

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

**Response to Comments  
City of Sandpoint Sand Creek Water Treatment Plant  
Permit No. ID-0024350**

**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 Sand Creek 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 Sand Creek Water Treatment Plant permit were received from Dave Pafundi and Kody Van Dyk of the City of Sandpoint.

**Comment**

The City commented that effluent sampling could be difficult and dangerous especially during the winter because of the remote location of the settling basin in the canyon. The City requested less frequent monitoring during the winter.

**Response**

The EPA visited the site and concurs with the City regarding the difficulty of the effluent sampling location. A note is added to Section I.B of the permit that states that "Effluent samples must be collected as long as it is safe to do so. If the effluent samples cannot be collected due to

unsafe conditions during a given month, the permittee may refrain from collecting the sample during that month. The reason why the sample was not collected must be stated on the DMR.”

**Comment**

The City requested clarification of the chlorine concentration effluent limits.

**Response**

The water quality-based effluent limits are provided in Table 1 of the permit as follows:

Average Monthly      0.01 mg/L

Maximum Daily        0.02 mg/L

Footnote 3 of Table 1 states that the effluent limits for chlorine are not quantifiable using EPA approved analytical methods. Therefore, the permittee will be in compliance with the chlorine limit if the total residual chlorine concentration is at or below 0.1 mg/L. Footnote 3 was part was I.B.6 in the draft permit, it was relocated in the final permit to provide clarity.

**Comment**

The permit requires monitoring for aluminum. The treatment process does not use alum or any other additives that contain aluminum. The City requested that aluminum monitoring be removed.

**Response**

The EPA agrees; monitoring for aluminum is removed from the permit.

**Comment**

The City commented that the metals monitoring requirement seems onerous and unnecessary. Similarly, monitoring for TTHMs in the wastewater effluent seems onerous and unnecessary. The City already monitors for TTHM and TTHM precursors its drinking water.

**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.

EPA disagrees that the TTHM monitoring requirement is onerous. Again, the permit requires a total of three samples: one sample per year for three years. The EPA disagrees that the information is unnecessary. Studies have shown increased TTHMs concentrations in spent filter backwash when compared to raw water samples after chemical addition (Filter Backwash Recycling Rule Technical Guidance Manual (EPA 816-R-02-014, December 2002). EPA does not have existing data on TTHM in the wastestream. Concentrations vary from plant to plant. Three samples is the minimum that EPA believes is necessary to characterize the effluent. EPA will review the monitoring data during development of the next permit and determine if limits and/or monitoring for additional parameters are necessary.

**Comment**

The City 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**

The City 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 Sand Creek Water Treatment Plant 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).