Permittee Name: Syringa Mobile Home Park

Effective Date of this Modification: January 22, 2020

Complete Description of Modification

The purpose of this Permit Modification is to extend the expiration date of M-256-01 for duration of an additional 1 year and establish new deadlines for the remaining compliance activities. The original intent of M-256-01 was for beneficial irrigation of recycled water for a single growing season concluding with the closure of Syringa’s wastewater treatment system in fall of 2019. However, cessation of irrigation occurred in August of 2019, approximately half way through the growing season. Thus, complete emptying of lagoons and closure of the site was not accomplished by expiration of the Reuse Permit, December 31, 2019. On November 27, 2019, DEQ received a request from the permittee for a permit extension of 1 year. The permittee estimates approximately half of the recycled water remains within the lagoons and intends to continue irrigation during the 2020 growing season. The Permit is hereby modified as shown below:

Page 1 replace text with:
Syringa Mobile Home Park (hereafter “permittee”) is hereby authorized to construct, install, and operate a reuse facility in accordance with (1) this permit; (2) IDAPA 58.01.17 “Recycled Water Rules”; (3) an approved plan of operation; and (4) all other applicable federal, state, and local laws, statutes, and rules. This permit is effective from the date of signature and expires December 31, 2020.

Page 3 through 25 replace header text with:
Reuse Permit M 256-01 Syringa Mobile Home Park
Permit Issuance: March 1, 2019 Permit Expiration: December 31, 2020

Page 8 update compliance activity due dates with:

<table>
<thead>
<tr>
<th>Compliance Activity (CA) Number and Completion Due Date</th>
<th>Compliance Activity Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>CA-256-01 March 15, 2020</td>
<td>Plans and Specifications: The permittee shall submit to DEQ for review and approval plans and specifications for the material modifications to the wastewater system including, but not limited to, the disinfection system, pumping, and distribution to the reuse site.</td>
</tr>
<tr>
<td>CA-256-06 March 15, 2020</td>
<td>Plan of Operation (PO): The permittee shall submit to DEQ for review and approval a PO that reflects current operations and incorporates the requirements of this permit. The PO shall comply with the applicable requirements stated in IDAPA 58.01.17.300.05 and shall address applicable items in the PO checklist in the DEQ Guidance for Reclamation and Reuse of Municipal and Industrial Wastewater (reuse guidance).</td>
</tr>
<tr>
<td>Compliance Activity (CA) Number and Completion Due Date</td>
<td>Compliance Activity Description</td>
</tr>
<tr>
<td>---------------------------------------------------------</td>
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</tr>
<tr>
<td>CA-256-07 March 15, 2020</td>
<td>Quality Assurance Project Plan (QAPP): The permittee shall prepare and implement a QAPP that incorporates all monitoring and reporting required by this permit. A copy of the QAPP along with written notice that the permittee has implemented the QAPP shall be provided to DEQ. The Permittee must follow the QAPP when collecting, analyzing, and reporting monitoring data submitted to DEQ. The QAPP shall be designed to assist in planning for collecting, analyzing, and reporting all monitoring in support of this permit and in explaining data anomalies when they occur. At a minimum, the QAPP must include the following: 1. Details on the number of measurements, number of samples, type of sample containers, preservation of samples, holding times, analytical methods, analytical detection and quantitation limits for each target compound, type and number of quality assurance field samples, precision and accuracy requirements, sample preparation requirements, sample shipping methods, and laboratory data delivery requirements 2. Maps indicating the location of each monitoring and sampling point 3. Qualification and training of personnel 4. Names, addresses, and telephone numbers of the laboratories used by or proposed to be used by the permittee 5. Example formats and tables that will be used by the permittee to summarize and present all data in the annual report The format and content of the QAPP should adhere to the recommendations and references in the Quality Assurance and Data Processing sections of the reuse guidance. The permittee shall amend the QAPP whenever there is a modification in sample collection, sample analysis, or other procedure addressed by the QAPP. The permittee shall notify DEQ of material changes to the QAPP and copies shall be kept on site and made available to DEQ upon request.</td>
</tr>
<tr>
<td>CA-256-08 March 15, 2020</td>
<td>Lagoon Closure Plan: The permittee shall provide DEQ a closure plan for the existing lagoon(s) in accordance with IDAPA 58.01.16.493.10</td>
</tr>
<tr>
<td>CA-256-09 March 15, 2020</td>
<td>Reuse Site Closure Plan: The permittee shall provide DEQ a closure plan for the reuse site in accordance with IDAPA 58.01.17.801.02</td>
</tr>
</tbody>
</table>

Page 14 replace text with:

6.1.1 Due Date
The annual report is due no later than December 31 of each year which shall cover the previous reporting year.

Permit Modification 2 is hereby approved. This modification to the Permit is incorporated into, and constitutes a part of, Reuse Permit No. M-256-01. This permit modification must be attached to the Permit. The Permit is incomplete under IDAPA 58.01.17, Recycled Water Rules, without this permit modification attached.

Signed,

John Cardwell
Regional Administrator
Lewiston Regional Office
Department of Environmental Quality

1/22/2020
DEQ provided a public comment period for permit modification 2 of M-256-01 for duration of 15 days. The public comment period ended January 21, 2020 and one comment was received by Mr. Mike Settel. Below is a response this comment:

Comment 1:
Having worked on this system previously, it is my opinion that there may be significant inflow into the lagoons. How will IDEQ address this during the upcoming irrigation season and during closure? How are inadvertent discharges to the SF Palouse obviated or prevented?

DEQ Response:
Syringa’s wastewater collection system is no longer in service and has been abandoned in place. The wastewater collection system has been plugged and disconnected from the existing wastewater lagoons. Operators have indicated that inflow into the existing wastewater lagoons has been successfully abated. Compliance activity CA-256-08 requires that a lagoon closure plan be submitted to DEQ for review and approval by March 15, 2020. This closure plan shall provide details of lagoon closure as necessary for cessation of the wastewater system.