

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

**Response to Comments  
City of Elk River (ID-002036-2)**

**Background**

On September 18, 2003, EPA proposed to reissue the National Pollutant Discharge Elimination System (NPDES) Permit for the City of Elk River wastewater treatment facility. The Public Notice of the draft permit initiated a public comment period which expired on October 27, 2003. The EPA received comments on the draft permit from the City of Elk River. No other comments were received.

This document summarizes the comments received on the draft permit, and EPA's response to the comments. 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.

**Comment 1**

The chlorine effluent limits in the draft permit are more stringent than the limits in the current permit. The current permit has a chlorine limitation of 2.0 mg/L. In order to meet the new limitations the City will need a compliance schedule to make the necessary modifications to the City's wastewater treatment plant. The City may be able to reduce the chlorine concentration in its effluent by using sodium bisulfate tablets. This solution could be implemented fairly quickly. However, if this method is not successful a more expensive solution, such as ultra violet disinfection may be required. This alternative could take up to 2 years to complete the feasibility study, secure funding, and complete construction.

**Response 1**

In their 401 Certification, Idaho Department of Environmental Quality provided a three-year compliance schedule for the final chlorine limitations to allow adequate time for any necessary treatment plant modifications to meet the limits. In the interim, a technology-based average monthly chlorine limit of 0.5 mg/L is established in the permit. The derivation of this technology-based limit was provided in the Fact Sheet.

Permit Modification: Section I.B *Chlorine Schedule of Compliance* is added. Section II.J *Compliance Schedules* is added. Table 1 *Effluent Limitations and Monitoring Requirements* is modified to include Note 4 regarding the chlorine compliance schedule.

**Comment 2**

The City of Elk River has a population of 170 and has limited financial and staff resources. The City requests that the Region inform the City, as soon as possible, if any other changes in the City's NPDES permit may occur in the next five years.

**Response 2**

Once the permit is issued final there will not be any other changes made to the City's effluent limitations for a five-year period. However, the effluent surface water sampling results in the permit will be used to evaluate the need for ammonia effluent limits during development of the next permit. Additionally, the Idaho Department of Environmental Quality (IDEQ) is scheduled to develop a TMDL for Elk Creek. The TMDL may contain total a phosphorus requirement for the City. The City can contact IDEQ for the TMDL development schedule.