



J.R. Simplot Company
Simplot Headquarters
1099 W. Front Street
Boise, Idaho 83702
P.O. Box 27
Boise, Idaho 83707

March 1, 2021

SENT VIA EMAIL TO: paula.wilson@deq.idaho.gov

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

Dear Ms. Wilson:

The Department of Environmental Quality (Department), as a part of the negotiated rulemaking for revising the arsenic human health water quality criteria has published a preliminary draft rule. The J.R. Simplot Company (Simplot) has a number of business interests throughout the State of Idaho that are subject to the arsenic human health water quality criteria. Thus, these criteria will have direct impact on water discharges or remedial actions that involve Simplot.

Simplot has been extensively involved with comments submitted by the Idaho Association of Commerce and Industry, including a comprehensive August 2020 submittal that reviewed the history of arsenic water quality criteria in Idaho, the regulatory framework for these standards and conducted a thorough evaluation of data on arsenic in Idaho waters and fish. IACI will be providing to the Department a supplemental technical document that includes a literature review on the bioaccumulation of arsenic in the aquatic environment and further analysis of the Department's field studies. The totality of this work supports the direction that the Department has set in regards to the human health water quality criteria for arsenic.

The preliminary draft rule proposes the following human health water quality criteria for arsenic.

- For water and fish consumption/exposure, the water column concentration must meet the maximum contaminant level for inorganic arsenic in IDAPA 58.01.08 and the fish tissue concentration must not exceed 8 µg/kg.
- For fish only consumption/exposure, the fish tissue concentration must not exceed 8 µg/kg.

Simplot supports these proposed criteria as they are consistent with the technical findings from the extensive studies conducted by the Department and analysis of this data.

We appreciate the opportunity to provide these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'A. Prouty', with a long horizontal stroke extending to the right.

Alan L. Prouty
Vice President, Environmental & Regulatory Affairs

