

RESPONSE TO COMMENTS

Independent Meat NPDES Permit ID0000388 October 22, 2015

On September 21, 2015 the U.S. Environmental Protection Agency (EPA) issued a public notice for the reissuance of the Independent Meat Company National Pollutant Discharge Elimination System (NPDES) Permit No. ID0000388. This Response to Comments provides a summary of significant comments and provides corresponding EPA responses. No changes to the permit resulted from the comments.

Comments were received from the following:

Justin Hays, Program Director, Idaho Conservation League (ICL)

1. **Comment: Effluent Limits.** We support EPA's determination of appropriate effluent limits for temperature for this discharge.

Response: Thank you for your comment.

2. **Comment:** We appreciate that the effluent is considered to be non-contact cooling water and the EPA has determined that the pollutants of concern is limited to temperature. That said, we are aware of at least one other instance in the Magic Valley where effluent was thought to be solely non-contact cooling water, but, upon closer review, it was determined that the discharge contained other pollutants.

To ensure that the discharge from Independent Meat does not inadvertently become contaminated with other pollutants, we ask that the EPA require the facility periodically test their effluent for other pollutants including, but not limited to: phosphorus, nitrate/nitrites, bacteria and ammonia. Such testing could be done once quarterly during periods of normal operation.

Response: The non-contact cooling system uses shell-and-tube water-cooled condensers. There is no direct contact between the refrigerant side and the cooling water side of the system. The source of the non-contact cooling water is springs that travel through the condensers and discharges to Rock Creek. Therefore there is no source of phosphorus, nitrate/nitrites, bacteria or ammonia. The only pollutant is temperature. Further, the facility is required to do a pollutant scan as part of the permit reapplication process.

The permit is not changed.