

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

**Response to Comments
City of Homedale
Permit No. ID-002042-7**

Background

On December 18, 2003, EPA proposed to reissue the National Pollutant Discharge Elimination System (NPDES) Permit for the City of Homedale wastewater treatment facility. The Public Notice of the draft permit initiated a public comment period which expired on February 2, 2004. The EPA received comments on the draft permit from Larry Bauer (the City of Homedale), Fred Ostler (Sunrise Engineering, Inc.) And David Bennett (Analytical Laboratories, Inc.).

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 City has questioned the need for 8-hour composite samples since the effluent being sampled is discharged from a large pond which can have a retention time of 3-4 weeks resulting in an effluent that does not vary substantially over time. Additionally, the city does not have a composite sampler nor does it have the manpower to collect the samples over an 8 hour period. The City would prefer collecting grab samples.

Response 1

EPA agrees and the final permit has been revised to require grab samples rather than 8-hour composite samples.

Comment 2

The City states that historically their system has never had an E. coli sample that was measurable, and their automated chlorinator is checked daily for proper function. Additionally, the lab is 50 miles from the city, the cost of 24-hr delivery is expensive, and the city's small crew of 3-people makes it difficult to drive to Boise 5 times per month.

Response 2

The requirement to sample 5 times per month is a stipulation of the Idaho Water Quality Standards (IDAPA 58.01.02.251). The Water Quality Standards require that waters designated for primary contact recreation not contain E. coli bacteria in concentrations exceeding "a geometric mean of 126/100 ml based on a minimum of five samples taken every 3-5 days over a 30 day period." The monitoring frequency of 5 samples per month was incorporated directly into the permit.

The permit contains a provision which states that the permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR 122.62, 122.64, or 124.5. (See Part

IV.A. of the permit). If the Idaho Department of Environmental Quality revises its water quality standard for E. coli, and EPA approves the water quality standard revision, then the permittee may submit a request for permit modification.

Comment 3

The effluent discharges to an unnamed drainage ditch which discharges to the Snake River. The drainage ditch is highly influenced by irrigation and storm water runoff. Any surface water testing on the city's small quantity of water, in this large drainage would be of little or no significance.

Response 3

The permit requires the city to collect surface water samples in the Snake River, upstream of where the drainage ditch enters the Snake River. This location has been clarified in the final permit. Additionally, the permit has been revised to clarify that surface water monitoring is required for 4 years only. While it is true that the city's discharge is small in comparison to the river, the data collection is necessary to verify whether or not the discharge has the potential to impact aquatic life in the river. The surface water sampling results will be used to evaluate the need for effluent limits during development of the next permit.