

## Guam Waterworks Authority

### Northern District, Agana/ Hagåtña, Agat-Santa Rita, and Umatac-Merizo Wastewater Treatment Plants

NPDES Permit Nos. GU0020141, GU0020087, GU0020222, GU0020273

#### RESPONSE TO COMMENTS DOCUMENT

U.S. EPA, Region 9

#### Comments by Guam Waterworks Authority (Received 7/1/19 via email):

##### Comments on Permit:

1. **Comment:** Page 4, Footnote (2) NDWWTP table 1. would it not be more appropriate to move the reference from the first row of the table down to put it with each metal, and include it also in table 3.?" This would be equally applicable to the tables for Hagåtña and Agat. The footnote number (2) works in all 6 tables.

**Response:** Footnote numbering in effluent tables for total recoverable metal has been adjusted.

2. **Comment:** Page 13, under Table 10, It would seem appropriate to change footnote (3) to (2) and skip the note that the unused (2) is not applicable. Similarly on Page 14, for notes (5) and (6) and then on Page 15 for notes (1) and (2).

**Response:** Footnotes that are not used in Table 10 are retained for consistency among all effluent limitation tables.

3. **Comment:** Page 21, Table 14 – under IWC (% Efficiency) for Umatac, I calculate that  $1/6 = 17\%$ .

**Response:** Instream Waste Concentration (“IWC”) is calculated as  $100\% * (1/(D+1))$ , where D=Dilution Ratio. Therefore,  $IWC = 100\% * (1/(6+1)) = 100\% * 1/7 = 14\%$ .

4. **Comment:** Page 36, Section J, item 3. We currently are doing this reporting to Susanne Perkins under the 2011 Court Order. We report large SSOs within 24 hrs. by phone and follow up with a written report within 5 days. We also submit a complete report of ALL SSOs at the end of each quarter. The data fields specified are included in both sets of reports. If I read item 3 correctly, we can submit our Court Order quarterly report to < R9NPDES@epa.gov > when we submit our NetDMR data to CDX. Please let me know if I am on the right track here.

**Response:** The requirements in the NPDES permit do overlap with requirements in the court order. GWA should submit regular reports to [R9NPDES@epa.gov](mailto:R9NPDES@epa.gov) concurrent with NetDMR reporting. In addition, GWA should continue reporting to any individual at US EPA, if required to by the Court Order.

The permit also references immediate reporting of SSOs which may endanger human health or the environment. This may overlap with GWA or the Court Order's definition of "Large," but is not explicitly defined in the permit.

5. **Comment:** Page 38. Item L – is still green – I guess we change it when we get GEPA's 401 certification.

**Response:** EPA updated the 401 certification language in response to receiving the 401 certification.

6. **Comment:** Page 57, Hagåtña WWTP schematic is still the old one without CEPT.

**Response:** Hagatna WWTP schematic updated to reflect CEPT.

#### Comments on Fact Sheet:

1. **Comment:** Umatac minimum river flow should be 1.5 cfs (not cfu).

**Response:** Umatac minimum river flow adjusted.

2. **Comment:** Page 5, Baza Gardens WWTP, third paragraph, I think the sentence should read "and re-routed all flows to the Agat-Santa Rita facility by ~~September 2018~~ that date.

**Response:** Baza Gardens upgrades description updated.

3. **Comment:** Pages 7-9 Section V, DESCRIPTION OF DISCHARGE does not take advantage of the recent (2018-2019) performance of the Agat-Santa Rita WWTP – We are getting CDX replies in NetDMR for ASRWWTP of permit compliance with no errors.

**Response:** Reasonable potential calculations were conducted based on data available at time of application review. Although EPA would consider more recent information, Agat-Santa Rita has been operating for less than one year and has not accumulated enough data for a reliable, updated reasonable potential analysis without the use of historical data. EPA may use updated data for next permit issuance and adjust limits accordingly.

4. **Comment:** Could we get some clarification on Footnote (1) [Page 9]? I have looked at my copy of the Guam Water Quality Standards and would like a little more information included in that footnote.

**Response:** Footnote 1 states: "Standard is variable and dependent on additional effluent or receiving water characteristics." The footnote is in reference to temperature, ammonia, and dissolved oxygen standards.

The Guam Water Quality Standard for temperature is: "Water shall not be changed more than 1.0 degree Centigrade from ambient conditions.

The standard for ammonia is pH-dependent.

The standard for dissolved oxygen is: “Dissolved oxygen shall not be decreased to less than seventy-five percent saturation at any time.”

All of these standards are dynamic and can not be summarized by a single numerical value.

5. **Comment:** Page 13, footnote (1) at the bottom of the table – non-detect = “0 values” need to be included in reasonable potential calculations as zeros. It is not clear that this is how these values were obtained. This approach also extends to the lack of use of dilution in the evaluation of the reasonable potential. (Page 14) Reasonable potential should take dilution into the calculation for RP evaluation. Being cohesively consistent is very important.

**Response:** Non-Detect values are used in reasonable potential calculation. Footnote (1) indicates that if a parameter is not detected, it is not considered for reasonable potential, however all data, including non-detect data, are included for parameters being considered for reasonable potential.

Data used in the reasonable potential calculations were obtained using DMR data from 2015 to 2018.

EPA is not using dilution in the evaluation of reasonable potential due to the following considerations:

- Dilution for these permit reissuances have not yet been approved by Guam EPA. Not incorporating dilution in the reasonable potential analysis will help ensure the permits are protective when requesting dilution.
- As part of the Biological Evaluation and EFH consultation, EPA recommended that all pollutants that exhibit reasonable potential end-of-pipe receive limitations in order to minimize impacts to listed species and essential fish habitat.
- Variability in the operations of the facilities due to construction and upgrade make historical data less reliable, and so EPA is using a more conservative approach for setting effluent limitations.

6. **Comment:** GWA may use peracetic acid instead of chlorine in the described unusual circumstances.

**Response:** Noted.

7. **Comment:** Page 22, Section B is still highlighted green. We continue to work with US Fish and wildlife, GEPA and USEPA to work around endangered species issues. Agat is resolved. Umatac-Merizo work is done with avoidance mainly for Moorhen which is sometimes present, but so far has not inhibited construction work. Also at the bottom section E, I think this has been resolved.

**Response:** Fact sheet language updated for ESA and NHPA.