



April 30, 2018

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

Clearwater Paper Corporation
601 West Riverside, Suite 1100
Spokane, WA 99201

**RE: Docket No. 58-0102-1801 - Negotiated Rulemaking
Idaho's Human Health Criteria for Arsenic**

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 these very important matters and look forward to participating as this rulemaking proceeds.

Arsenic is a natural background chemical in the state of Idaho. Under the Safe Drinking Water Act, the Arsenic standard is 10 µg/L. We know that EPA Region X has already disapproved that value, but the legal and technical bases for EPA's decision needs a review. If a different approach is required utilizing a human health criteria equation, the inputs should consider whether the resulting more stringent criteria are achievable. Dischargers should not be forced to spend money on control measures that are unlikely to have any significant effect on ambient pollutant concentrations. For ubiquitous substances such as arsenic, IDEQ should consider alternative risk and other factors, as Oregon did in establishing its human health criteria for arsenic, which naturally occurs at high concentrations in Oregon waters. This approach would need to be customized to be specific to the state of Idaho when selecting the inputs to a human health criteria equation, and would include focusing only on the inorganic soluble portion of arsenic.

On behalf of Clearwater Paper, we are continuing to review the technical aspects of this rulemaking and appreciate the opportunity to provide comments on this important matter. We 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,

A handwritten signature in black ink that reads "Malisa Maynard".

Malisa Maynard
Corporate Environmental & Sustainability