

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

**Response to Comments
City of Parma
Permit No. ID-002177-6**

Background

On December 18, 2003, EPA proposed to reissue the National Pollutant Discharge Elimination System (NPDES) Permit for the City of Parma wastewater treatment facility. The Public Notice of the draft permit initiated a public comment period which expired on February 2, 2004. The EPA received comments on the draft permit from Mayor Bob Flowers on behalf of the City of Parma and Craig Shepard from the Idaho Department of Environmental Quality (IDEQ).

This document summarizes the 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 effluent composition from the wastewater treatment lagoon system is not subject to short term fluctuation and the change in an 8 hour period is not sufficient to justify taking an 8-hour composite sample. The City requests that the sample type be changed to grab.

Response 1

The EPA agrees, Table 1 of the final permit has been revised to require grab samples rather than 8-hour composite samples.

Comment 2

Table 2 requires the City to take surface water samples during the entire life of the permit. The city believes that monitoring should occur for one year so that 4 samples of temperature, pH, dissolved oxygen, total phosphorus and ammonia are taken. The city believes that it is unnecessary to require quarterly testing for 5 years because of the frequency that the stream is being sampled by other agencies.

IDEQ agreed with the City's comment as it pertained to total phosphorus and stated that surface water monitoring for total phosphorus does not have to be monitored for more than 1 year.

Response 2

The surface water sampling results will be used to evaluate the need for ammonia effluent limits during development of the next permit, as well as for TMDL development. A minimum of 12 surface water samples is required to minimally characterize the surface water. The sampling frequency (i.e. quarterly) in the final permit is unchanged. However, Section I.B of the permit has been modified to reduce phosphorus monitoring to one year and require three years of monitoring for temperature, pH, dissolved oxygen, and total ammonia.