

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

**Response to Comments
Laclede Water District Water Treatment Plant
Permit No. ID-0027944**

Background

On June 22, 2006, EPA proposed to reissue/issue the National Pollutant Discharge Elimination System (NPDES) Permits for nine water treatment plants in Idaho:

City of Bonners Ferry Water Treatment Plant	ID-0020451
City of Sandpoint Sand Creek Water Treatment Plant	ID-0024350
Laclede Water District Water Treatment Plant	ID-0027944
City of Lewiston Water Treatment Plant	ID-0026531
City of Pierce Water Treatment Plant	ID-0020893
City of Orofino Water Treatment Plant	ID-0001058
Riverside Independent Water District Water Treatment Plant	ID-0021237
City of Weiser Water Treatment Plant	ID-0001155
Wilderness Ranch Water Treatment Plant	ID-0028312

The Public Notice of the draft individual permits initiated a public comment period which was initially scheduled to expire on July 21, 2006. The public comment documents included one fact sheet which provided the basis for the conditions in the draft individual permits. Based on interest and concerns with the permits, the public comment permit was extended to August 5, 2006.

This document summarizes significant comments received on the Laclede Water District Water Treatment Plant permit. 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.

Comments specific to the Laclede Water District Water Treatment Plant permit were received from Jeff Jordine of the Laclede Water District.

Comment

The District noted that the facility does not discharge directly to the Pend Oreille River. The backwash lagoon is located approximately 1/3 of a mile from the river. The District requested that the EPA conduct a site visit to make the permit a more relevant tool.

Response

At the District's request, EPA visited the facility and observed the location of the outfall. The outfall discharges to a wetlands area adjacent to the Pend Oreille River, but does not discharge directly to the river. Hence, there is no dilution available from the river. As a result, Table 1 of

the permit has been modified to require that the water quality-based effluent limits for chlorine be met at the end of the pipe.

Comment

The District requested that the permit be revised based on the maximum volume of flow discharged from the facility. The maximum flow is 20,000 gallons per day (gpd), instead of 40,000 gpd.

Response

The EPA agrees; the mass-based limits in the permit are revised based on a maximum flow of 20,000 gpd.

Comment

The sampling, BMP, and QAP are not applicable to a facility of this size.

Response

The EPA disagrees that the BMP and QAP are not applicable; these documents can be tailored to the size of the facility. The permittee did not have any specific comments on the sampling requirements, but only that they were not appropriate for the size of the District. At the District's request, the EPA did conduct a site visit and did not observe anything that would not preclude the permit requirements, other than those discussed in the remaining comments/responses.

Comment

Comments were received from the City of Sandpoint, the City of Weiser, and the City of Bonners Ferry, on their individual water treatment plant permits, regarding metals monitoring. EPA has determined that these comments apply to the permit for the Laclede Water District facility as well, because of the similarity of the water treatment plant operations which resulted in similar draft permit conditions and limitations. Concern with the metals monitoring was that the monitoring requirement was onerous and the analysis was costly. Analysis was unnecessary if the particular metal was not added during the treatment process. In addition, the finished water is already tested for metals.

Response

EPA disagrees that the metals monitoring requirement is onerous. The permit requires a total of three samples: one sample per year for three years. Three samples is the minimum that EPA believes is necessary to characterize the effluent.

The EPA disagrees that the information is unnecessary. The purpose of this sampling is to characterize the metal concentrations in the wastestream from the water treatment plant. This information will be used to determine whether the discharge has the reasonable potential to cause or contribute to an excursion of water quality criteria for metals in the receiving water. EPA must assure that the discharge of the wastestream from the water treatment process does not exceed water quality criteria in the receiving water. The coagulation filtration process removes

any trace metals that may be in the source water. As a result, the wastewater may contain elevated concentrations of metals. Studies have shown increased metals concentrations in spent filter backwash when compared to raw water samples (Filter Backwash Recycling Rule Technical Guidance Manual (EPA 816-R-02-014, December 2002). EPA does not have existing data on the levels of metals in the wastestream. Concentrations vary from plant to plant. EPA will review the monitoring data during development of the next permit and determine if limits and/or monitoring for additional parameters are necessary.

To reduce the cost of the analysis, the permit is revised to remove analysis for mercury and to substitute total chromium for chromium III and VI. Analytical costs can vary, but an assessment indicates the analytical cost for the total remaining twelve metals to be about \$120 to \$180.

Comment

Comments were received from the City of Orofino, the Riverside Independent Water District, and the City of Sandpoint, on their individual water treatment plant permits, regarding flow monitoring. EPA has determined that these comments apply to the permit for the Laclede Water District facility as well, because of the similarity of the water treatment plant operations which resulted in similar draft permit conditions and limitations. The permittees commented that flow monitoring should be calculated based on plant operations instead of continuous monitoring.

Response

The EPA agrees. Flow monitoring in Table 1 of the permit is revised to be estimated based on plant operation, instead of continuous monitoring. Water treatment plant operators track water balance through the treatment plant as part of treated water production. Basing the flow on these values is sufficient for the NPDES permit, and does not warrant a metering device on the effluent discharge.

Comment

Comments were received from the City of Lewiston, the City of Pierce, the City of Orofino, the Riverside Independent Water District, and the City of Sandpoint, on their individual water treatment plant permits, regarding the 24-hour composite sampling. EPA has determined that these comments apply to the permit for the Laclede Water District facility as well, because of the similarity of the water treatment plant operations which resulted in similar draft permit conditions and limitations. The permittees requested grab samples for TSS and metals instead of composite samples.

Response

The EPA agrees. The sample type for these parameters was revised to be “grab” instead of “composite.” The EPA believes that the grab sample will be representative of the discharge.

Comment

Comments were received from the City of Pierce and the Riverside Independent Water District, on their individual water treatment plant permits, and from Jerry Shaffer of Idaho Department of Environmental Quality (IDEQ) regarding ambient monitoring for turbidity. EPA has determined

that these comments apply to the permit for the Laclede Water District facility as well, because of the similarity of the water treatment plant operations which resulted in similar draft permit conditions and limitations. The comments stated that ambient sampling for turbidity is unnecessary. The drinking water treatment plants that use surface water, monitor for upstream turbidity on a daily basis and report these values to IDEQ in a monthly report. It would be redundant and provide no additional information to require the systems to monitor upstream turbidities as part of the permit.

Response

The EPA agrees. Ambient sampling for turbidity is removed (Section I.C of the draft permit.)