



CITY OF *Caldwell, Idaho*

GARRET NANCOLAS
Mayor

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SALVADOR ARREOLA
Wastewater Superintendent

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Treatment Plant
208 Johnson Lane
Caldwell, Idaho 83605

US EPA Region 10
Attn: NPDES Permits Unit Manager
1200 Sixth Ave., Suite 900
OWW-191
Seattle, WA 98101-3140

December 20, 2016

Request for increased Minimum Levels (MLs)

To Whom it may Concern,

Currently the City of Caldwell (NPDES #ID0021504) has performed the bolded parameters in the table below at a Minimum Detection Limit (MDL) above the Minimum Limit (ML) listed in the permit. After becoming aware of this issue today, the City contacted the contract laboratory performing the analyses to inquire if lower level testing is feasible, however in most cases it is not. For those cases where it is feasible, arrangements have been made to run the analyses at the lower MDL or at another laboratory.

The City contracts the following laboratory to complete these analyses:
Analytical Laboratories, Inc.
1804 N. 33rd St.
Boise, ID 83703

Parameter	ALI's MDL	Permit ML
Arsenic, Total	2 ug/L	0.5 ug/l
BOD	3 mg/L	2 mg/L
Chlorine, Total Residual	100 ug/L	50.0 ug/L
Hardness	5000 ug/L	200 ug/L
Molybdenum	1 ug/L	0.5 ug/L
Phosphorus, Total	50 ug/L	10 ug/L
Cadmium, Total	0.5 ug/L	0.1 ug/L
Chromium, Total	2 ug/L	1.0 ug/L
Copper, Total	5 ug/L	2 ug/L
Lead, Total	1 ug/L	0.16 ug/L
Nickel, Total	5	0.5
Silver, Total	2	0.2
Zinc, Total	5	2.5

All other MDLs are the same as or below the permit-required MLs.

Due to cost, holding time, or delivery complication considerations, we request that the EPA raise the City's ML limits to match the MDLs above so that we can continue to conduct our lab analyses within the state and in a cost-effective manner. Please let us know the EPA's decision and any next steps the City should take.

Sincerely,

Salvador Arreola, Wastewater Superintendent