

Response to Comments
2007 NPDES Permit Issuance to the City of Hansen Wastewater Treatment Plant -
Hansen, Idaho
NPDES Permit No. ID0022446

City of Hansen
Public Comment Period: 6/6/2007 – 7/6/2007
Wastewater Treatment Plant
PO Box 170
Hansen, Idaho 83334

During the public comment period specified above comments were received from the City of Hansen (City). This document summarizes those comments and provides EPA's response to them.

1. Regarding Location of flow measurements

Comment: Actual measurement of flow has always been at the influent, due to location constraints at the effluent. The City would like to change the location of the flow measurement from the effluent to the influent.

Response: Since measuring influent flow is more stringent than measuring the effluent flow, the permit has been modified to reflect the change in the flow measurement location to the influent.

2. Regarding E. Coli Sampling

Comment: Geometric mean sampling for E. Coli bacteria, Part I.B Table 1 Note1, "minimum of five samples taken every 3-7 days within a calendar month." As written this could be interpreted to mean that sampling has to occur every week or seven day period during the month. The City would like to see the language modified to specify that, the required five samples per month be obtained by collecting a minimum of one sample per calendar week of a calendar month.

Response: Idaho Water Quality Standards (IDAPA 58.01.02.251.01a) state: "Waters designated for primary or secondary contact recreation are not to contain E. coli bacteria in concentrations exceeding a geometric mean of one hundred twenty-six (126) E. coli organisms per one hundred (100) m. based on a minimum of five (5) samples taken every three (3) to seven (7) days over a thirty (30) day period." No change to the permit required as a result of this comment.

3. Regarding continuous temperature monitoring

Comment: Since Idaho Department of Environmental Quality (IDEQ) has indicated that discharge from Hansen most likely does not reach the Snake River and that the canal the discharge goes to is considered agricultural in nature, continuous monitoring at the influent and effluent seems excessive and unduly burdensome.

Response: This condition was incorporated into the draft permit because it was a condition of the IDEQ's draft 401 certification of the draft NPDES permit. IDEQ's final 401 certification requires influent, effluent, and ambient wastewater temperature sampling be conducted in one hour intervals, 24 hours per day, for five years.

4. Regarding compliance schedule

Comment: Meeting the final TSS limit no later than January 1, 2010, is going to require significant upgrades to the treatment system, and most likely will also involve a lengthy design, build, and bid process. The City requests the compliance schedule date be defined as three years from the date of permit issuance.

Response: The final permit has been revised to change the compliance date to December 31, 2010. However, EPA would like to clarify that the permit only defers compliance with the final effluent limits for TSS loading until December 31, 2010. All other limitations must be met upon the effective date of the permit.

5. Regarding sample types

Comment: The City currently collects time based composite samples, taken every 30 minutes over a 24 hour period, for BOD, TSS, ammonia, and phosphorus. The City would like to continue taking composite samples instead of switching to grab samples.

Response: Since composite samples are usually more representative of the discharge as a whole, the permit has been changed to reflect composite sampling for the parameters listed above.

6. Regarding surface water monitoring

Comment: The City requests that all surface water monitoring be removed from the permit.

Response: The City must do surface water monitoring in order for EPA to evaluate the reasonable potential for the discharge to cause an instream excursion above water quality criteria, and to develop permit limits. No change to the permit required as a result of this comment.

7. Regarding Total Maximum Daily Loads (TMDLs) and Waste Load Allocations (WLA)

Comment: The City requests that the rationale stemming from the TMDL / WLA for the mid-reach sections of the Snake River be re-examined, to exclude the discharge from the City's WWTP.

Response: As stated in the fact sheet, federal regulations (40 CFR 122.44(d)(1)(vii)) require effluent limits in NPDES permits to be consistent with a TMDL that has been prepared by the State when it is based on the State's water quality standards and approved by EPA. If at some point in the future the TMDL is revised, the federal regulations at 40 CFR 122.62 allow a permit to be modified for cause, and this is included in the permit in Section V.A (Permit Actions). Cause for modification includes, among other things, new information. Therefore, if the EPA approves a revised TMDL that includes the City of Hansen, the permittee may request that their permit be modified to include the conditions in the revised TMDL.