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November 18, 2016

US Environmental Protection Agency
Engineering and Analysis Division (4303T)
1200 Pennsylvania Avenue NW
Washington DC 20460

Attention: Docket ID No. EPA-HQ-OW-2016-0404

RE: Proposed Collection; Comment Request; Proposed Information Collection Request for the National Study of Nutrient Removal and Secondary Technologies: Publicly Owned Treatment Works (POTW) Screener Questionnaire

Dear Dr. Paul Shriner,

The Association of Idaho Cities (AIC) was founded in 1947 and is a nonpartisan, nonprofit corporation owned, organized, and operated by Idaho's city governments. The organization serves to advance the interests of the cities of Idaho through legislative advocacy, technical assistance, training, and research. Idaho cities play an important role as the primary implementers of the Clean Water Act and have a significant interest in the development of rules, guidance, and treatment technologies pertaining to nutrient removal. AIC and our member cities are actively engaged in water quality issues through the work of our Environment Committee, chaired by Boise City Councilmember Elaine Clegg.

The EPA is soliciting comments on an information collection request (ICR) for a mandatory survey, "Proposed Information Collection Request for the National Study of Nutrient Removal and Secondary Technologies: Publicly Owned Treatment Works (POTW) Screener Questionnaire" (EPA ICR No. 2553.01, OMB Control No. 2040-NEW).

Nutrients are an important water quality issue nationally that warrant further investigation and analysis, and AIC appreciates the opportunity to comment on the ICR. However, AIC believes that a mandatory national survey of all POTWs will provide information on treatment processes and nutrient removal that is currently available from existing data sources, including, but not limited to: National Pollutant Discharge Elimination System (NPDES) reapplications, permit Fact Sheets, Discharge Monitoring Reports (DMRs), and EPA's Enforcement and Compliance History Online (ECHO). NPDES permittees sign the permit reapplications and DMRs, which contain the same signatory requirements as required under section 308.

By using the existing data sources, EPA staff can develop the desired searchable database. For example, AIC notes that ECHO is searchable by the public today for NPDES, Clean

Air Act, and RCRA permitted facilities. Data extraction from existing data sources would allow the EPA to:

- (1) develop a searchable database and statistical data on the processes used by municipal and industrial point sources discharging nutrients on a nationwide basis;
- (2) identify the status of NPDES permittee nutrient monitoring and nutrient removal on a national or watershed basis (e.g., permit applications require latitude, longitude, and receiving water bodies); and,
- (3) develop a better understanding of potential low cost operational optimization actions to reduce NPDES permittee effluent nutrient levels.

AIC observes that the ICR is not necessary because EPA already has all of the data that are being requested. Further, AIC believes the ICR would be a significant and unnecessary effort by NPDES permittees. EPA should not proceed with the ICR because:

- The data EPA is proposing to have NPDES permittees submit already exist in the NPDES permit applications, NPDES permit Fact sheets, and Net Data Monitoring Reports (DMR) data reported monthly by NPDES Dischargers. The proposed ICR would be duplication of data already collected with some already housed in searchable databases (e.g. ECHO) for all NPDES dischargers.
- The signatory requirements under Section 308 are identical the signatory requirements for NPDES permit applications and DMR submittals.
- EPA can use existing data sources including, but not limited to: ECHO, State and EPA Fact Sheets, NPDES permit applications, Net DMR influent and effluent monitoring data, impaired water, EPA approved Total Maximum Daily Loads (TMDLs) for nutrients, receiving stream, and latitude and longitude information contained in Fact Sheets, Integrated Reports, EPA approved TMDLs, and permits (i.e., instead of requesting these duplicate data from NPDES permittees).

Based on these considerations, AIC does not support the ICR as proposed. Should you have questions concerning our comments, please feel free to contact me at (208) 344-8594.

Sincerely,



Seth Grigg

Executive Director

cc: Elaine Clegg, AIC Environment Committee Chair
Johanna Bell, AIC Policy Analyst