

**U.S. Environmental Protection Agency  
Region 10**

**Response to Comments  
City of Juliaetta  
Permit No. ID-002376-1**

**Background**

On October 17, 2003, EPA proposed to reissue the National Pollutant Discharge Elimination System (NPDES) Permit for the City of Juliaetta wastewater treatment facility. The Public Notice of the draft permit initiated a public comment period which expired on October 27, 2003. The EPA received comments on the draft permit from the City of Juliaetta. No other comments were received.

This document summarizes the comments received on the draft permit, and EPA's response to the comments. The document provides a record of the basis for changes made from the draft permit to the final permit. The Fact Sheet that accompanied the draft permit was not revised because it is already a final document that provides a basis for the draft permit.

**Comment 1**

The sampling frequency for E. coli is five times per month which is a financial burden on the City. The City requests that E. coli monitoring be reduced to once per week which will provide 52 annual samples which is equivalent to 60 samples for statistical analyses of the effluent characteristics.

Additionally, EPA allowed the City of Cottonwood to monitor once per week. At the least, the permit should provide a re-opener clause to address this issue if the Idaho Department of Environmental Quality revises its water quality standard for E. coli.

**Response 1**

The requirement to sample five times per month is a stipulation of the Idaho Water Quality Standards (IDAPA 58.01.02.251). The Water Quality Standards require that waters designated for primary contact recreation not contain E. coli bacteria in concentrations exceeding "a geometric mean of 126/100 ml based on a minimum of five samples taken every 3-5 days over a 30 day period." The monitoring frequency of 5 samples per month was incorporated directly into the permit.

The permit contains a provision which states that the permit may be modified, revoked and reissued, or terminated for cause as specified in 40 CFR 122.62, 122.64, or 124.5. (See Part IV.A. of the permit). If the Idaho Department of Environmental Quality revises its water quality standard for E. coli, and EPA approves the water quality standard revision, then the permittee may submit a request for a permit modification.

Final Permit Revision: None

**Comment 2**

The City's budget has been established for fiscal year 2004 and expenses necessary for effluent dechlorination, sampling/testing equipment, new sampling requirements, development of an Operations and Maintenance Plan, and a Quality Assurance Plan have not been funded. The City does not have the in-house expertise to address these items and will need to procure engineering services. Therefore, the City requests that the compliance date for sampling revisions, dechlorination, development of an Operations and Maintenance Plan, and development of a Quality Assurance Plan be extended to January 2005.

**Response 2**

To allow the City additional time to fund and develop the Operation and Maintenance Plan and the Quality Assurance Plan, the final permit has been revised to require these documents to be developed and implemented within 18 months of the effective date of the permit.

In their 401 Certification, Idaho Department of Environmental Quality provided a three-year compliance schedule for the final chlorine limitations to allow adequate time for any necessary treatment plant modifications to meet the limits. In the interim, a technology-based average monthly chlorine limitation of 0.5 mg/L is established in the permit. The derivation of this technology-based limit was provided in the Fact Sheet.

The final permit requires surface water sampling to begin in January 2005. This will allow the permittee additional time to prepare for the monitoring.

Final Permit Revision: Sections I.D. (Operation and Maintenance Plan) and I.E. (Quality Assurance Requirements) of the permit are modified to require that the documents be developed and implemented within 18 months of the effective date of the permit. Section I.B *Chlorine Schedule of Compliance* is added. Section II.J *Compliance Schedules* is added. Table 1 *Effluent Limitations and Monitoring Requirements* is modified to include Note 4 regarding the chlorine compliance schedule. Section I.C (Surface Water Monitoring Requirements) is revised to require surface water monitoring to begin in January 2005.