

**U.S. Environmental Protection Agency  
Region 10**

**Response to Comments  
City of Craigmont  
Permit No. ID-002128-8**

**Background**

On June 24, 2004, EPA proposed to reissue the National Pollutant Discharge Elimination System (NPDES) Permit for the City of Craigmont wastewater treatment facility. The Public Notice of the draft permit initiated a public comment period which expired on July 23, 2004. The EPA received comments on the draft permit from the City of Craigmont.

This document summarizes significant comments received on the draft permit, and EPA's response to the comments. The document provides a record of the basis for changes made from the draft permit to the final permit. The Fact Sheet that accompanied the draft permit was not revised because it is already a final document that provides a basis for the draft permit.

**Comment 1**

The chlorine effluent limits in the draft permit are more stringent than the limits in the current permit. The current permit has a chlorine limitation of 2.0 mg/L. Significant upgrades to the City's wastewater treatment plant's disinfection system will be required to meet the new limits. The City requests three years from the effective date of the permit to come into compliance with the new limits.

**Response 1**

A three-year compliance was provided in the permit to allow adequate time for any necessary treatment plant modifications to meet the limits. See permit Table 1 (Note 4) and Section I.B Chlorine Schedule of Compliance. In the interim, a technology-based average monthly chlorine limit of 0.5 mg/L is established in the permit. The derivation of this technology-based limit was provided in the Fact Sheet. In reviewing chlorine effluent monitoring data for the facility, the facility should have no problem meeting the interim limit of 0.5 mg/L.

Permit Modifications: Section I.B *Chlorine Schedule of Compliance* is added. Section II.J *Compliance Schedules* is added. Table 1 *Effluent Limitations and Monitoring Requirements* is modified to include Note 4 regarding the chlorine compliance schedule.

**Comment 2**

The City requested a one-year compliance schedule to come into compliance with the TSS effluent and percent removal requirements. The City has never monitored for TSS percent removal, but anticipates difficulty in meeting the required 65% removal because of high inflow/infiltration (I/I) in the system. The previous permit had TSS effluent limits of 70/105 mg/L (average monthly/average weekly). The facility's current average effluent concentration

is 48 mg/L. The City believes that most of the problems with high effluent TSS levels due to high I/I. The City is working to reduce I/I.

**Response 2**

The EPA cannot include a compliance schedule in the permit for the TSS limitations because the regulations (40 CFR § 122.47) do not allow compliance schedules for technology-based effluent limits. The TSS effluent limits in the permit are “Treatment Equivalent to Secondary” limits. Information on Treatment Equivalent to Secondary limits was provided in the Fact Sheet (Appendix B). These are the least stringent TSS limits available for the facility. The EPA recognizes the City’s efforts to reduce I/I in the collection system and encourages them to continue with these efforts.

Permit Modification: None