

From: [Ashley Newbry](#)
To: [Vakoc, Misha](#)
Subject: RE: Comment Period Extension: EPA Invites Public Comment through March 22nd on a Municipal Stormwater Discharge Permit for City of Lewiston and Lewis-Clark State College, in Nez Perce County, Idaho - Permit #IDS028061
Date: Wednesday, February 20, 2019 9:24:42 AM
Attachments: [image001.png](#)

Misha,

I am providing a few comments below.

I appreciated how the emphasis of this permit is to get the program up and running by developing its guidance documents. It seems like a good place to start.

3.1.5 Assessment – This would be difficult to assess, and even more difficult to quantify without baseline (pre-permit) sampling data. Even with data, stormwater quality varies so much from City to season to event, it could still be very nearly impossible to make an inference of any certainty. A detailed summary of the activity and community attitude (response) might be more achievable.

7.9 Twenty-Four Hour Notice of Noncompliance Reporting – Concerning bullet No 1, does this include discharges that are the result of regular sampling? For example, when the laboratory results are returned, and the permittee sees an excursion above the WQS, is this also subject to 24 hour Noncompliance? Or only anticipated spills/upsets/etc? I think Lee Van de Bogart brought up this issue when you visited us to discuss the MS4GP.

There is a lot of training (various audiences internal and external), reporting (facility swpps, annual reports, inspection reports), and inspection (dry weather, idde, construction, catch basins & inlets, finish SW BMP's maintenance) wrapped up in this permit. Do you anticipate that this could all be completed by one part-time employee (phase 2 municipality)? What's your vision regarding the necessary resources the City should put toward a successfully compliant permit? I don't get to decide these things for my employer, but I always wonder.

Thank you,



Ashley Newbry, PE, CFM
Project Engineer
Stormwater & Floodplain Programs
621 Cleveland Blvd
Caldwell, ID 83605
(208) 455-3006 x 4672

From: Vakoc, Misha <Vakoc.Misha@epa.gov>
Sent: Thursday, January 31, 2019 7:34 PM
To: Vakoc, Misha <Vakoc.Misha@epa.gov>
Subject: Comment Period Extension: EPA Invites Public Comment through March 22nd on a Municipal Stormwater Discharge Permit for City of Lewiston and Lewis-Clark State College, in Nez Perce County, Idaho - Permit #IDS028061

Comment Period Extension: Public Comment will now be accepted through March 22, 2019 on the draft municipal stormwater discharge permit for City of Lewiston and Lewis-Clark State College.

The Environmental Protection Agency, Region 10, has proposed to issue a National Pollutant Discharge Elimination System (NPDES) permit to City of Lewiston and Lewis-Clark State College, in Lewiston, Idaho, for discharges from their municipal separate storm sewer systems (MS4s).

The draft permit and supporting fact sheet are available for review at <https://www.epa.gov/npdes-permits/proposed-stormwater-permit-city-lewiston-and-lewis-clark-state-college-idaho>

Please pass this announcement to others who may be interested. Thank you.

Questions? Contact Misha Vakoc, EPA Region 10, at (206) 553-6650 or via email at vakoc.misha@epa.gov

*Note: You are receiving this message regarding the draft **City of Lewiston and Lewis-Clark State College (ID) MS4 Permit** because you've previously indicated interest in the EPA Region 10's municipal stormwater permitting and/or environmental justice issues in Idaho.*

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