

From: Burgess, Karen [<mailto:Burgess.Karen@epa.gov>]
Sent: Sunday, January 29, 2017 10:20 PM
To: Troy Smith
Cc: Lidgard, Michael
Subject: EPA Comments IPDES Guidance - ELDG Chapter 4

Troy, I did not have sufficient time to thoroughly review Chapter 4 of the ELDG, so I will defer further review of Chapter 4 with the complete ELDG during the public comment period.
At this time, I the following comments:

Page 62, top paragraph, last sentence. I believe the correct regulatory citation should be 40 CFR 122.44(d).

Page 64, Section 4.1.2.1. As guidance to permit writers, it would be appropriate to provide specific recommendations or requirements for effluent design flow for use in permitting (e.g. monthly average, monthly maximum, etc.)

Page 65, Table 21. The table should distinguish between carcinogen and non-carcinogen human health criteria. EPA's Technical Support Document for Water Quality-based Toxic Controls (<https://www3.epa.gov/npdes/pubs/owm0264.pdf>) page 87-89 recommends 30Q5 for non-carcinogens and harmonic mean for carcinogens.

Page 68-71, Section 4.3.2.1.1. The section includes the specific formula for calculation hardness, pH and temperature-dependent criteria. Since these criteria may change over time, it may be appropriate to refer to, or at least direct permit writer refer to the approval WQS.

Thank you, Karen

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