

FACT SHEET

The United States Environmental Protection Agency (EPA)
Plans To Reissue A
National Pollutant Discharge Elimination System (NPDES) Permit To:

Caldwell Housing Authority-Farm Labor Camp
22730 Farmway Road
Caldwell, Idaho 83605

Permit Number: ID-002545-3
Public Notice date:

EPA Proposes NPDES Permit Reissuance.

EPA proposes to issue an NPDES permit to the Caldwell Housing Authority. The draft permit places conditions on the discharge of pollutants from the wastewater treatment plant to Sebree Canal. In order to ensure protection of water quality and human health, the permit places limits on the types and amounts of pollutants that can be discharged.

This Fact Sheet includes:

- information on public comment, public hearing, and appeal procedures
- a description of the current discharge and current sewage sludge (biosolids) practices
- a listing proposed effluent limitations, schedules of compliance, and other conditions
- a map and description of the discharge location
- technical material supporting the conditions in the permit

The State of Idaho Proposes Certification.

EPA is requesting that the Idaho Division of Environmental Quality certify the NPDES permit for the Caldwell Housing Authority, under section 401 of the Clean Water Act. The state provided preliminary comments on the draft permit, and these comments have been incorporated into the draft permit.

Public Comment.

Persons wishing to comment on or request a Public Hearing for the draft permit may do so in writing by the expiration date of the Public Notice. A request for a Public Hearing must state the nature of the issues to be raised as well as the requester's name, address and telephone number. All comments and requests for Public Hearings must be in writing and should be submitted to EPA as described in the Public Comments Section of the attached Public Notice.

After the Public Notice expires, and all comments have been considered, EPA's regional Director for the Office of Water will make a final decision regarding permit reissuance.

Persons wishing to comment on State Certification should submit written comments by the Public

Notice expiration date to the Idaho Division of Environmental Quality (IDEQ) at 1445 North Orchard, Boise, Idaho 83706-2239.

If no substantive comments are received, the tentative conditions in the draft permit will become final, and the permit will become effective upon issuance. If comments are received, EPA will address the comments and issue the permit. The permit will become effective 30 days after the issuance date, unless a request for an evidentiary hearing is submitted within 30 days.

Documents are Available for Review.

The draft NPDES permit and related documents can be reviewed or obtained by visiting or contacting EPA's Regional Office in Seattle between 8:30 a.m. and 4:00 p.m., Monday through Friday (See address below). Draft permits, Fact Sheets, and other information can also be found by visiting the Region 10 website at www.epa.gov/r10earth/offices/water/npdes.htm.

United States Environmental Protection Agency
Region 10
1200 Sixth Avenue, OW-130
Seattle, Washington 98101
(206) 553-2108 or
1-800-424-4372 (within Alaska, Idaho, Oregon and Washington)

The Fact Sheet and draft permit are also available at:

EPA Idaho Operations Office
1435 North Orchard Street
Boise, Idaho 83706
(208) 378-5746

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I. APPLICANT

Caldwell Housing Authority
NPDES Permit No.: ID-002545-3

Facility Mailing Address:
P.O. Box 70
Caldwell, Idaho 83606

II. FACILITY INFORMATION

The Caldwell Housing Authority owns and operates, a housing facility for migrant farm labor in Canyon County northwest of Caldwell Idaho. Domestic sewage from the Caldwell Housing Authority, which serves a population of 1600, is treated and discharged to the Sebree Canal. The annual average flow from the facility is .206 million gallons per day (mgd). Treatment of wastewater consists of screening, followed by flow through an aeration pond, aerobic decomposition in a stabilization pond and two polishing ponds, and chlorination. Sludge is indefinitely stored at the bottom of the ponds.

The facility has been in operation since the 1940's. This will be the first NPDES permit issued to the facility.

A map has been included in Appendix A which shows the location of the treatment plant and the discharge location.

