

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

**Response to Comments
Fenn Ranger Station (Permit No. ID 002071-1)**

Background

On May 29, 2003, EPA proposed to reissue the National Pollutant Discharge Elimination System (NPDES) Permit for the Fenn Ranger Station Wastewater Treatment Plant (WWTP). The Public Notice of the draft permit initiated a 30-day public comment period which expired on June 27, 2003. The EPA received comments on the draft permit from Bruce E. Bernhardt of the United States Department of Agriculture, Forest Service (USFS). No other comments were received.

This document summarizes the comments received on the draft permit, and EPA's responses to the comments. The document provides a record of the basis for changes to the draft permit to produce 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

The USFS requested that the testing and monitoring requirements in the draft permit be reduced because the required costs and time associated with sampling, transportation of samples, and analysis is excessively burdensome to the small system. Specific requests included:

- E. coli Sampling
E. coli sampling frequency be changed from 5/month to 1/month.
- Surface Water Sampling
Reduced testing and monitoring requirements for the surface water sampling.
- Effluent Ammonia Sampling
Reduced testing and monitoring requirements for the effluent sampling of ammonia.

Response

Responses to USFS comments on E. coli, surface water, and effluent ammonia sampling:

- E. coli Sampling
The EPA disagrees. The requirement that the permittee sample 5 times per month is a stipulation of the Idaho Water Quality Standards (58.01.02). Section 251 *Surface Water*

Quality Criteria For Recreation Use Designations requires that waters designated for primary contact recreation not contain E. coli bacteria in concentrations exceeding “a geometric mean of 126/100 ml based on a minimum of five samples taken every 3-5 days over a 30 day period.” An NPDES permit must ensure that the discharge from the facility complies with the State water quality standards. Therefore, the monitoring frequency of 5 samples per month is incorporated into the permit.

Final Permit Modification: None

- Surface Water Sampling

The EPA agrees. The surface water sampling results will be used to evaluate the need for effluent limits during development of the next permit. Reducing the number of surface water samples from 16 samples to 12 samples will provide the minimum number of samples that the EPA considers necessary to characterize the surface water. Note that it is to the permittee’s benefit to adequately characterize the receiving water when evaluating the need for effluent limits. The permittee has the option of taking more samples than are required under the permit.

Final Permit Modification: Section I.B.4 of the final permit has been revised to reduce the duration of the quarterly surface water monitoring from four years to three years. A minimum of 12 samples must be collected during the permit cycle.

- Effluent Ammonia Sampling

The EPA disagrees. The permit requires monthly effluent ammonia sampling for one year. The EPA considers this the minimum sampling effort to characterize ammonia concentrations in the effluent. These data will be used to evaluate the need for ammonia effluent limits during development of the next permit.

Final Permit Modification: None