

# **Response to Comments on the Draft NPDES Permit for Bennett Lumber Products, Inc.**

**EPA Region 10  
October 2006  
NPDES Permit #ID-002053-2**

## **Background**

On August 16, 2006, EPA issued a public notice of the availability of a draft NPDES permit for Bennett Lumber Products. The permit would authorize discharges of stormwater, boiler blowdown, kiln condensate, and drinking water filtration wastewater from the Bennett Lumber Products sawmill in Princeton, Idaho. The public comment period ended on September 15, 2006.

## **Response to Public Comments on the Draft NPDES Permit**

EPA received comments on the draft NPDES Permit from Bennett Lumber Products.

### ***Comment #1***

Bennett Lumber Products, Inc. commented that monitoring frequencies of “weekly when discharging” and “once per rain event” are burdensome for a relatively small sawmill. Bennett noted that most months of the year, there is no discharge to the Palouse River, and that the impact of their discharges on water quality is small.

### ***Response #1***

EPA generally agrees with this comment. A “rain event” is not defined in the draft permit or the fact sheet, making it difficult for the permittee to determine how often they should sample (i.e. how significant a “rain event” must be in order for sampling to be required).

For visual monitoring of oil and grease, floating debris, and floating solids or visible foam for outfalls 002, 003, and 005, the final permit requires a monitoring frequency of “monthly when discharging,” rather than “weekly when discharging” or “once per rain event” as proposed in the draft permit. For outfall 001, the final permit retains the proposed monitoring frequency of “weekly when discharging” for visual monitoring. A higher frequency is required for outfall 001, because discharges from outfall 001 are larger and more frequent than discharges from other outfalls. Monitoring frequency for flow rate and pH in the final permit is now “monthly when discharging” for all outfalls. These monitoring frequencies mean that the permittee must monitor the effluent at least once during any calendar month or calendar week in which a discharge occurs, as appropriate. These monitoring frequencies are defined in the final permit to avoid ambiguity. Monitoring frequencies linked to the occurrence of a discharge are preferable to those tied to the occurrence of a “rain event” in the context of a permit for discharge to surface waters.

EPA believes these monitoring frequencies are more clearly defined and less burdensome than “once per rain event,” yet provide adequate characterization of the discharges. EPA does not believe that monthly or weekly visual monitoring represents an undue burden for the permittee.

It should take only a few minutes for staff to complete this monitoring, and there will be no cost associated with this monitoring beyond this minimal staff time.

***Revisions to the Permit***

The required monitoring frequency for flow rate and pH for outfalls 003 and 005 has been changed from “once per rain event” to “monthly when discharging.” The required frequency for visual monitoring of floating solids and visible foam, floating debris, and oil and grease for outfalls 002, 003 and 005 has been changed from “once per rain event” or “weekly when discharging” to “monthly when discharging.” Definitions of “monthly when discharging” and “weekly when discharging” have been added as footnotes to Table 1 of the final permit.