

Response to Comments
Draft NPDES Permit No. ID-002075-3
City of American Falls, Idaho

Background:

On March 7, 2001, EPA issued a notice of proposed reissuance of a National Pollutant Discharge Elimination System (NPDES) permit for a wastewater treatment facility owned and maintained by the City of American Falls, Idaho. The facility consists of solids removal by bar screening followed by dewatering and land-application of removed solids. Next is preaeration/grit removal by grit chamber. Secondary treatment is done with a submerged biological contactors and rotating biological contactor. Followed by secondary clarification and chlorination. The public review and comment period was from March 7, 2001 through April 7, 2001.

Written comments regarding the proposed permit for the City of American Falls facility were received from the permittee, through a letter from Deborah Rudeen, Mayor of the City of American Falls. The following summarizes and responds to each comment raised.

1. Comment: The permittee requested a decrease in monitoring of fecal coliform and E. coli because five times a week will create a financial burden to the city. The frequency of the previous permit was twice a week. They request EPA to consider no more than four times per week for sampling frequency so they can complete the tests in the five day work week.

Response: The State of Idaho 401 water quality certification in a letter dated September 12, 2001, has changed the frequency of monitoring of E. coli of this permit, as well as eliminating fecal coliform monitoring. (See letter addressed to City of Aberdeen from Idaho Department of Environmental Quality dated September 12, 2001.) The permit has been revised and fecal coliform monitoring will no longer be done and E. coli monitoring frequency shall be changed from 5/week to 2/week.

2. Comment: The permittee is concerned about the addition of the ambient monitoring requirement upstream. They express that it will be a financial burden to the city to purchase a larger boat and/or to build a monitoring station, as well as being extremely dangerous to take a boat out into this portion of the river.

Response: EPA does not expect the permittee to do anything that would put them in danger. A location will be selected, and agreed upon by all parties, which shall include: the permittee, Idaho Department of Environmental Quality, and Region 10 EPA that is safe to use for monitoring.

3. Comment: The permittee requests that the 7Q10 flow be calculated starting with the year 1958, and not the year 1910 as the draft fact sheet states. Their reason is the Palisades Dam was constructed in 1958 and the permittee believes that the presence of the dam has changed the flow characteristic of the Snake River. The permittee believes that from 1958 to the present time would be more reflective of present day flow values. The permittee believes that the 7Q10 flow used in the draft permit is too low and it is causing their limit for chlorine to be too low. They would like the limit to be raised and not be less than 0.2 mg/l chlorine residual, otherwise they would have to add dechlorination equipment or change their method of disinfection. Either way would be a

financial burden to the citizens of their city.

Response: EPA agrees that the 1Q10 and 7Q10 flows would be more reflective of present day flows if calculated from 1958, when the dam was built, and not from 1910. The 1Q10 and the 7Q10 flows were calculated starting in 1958 and used in the calculations to determine the limits for chlorine. Originally, in the draft fact sheet the acute, 1Q10 flow was more stringent than the chronic, 7Q10 flow and it was the 1Q10 that was used to determine the limits for chlorine. After using the data going back to 1958, the 1Q10 flow was still the most stringent and the flow value had not changed much from the year 1910 (from 58.0 cfs to 53.5 cfs). Therefore, the chlorine limits from the draft permit have been retained in the final permit (See Appendix A for additional information on developing the permit limits).