DO TMDL Implementation Committee Advisory Call May 12th Conference Call Minutes

Kelly Susewind reported that Ecology had discussed with their legal staff whether a TMDL amendment would be necessary for the changes in wasteload allocations proposed by the May 4, 2011 LimnoTech modeling run. Specifically, Ecology asked whether nutrient equivalency changes (less ammonia for more phosphorus for example) proposed by Spokane County could be done without amending the TMDL prior to issuing permits.

The conclusion is that the May 4 modeling run <u>does not</u> require TMDL amendments. Use of the modeling run still requires validation steps identified at the May 6th advisory committee meeting.

Dave Moore reported that IEP does want to be included in a new Alternate Seasonal Limit model. All inputs will be the same as the May 4th run except IEP will be included with a limit of 70 ug/L total phosphorus based on an extended seasonal limit (February through October).

Doug Krapas clarified that due to technical difficulties adjusting Ortho-P variable in draft permit is not expected. Enabling language to incorporate Ortho-P as a permit modification is expected. This will enable IEP to utilize sampling data from their full scale commercial system at the earliest practical time sampling allows.

The permit timeframe discussed at May 6 meeting is still on track for implementation. Ecology will e-mail committee confirming when the model run is complete and validation of the model confirmed.

The county and Idaho discharger representatives inquired as to whether EPA legal staff concurred with Ecology on use of proposed modeling. Kelly responded Ecology has touched base with EPA. Don Martin will follow-up and affirm EPA's position as soon as possible.

With no further business, the conference call was adjourned.