

Paula Wilson

From: Glen Holdren [gholdren@kellerassociates.com]
Sent: Wednesday, April 28, 2010 2:53 PM
To: Paula Wilson
Cc: Justin Walker; 'Nate Marvin'; 'Brad B. Hansen'
Subject: Comments to the Preliminary Draft Negotiated Rule - Antidegradation Implementation Procedures
Paula,

My comments to the Preliminary Draft Negotiated Rule – Anti-degradation Implementation Procedures by section and paragraph number are as follows:

- 051.01.a Change to read: “Maintain the existing high quality in the surface waters of Idaho;”
- 051.04.d.iv Delete second sentence.
- 051.04.f.iii Provide values for percent and date.

Proposed New Definitions

Measurable The lowest MDL for measurement of total phosphorus is 5 ug/L using EPA method 365.1. Therefore change the definition of measurable change in TP to: A change in total phosphorus of less than 5 ug/L.

Thanks for the opportunity to provide comments.

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