U.S. Environmental Protection Agency
Region 10

Response to Comments
City of Ririe Wastewater Treatment Plant
Permit No. ID-002617-4

Background

On May 29, 2003, EPA proposed to reissue the National Pollutant Discharge Elimination System (NPDES) Permit for the City of Ririe 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 George Frank, the Public Works Director for the City of Ririe. No other comments were received.

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

Comment 1

The draft permit allows the facility to discharge to Dry Bed Canal from November 1 through April 30, and to Enterprise Canal from May 1 to October 31, provided there is a minimum flow of 10 cfs in the receiving canal. The City of Ririe requested that the treatment plant be allowed to discharge to either canal (Dry Bed Canal or Enterprise Canal) provided there is a minimum flow of 10 cfs in the receiving canal, and that the discharge not be restricted by the month of the year.

Response 1

The EPA agrees. Section I.A.1 of the permit has been modified to allow the City to discharge to either canal provided there is a minimum flow of 10 cfs in the receiving canal. The seasonal discharge location and minimum flow requirements in the draft permit had been a condition of the facility's previous permit. The previous permit had different limits for the two canals. The effluent limits in the draft (and final) permit are the same for the two canals, since the beneficial uses that each water body is expected to achieve are the same (i.e. cold water communities and primary contact recreation). Therefore, the City may discharge to either provided there is a minimum flow of 10 cfs.

Comment 2
The City of Ririe requested a compliance schedule to meet the 85% removal requirements for BOD_5 and TSS. The City anticipates difficulty in meeting the 85% removal requirements during the irrigation season because of high infiltration. The City is in the planning phase of an effort to reduce excessive infiltration caused by the high seasonal groundwater. The City expects to be able to meet the 85% removal requirements within five years through replacement of those portions of the collection system subject to high infiltration.

Response 2
The EPA cannot include a compliance schedule in the permit for the 85% removal requirement because the regulations (40 CFR § 122.47) do not allow compliance schedules for technology based effluent limits.

If the facility is unable to comply with the 85% removal requirement during the term of the permit, EPA may then evaluate the non-compliance activity and determine the appropriate action (e.g., notice of violation letter, compliance order, etc).

It is EPA's understanding from discussions with IDEQ, that the City of Ririe is working diligently to remove the excessive infiltration from their collection system in an effort to meet the 85% removal requirements. The EPA recognizes these efforts and encourages the City to continue to work with IDEQ to eliminate their excessive infiltration.

Comment 3
The City of Ririe requested a compliance schedule to meet the *E. coli* limits because the previous permit did not have *E. coli* limits and because a recently completed facility plan recommended that the disinfection unit be upgraded to assure "its continued ability to kill bacteria."

Response 3
The EPA does not believe that a compliance schedule is warranted. The previous permit contained a bacteria criteria (fecal coliform). The draft (and final) permit, replaces the fecal coliform criteria with an *E. coli* criteria. The City has not provided a reason why their existing system was able to meet the fecal coliform limit, yet would be unable to meet the *E. coli* limits.

The EPA recognizes that the City is in the process of upgrading their disinfection system, and encourages them to continue with those efforts.

Comment 4
The City notified the EPA that the design flow of the treatment plant is 0.15 mgd, not 0.10 mgd which was used in the draft

permit.

Response 4
The design flow of the facility provided on the NPDES permit application was 0.10 mgd. Subsequent discussions with the City's wastewater treatment plant design engineer confirmed that the design flow of the treatment plant is 0.15 mgd. The design flow is used to calculate the mass-based effluent limits. The mass-based effluent limits in the final permit (refer to Table 1) have been modified to be based on the revised design flow of 0.15 mgd.