From:	Nickel, Brian
To:	"June.Bergquist@deq.idaho.gov"
Cc:	"Thomas.Herron@deq.idaho.gov"; "Daniel.Redline@deq.idaho.gov"
Bcc:	Lidgard, Michael; Poulsom, Susan
Subject:	RE: Sandpoint WWTP meeting followup
Date:	Monday, December 08, 2014 4:16:00 PM
Attachments:	Capture.JPG Bergquist_RE= Sandpoint Design Flow_1-10-13_1521.pdf Sandpoint Effluent TP Load quarterly conc at max flow for quarter.xlsx

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June, all:

Thank you for the meeting summary.

We have offered to meet with the City, but, to my knowledge, we have not yet scheduled that meeting.

Regarding the design flow, you might recall that, originally, I had sent to you a preliminary draft permit in late 2012, which was based on a design flow of 5.0 mgd, because that was the design flow that the city had reported on its most recent permit application. After discussions with you (see attached PDF), we decided to reduce that to 3.62 mgd, because that was the average daily design flow that was reported in the City's operation and maintenance manual (dated January 2011, see attached JPEG image). At that time, you said "I can't find anything that would indicate they can treat more than 3.62 MGD." **Do you have new information corroborating the 5.0 mgd design flow that the City claims?**

Since the TP limits are intended to maintain the status quo, I would be open to expressing the limit as a longer term average. However, if we did that, the limits would need to be somewhat lower that what we've proposed, because the average monthly and average weekly limits are set higher than the observed average load, to allow for variability. I estimate their average TP load is 65.3 lb/day; that really is an estimate because I only have quarterly concentration measurements, and I don't know what the flow rate was at the time the concentration samples were taken. I estimated the load by pairing the concentrations with the maximum monthly average flow for the quarter in which the concentration was measured. In any event, a long-term average limit that's intended to maintain current conditions would need to be set at some reasonable estimate of the average load.

Also, I'm not quite sure what the City was proposing for June – September; do they consider the proposed limits acceptable for that season, but not at other times?

We'll have to discuss internally whether we could remove water column monitoring for mercury and PCBs in the receiving water in favor of a fish-tissue-only approach. We don't have many permits that have PCB monitoring requirements, but, for mercury, whenever we've required fish tissue monitoring, we've required water column monitoring as well, so it would definitely be a departure from past practice to monitor for mercury in fish tissue exclusively.

Thanks again,

Brian Nickel, E.I.T.
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From: June.Bergquist@deq.idaho.gov [mailto:June.Bergquist@deq.idaho.gov]

Sent: Monday, December 08, 2014 3:31 PM
To: Nickel, Brian
Cc: Thomas.Herron@deq.idaho.gov; Daniel.Redline@deq.idaho.gov
Subject: Sandpoint WWTP meeting followup

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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