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Sent via email to: paula.wilson@deq.idaho.gov

August 1, 2018

Ms. Paula Wilson
Idaho Department of Environmental Quality
1410 N. Hilton, Boise, ID 83706

Dear Ms. Wilson:

The Department of Environmental Quality (the Department) has commenced a rulemaking to revise the arsenic human health water quality criteria and has requested comments on information presented at the last rulemaking meeting. The J.R. Simplot Company (Simplot) has numerous operations in Idaho (such as mining, food and fertilizer manufacturing) which may be affected by changes to Idaho's water quality criteria. Thus, Simplot has a direct interest in this rulemaking.

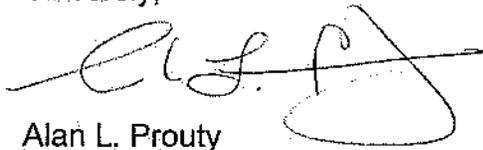
The new timeline for revising the arsenic human health water quality criteria does provide the State of Idaho additional time to develop criteria that is both protective of human health and practicable (i.e., recognizes naturally occurring arsenic in groundwater and surface water) utilizing the best Idaho scientific information and methods.¹ As an example, as shown in Simplot's June 6, 2018 comments, there appears to be no relationship between inorganic arsenic concentrations in the water column and corresponding (paired) fish tissue inorganic arsenic concentrations. Though one of the reasons given by EPA in its September 15, 2016 reversal and disapproval of the 10 µg/L criteria was that "consumption of fish and other aquatic organisms" was not included, data gathered in Idaho show that such an exposure route is likely very low. Thus, Idaho specific data will be very helpful in deriving a new criteria.

Simplot supports the Idaho Association of Commerce and Industry comment letter and in particular, endorses the recommendations for additional actions described in that letter.

¹ The proposed criteria is for surface water, however from a discharger perspective, often the water being discharged by a facility or municipality comes from groundwater. Groundwater in Idaho, like surface waters, can and do have elevated arsenic concentrations.

We appreciate the opportunity to submit comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. L. Prouty', written in a cursive style.

Alan L. Prouty
Vice President
Environmental & Regulatory Affairs

C:
Food Northwest
Idaho Association of Commerce and Industry
Idaho Mining Association

