

## Boe, Erik

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**From:** Boe, Erik  
**Sent:** Tuesday, July 18, 2023 3:12 PM  
**To:** Boe, Erik  
**Subject:** FW: Public Comments RE: Negotiated Rulemaking, IDAPA 37.03.03

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**From:** Will Tiedemann <[wtiedemann@idahoconservation.org](mailto:wtiedemann@idahoconservation.org)>  
**Sent:** Thursday, June 22, 2023 10:19 AM  
**To:** RulesInfo <[rulesinfo@idwr.idaho.gov](mailto:rulesinfo@idwr.idaho.gov)>  
**Subject:** Public Comments RE: Negotiated Rulemaking, IDAPA 37.03.03

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Hello,

In regards to the ongoing ZBR negotiated rulemaking for IDAPA 37.03.03, I'd like to submit the following comments:

Under the current "Strawman Rev2" proposed version of the rules Section 052.06.b states:

**Deep Injection Wells.** *Recycled municipal wastewater or recycled industrial wastewater shall meet or exceed ground water quality standards and comply with IDAPA 58.01.17 (Recycled Water Rules) prior to injecting into a deep injection well. Additionally, the concentration of each contaminant in the injected fluids shall not exceed the concentration of each contaminant in the receiving water that is likely to reach a USDW.*

I proposes the following modified language:

**Deep Injection Wells.** *Recycled municipal wastewater or recycled industrial wastewater shall meet or exceed ground water quality standards and comply with IDAPA 58.01.17 (Recycled Water Rules) prior to injecting into a deep injection well. Additionally, the concentration of each contaminant in the injected fluids shall not exceed the background concentration of each contaminant in the receiving water that is likely to reach a USDW. The background concentration of any applicable contaminant shall be determined by a statistical analysis consisting of a type and method deemed appropriate by the Department.*



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