

**From:** Hubert  
**To:** [Paula Wilson](#)  
**Subject:** comment on De Minimus Heat Additions  
**Date:** Monday, July 23, 2018 8:28:26 AM

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## Hubert Osborne

Subject: RE: comment on De Minimus Heat Additions  
(Preliminary Draft Negotiated Rule (Drat No.1)  
Docket No. 58-0102-1803, Dated June 20, 2018

Ms. Paula Wilson  
Idaho Department of Environmental Quality

The .03 De Minimus Heat Addition as presented is a step in the right direction.

However, in my town of Nampa where the wastewater plant is identified as a point source I must object to being included in the calculations for the Boise River system. All water from the Indian Creek drainage is diverted into the Riverside Canal at a point on the west side of Caldwell and does not flow into the Boise River during irrigation season. This water with Nampa wastewater plant effluent mixed in, then is used for irrigation growing corn not algae in the farmland to the west, with a very minor amount spilled into the Snake River. (See Idaho Powers mitigation plan for Brownlee).

Proof of this can be found in the report calculations that Idaho Department of Water Resources has at the mouth of Indian Creek. It shows NO water reaching the Boise River during Irrigation season. The guage cited in NPDES and included in calculations for the Boise River in the De Minimus presentation is above the Riverside Canal diversion point.

I would respectfully request that the Nampa wastewater calculation as a heat source be a stand alone calculation--not as a part of the Boise River calculations.

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