



**Association of Idaho Cities**  
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February 3, 2021

Ms. Amy Williams, IPDES Rules/Guidance Supervisor  
Idaho Department of Environmental Quality  
1410 N Hilton  
Boise, ID 83706

Re: IPDES User's Guide to Permitting and Compliance Volume 6 – Sewage Sludge, 01/20/2021 Stakeholder Meeting

Dear Ms. Williams/Amy,

The Association of Idaho Cities (AIC) serves to advance the interests of the cities of Idaho through legislative advocacy, technical assistance, training, and research. Idaho cities and municipal drinking water utilities play important roles as primary providers of drinking water and implementers of the Clean Water Act. Idaho cities represent over 70% of all Idaho residents. These stakeholders have significant interests in the development of effective sludge/biosolids handling, treatment, disposal, and beneficial uses. AIC is actively engaged in sewer treatment and biosolids quality issues through the work of our IPDES Task Force.

AIC has reviewed the January 2021 draft guidance, along with comments developed and submitted by the City of Meridian. AIC submits this "Letter of Concurrence" with Meridian's comments, along with these clarifying comments on behalf of our members and Board.

Overall, AIC is supportive of how the IDEQ seeks to keep the current basic regulatory approach. This approach by the IDEQ (i.e., to keep compliance with the federal 503 regulations as simple as possible) is aligned with our cities' interests. This includes how the public participation and comments are invited for draft IPDES permits where the requirement to comply with the 503 regulations, as well as the approach outlined in Section 3.1.7 for "Exceptional Quality" materials.

AIC appreciates the opportunity to participate in the development of IPDES User's Guide to Permitting and Compliance Volume 6 and looks forward to working with our State and partners in the development of this and other IPDES guidance documents.

Sincerely,

A handwritten signature in black ink, appearing to read 'Johanna Bell', is written in a cursive style.

Johanna Bell, Policy Analyst

cc: Kelley Packer, AIC Executive Director  
Tom Jenkins, AIC President  
AIC IPDES Task Force

Attachment