

November 21, 2001

Response to Comments

Draft NPDES Permit for:  
Avista Utilities  
Cabinet Gorge Power Station  
NPDES No.: ID-002799-5

On May 2, 2001, the Environmental Protection Agency (EPA) issued a draft National Pollutant Discharge Elimination System (NPDES) permit to the Cabinet Gorge Power Station which is operated by Avista Utilities. The facility is located approximately 7.5 miles east of Clark Fork, Idaho. The draft permit authorizes a discharge from a small package plant, which is located at the power station, to the Clark Fork River. The package plant provides secondary treatment of sanitary wastewater from restrooms used by employees and temporary contractors. The public comment period for the draft permit extended thirty days from May 2 to June 1, 2001.

The facility operator was the only party to provide comments on the proposed action. The comments were transmitted via a letter from Kevin Booth, Environmental Compliance Coordinator, Avista Utilities, to Randall Smith, Director, Office of Water, EPA Region 10, dated May 22, 2001. This document represents EPA's response to the comments received.

*Comment 1.* Avista Utilities commented that the sampling frequency for E. Coli Bacteria of five times per month is neither practical nor necessary given the distance of the Cabinet Gorge Power Station to the nearest certified laboratory that can perform the test and the extremely small discharge from this plant. Avista requests that the sampling frequency be changed to one time per month. Avista believes the suggested sampling frequency will provide high-quality, representative information for this discharge.

*Response.* EPA agrees with the comment and will reduce sampling for E. Coli to once per month, however, both the monthly and daily E. Coli limitations will be retained in the permit as required by Idaho water quality standards. If the permittee samples E. Coli more than once during the month, a geometric mean shall be calculated in order to determine compliance with the monthly limitation. EPA believes that a sampling frequency of once per month is appropriate given the average discharge from this facility is 224 gallons per day and the receiving water low flow used in the permit evaluation is 4,500 cubic feet per second.

*Comment 2.* Avista Utilities commented that the sampling frequency for pH and Total Residual Chlorine of once per day is not necessary given the lack of variation in discharge nor is it practicable given the staffing schedule at the facility. In addition, the batch basis of the discharge makes obtaining a daily sample difficult. Avista requests that the sampling frequency be changed to four times per month. Avista believes the suggested sampling frequency will provide high-quality, representative information for this discharge.

*Response.* EPA agrees that sampling less frequently than daily is appropriate since the average discharge from this facility is 224 gallons per day and the receiving water low flow used in the permit evaluation is 4,500 cubic feet per second. Four samples per month, as suggested in the comment, is a reasonable frequency for pH and total residual chlorine and will be incorporated into the final permit. In order to assure the four samples are integrated throughout the month, EPA will require sampling be conducted once per week.