III. RECEIVING WATER

A. Receiving Water

The treated effluent from the facility is discharged from outfall 001 to the Sebree Canal. During the irrigation season, the Sebree Canal receives water from the Boise River. The Sebree Canal flows in a northwest direction for approximately 4 ½ miles before flowing into Conway Gulch. Conway Gulch is a tributary of the Boise River. The amount of flow in the canal depends upon the irrigation season, as follows:

- During the irrigation season (April through September), the flow rate in the canal is can vary from a low of 13 cfs (8.4 mgd) to a high of 355 cfs (230 mgd). The ratio of canal flow to effluent flow can vary from a low of 40:1 to a high of 1116:1.
- During the non-irrigation season, storm water runoff and the discharge are the only flows into the canal. The canal is dry a high percentage of the time.

B. Water Quality Standards

A State's water quality standards are composed of use classifications, numeric and/or narrative water quality criteria, and an anti-degradation policy. The use classification system designates the beneficial uses (such as cold water biota, contact recreation, etc.) that each water body is expected to achieve. The numeric and/or narrative water quality criteria are the criteria deemed necessary, by the State, to support the beneficial use classification of each water body. The anti-degradation policy represents a three tiered approach to maintain and protect various levels of water quality and uses.

Section IDAPA 16.01.02.101.02., of the *Idaho Water Quality Standards and Wastewater Treatment Requirements* states that man-made waterways are to be protected for the use for which they were developed. The Sebree Canal is used agricultural irrigation.

The Sebree Canal flows into Conway Gulch, which is protected for cold water biota, and primary and secondary contact recreation. Conway Gulch then flows into the Boise River, which is protected for cold water biota, primary and secondary contact recreation, and agricultural water supply.

C. Water Quality Limited Segment

A water quality limited segment is any waterbody, or definable portion of water body, where it is known that water quality does not meet applicable water quality standards, and/or is not expected to meet applicable water quality standards. The Boise River, at the confluence of Conway Gulch, has been listed as a water quality limited segment. This section of the Boise River has been listed as water quality limited for nutrients, sediment, temperature and bacteria.

Section 303(d) of the Clean Water Act (CWA) requires States to develop a Total Maximum Daily Load (TMDL) management plan for water bodies determined to be water quality limited. A TMDL documents the amount of a pollutant a waterbody can assimilate without violating a state's water quality standards and allocates that load to known point sources and nonpoint sources.

The Idaho Division of Environmental Quality, Boise Regional Office is scheduled to prepare TMDLs for the tributaries to the Boise River in the year 2001. The TMDLs will address phosphorus, sediment, temperature and bacteria.

IV. EFFLUENT LIMITATIONS

In general, the Clean Water Act requires that the effluent limits for a particular pollutant be the more stringent of either technology-based effluent limits or water quality-based limits. A technology based effluent limit requires a minimum level of treatment for municipal point sources based on currently available treatment technologies. A water quality based effluent limit is designed to ensure that the water quality standards of a waterbody are being met.

In this case, water quality standards are not applicable for the Sebree Canal. There is the possibility that the discharge could impact Conway Gulch. However, during the irrigation season the dilution ratio is at least 40:1. If the effluent were to reach Conway Gulch it is not likely to affect the water quality because of the large dilution ratio. During the non-irrigation season, the only flow in the canal is from the facility and from storm water runoff. It is not know how much, if any, of the effluent reaches Conway Gulch. Therefore, the proposed permit will require the facility to comply with technology based effluent limits. In addition, monitoring conditions will be incorporated into the permit to help determine if the discharge is impacting water quality in Conway Gulch. For more information on deriving technology-based effluent limits and water quality-based effluent limits see Appendix B.

The following summarizes the effluent limitations that are in the draft permit.

1. The pH range shall be between 6.0 - 9.0 standard units.
2. 85% Removal Requirements for BOD₅: For any month, the monthly average effluent concentration shall not exceed 15 percent of the monthly average influent concentration.

