

EPA RESPONSE TO COMMENTS

From Mr. Sherwin Curley of NTUA emailed to EPA on January 16, 2018

1. BOD, TSS, E. Coli, TRC Monitoring Frequency – Current permit requirements are to monitor for these parameters 3 times per month. NTUA requests to have this frequency changed to once per month.

Response: The previous permit required this frequency of monitoring. DMR data show that the facility has had multiple exceedances of several of these parameters. Additionally, no supporting data or other qualitative information was provided by NTUA to justify a reduction in monitoring frequency. Therefore, no change is warranted and the new permit will continue to require this frequency of monitoring.

2. NTUA requests to have temperature units changed from °F to °C.

Response: The temperature units to be reported will be changed from °F to °C.

3. WET Monitoring Frequency – Current permit requirement is to monitor WET quarterly for the single most sensitive species. NTUA requests to have WET monitoring changed to bi-annual for the single most sensitive species.

Response: The previous permit required quarterly WET testing using the most sensitive species. The facility is classified as a Major discharger and discharges into the San Juan River, which has perennial flow and an established aquatic life habitat. Additionally, no data or qualitative justification for this request in reduced WET monitoring was provided by NTUA. Therefore, no change is warranted and the new permit will continue to require a quarterly WET monitoring frequency.

4. The draft permit states 90 days to provide report to USEPA an estimate of current sludge quantity and projection of disposal. The fact sheet (page 12 of 15) indicates 60 days. NTUA requests that it be changed to 120 days.

Response: After due consideration, EPA will modify the permit and fact sheet to require the sludge report to be provided within 120 days of sludge disposal.

5. The draft permit states that the report is required to be submitted to USEPA 120 days prior to sludge disposal. The fact sheet (page 12 of 15) indicates 90 days. NTUA requests that the fact sheet be changed to 120 days.

Response: No change is made to the permit. EPA will modify the fact sheet to reflect the same timeframe as the permit.