

Idaho Department of Environmental Quality

Revision of Idaho's
Human Health Criteria for Arsenic
Docket No. 58-0102-1801
December 16, 2020

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Objectives



Outline

- Review of Comments
- Presentation of Draft Rule
- Rationale
- Discussion



Comments Received



National Council for Air and Stream Improvement

- Recommend Fish Only criterion based on fish tissue only
- Recommend narrative criteria for Fish+Water



Idaho Association of Commerce and Industry

- Recommend Fish Tissue criterion for Fish Only
- Water column screening based on drinking water exposure
- Recommend narrative criteria for Fish + Water



Association of Idaho Cities

- Recommend Fish Tissue criterion for Fish Only
- Water column screening based on drinking water exposure
- Recommend forming subcommittee to explore how to implement tissue criterion in IPDES permits
- Recommend narrative criteria for F+W



Idaho Rural Water Association

- Urge DEQ not to develop criteria lower than the MCL
- Support narrative criteria



US EPA Region 10

- BAF: Suggest collecting more data or evaluating in different ways
- Require more detail to evaluate tissue only
- Concern that narrative criteria would not meet requirements of Section 303(c)(2)(b) of the CWA



Draft Rule Language

Fish Only	Fish + Water
8 µg/kg fish tissue	8 µg/kg fish tissue
	MCL from Idaho Drinking Water Rules



Fish Only Exposure

- Based on modified HHC equation

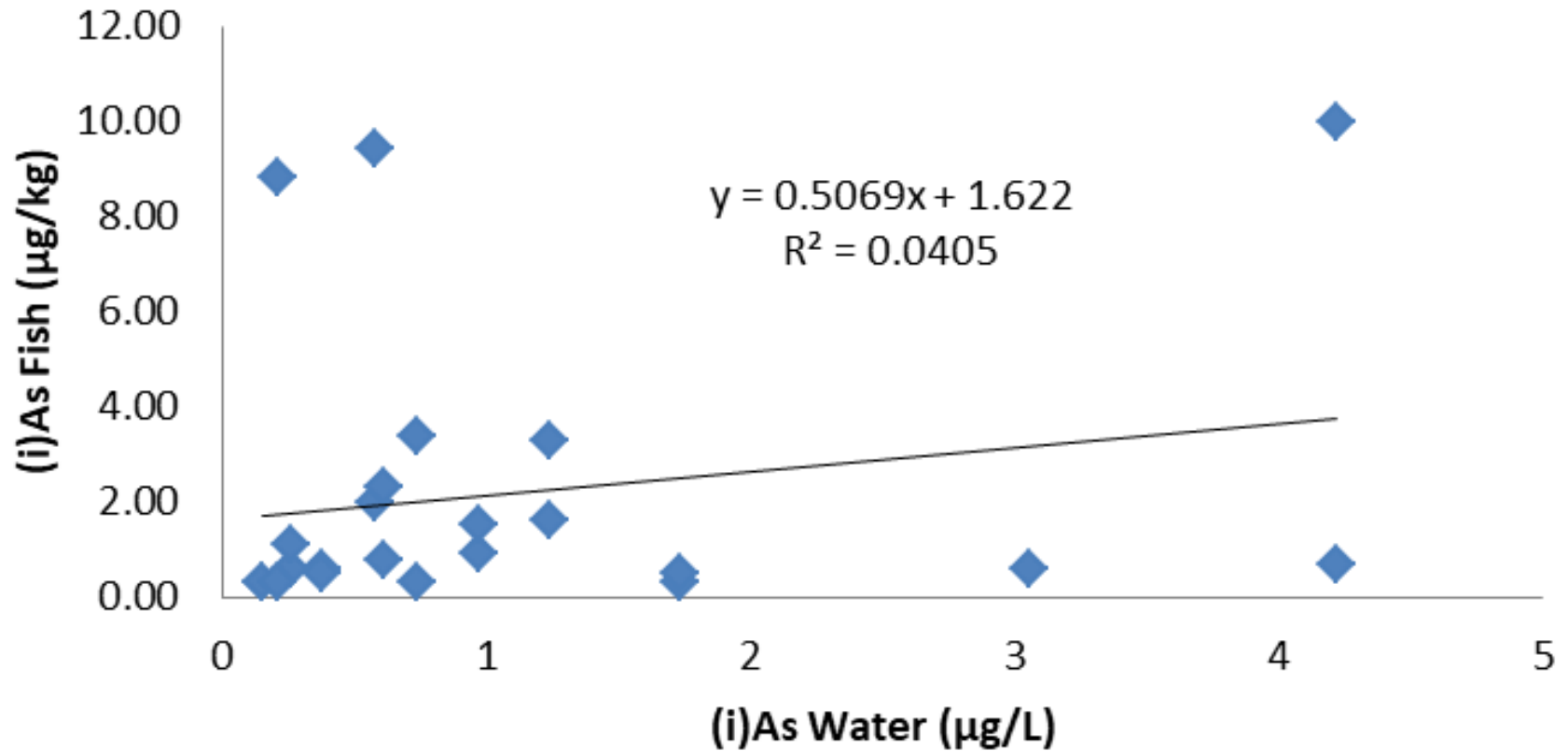
Fish tissue criteria

$$= \left(\frac{(1 \times 10^{-5})}{1.5 \text{ (mg/kg day)}^{-1}} \right) \times \left(\frac{80 \text{ kg}}{(0.0665 \text{ kg/day})} \right)$$

