

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

**Response to Comments
City of Cascade Wastewater Treatment Plant (Permit No. ID 002316-7)**

Background

On May 29, 2003, EPA proposed to reissue the National Pollutant Discharge Elimination System (NPDES) Permit for the City of Cascade Wastewater Treatment Plant (WWTP). The Public Notice of the draft permit initiated a 30-day public comment period which expired on June 27, 2003. The EPA received comments on the draft permit from Bryan Donaldson of JUB Engineers.

This document summarizes the comments received on the draft permit, and EPA's responses to the comments. The document provides a record of the basis for changes to the draft permit to produce 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

JUB Engineers commented that it is not always possible to have continuous flow monitoring or to collect samples at the discharge location. The comments note that underdrain flows are infrequent and only occur when the "groundwater level beneath the facility rises significantly, due primarily to high flows and water levels in the adjacent Payette River." In addition, the comments state that during discharge events, the underdrain from the infiltration basins may be submerged below the river.

Response

Because the permittee is unable to monitor effluent flow, the permit is modified to require continuous influent flow monitoring, instead of effluent flow monitoring. Table 1 of the permit has been modified accordingly.

The permit is modified to require that the effluent sampling be conducted prior to the rapid infiltration basins. Based on the comments received, the effluent flow from the underdrain does not appear to be representative of the treated wastestream. But instead, the underdrain flow is a mixture of wastewater effluent and groundwater/river water. NPDES regulations require that the effluent monitoring be representative of the treated effluent alone. In addition, because the river may at times be above the infiltration basin underdrain, the treatment provided by the infiltration basins prior to discharge to the river is in question. Therefore, section I.A.5 has been added to the final permit requiring that the effluent be sampled prior to the infiltration basins.

