From: Brett M. Converse
To: Nickel, Brian; June Bergquist (June.Bergquist@deq.idaho.gov)
Cc: kermit keibert
Subject: Re: Latest 401 cert dated 9/22/16
Date: Monday, September 26, 2016 8:06:04 AM

Brian:

We received a new 401 cert from IDEQ. A snip of a paragraph is attached/below. I believe the statement highlighted in the snip below is contrary to an agreement reached during our last meeting. I thought we had agreed that the summer P limit was based on the current mass of P discharged during the critical period. My understanding was that the critical period was shortened which changed average mass of P discharged (statistic applied). And, using the current mass discharged the P limit was set using anti-degradation. This point was emphasized at the meeting and resolved an issue which is a concern for all Idaho discharges about lowering historic effluent loads without a documented loss of beneficial use and a TMDL. Did I misunderstand what you said at that meeting?

If it is important to have some kind of statement in the cert showing a p reduction, I think something could be said about the critical averaging period being shortened which resulted in lower P limit throughout the Critical period than originally calculated (4 months of Summer and/or annually).

Regards

Brett

Due to the limited amount of phosphorus data and its variability, the entire record to date was used to develop the new effluent limits. (Details of how the effluent limits were calculated can be found in Appendices E and F of the Revised Fact Sheet.) New permit limits for phosphorus during the summer recreation season are lower than what is currently discharged to ensure no degradation during the time of year when the effects of phosphorus are relevant to recreational uses. Modeling was also done to ensure that this amount of phosphorus would not cause degradation from current conditions in the river as a whole (see Appendix B). Modeling reports are available upon request by calling the contact shown at the end of this certification.

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