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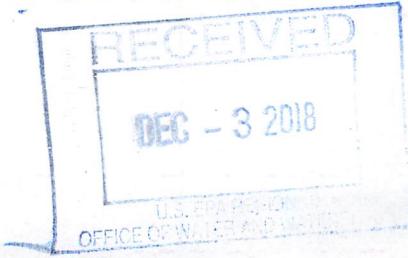
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# CITY OF *Caldwell, Idaho*

November 30, 2018



U.S. EPA Region 10  
Attn: Director, Office of Water and Watersheds  
1200 Sixth Avenue (OWW-191)  
Seattle, Washington, 98101

Dear Ms. Vakoc:

Thank you for the opportunity to comment on the draft individual NPDES permit for the City of Pocatello et. al. MS4 stormwater permit. The City of Caldwell would like to provide the following comments.

Section 2.2 – The regulatory message in this paragraph is not clear to us. Most cities do not have direct control over the snow melt water quality. Furthermore, formally designated and designed snow disposal sites are not common in Idaho. Snow is often plowed to the gutter or piled up at the corner of a parking lot. It is not feasible to collect snow from the roadway and truck it to a designated disposal location, similar to residential garbage service. Snow melt water passes through the same BMP's contained within the MS4 infrastructure as precipitation that falls as rain.

Section 2.6 – Alternative Control Measure request should be available throughout the permit term, or at a minimum, for the first year of the permit. Technology and circumstances change greatly throughout the life of the permit. Please elaborate on the rationale/advantage of only allowing 180 days to submit ACM requests.

Section 2.6.2 – This section needs to specify the magnitude of the scope. Please provide a non-exclusive list of suggested pollutant reduction activities. We are interested in better understanding the nature, scale, infrastructure, and outreach necessary to create an acceptable proposal. An appendix might be appropriate to explain or demonstrate what types of activities are acceptable.

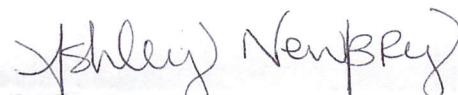
*"The Treasure of the Valley"*

Section 3.4.2 – Please demonstrate or cite how the 95% must be calculated. We disagree with any methods which propose to truncate the data set, in order to disregard Idaho precipitation events less than 0.10 inch.

Section 4.3 and 6.2.2 – The requirement to “quantify pollutant loadings from the MS4’s” into the receiving water body is, in most cases, simply not feasible. We cannot speak for the City of Pocatello, but Caldwell has over 300 outfalls, with some co-mingled with groundwater and/or irrigation water throughout the year. Imagine the resources necessary to collect the total pollutant load during one precipitation event. The idea of accurately quantifying the load from the MS4 is simply unattainable. It is understandable that EPA and DEQ would prize this type of information for regulatory purposes, especially the creation of TMDL's. Unfortunately, broad assumptions would have to be made in order to quantify such a load; we fear that such assumptions could lead to poor quality inferences made by our regulators. A better regulatory effort would be to reduce the quantity and/or improve quality of discharge from urban areas. Everyone knows that stormwater discharge is pollutant-laden; it is a more valuable effort to clean than to quantify the load.

Section 7.9 – By nature, stormwater is not necessarily clean. It picks up pollutants from the roadway. Does this section strictly refer to treatment facility bypass and the addition of harmful pollutants from sources other than automobile traffic (ie leaks, spills, failing construction BMP's)? Does this include the discharge of stormwater which may randomly achieve an e-coli hit from a neighbor not cleaning up after his dog? Furthermore, lab results may be released weeks after the storm event. In addition, the term “upset” as used in a stormwater context is unclear. Should we presume this refers to a failing or surcharged stormwater treatment mechanism?

Thank you for your consideration,



Ashley Newbry, PE  
Stormwater Program  
City of Caldwell