$$***Fish tissue criteria = 8 \mu\text{g/kg}***$$



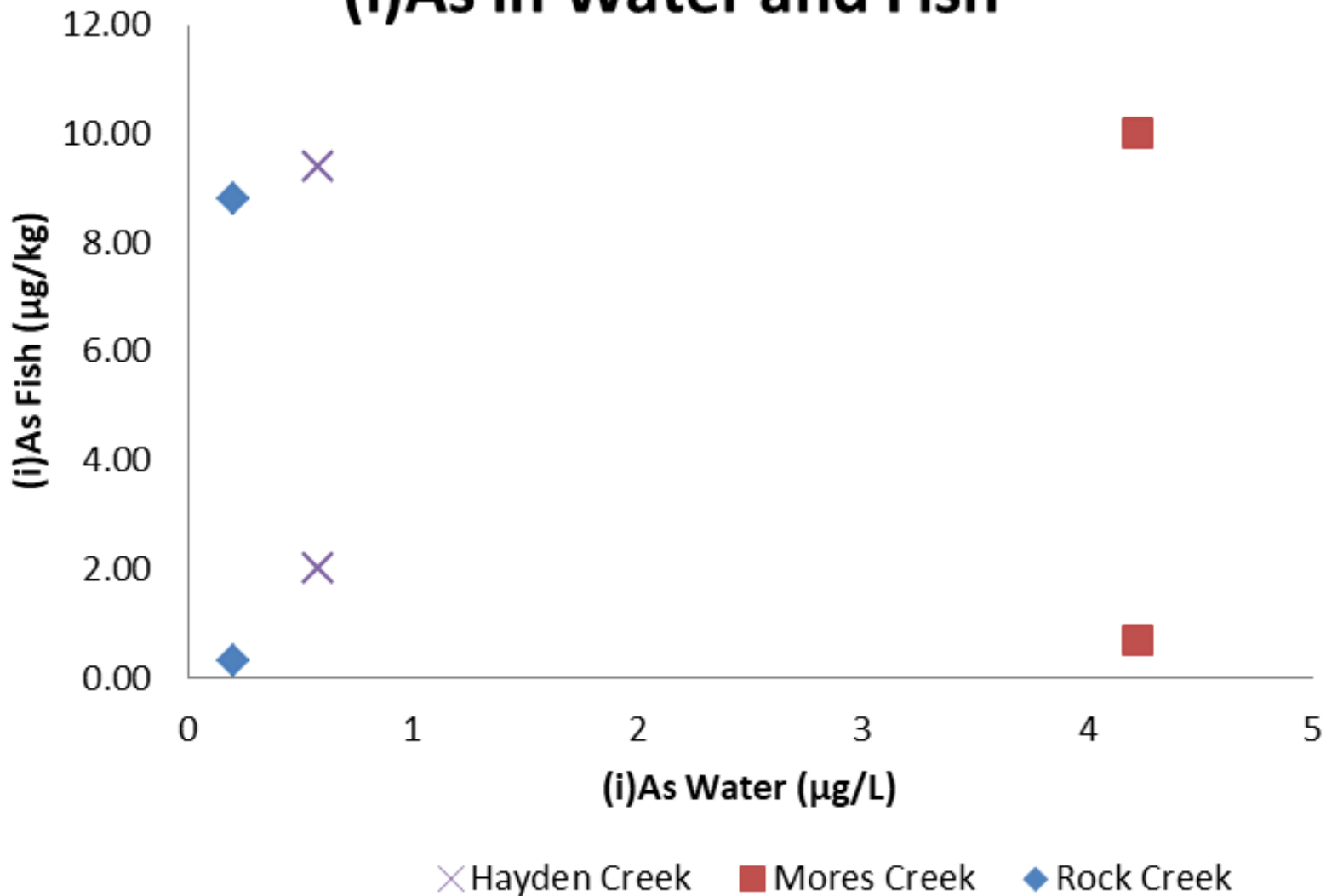
(i)As in Water and Fish



Tissue only criterion



(i)As in Water and Fish



Tissue only criterion





Fish + Water Criterion



+



Other changes...

210.05.b.ii details the procedure DEQ will use to calculate HHC.

Adding 210.05.b.iii to specify that this does not apply to arsenic



Discussion...



Next Steps

- Comments Due:
January 15, 2021
- Next Meeting:
April 22, 2021

