

November 21, 2001

Response to Comments

Draft NPDES Permit for:
U.S. Army Corps of Engineers
Albeni Falls Dam
NPDES No.: ID-002068-1

On May 2, 2001, the Environmental Protection Agency (EPA) issued a draft National Pollutant Discharge Elimination System (NPDES) permit to the U.S. Army Corps of Engineers Albeni Falls Dam, near Newport, Washington. The draft permit authorizes a discharge from a small package plant which provides secondary treatment of sanitary wastewater from restrooms used by visitors and employees at the dam. The treated effluent from the facility is discharged to the Pend Oreille River approximately 2 miles from the Idaho-Washington border. The public comment period for the draft permit extended thirty days from May 2 to June 1, 2001. Five other permits within the Pend Oreille Lake/River watershed were also issued as drafts on May 2, together with the Albeni Falls permit.

EPA received no comments on the draft permit for Albeni Falls Dam. EPA did, however, receive two comments on the draft permit for the Cabinet Gorge Power Station which was public noticed along with the Albeni Falls permit. In response to those comments, EPA has made changes to the draft Cabinet Gorge permit. The Cabinet Gorge and Albeni Falls permits are nearly identical since both facilities are very similar in type of waste being treated, degree of treatment, plant capacity, and receiving water conditions. EPA believes these two permits should be consistent, to the extent possible. Therefore, the changes made in response to the comments received on the Cabinet Gorge permit are relevant to Albeni Falls and will be incorporated into the final Albeni Falls permit as well. The revisions are relatively minor changes to monitoring frequency for three parameters. The Cabinet Gorge comments and responses are cited below. Identical revisions have been incorporated into the Albeni Falls permit:

“Comment 1. Avista Utilities commented that the sampling frequency for E. Coli Bacteria of five times per month is neither practical nor necessary given the distance of the Cabinet Gorge Power Station to the nearest certified laboratory that can perform the test and the extremely small discharge from this plant. Avista requests that the sampling frequency be changed to one time per month. Avista believes the suggested sampling frequency will provide high-quality, representative information for this discharge.

Response. EPA agrees with the comment and will reduce sampling for E. Coli to once per month, however, both the monthly and daily E. Coli limitations will be retained in the permit as required by Idaho water quality standards. If the permittee samples E. Coli more than once during the month, a geometric mean shall be calculated in order to determine compliance with the monthly limitation. EPA believes that a sampling frequency of once per month is

appropriate given the average discharge from this facility is 224 gallons per day and the receiving water low flow used in the permit evaluation is 4,500 cubic feet per second.

Comment 2. Avista Utilities commented that the sampling frequency for pH and Total Residual Chlorine of once per day is not necessary given the lack of variation in discharge nor is it practicable given the staffing schedule at the facility. In addition, the batch basis of the discharge makes obtaining a daily sample difficult. Avista requests that the sampling frequency be changed to four times per month. Avista believes the suggested sampling frequency will provide high-quality, representative information for this discharge.

Response. EPA agrees that sampling less frequently than daily is appropriate since the average discharge from this facility is 224 gallons per day and the receiving water low flow used in the permit evaluation is 4,500 cubic feet per second. Four samples per month, as suggested in the comment, is a reasonable frequency for pH and total residual chlorine and will be incorporated into the final permit. In order to assure the four samples are integrated throughout the month, EPA will require sampling be conducted once per week.”