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Paula Wilson
IDEQ State Office
Attorney General's Office
1410 N. Hilton
Boise, ID 83706

**RE: Docket No. 58-0102-1502 - Negotiated Rulemaking
IDEQ Update to Copper Criteria for Aquatic Life Use**

Dear Ms. Wilson:

Clearwater Paper is pleased to offer this comment letter on the subject rulemaking. We appreciate the Idaho Department of Environmental Quality's (IDEQ) work on this very important matter and look forward to our continued participation in this rulemaking process. Comments for your consideration are detailed below.

- From page 12 of the "DRAFT Statewide Monitoring for Inputs to the Copper Biotic Ligand Model":

DOC blanks with detectable concentrations ranged from 0.208–0.236 mg/L. These blank results affected 3 sample batches and were considered to affect results for 16 samples. The DOC results from these 16 samples were reduced by the associated blank concentrations. Results from affected DOC samples and the resulting DOC concentration adjustments are reported in Table 5.

The purpose of field blanks is to determine the potential for field contamination. Generally, a field blank is used to identify and mitigate contamination for future sampling efforts. A DOC blank with a detectable concentration of 0.235 mg/l DOC was measured by the IDEQ regional office in Coeur d'Alene for a blank sample collected on 10/4/2016. The average sample DOC concentration of the twelve samples collected on the same day and location as the DOC field blank was 0.512 mg/l. The field blank was 46% of the average measured DOC sample concentration. IDEQ's approach to detectable DOC field blank concentrations was to reduce the measured sample concentrations by the associated blank concentration. A more appropriate approach to detectable DOC field blanks is to discard the sample batch that has the potential for field contamination and

resample. This is especially important for samples with potential DOC contamination since DOC is the most important input parameter for calculating BLM criteria. Calculated BLM criteria output is 100% sensitive to changes in DOC (Di Toro et al 2001; USEPA 2016), meaning that if the DOC concentration is reduced by 46% the calculated BLM criteria will be approximately 46% lower. The same issue exists for samples collected by the IDEQ regional office in Coeur d'Alene on 10/5/2016. In this case a DOC field blank with a detectable concentration of 0.208 mg/l DOC was measured. The average sample DOC concentration of the four samples collected on the same day and location as the DOC field blank was 0.638 mg/L. The field blank was 33% of the average measured DOC sample concentration for that day. For this day as well the sample batch that has the potential for field contamination should be discarded and new measurements conducted.

On behalf of Clearwater Paper, we appreciate the opportunity to provide comments on this important matter and look forward to participating with IDEQ as this rulemaking goes forward. Please contact me at 509-344-6419 or malisa.maynard@clearwaterpaper.com with questions.

Sincerely yours,



Malisa Maynard
Environmental & Sustainability Manager

References

- Di Toro, D., Allen, H.E., Bergman, H.L., Meyer, J.S., Paquin, P.R., and Santore, R.C. 2001. Biotic ligand model of the acute toxicity of metals. 1. Technical basis. *Environmental Toxicology and Chemistry* 20(10):2383-2396.
- United States Environmental Protection Agency (USEPA). 2016. *Draft Technical Support Document: Recommended Estimates for Missing Water Quality Parameters for Application in EPA's Biotic Ligand Model*. EPA 820-R-15-106. United States Environmental Protection Agency Office of Water. p 2.