

Response to Comments

City of Parma Wastewater Treatment Plant

NPDES Permit Number: ID0021776

January 23, 2017

On April 4, 2016, the U.S. Environmental Protection Agency Region 10 (EPA) issued a public notice for the proposed reissuance of the City of Parma wastewater treatment plant's (WWTP) draft National Pollutant Discharge Elimination System (NPDES) Permit No. ID0020389. The public comment period closed on May 5, 2016.

During the public comment period, the EPA received comments from the following:

- Russell Brooks of Pharmer Engineering (Pharmer) on behalf of the City of Parma (City)
- Susan Drumheller of the Idaho Conservation League (ICL)

This document presents the comments received and provides corresponding response to those comments.

Comment 1. Latitude and Longitude of the Treatment Facility and Outfall (Pharmer on behalf of the City)

Pharmer stated that the latitude and longitude of the outfall in the draft permit appeared incorrect.

Response. The latitude and longitude identified in the draft permit were from the application submitted by the City in 2008. In subsequent correspondence, Pharmer submitted updated latitude and longitude coordinates. The coordinates are corrected in the final permit; they are:

Treatment facility: lat 43° 47' 16" N, long 116° 57' 26" W (43.7878°, 116.9572°)

Outfall: lat 43° 47' 12" N, long: 116° 57' 34" W (43.7867°, 116.9594°)

Comment 2. Sediment Limits (Pharmer on behalf of the City)

The commenter requested that the 4-month rolling average for Total Suspended Solids (TSS) of 17.5 mg/L be removed from the permit. The commenter noted that the limit was based on the Lower Boise River TMDL [total maximum daily load]. The wasteload allocation (WLA) was set the same for all point sources and was set at 20 mg/L minus 2.5 mg/L background sediment. The TMDL was not specific for Sand Hollow Creek. The 4 month rolling average limit is contradictory because it is possible for the facility to meet the secondary effluent limits for TSS, while violating the 4-month rolling average limit.

Response. EPA is required to include the 4-month rolling average limit for TSS. The effluent limits for a particular pollutant must be the more stringent of either technology-based (TBELs) or water quality based effluent limits (WQBELs). As described in the Fact Sheet, the Average Monthly Limits and Average Weekly Limits are TBELs. (*See* Fact Sheet, Appendix C, Part A). The 4-month rolling average limit for TSS is a WQBEL. The (*See* Fact Sheet, Appendix C, Part B). The NPDES regulations require that NPDES permits include effluent limitations developed

consistent with the assumptions and requirements with any WLA that has been assigned to the facility as part of an EPA-approved TMDL. (See 40 CFR 122.44 (d)(vii)(B)). The Lower Boise River TMDL provides a WLA of 99.2 lbs/day for the City of Parma based on a 4-month average (See 2015 TMDL, Table 26 on Page 47). Therefore, the EPA has included this WLA directly into the permit.

Comment 3. Total Residual Chlorine Limit (Pharmer on behalf of the City)

The total residual chlorine limits are lowered compared to a draft permit provided in 2014. The Average Monthly Limit is now 0.074 mg/L compared with a 0.136 mg/L draft permit.

Response. The reissuance of this permit was public noticed for the first time on April 4, 2016. There were no previous versions of the permit that were public noticed. The calculations for the chlorine limits are provided in the fact sheet. The commenter has not provided a basis for changing the chlorine effluent limits nor has the commenter requested a change to the chlorine effluent limits.

Comment 4. Evaluate and Obtain Financing (Pharmer on behalf of the City)

The commenter requested that the task occur 5 years from the effective date of the permit. The commenter stated that this completion date was reflected in the draft compliance schedule.

Response. The EPA has revised the final permit to have this interim task completion date be 5 years from the effective date of the permit. The date for the completion of this task was inconsistent in IDEQ's draft 401 certification (refer to columns 2 and 3 of Task No. 3 in the draft certification). This inconsistency is corrected in IDEQ's certification of the permit and is 5 years from the effective date of the permit.

Comment 5. Reopener Clause (Pharmer on behalf of the City)

The commenter requested language in the reopener clause that would allow the permit to be reopened for phosphorus trading and adjustment to the WLA. The City believes that inclusion of the clause would provide more flexibility and more ability in meeting the 10-year phosphorus limits.

