

Comments for the User's Guide Volume 2

Meeting Date	Comment Date	Commenter	Comment No.	Section	Page	Topic	Comment
7/19/2017	7/27/2017	EPA Region 10	1	2.1.8	12	Part H. Requests	This section states that "mixing zones cannot be authorized for pollutants with technology-based effluent limits...." While it is true that technology-based effluent limits must be met at the end-of-pipe, regardless of mixing, a mixing zone could nonetheless be granted for a pollutant subject to a technology-based effluent limit, if the technology-based limit would not ensure compliance with applicable water quality criteria at the end-of-pipe.
7/19/2017	7/27/2017	EPA Region 10	2	2.2.4.3	14-15	Sewage Sludge	Biosolids rules apply to treatment works treating domestic sewage (TWTDS), which is a broader term than "POTW." In addition, third party operators that handle and land apply biosolids must comply with Federal biosolids regulations. IDEQ's guidance should cite 122 and 503 or state equivalent regulations for their TWTDS. In addition, it is not clear from the guidance if IDEQ requires TWTDS to submit form 2S as required in 122 and annual biosolids report as required in 503. See also Section 9.2.2 of the U.S. Environmental Protection Agency NPDES Permit Writers' Manual.
7/19/2017	7/27/2017	EPA Region 10	3	2.2.7.5.2	23-24	General Pretreatment Program Prohibitions	IDEQ's prohibition language does not match the specific federal prohibitions under 403.5(b)(1-8).
7/19/2017	7/27/2017	EPA Region 10	4	2.2.7.5.4	25-26	When is a Pretreatment Program Required?	IDEQ's guidance language states: A POTW must develop a Pretreatment program due to facility size or contribution of discharge from SIUs. A program may be necessary due to a combination of factors, not just size or discharge from SIUs. The implementing regulations at 40 CFR 403.8(a) state that: Any POTW (or combination of POTWs operated by the same authority) with a total design flow greater than 5 million gallons per day (mgd) and receiving from Industrial Users pollutants which Pass Through or Interfere with the operation of the POTW or are otherwise subject to Pretreatment Standards will be required to establish a POTW Pretreatment Program unless the NPDES State exercises its option to assume local responsibilities as provided for in § 403.10(e). The Regional Administrator or Director may require that a POTW with a design flow of 5 mgd or less develop a POTW Pretreatment Program if he or she finds that the nature or volume of the industrial influent, treatment process upsets, violations of POTW effluent limitations, contamination of municipal sludge, or other circumstances warrant in order to prevent Interference with the POTW or Pass Through.
7/19/2017	7/27/2017	EPA Region 10	5	2.2.7.7	26-37	Pretreatment Program Requirements	IDEQ should consider adding language that addresses the new dental rule. Dental facilities are not considered SIUs. https://www.epa.gov/eg/dental-effluent-guidelines
7/19/2017	7/27/2017	EPA Region 10	6	2.2.7.7.1	27-28	Control Authority vs. Approval Authority Responsibility	Roles and responsibilities of approved pretreatment programs are listed under 403.8(f)(1) and 403.8(f)(2). IDEQ's guidance should be more detailed.
7/19/2017	7/27/2017	EPA Region 10	7	2.2.7.7.2	28-32	Pretreatment Program Application and Approval Process	The EPA developed a guidance to help evaluate a pretreatment program submission: https://www3.epa.gov/npdes/pubs/owm0024.pdf