



City of Rigby Pretreatment Program

Response to Public Comment per 40 CFR 403.11(b)

Keller Associates on behalf of City of Rigby, July 28, 2021 E-mail

1. RV Septic Dump Stations

Add to the ordinances (where appropriate) the right of the City to create a specific rate for septic dump stations. Rate to be adjusted by City Council per resolution.

All septic dump stations shall have an approved flow meter.

Response 1: This comment does not affect DEQ's approval of the pretreatment program. The City may add this provision after approval.

2. Terminology

The city does not have a "sewer superintendent" per se. Every and all reference with this term in the ordinances needs to be changed to "public works director or his designated agent."

Response 2: 40 CFR 403 makes no distinction on titles. This comment does not affect DEQ's approval of the pretreatment program. The City may make this correction after approval.

3. Flow Charts

Kellers logos need to be removed being this is a city document and not Kellers.

Response 3: This comment does not affect DEQ's approval of the pretreatment program. The City may make this correction after approval.

4. Industrial Waste Discharge Permit

On number #8, delete phone number references. Replace with "contact Pretreatment Coordinator".

Industrial Wastewater Discharge Permit: Mis-numbering of pages (e.g., 8 of 5).

Response 4: This comment does not affect DEQ's approval of the pretreatment program. The City may make this correction after approval.

5. Pretreatment Program Procedures Manual

On pg. 13, remove Pretreatment Coordinator phone number.

On pg. 16, change reference from Jefferson Star to newspaper of record.

Response 5: This comment does not affect DEQ's approval of the pretreatment program. The City may make this correction after approval.

6. Pretreatment Ordinance

On pg. 35, remove reference to a specific interest rate, and replace with reference to Idaho Code 28-22-104.

Add the following two items to list of specific prohibitions:

Formaldehyde

Industrial cleaning chemicals.

Response 6: 40 CFR 403 does not regulate interest rates for Administrative fines. Specific prohibitions in addition to those listed in 40 CFR 403.5(b) are allowed. This comment does not affect DEQ's approval of the pretreatment program. The City may make this correction prior to Council approval of the ordinance.

7. Miscellaneous Comments

Add explanation that the Pretreatment Coordinator may be the same individual as the WWTP Superintendent.

Response 7: 40 CFR 403 makes no distinction on titles. This comment does not affect DEQ's approval of the pretreatment program. The City may make this correction after approval.

8. Notice of Violation

Page 2 of 3 of the Notice of Violation has the following two errors:

Administrative Fines should read "one thousand dollars" instead of "ten thousand dollars".

Criminal Prosecution #2 should read "not more than" rather than "at least".

Response 8: Corrections to the template language of this document do not affect DEQ's approval of the pretreatment program. The City may make this correction after approval.

Keller Associates on behalf of City of Rigby, July 30, 2021 E-mail

1. Notice of Violation

Page 2 of 3 of the Notice of Violation has the following two errors:

Administrative Fines should read "one thousand dollars" instead of "ten thousand dollars".

Criminal Prosecution #2 should read "not more than" rather than "at least".

Response 1: Corrections to the template language of this document do not affect DEQ's approval of the pretreatment program. The City may make this correction after approval.