



RESPONSE TO COMMENTS

City of Soldotna Wastewater Treatment Facility
NPDES Permit No. AK-002003-6

On April 4, 2000, EPA published a draft permit for this facility along with a fact sheet explaining the basis for conditions in the permit. Only the City submitted comments. Following are the comments submitted by the City and EPA's response to those comments.

- Comment:** Because of concerns that winter weather may prevent delays in whole effluent toxicity (WET) testing, the City requests that the proposed January 2003 testing date be moved up to September 2002.

Response: EPA understands that severe weather can cause delays in shipping the effluent samples to the WET testing laboratory in Oregon. However, EPA proposed the dates in an effort to collect samples in different seasons. The date for the final WET test has been changed in the permit to November 2002 instead of January 2003.
- Comment:** During a fall 1999 meeting with the City, the permit writer stated that for statistical purposes, 10 samples were required for monitoring. The City requests that the monitoring for copper, zinc, ammonia, pH, and temperature be reduced to 10 samples from the proposed 12.

Response: Ten samples are the minimum amount of samples necessary in order to calculate a facility-specific coefficient of variation (CV). A facility-specific CV allows any needs for permit limits to be based on actual data, rather than statistical assumptions. The *Technical Support Document for Water Quality-based Toxics Control (TSD)*, EPA's guidance for water quality-based effluent limitation development, recommends that at least a year's worth of data be collected when characterizing the effluent. Since the City has already collected some of this data, EPA believes that it is reasonable to reduce the amount of new samples needed to 10. The permit has been revised to require that only 10 samples of each of the parameters be collected.

3. **Comment:** Receiving water sampling is scheduled for “once per month during May - October and twice during the remainder of the year, October 1 - April 30.” This overlap is confusing and the City requests that monthly monitoring be eliminated in October and that October be included in the remainder of the year testing. The City also requests that, for safety considerations, EPA realize sampling will be conducted when the river is either ice-free or the ice cover is stable enough to allow sampling crews on the river.

Response: The period “October 1 - April 30” was a typographical error and has been corrected to “November 1 - April 30.” In addition, this period was specified by the Alaska Department of Environmental Conservation (ADEC) in its certification, dated June 19, 2000. By not specifying exactly when during the remainder of the year that sampling is required, EPA has left the City the discretion to carry out the sampling when it is safe to do so.

4. **Comment:** The City requests clarification on what results would be necessary to warrant reducing receiving water sampling for copper, zinc, hardness, and alkalinity to twice a year from the proposed schedule in the permit.

Response: EPA re-evaluated the sampling schedule and the need for current data for future permit reissuance. As a result, the permit has been revised to require sampling once every two months during the period May 1 - October 31 until ten samples have been collected. After ten samples have been collected, then monitoring shall be reduced to twice a year, once during the period of May 1 - October 31, and again during the period of November 1 - April 30, until June 29, 2005.

5. **Comment:** The City requests that the reporting requirement that ADEC be notified whenever there is an increase of 10 percent of flow based on the previous 12 months of data since it was not included in the preliminary certification submitted by ADEC.

Response: ADEC included this condition originally since the mixing zone granted is based on the information submitted by the City. If the information changes significantly, ADEC may need to adjust the mixing zone. ADEC certified a higher flow capacity (1.08 mgd) in this case to replace the notification requirement. The permit has been revised accordingly.

6. **Comment:** The draft permit requires sampling of influent flows before addition of recirculation flows. Based on current plant design, it is not possible to meet this condition.

Response: This condition is usually included where a city has a pretreatment program and it is necessary to know all significant flows when evaluating the need for local limits. Since that is not the case with the City of Soldotna, EPA has revised the permit to remove this condition.