of Sandpoint has raised issues with their TP limit, (oddly) our authorization of use of a mixing zone, their ammonia limit, and mercury fish tissue monitoring requirements.

I am writing now just regarding the TP limits, and in particular this paragraph in the factsheet (pg E-7):

Probability Basis

The probability basis is the probability that the permittee will comply with the average monthly effluent limit, if the permittee's long term average and coefficient of variation are consistent with the assumptions used in the calculation of the average monthly limit. In general, for toxics permitting, Section 5.5.4 of the TSD recommends the use of the 95th percentile (5% exceedance probability) for the average monthly limit. This is a conservative approach, which is justified when establishing effluent limits for toxic pollutants, but this conservatism is not necessary when establishing effluent limits for nutrients, where the goal is to achieve a certain seasonal average loading or concentration. Therefore, EPA has used the 99th percentile (1% exceedance probability) to calculate the average monthly limit.

Been trying to wrap my head around the statement that using the 95th rather than 99th % probability of compliance is more conservative. Seems to me a lower probability of exceedance (higher probability of compliance) is the more conservative approach. Did using the 99 % probability of compliance actual result in higher TP limits in the analysis of the Sandpoint discharge?

Has Dan Redline asked you to participate in the meeting/call with City of Sandpoint this Friday?

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