

**Paula Wilson**

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**From:** Lawrence Bennett [l.j.bennett.engineering@gmail.com]  
**Sent:** Monday, January 24, 2011 1:17 PM  
**To:** Paula Wilson  
**Cc:** Michael Fuss; Greg Pearce; Sheri Murray; Lawrence Bennett; ROBBIN FINCH; Greg Lanning; Herrick, Jon  
**Subject:** Comments on draft Anti-degradation Implementation Procedures Section 2 and Appendices B and D

Hi Paula,

At the January 13, 2011 meeting, DEQ requested comments on the drafts of Section 2 and Appendices B and D. I have the following comments for DEQ's considerations:

1. Section 2:

A. Some additional punctuation (particularly, commas) could be added. I expect that your technical editor will add those.

B. On page 14, in the top paragraph, there is a discussion on handling sites with only two sampling stations (use the lowest value) and more than two sampling stations (average the values). This paragraph refers to Appendix B for examples. When I reviewed Appendix B, I found the situation of two station but I could not find the situation of averaging more than two stations.

Also, the example in Appendix B for one station could be better worded. The wording in Chapter 2 is clearer and could be cloned into the example.

2. Appendix D:

A. Add the name of the NPDES holder to the table. This could be done by expanding the first column (NPDES No.) with a second line that briefly identifies the permit holder (i.e., City of Nampa).

B. Delete the column that presents the status of the permit. This status will change quite often, especially when EPA starts reissuing overdue permits. It will be an on-going work item for DEQ to maintain this table.

C. The column on Average Score Index appears to be another column that could be deleted. The data could change as more information is known or more sampling is completed.

Thank you for your efforts in making this document most useful.

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