

RESPONSE TO COMMENTS
Legends Casino Wastewater Treatment Plant
NPDES Permit # WA-002674-3
September 24, 2013

On August 21, 2013, the U.S. Environmental Protection Agency (EPA) issued a public notice for the issuance of the Legends Casino Wastewater Treatment Plant (WWTP) draft National Pollutant Discharge Elimination System (NPDES) Permit No. WA-002674-3. The public notice period for the draft NPDES Permit was from August 21, 2013, thru September 20, 2013.

On September 19, 2013, the EPA received one comment from Kenneth Grasser of Legends Casino. This was the only comment EPA received during the public notice period.

This Response to Comments document provides a summary of significant comments and provides corresponding EPA responses. Two minor changes in Tables 1 and 2 were made to the permit as a result of this comment.

Comment From Kenneth Grasser of Legends Casino:

“On page 5 Table 1 (Effluent Limitations) and page 6 Table 2 (Effluent Monitoring Requirements) of the Draft NPDES permit total ammonia lists sampling location outfall #3. Legends Casino WWTP currently has the equipment to conduct ammonia sampling just after the UV system however relocating the equipment to outfall #3 may prove problematic.”

“Legends Casino WWTP would like to entertain the request to move the sampling area for total ammonia from outfall #3 to either its current location or a location estimated 15 feet from the WWTP on the effluent discharge line post the 36 hour holding tank. By doing so would provide Legends Casino WWTP with a cost effective means to conduct sampling and prevent the potential of equipment vandalism/tampering.”

Response:

EPA clarifies that the permit authorizes discharge at Outfall 003; however, EPA did not intend the monitoring location for Total Ammonia must be restricted at the end-of-pipe of Outfall 003. The monitoring location for Total Ammonia must meet the requirement specified on Page 7, Part I.B.5 of the permit which states:

“5. The permittee must collect effluent samples from the effluent stream after the last treatment unit prior to discharge into the receiving waters.”

Other than for temperature, which must be measured at the end-of-pipe at Outfall 003 (as specified in Table 2, Footnote 2), all other parameters required by the permit are to be collected for analyses from a location that meets the requirement specified by Part I.B.5 of the permit.

As a result of this comment, “(Outfall 003)” was deleted from the line item for Total Ammonia in Tables 1 and 2.