Response. The NPDES regulations allow for NPDES permits to be modified for cause (See 40 CFR 122.62). If the permittee provides new information regarding trading, the EPA may reopen the permit to incorporate phosphorus trading. Therefore, a reopener clause in the permit not necessary. EPA notes that with trading, the WLA is not adjusted; instead, the permittee uses trading to achieve the compliance limit.

Comment 6. Industrial Waste Management (Pharmer on behalf of the City)

Section II.B. states that there are no industrial users connected to the system which is also what the City understands. Section VII, F requires the City to submit a list of significant industrial dischargers to the POTW. The list of dischargers and pretreatment ordinance must be submitted to EPA within 90 days of effective date of permit. It seems unnecessary to provide a list.

Response. The EPA disagrees that this provision is unnecessary. Section II.B of the permit requires the Permittee to develop and maintain a master list of the industrial users introducing pollutants to the POTW (not just significant industrial users). Industrial user means any source of indirect discharge from a non-domestic source. An industrial user connected to the system could be as simple as coin-operated car wash. Discharges from both industrial and commercial sources can cause problems at POTWs and can have detrimental effects on the water quality of the receiving waterbody. EPA encourages the commenter to become familiar with importance of pretreatment. A good introduction to the topic is: Introduction to the National Pretreatment Program EPA-833-B-11-001, EPA June 2011.

Comment 7. Facility Plan (Pharmer on behalf of the City)

Section VII, D - must compare influent flow and loading to the facility's design flow and loading and prepare a facility plan for maintaining compliance when annual average flow or loading exceeds 85% of the design criteria for three consecutive months. This criteria seems redundant since the compliance schedule requires facility planning milestones be met within the 1st year for total residual chlorine and 2nd year for total phosphorus. The City just had a DEQ approved facility plan finished in 2015.

Response. This is standard permit condition to insure that the facility maintains adequate capacity. The condition does not require a separate facility plan.

Comment 8. Coefficient of Variation (Pharmer on behalf of the City)

In appendix E footnote on page 44 calls for a coefficient of variation CV of 0.5. However, a CV of 0.6 was used in calculations. It is noted that the draft permit used a CV of 0.6. Please verify CV and calculations.

Response. EPA used a CV of 0.6 to calculate the chlorine WQBEL. The footnote in the Fact Sheet stating CV value of 0.5 for calculating the WQBEL is incorrect. A CV of 0.6 is the default from EPA's Technical Support Document for Water Quality-Based Toxics Control (*TSD*). The facility will need to install treatment to meet the final chlorine effluent limits. The variability of chlorine concentrations once the facility installs treatment is unknown. Because EPA does not know the future chlorine variability, EPA used a default value of 0.6 as recommended by *TSD* (See Section 5.5.2 Coefficient of Variation of the *TSD*).

Comment 9. Typographical Error in Fact Sheet (ICL)

There appears to be a typographical error in the Fact Sheet for this NPDES permit on page 17: 576 CFU/ml should read 576 CFU/100ml.

Response. Comment noted regarding Fact Sheet. The units in the draft and final permits are correct.

Comment 10. Lack of Monitoring (ICL)

There is the lack of monitoring to help ensure that the average weekly limits are met. In the draft permit, average weekly limits (AWLs) are included for BOD, TSS, pH, chlorine and total

phosphorus. However, the monitoring requirements are only monthly, with the exception of pH. In order to have adequate data points for calculating the AWLs for those pollutants, weekly monitoring should be required.

Response. EPA is not required to include weekly sampling just because the permit includes average weekly limits. EPA determined that monthly monitoring is sufficient to characterize the wastewater and assess compliance with the effluent limits based on the type of treatment, flows to the facility, and variability of the effluent. If the permittee collects one sample, that value is used to assess compliance with both the weekly and monthly limit.

Comment 11. Need for Mercury Conditions (ICL)

Given that fish tissue in downstream waters exceeds the mercury fish tissue limits, we believe that EPA is obligated to assign this facility mercury limits in its NPDES or at least a requirement calling for the creation and implementation of a mercury minimization plan.

Response. EPA does not have a basis to include mercury limits or a mercury minimization plan for this facility. The EPA has no basis to believe that the City is a significant contributor of mercury. This is a small facility treating residential and commercial wastewater.