

From: bb@nwpoa.org [<mailto:bb@nwpoa.org>]

Sent: Friday, September 13, 2013 8:27 AM

To: Nickel, Brian

Subject: FW: EPA proposed discharge limits and treatment for Post Falls, Cda and Hayden.

Brain,

Since attending your local Cda Library mtg, (*and thank-you for answering some of my questions!*) I'd like to **strongly suggest** that the EPA delay the implementation of the proposed limits on Post Falls, Cda, and Hayden. After learning that the burden of such strict compliance would be put upon these three Idaho cities, while perhaps no other Washington based municipality is being required to meet these strict limits is well "absurd". You may recall I asked the question, "*Assume between here and the river path to the Pacific ocean, that there are 100 municipal wastewater discharge points, what percent are currently being required to comply with standards as strict as being forced upon Post Falls, Cda, and HARSB?*" you replied, "zero" ... then elaborated further saying "*perhaps one*".

I find that Idaho is being forced to comply with regulations that Washington State is requiring, while not themselves doing it, to be ridiculous. Washington State needs to step up before they force Idaho to. Any regulations doing otherwise in a word, "wacked".

I'm suggesting that the EPA amend the permit to

1. That the EPA extend the compliance date (of 10yrs) to meet the requirements to a point when at least 50% (or better yet, 70%) of all the Washington State municipal NPDES point discharge entities also meet these same stringent standards along the river system to the west coast.
and/or
2. That the requirement deadline be stretched from 10 yrs to 15-18 yrs to allow each of the 3 North Idaho Cities to gradually begin to raise sewer rates and to gradually accumulate the required funds instead of having to force citizens to experience doubling and perhaps tripling of their sewer rates.

I hope the EPA will seriously consider this input, the EPA's reputation has been going down hill rapidly over the last few years and it is long past time to start making good decisions. Picking on little people and little cities will win you no friends. The typical minority of dogmatic and radical environmentalist groups may be the main people showing up to push all this, but ultimately the vast majority is the common folk and the EPA needs to start considering them.

Thanks!
Bob Bingham

From: bb@nwpoa.org [<mailto:bb@nwpoa.org>]

Sent: Tuesday, August 27, 2013 12:21 PM

To: Nickel, Brian

Cc: Clarkin@postfallsidaho.org; dgookin@cdaid.org; vrutherford@cityofhaydenid.us

Subject: EPA proposed discharge limits and treatment for Post Falls, Cda and Hayden.

Brain,

I'm going to try to be at the public meetings tomorrow and would like the following questions submitted and answered as a matter of public record regarding the proposed change to the 3 city discharge permits here in North Idaho. I have the opinion from a casual review of NPDES permits in north Idaho and Washington's state (*administered by Washington state*) that these 3 permits are the strictest, (*I found none with standards as strict*) which causes me concern.

1. How many municipal wastewater NPDES permits are there in the EPA database that the EPA oversees?

2. How many municipal wastewater NPDES permits are there in State run programs database that the EPA requires, but allows the respective state to assume oversight and jurisdiction?
3. From a combination of the two questions above, what % are as strict as the proposals being put forth upon Post Falls, Cda, and Hayden?
4. How many municipal wastewater NPDES permits in Region 10 along the waterway system that these 3 cities discharge into?
5. Please provide a map showing the locations of each and their respective permit limits (*Nitrogen and phosphorus/phosphate*) and respective permit renewal dates. (*I ask this because I've seen permits recently renewed but not near as strict*)
6. Please provide the last 10 yrs of annual historical records for nitrogen and phosphorus/phosphate sampling along the path 50 miles upstream and 250 miles down stream of these 3 discharge source points.
7. Please list all municipal permits that have equal to or stricter limits and their permit limits along the entire river path to the Pacific ocean. I have at least one USGS map showing much higher concentrations along the Pacific Coast rather than inland.
8. Please comment on the BPA government program that is **adding** both phosphate and nitrogen to improve fisheries in a NW river.
9. Please provide comment on the effect banning phosphate in detergents has had on any these specific water ways.
10. Please provide a summary of the methods used for collection, handling and analyzing of samples including standardization of equipment.
11. Please discuss the known effects of farming, ranching along the path 50 miles upstream and 250 miles down stream of these 3 cities.
12. Please describe the current percent permit removal or achievement and the proposed change.
13. Please quantify the number of total other municipal permits being required to attain these same reduction goals and why not all permits are being forced to the same standards.
14. If these permits are instituted, please provide the projected net gains (what ever they may be) to river quality and the methods used to predict/forecast such gains.

Certainly we all care about our water quality and those of us with experience in waste discharge understand we are basically recycling our waste streams.

An electronic reply with links to specific data and answers to questions is greatly appreciated. Please also acknowledge receipt of this inquiry.

Thank-you

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