

## RESPONSE TO COMMENTS

**City of Glenns Ferry  
Wastewater Treatment Plant  
NPDES Permit # ID-002200-4  
November 16, 2011**

On September 14, 2011, the U.S. Environmental Protection Agency (EPA) issued a public notice for the proposed reissuance of the City of Glenns Ferry Wastewater Treatment Plant (WWTP) draft National Pollutant Discharge Elimination System (NPDES) Permit No. ID-002200-4. This Response to Comments provides a summary of significant comments and provides corresponding EPA responses. Where indicated, EPA has made appropriate changes to the final NPDES Permit.

Comments were received from the following:

Jeff Cook, Public Works Director - City of Glenns Ferry,

- 1. Comment:** The cost of ammonia monitoring is an economic burden on the City of Glenns Ferry during a time when in general and Elmore County in particular have been economically devastated. It is from this point of view that we ask for a reduction of ammonia sampling from monthly to quarterly. The historical results for this plant show that ammonia is relatively constant and there would be little if any benefit from additional data. Modify sampling frequency to quarterly.

**Response:** EPA disagrees with the statement that ammonia discharges are relatively constant. Ammonia discharges varied from 0.62 mg/L to ten times this concentration to 6.25 mg/L. This is a significant difference. There is no cost for collection of the analyte because the monthly composite sample for TSS and BOD<sub>5</sub> can be used for the analysis of ammonia. The cost of analysis of ammonia using method 350.1 is fifteen dollars bringing the added cost for monthly sampling to \$120. This is a reasonable additional cost to provide more representative impacts to the Snake River listed for nutrients under the Clean Water Act Section 303(d). Monthly ammonia monitoring is consistent with ammonia monitoring in other sewage treatment plant permits in Idaho. The monthly ammonia monitoring requirement is unchanged in the final permit.

- 2. Comment:** For the same reasons we are requesting continuing with the previously EPA approved practice of considering the influent and effluent equal. Currently there is no monitoring system in the effluent. A vault sufficient to house flow measuring and data collection equipment would be significantly deep – approximately fifteen feet and would probably cost in the vicinity of \$25,000 which is not available. This may in fact be only half of the potential project cost. Recent similar installation range from \$37,000 to \$52,000.

**Response:** Continuous flow monitoring is changed from effluent to influent in the final permit. Effluent flow is now required to be estimated weekly to determine if influent flow

monitoring is representative of effluent flow. The results will be used in deciding if effluent monitoring is required in the next permit reissuance.

3. **Comment:** The fact sheet shows that the plant disinfection utilizes ultraviolet radiation. In actual fact there is no formal disinfection process. The Rapid Infiltration Basins have performed very well as tertiary treatment and provide disinfection through natural (green) processes.

**Response:** The typographical error is noted. Fact sheets are not changed for final issuance of permits. EPA also notes only one violation of the e-coli limit occurred during the last permit cycle.