



STATE OF IDAHO  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
BOISE REGIONAL OFFICE  
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WATER RESOURCES  
WESTERN REGION

## DEQ Response to Request for Environmental Com

Date: July 5, 2007  
Agency Requesting Comments: SPF Water Engineering  
Date Request Received: June 29, 2007  
Application No: 63-32499  
Description: Goldsmith Water Right Development  
Applicant: SPF Water Engineering

Thank you for the opportunity to respond to your letter dated June 28, 2007. Based on the limited information provided on this project, we have the following comments:

### 1. Air Quality

- The Department of Environmental Quality (DEQ) proposes that if the county approves the Conditional Use Permit they also require compliance with The Rules for the Control of Air Pollution in Idaho.
- **Fugitive Dust:** According to IDAPA 58.01.01.651, "All reasonable precautions shall be taken to prevent particulate matter from becoming airborne." Based on that rule, DEQ would request that the county require development of a dust control plan by the applicant, which incorporates appropriate best management practices (BMP) to control fugitive dust that may be generated at the site. DEQ would offer technical assistance to the applicant in the development of this plan.
- **Trade Waste Burning:** According to IDAPA 58.01.01.600-617, the open burning of "trade waste" is specifically prohibited. For contractors and builders, trade waste includes materials which are generated during the course of the construction, renovation or repair of buildings. Common construction waste materials include: lumber, shingles, plywood, insulation, cardboard and plastics. Based on this rule, DEQ would request that any permit issued for construction activities include this prohibition on open burning of trade waste.

For questions contact Leonard Herr, Air Quality Manager at 373-0550.

### 2. Wastewater

- No comment as wastewater is not included in this project.  
For questions contact Mark Mason, P. E., Engineering Manager at 373-0550.

### 3. Drinking Water

- This project appears to propose a new Public Drinking Water System (PWS) and/or Supply. Per Idaho Code §39-118 and the associated Idaho Rules for Public Drinking Water Systems, all components of PWS construction, including wells and well sites, must be designed by an Idaho registered professional engineer and approved by DEQ prior to construction. We recommend that the developer and his engineer schedule a pre-design meeting with this office.
- This project proposes a new PWS. Per the Idaho Rules for Public Drinking Water Systems, the system is required to have a current facility plan approved by DEQ prior to

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submitting plans and specifications for the drinking water system for review and approval by DEQ.

- This project proposes a new PWS. Per the Idaho Rules for Public Drinking Water Systems, the system is required to have a project specific engineering report approved by DEQ prior to submitting plans and specifications for the drinking water system for review and approval by DEQ.
- This project proposes a new PWS. Per the Idaho Rules for Public Drinking Water Systems, the system is required to demonstrate technical, financial and managerial capacity. This capacity demonstration must be submitted to and approved by DEQ prior to or concurrent with submitting plans and specifications for the drinking water system for review and approval by DEQ.
- This project will serve between 2 and 9 connections. All components of water system construction, including wells, must be designed by an Idaho registered professional engineer and may need to be approved DEQ prior to construction. Refer to Idaho Code §39-118 to determine applicability of DEQ design review. We recommend that you contact our office directly for each new water system at 373-0550.
- If the PWS will be used to provide water for fire suppression, contact the local authorities for fire flow requirements. Please note that any fire flow requirements are in addition to domestic requirements.

For questions contact Tiffany Floyd, Drinking Water Manager at 373-0550.

#### **4. Surface Water**

- If the project will involve de-watering of groundwater during excavation, treatment of any discharges from this process will be needed to prevent excessive sediment and turbidity from entering surface water. If the project disturbs more than one acre, a stormwater permit from the U.S. EPA may also be needed.

- **Construction Storm Water**

The Clean Water Act requires operators of construction sites to obtain permit coverage to discharge storm water to a water body or to a municipal storm sewer. In Idaho, EPA has issued a general permit for storm water discharges from construction sites. In the past storm water was treated as a non-point source of pollutants. However, because storm water can be managed on site through management practices or when discharged through a discrete conveyance such as a storm sewer, it now requires a National Pollution Discharge Elimination System (NPDES) Permit.

a) **The Construction General Permit (CGP)**

If a construction project disturbs more than one acre of land (or is part of larger common development) that will disturb more than one acre), the operator is required to apply for permit coverage from EPA after developing a site-specific Storm Water Pollution Prevention Plan.

b) **Storm Water Pollution Prevention Plan (SWPPP)**

To obtain the Construction General Permit, operators must develop a site-specific Storm Water Pollution Prevention Plan. The operator must document the erosion, sediment, and pollution controls they intend to use, inspect the controls periodically and maintain the best management practices (BMPs) through the life of the project.

For questions contact Craig Shepard, Water Quality Manager at 373-0550.

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### **5. Hazardous Waste And Ground Water Contamination**

- Comment: No trash or other solid waste should be buried, burned or otherwise disposed at the site. These disposal methods are regulated by various state regulations including Idaho's Solid Waste Management Regulations and Standards, Rules and Regulations for Hazardous Waste, and Rules and Regulations for the Prevention of Air Pollution.
- **Ground Water Contamination.** DEQ requests that this project will comply with Idaho's Ground Water Quality Rules. IDAPA 58.01.11.400.01 Ground Water Contamination Rule states that, "Releases, Degrading Ground Water Quality: No person shall cause or allow the release, spilling, leaking, emission, discharge, escape, leaching or disposal of a contaminant into the environment in a manner that:
  - a. Causes a groundwater quality standard to be exceeded;
  - b. Injures a beneficial use of ground water; or
  - c. Is not in accordance with a permit, consent order or applicable best management practice, best available method or best practical method.

For questions contact Ron Lane, Remediation Manager at 373-0550.

### **6. Additional Notes**

- Please contact and coordinate with the local fire authority **and** State Fire Marshall for fire code requirements.

We look forward to working with you in a proactive manner to address potential environmental impacts that may be within our regulatory authority. Please contact me or any technical staff at 208-373-0550, if you have any questions.

Sincerely,



Tiffany Floyd  
Assistant Regional Administrator  
Boise Regional Office

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cc: File 24, Manager's File, Reading File