



PUBLIC WORKS DEPARTMENT

MAYOR: Lauren McLean | DIRECTOR: Stephan Burgos

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Comments submitted electronically: Mary.Anne.Nelson@deq.Idaho.gov

Subject: Review Comments for Groundwater Quality Rule – Docket No. 58-0116-2501

Dear Dr. Nelson,

I am writing on behalf of the City of Boise (city) to submit comments on the Zero-Based Negotiated Rulemaking Process for the Wastewater Rules (IDAPA 58.01.16). The city appreciates the opportunity to participate in the meetings and the ability to submit comments.

1. General comment: The city acknowledges that the volume of material to be reviewed was substantial; however, we were disappointed in the inability to discuss submitted comments. To enhance future collaboration, the city suggests scheduling an additional meeting for comprehensive regulations of this nature, as stakeholders would greatly benefit from the opportunity to review and discuss the comments.
2. In rule section 410.04b(i), the term "model" implies a more sophisticated analysis than what may be necessary for some collection systems. A simple spreadsheet analysis or hand calculation analysis may be appropriate for some systems, could be calibrated or confirmed with existing flow data, and serve the public better at less cost than a commercial hydraulic model running on the latest SWMM engine. The city recommends using the word analysis instead of model.
3. 411.03.c.i.3.a and b include the following text:

*Friction losses through force mains must be based on the Hazen and Williams formula or other acceptable methods. friction losses must be evaluated for different types and ages of pipe; and
When initially installed, force mains will have a significantly higher "C" factor. The effect of the higher "C" factor must be considered in calculating maximum power requirements and duty cycle time to prevent damage to the motor. The effects of higher discharge rates on selected pumps and downstream facilities must also be considered; and...*

Age related C factor changes should be considered in large pipe model networks but for treatment facility design it seem excessive to consider when pumping several hundred feet. The city recommends leaving the consideration and analysis it up to the QLPE, rather than making it required. Or put the C factor discussion just into the Force Main section (440.09.f).

4. 411.03.c.iii. 2 and 3. The city recommends removing items 2 and 3 (operator interface and process and instrumentation diagrams, respectively) from the requirements for the PER as these are better addressed during the design phase.
5. 440.02.a. The new text added in this section regarding construction materials used for pumping station structures appears to be common knowledge and standard practice. Unless DEQ feels there is a need to include it, the city recommends removing it as it does not fit the ZBR goals.
6. 430.01. The city recommends rejecting the proposed change from "ultimate tributary population" to "buildout flow". The lift station should be designed for the flows expected during the life of the lift station. Buildout is a good long term planning tool, that could be used by the design engineer if they thought it was appropriate but shouldn't be a requirement.
7. 440.02.b(ii). The city is unclear on the need for the new text in this section that requires pump suction and discharge openings to be at least 4 inches in diameter. The city recommends that the original text be retained, at least 3 inches. The concern is that by adding such specificity to the rules, it would limit the ability to purchase the optimal equipment for the project.
8. 493.03.a. The city recommends the following revision for this section. "Lagoons must be designed and sealed such that seepage loss through the seal is as low as possible." Similar to other comments above, the rule appears to add specificity where it is not necessary.
9. 500.05.b The city recommends that the "one year's worth of UV transmittance data (4x/day) prior to the PER is required"....be changed back to "encouraged". The new requirement will increase the time to design and delay projects.

The city requests further discussion with DEQ regarding the response to the city's comment on SSOs. DEQ's simple response is that it is outside of the scope of the wastewater rule. The city's request was consistent with the scope of the ZBR process to streamline rules and provide greater flexibility in regulatory processes. The city's request would be beneficial for both permittees and DEQ and be consistent with protection of health and environment requirements. The city's request could be addressed in the wastewater rule, IPDES rules and/or guidance, or as permits are modified or reissued. The current situation related to language in the city's IPDES permits is untenable for permittees and DEQ as explained in more detail in the city's comment.

If you have any questions or concerns, please feel free to contact me at kharris@cityofboise.org or 208-867-0524.

Sincerely,

Kate Harris