TABLE 1: Monthly, Weekly and Daily Effluent Limitations

Parameters	Average Monthly Limit	Average Weekly Limit	Maximum Daily Limit
BOD ₅	30 mg/L (51.5 lbs/day)	45 mg/L (77.3 lbs/day)	---
TSS	30 mg/L (51.5 lbs/day)	45 mg/L (77.3 lbs/day)	---
Fecal Coliform Bacteria	---	200 colonies/100 ml	---

V. SLUDGE REQUIREMENTS

Currently, sludge from the treatment plant is stored at the bottom of the ponds. The permittee does not anticipate having to remove the sludge from the bottom of the ponds during the term of this permit (five years).

Section 405(f) of the CWA requires sludge use and disposal requirements to be incorporated into NPDES permits issued to a treatment works treating domestic wastewater. In addition, the sludge permitting regulations in 40 CFR §122 and §124 apply to all treatment works treating domestic wastewater.

General conditions have been incorporated into the proposed permit requiring the permittee to comply with all existing federal and state laws, and all regulations applying to sludge use and disposal.

VI. MONITORING REQUIREMENTS

Section 308 of the Clean Water Act and federal regulation 40 CFR 122.44(i) requires that monitoring be included in permits to determine compliance with effluent limitations. Monitoring may also be required to gather data for future effluent limitations or to monitor effluent impacts on receiving water quality. The Permittee is responsible for conducting the monitoring and for reporting results on Discharge Monitoring Reports to EPA. Table 2 presents the proposed effluent monitoring requirements based on the minimum sampling necessary to adequately monitor the facility's performance. Because the Boise River is listed as water quality limited for nutrients and temperature monitoring for these parameters has been included in the permit to help gather information for the development of the TMDL.

TABLE 2: Treatment Plant Monitoring Requirements

Parameter	Sample Location	Sample Frequency	Sample Type ¹
Flow, mgd	Influent or Effluent	Continuous	----
BOD ₅ , mg/L	Influent and Effluent	2/month	8-hour composite
TSS, mg/L	Influent and Effluent	2/month	8-hour composite
pH, standard units	Effluent	2/month	grab
Fecal Coliform Bacteria, colonies/100 ml	Effluent	5/week	grab
Chlorine ² , mg/L	Effluent	2/month	grab
Temperature, °C	Effluent	2/month	grab
Total Ammonia as N ² , mg/L	Effluent	2/month	8-hour composite
Total Kjeldahl Nitrogen ² , mg/L	Effluent	2/month	8-hour composite
Nitrate-Nitrite ² , mg/L	Effluent	2/month	8-hour composite
Total Phosphorus ² , mg/L	Effluent	2/month	8-hour composite
Ortho-Phosphate ² , mg/L	Effluent	2/month	8-hour composite
Footnotes:			
1. An eight (8) hour composite sample shall consist of three discrete aliquots collected over an eight hour period. Each aliquot shall be a grab sample of not less than 100 ml and shall be collected and stored in accordance with procedures prescribed in <i>Standard Methods for the Examination of Water and Wastewater</i> , 18th Edition.			
2. Monitoring for these parameters shall continue for a period of 24 months.			

VII. OTHER PERMIT CONDITIONS**A. Quality Assurance Plan**

The federal regulation at 40 CFR 122.41(e) requires the Permittee to develop and submit a Quality Assurance Plan to ensure that the monitoring data submitted is accurate and to explain data anomalies if they occur. The Permittee is required to submit a Quality Assurance Plan within 60 days of the effective date of the draft permit. The Quality Assurance Plan shall consist of standard operating procedures the Permittee must follow for collecting, handling, storing and shipping samples, laboratory analysis, and data reporting.

