

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

**Response to Comments  
City of Cambridge  
Permit No. ID-001280-6**

**Background**

On June 24, 2004, EPA proposed to reissue the National Pollutant Discharge Elimination System (NPDES) Permit for the City of Cambridge 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 Holladay Engineering Company on behalf of the City of Cambridge.

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 Cambridge Sewer Association no longer exists. The responsible party for the wastewater collection and treatment facility is the City of Cambridge. The City requests that the permit be modified accordingly.

**Response 1**

The EPA agrees. The cover page of the permit has been revised to refer to the City of Cambridge as the permittee.

**Comment 2**

The comment requested grab samples for BOD<sub>5</sub>, TSS, total ammonia, and phosphorus instead of 8-hour composites. The effluent quality from the lagoon system does not warrant 8-hour composite samples.

**Response 2**

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

**Comment 3**

An effluent pH range of 6.5 to 10.0 should be allowed, instead of the range of 6.5 to 9.0 in the draft permit. IDEQ granted the City a pH variance on May 30, 2000. The effluent pH exceeds 9.0 a number of times per year.

### **Response 3**

For a variance to be in effect for the NPDES permit, the EPA would have had to approve it; the EPA never approved of a pH variance for the City. In the absence of a mixing zone, the effluent must meet the pH range of 6.5 to 9.0. The City may consider gathering sufficient pH, temperature, and alkalinity data for the effluent and receiving water for consideration of a mixing zone for pH in the next permit.

### **Comment 4**

The City requested until January 2008 to come into compliance with the water quality based effluent limits for chlorine. The City also requested an interim limit of 2.0 mg/L.

### **Response 4**

The EPA agrees that a compliance schedule to meet the chlorine limits is warranted. In their 401 Certification, Idaho Department of Environmental Quality has provided a compliance schedule for the final chlorine limitations to allow adequate time for any necessary treatment plant modifications to meet the limits. The final limits must be met by January 1, 2008. 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. A review of the facility's chlorine effluent monitoring data, indicates that the facility should not have a problem meeting the interim limit.

Permit Modification: 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 3 regarding the chlorine compliance schedule.

### **Comment 5**

The City requested that the schedules for the Operation and Maintenance Plan and Quality Assurance Plan be extended to 270 days to allow sufficient preparation time.

### **Response 5**

To allow the City additional time to develop the Operation and Maintenance Plan and Quality Assurance Plan, the permit has been revised to require the documents to be developed and implemented within 270 days of the effective date of the permit.

Final Permit Revision: Sections I.D. (Operation and Maintenance Plan) and I.E. (Quality Assurance Requirements) of the permit revised accordingly.

### **Comment 6**

The City requested less stringent percent removal requirements for BOD<sub>5</sub> during high flows. The City anticipates difficulty in meeting the 85% removal requirements because of dilute influent. The City is undertaking efforts to replace old or deteriorated lines to reduce the inflow and infiltration into the system, but in the interim is requesting a reduced percent removal.

**Response 6**

The EPA disagrees. As presented in the fact sheet, a lower percent removal limit for BOD was not provided in the permit, because it appears that the less concentrated influent may be the result of excessive I/I. In accordance with 40 CFR § 133.103 (d), the EPA is authorized to substitute a lower percent removal requirement if the permittee satisfactorily demonstrates that the less concentrated influent wastewater is not the result of excessive I/I. The permittee has not demonstrated this. The EPA recommends that the City continue their efforts to analyze their collection system and remove excessive I/I.