

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

**Response to Comments
City of Lewiston Water Treatment Plant
NPDES Permit No. ID-0026531**

Background

On June 22, 2006, EPA proposed to reissue/issue the National Pollutant Discharge Elimination System (NPDES) Permits for nine water treatment plants in Idaho:

City of Bonners Ferry Water Treatment Plant	ID-0020451
City of Sandpoint Sand Creek Water Treatment Plant	ID-0024350
Laclede Water District Water Treatment Plant	ID-0027944
City of Lewiston Water Treatment Plant	ID-0026531
City of Pierce Water Treatment Plant	ID-0020893
City of Orofino Water Treatment Plant	ID-0001058
Riverside Independent Water District Water Treatment Plant	ID-0021237
City of Weiser Water Treatment Plant	ID-0001155
Wilderness Ranch Water Treatment Plant	ID-0028312

The Public Notice of the draft individual permits initiated a public comment period which was initially scheduled to expire on July 21, 2006. The public comment documents included one fact sheet which provided the basis for the conditions in the draft individual permits. Based on interest and concerns with the permits, the public comment permit was extended to August 5, 2006.

This document summarizes significant comments received on the City of Lewiston permit. 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. Comments specific to the City of Lewiston permit were received from David Six and Vernon Guest of the City of Lewiston and Jerry Shaffer of Idaho Department of Environmental Quality (IDEQ).

Comment

The City commented that sampling for specific metals such as beryllium and mercury seem to have no significance in the watershed and requested that sampling for these metals be deleted from the permit. Other comments were received from the City of Sandpoint, the City of Weiser, and the City of Bonners Ferry, on their individual water treatment plant permits, regarding metals monitoring. EPA has determined that these comments apply to the permit for the City of Lewiston facility as well, because of the similarity of the water treatment plant operations which resulted in similar draft permit conditions and limitations. Concern with the metals monitoring was that the monitoring requirement was onerous and the analysis was costly. Analysis was

unnecessary if the particular metal was not added during the treatment process. In addition, the finished water is already tested for metals.

Response

The City did not provide sufficient argument to remove beryllium from the monitoring requirements. However, based on the City’s comments and those of the other water treatment plant permittees, the permit is revised to remove analysis for mercury and to substitute total chromium for chromium III and VI.

EPA disagrees that the metals monitoring requirement is onerous. The permit requires a total of three samples: one sample per year for three years. Three samples is the minimum that EPA believes is necessary to characterize the effluent.

The EPA disagrees that the information is unnecessary. The purpose of this sampling is to characterize the metal concentrations in the wastestream from the water treatment plant. This information will be used to determine whether the discharge has the reasonable potential to cause or contribute to an excursion of water quality criteria for metals in the receiving water. EPA must assure that the discharge of the wastestream from the water treatment process does not exceed water quality criteria in the receiving water. The coagulation filtration process removes any trace metals that may be in the source water. As a result, the wastewater may contain elevated concentrations of metals. Studies have shown increased metals concentrations in spent filter backwash when compared to raw water samples (Filter Backwash Recycling Rule Technical Guidance Manual (EPA 816-R-02-014, December 2002). EPA does not have existing data on the levels of metals in the wastestream. Concentrations vary from plant to plant. EPA will review the monitoring data during development of the next permit and determine if limits and/or monitoring for additional parameters are necessary. Note that analytical costs can vary, but an assessment indicates the analytical cost for the total remaining twelve metals to be about \$120 to \$180.

Comment

The City commented that composite sampling would be difficult since the facility discharges intermittently.

Response

The EPA agrees. The sample type for these parameters was revised to be “grab” instead of “composite.” The EPA believes that the grab sample will be representative of the discharge and will be more appropriate given the intermittent nature of the discharge.

Comment

The City commented that the sampling requirement and permit conditions should be specific for the individual facilities and looked at independently.

Response

The EPA concurs with this comment; however no revisions are made to the permit based on the comment. The EPA did look at facility and receiving water in developing the permit conditions. Several of the permit conditions are the same for the individual water treatment plant permits because of the similarity of the water treatment plant operations and effluent characteristics.

Comment

Comments were received from the City of Orofino, the Riverside Independent Water District, the City of Sandpoint, the City of Lewiston, and the City of Pierce, on their individual water treatment plant permits, regarding flow monitoring. EPA has determined that these comments apply to the permit for the City of Lewiston facility as well, because of the similarity of the water treatment plant operations which resulted in similar draft permit conditions and limitations. The permittees commented that flow monitoring should be calculated based on plant operations instead of continuous monitoring.

Response

The EPA agrees. Flow monitoring in Table 1 of the permit is revised to be estimated based on plant operation, instead of continuous monitoring. Water treatment plant operators track water balance through the treatment plant as part of treated water production. Basing the flow on these values is sufficient for the NPDES permit, and does not warrant a metering device on the effluent discharge.

Comment

IDEQ commented that ambient sampling for turbidity is unnecessary. The drinking water treatment plants that use surface water, monitor for upstream turbidity on a daily basis and report these values to IDEQ in a monthly report. It would be redundant and provide no additional information to require the systems to monitor upstream turbidities as part of the permit.

Response

The EPA agrees. Ambient sampling for turbidity is removed (Section I.C of the draft permit).