

RESPONSE TO COMMENTS

City of Fruitland Payette River Facility Wastewater Treatment Plant NPDES Permit # ID-002119-9 April 27, 2011

On March 3, 2011, the U.S. Environmental Protection Agency (EPA) issued a public notice for the proposed reissuance of the City of Fruitland Payette River Facility Wastewater Treatment Plant (WWTP) draft National Pollutant Discharge Elimination System (NPDES) Permit No. ID-002119-9. 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:

Carl Hipwell, PE., City Engineer - Water/Wastewater Pharmed Engineering, LCC for the City of Fruitland Payette Facility (City),

- 1. Comment (City):** We are requesting clarification as to the requirement to send in additional industrial information as we have done in the past with our DMRs. May we discontinue this practice. The permit does not refer to this past practice.

Response: The comment is referring to the Facility Planning Requirement under Condition I.D.

“Facility Planning Requirement.

Each month, the permittee must compute an annual average value for the flow, BOD5 loading, and TSS loading entering the facility based on the previous twelve months data or all data available, whichever is less. If the facility has completed a plant upgrade that affects the facility planning values listed in Table 3, only the data collected after the upgrade should be used in determining the annual average value.

When the annual average values exceed 85% of the facility planning values listed in Table 3 three months in a row, the permittee must develop a facility plan and schedule within one year from the date of the third exceedance. The plan must include the permittee’s strategy for continuing to maintain compliance with effluent limits and will be made available to the Director or authorized representative upon request.”

Criteria	Value	Units
Average Flow	0.35	mgd
Influent BOD5 Loading	1800	lbs/day
Influent TSS Loading	1250	lbs/day

The Facility Planning Requirement is not required under the reissued permit. The permit is unchanged.

2. **Comment (City):** Remove the requirement of continuous temperature measurement and replace with daily recording of temperature during the weekdays. The temperature of the lagoons do not fluctuate in such large bodies of water over short time periods and it seems reasonable to measure the temperature daily rather than continuously.

Response: Pursuant to Section 401(d) of the Clean Water Act, EPA has required Fruitland to comply with the conditions set forth in the State of Idaho's 401 Certification, which includes a requirement for continuous effluent and ambient monitoring for temperature. The permit is unchanged.

3. **Comment (City):** The surface water monitoring is an economic burden to the City. We are requesting the surface water monitoring be removed from the permit.

Response: Pursuant to Section 401(d) of the Clean Water Act, EPA has required Fruitland to comply with the conditions set forth in the 401 Certification, which includes the surface water monitoring for temperature.