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To: [Jason Pappani](#)
Cc: [Paula Wilson](#)
Subject: EPA comments to Idaho DEQ on Idaho WQS Triennial Review
Date: Friday, June 30, 2017 4:09:24 PM

Subject: Idaho Water Quality Standards Triennial Review

Jason – The EPA has reviewed the issue summaries that DEQ developed for its 2017 triennial review and posted on DEQ’s website. The EPA supports DEQ embarking on a triennial review of its water quality standards consistent with the requirements contained in the federal water quality standards regulations at 40 CFR 131.20

DEQ’s Issue Paper #4 compares certain Idaho numeric toxic criteria with the EPA’s current 304(a) national criteria recommendations and notes that Idaho’s criteria for these specific toxic pollutants are outdated and thus inconsistent with EPA’s latest national criteria recommendations. Bacteria Criteria to protect recreational uses and ammonia criteria for the protection of aquatic life are included in these criteria. In a letter of May 16, 2014 to DEQ, EPA highlighted its recent publication of ammonia and recreational criteria recommendations reflecting the latest science and urged DEQ to use its triennial review to consider adoption of these criteria. The EPA again encourages DEQ to use its triennial review to consider adoption of these criteria. Ensuring that water quality standards include up to date water quality criteria that are protective of aquatic life and human health, including the health of subsistence consumers of aquatic organisms, is important and EPA also supports DEQ addressing that issue. If DEQ chooses not to update Idaho’s criteria to be consistent with the current 304(a) national criteria recommendations, consistent with the revised federal water quality standards regulations, DEQ will need to explain why you are not doing so.

Additionally, in 2015, the EPA’s final rule revising the federal water quality standards regulations at 40 CFR 131 was published in the federal register. Given revision of a number of water quality standards regulatory requirements EPA strongly encourages DEQ to use the triennial review process to review these new/revised requirements and if necessary update any of Idaho’s water quality standards regulations that are inconsistent with the EPA’s revised federal water quality standards regulations. The EPA looks forward to working with DEQ to identify any revisions that maybe necessary to ensure that Idaho’s water quality standards are consistent with the revised federal rule.

Thank you for the opportunity to comment on DEQ’s Triennial Review.

Please contact me if you have questions.

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