B. Additional Permit Provisions

Sections II, III, and IV of the draft permit contain standard regulatory language that must be included in all NPDES permits. Because they are regulations, they cannot be challenged in the context of an NPDES permit action. The standard regulatory language covers requirements such as monitoring, recording, reporting requirements, compliance responsibilities, and other general requirements.

VIII. OTHER LEGAL REQUIREMENTS

A. Endangered Species Act

The Endangered Species Act requires federal agencies to consult with the National Marine Fisheries Service and the U.S. Fish and Wildlife Service if their actions could adversely affect any threatened or endangered species. EPA has determined that issuance of this permit will not affect any of the endangered species in the vicinity of the discharge. See Appendix C for further details.

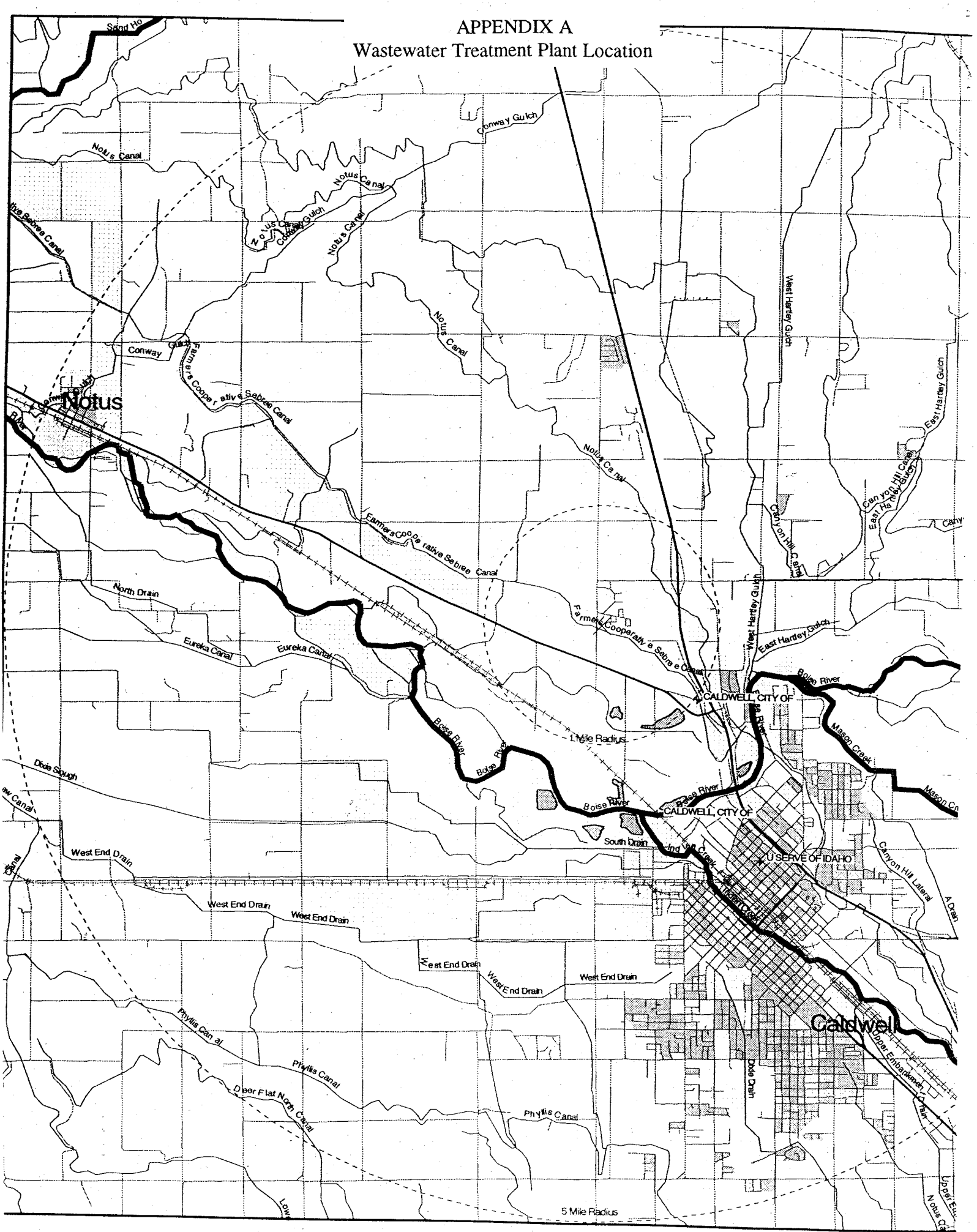
B. State Certification

Section 401 of the Clean Water Act requires EPA to seek state certification before issuing a final permit. As a result of the certification, the state may require more stringent permit conditions or additional monitoring requirements to ensure that the permit complies with water quality standards.

C. Permit Expiration

This permit will expire five years from the effective date of the permit.

APPENDIX A
Wastewater Treatment Plant Location



APPENDIX B
Basis for Effluent Limitations

Technology-based Effluent Limitations

The Caldwell Housing Authority is a non-municipal discharger referred to as a Treatment Works Treating Domestic Sewage (TWTDS). National performance based effluent limitations for TWTDS discharges have not been promulgated by EPA. In these cases, effluent limitations are developed using Best Professional Judgement (BPJ).

The authority for BPJ is contained in Section 402(a)(1) of the CWA. The NPDES regulations at 40 CFR § 125.3 define what factors must be considered when establishing BPJ-based conditions in a permit. In this case, BPJ-based limits have been incorporated into the draft permit based on the secondary treatment standards for municipal wastewater treatment plants.

