

November 21, 2001

Response to Comments

Draft NPDES Permit for:
City of Priest River
Wastewater Treatment Facility
NPDES No.: ID-002080-0

On May 2, 2001, the Environmental Protection Agency (EPA) issued a draft National Pollutant Discharge Elimination System (NPDES) permit to the City of Priest River for the discharge from a wastewater treatment facility. The City of Priest River owns and operates the facility which treats domestic sewage from local residents and commercial establishments. Following treatment the effluent is discharged to the Pend Oreille River. The public comment period for the draft permit extended thirty days from May 2 to June 1, 2001.

Esvelt Environmental Engineering (Esvelt) was the only party to submit comments on the proposed action. Esvelt requested changes to the draft permit on behalf of the City of Priest River. The comments were transmitted via a letter from Larry A. Esvelt, to Mike Lidgard, US EPA, dated May 30, 2001. This document represents EPA's response to the comments received.

On July 26, 2001, EPA received a final certification from the State of Idaho pursuant to the provisions of Section 401 of the Clean Water Act. The Section 401 certification finds that if the facility complies with the terms and conditions imposed by the permit, there is reasonable assurance that the discharge will comply with Idaho Water Quality Standards and Wastewater Treatment Requirements (Idaho standards). This certification was provided in a letter to Mr. Robert Robichaud, EPA, from Mr. Gwen P. Fransen, Regional Administrator, Idaho Department of Environmental Quality, Coeur d'Alene.

Comment 1. Esvelt commented that requirements for both fecal coliform and E. coli bacteria appears to require an excessive amount of monitoring and practice for two separate test procedures. Esvelt request that limitations be for either fecal coliform or E. coli bacteria, and that monitoring be required for only one of the parameters.

Response. As discussed further in the 401 certification letter, the Idaho Department of Environmental Quality (IDEQ) believes that both the E.coli and fecal coliform limitations provide approximately equivalent levels of protection. Therefore, IDEQ will interpret the E.coli limitation as a surrogate for fecal coliform for the purposes of evaluating compliance with Idaho standards. As a result of this interpretation, the fecal coliform limitation in the permit is redundant and has been removed from the final permit. IDEQ request that E.coli limitations be retained in the final permit as proposed with a sampling frequency of five (5) samples taken every three (3) to five (5) days over a thirty (30) day period as required by the standards. EPA has included the E.coli limitation as proposed in the final permit.

Comment 2. Esvelt commented that continuous temperature monitoring equipment was not included in the recently approved contract and not installed during the recent treatment plant upgrade project. Esvelt request that temperature monitoring be by grab sample, collected daily 5 days per week.

Response. In light of the comment EPA agrees to modify the temperature monitoring requirement of the final permit as suggested.

Comment 3. Esvelt provided additional description of conditions under which outfall 002 will be operational. Treated effluent will only be discharged from outfall 002 when the receiving water is at the elevation predicted for the 100-year return interval flood flow and discharge is at approximately maximum monthly average design flow. It is anticipated that discharge through this outfall will occur only on a frequency of annually or less. Effluent quality through outfall 002 will be the same as outfall 001 since the diversion follows all treatment processes. Monitoring also takes place prior to the diversion. Esvelt, therefore, request that the requirement for flow recording of the discharge through outfall 002 be eliminated. Esvelt suggest that if necessary, a notation that the discharge has occurred through outfall 002 be included in the permit.

Response. Since flow and effluent quality monitoring takes place prior to the diversion, flow and total loading reported under the primary discharge, Outfall 001, will represent total flow from the facility. A footnote will be added to the permit to explain that Outfall 001 loadings and flow represent the combination of both outfalls. Flow monitoring and loading requirements for Outfall 002 will be removed from the final permit as suggested. The permit will require the permittee to report the number of days that Outfall 002 is utilized each month. Outfall 002 will also be required to meet the same effluent concentration limitations required of Outfall 001.