The CWA requires Publicly Owned Treatment Works (POTWs) to meet performance-based requirements based on available wastewater treatment technology. Section 301 of the CWA established a required performance level, referred to as “secondary treatment,” that all POTWs were required to meet by July 1, 1977. EPA developed “secondary treatment” regulations which are specified in the 40 CFR 133. These technology-based effluent limits identify the minimum level of effluent quality attainable by secondary treatment in terms of five-day biochemical oxygen demand (BOD₅), total suspended solids (TSS), and pH.

The technology based effluent limits applicable to this facility are as follows:

TABLE 1: Effluent Limitations

Parameters	Average Monthly Limit	Average Weekly Limit	Percent Removal Requirements
BOD ₅	30 mg/L (51.5 lbs/day)	45 mg/L (77.3 lbs/day)	85
TSS	30 mg/L (51.5 lbs/day)	45 mg/L (77.3 lbs/day)	85

1. The pH range shall be between 6.0 - 9.0 standard units.
2. In addition to the above the, the Idaho *Water Quality Standards and Wastewater Treatment Requirements* (IDAPA16.01.02.420.02.b) require that fecal coliform concentrations in treated effluent not exceed a geometric mean of 200 colonies/100ml based on no more than one week’s data and a minimum of five samples.

APPENDIX C
ENDANGERED SPECIES ACT

Section 7 of the Endangered Species Act (ESA) requires federal agencies to request a consultation with the National Marine Fisheries Service and the U.S. Fish and Wildlife Service regarding potential effects an action may have on listed endangered species.

In a letter dated February 11, 1999, the U.S. Fish and Wildlife Service identified the Gray wolf as being a federally-listed endangered species. There are no proposed or candidate species in the area of the discharge. In a letter dated February 9, 1999, the National Oceanic and Atmospheric Administration, National Marine Fisheries Service stated that there are no listed endangered species within the Boise River basin.

EPA has determined that the requirements contained in the draft permit will not have an impact on the gray wolf. Hunting and habitat destruction are the primary causes of the gray wolf's decline. Issuance of an NPDES permit for the City of Notus wastewater treatment plant will not result in habitat destruction, nor will it result in changes in population that could result in increased habitat destruction. Furthermore, issuance of this permit will not impact the food sources of the gray wolf.