

Response to Comments
Draft NPDES Permit No. ID-002545-3
Housing Authority of the City of Caldwell, Idaho, Farmway Village.

Background: On June 11, 1999, EPA issued a notice of proposed issuance of a National Pollutant Discharge Elimination System (NPDES) permit for the Caldwell Housing Authority. The facility is a flow through lagoon system. The wastewater from the facility is discharged to the Sebree Canal. The public review and comment period expired on, July 12, 1999.

Written comments regarding the proposed permit for the facility were received from Holladay Engineering Company. The following summarizes and responds to each significant comment raised.

- Comment: The correct name of the facility is the Housing Authority of the City of Caldwell, Idaho, Farmway Village.

Response: The final permit has been revised to reflect the correct name.

2. Comment: The facility is a flow through lagoon system that will not provide the treatment noted in the draft permit. The effluent limitations should be as follows:
 - a) the pH range should be 5.0 - 10.0
 - b) the removal requirements for BOD₅ should be 65%
 - c) the concentrations limits for BOD₅ should be an monthly limit of 45 mg/L and a weekly limit 65 mg/L
 - d) the concentrations limits for TSS should be a monthly limit of 70 mg/L and a weekly limit 105 mg/L

Response: The regulations allow alternative limits for facilities, using lagoon systems. These alternative limits are called “treatment equivalent to secondary treatment.”

The regulation also includes a provision for an Alternative State Requirement (40 CFR 133.105(d)). This allows the State the flexibility to set permit limits above the maximum levels for “treatment equivalent to secondary treatment.” For waste lagoons, the Idaho *Water Quality Standards and Wastewater Treatment Requirements at IDAPA16.01.02.420.02.b* has established average monthly limits for five-day BOD₅, and TSS. The final permit has been revised to include the following:

- a) a 65% removal requirement for BOD₅,
- b) a monthly limit of 45 mg/L, and a weekly limit 65 mg/L for BOD₅, and
- d) a monthly limit of 70 mg/L, and a weekly limit 105 mg/L for TSS.

There is no alternative limit allowed for pH, therefore, the final permit retains the pH range of 6.0 - 9.0 standard units (see Idaho Certification Requirements for additional information on pH).

3. Comment: The draft permit required the permittee to monitor for parameters to support the development of the nutrient TMDL. It was requested that these monitoring requirements be deleted from the final permit since it is a duplication of testing being done by IDEQ and others.

Response: EPA has contacted IDEQ and found that they are not monitoring the facility's effluent, therefore, these requirements will remain in the final permit.

4. Comment: The commenter requested that monitoring for BOD₅, TSS, and pH be changed from twice per month to once per month. Additionally, they requested that fecal coliform monitoring be changed from 5 times per month to once per month.

Response: Monitoring for BOD₅, TSS and pH twice per month is typical for small facilities. Monitoring 5 times a week for fecal coliform is a requirement of the state water quality standards, and EPA cannot revise their standard. Additionally, since there is no data available for the facility it is important to collect enough data to determine if the facility is operating efficiently.

5. Comment: The commenter requested that the facility be allowed to discharge year round rather than just from November 1 through March 31.

Response: The final permit has been revised to allow discharge year round.

Idaho State Certification Requirements

Pursuant to Section 401 of the Clean Water Act, the State of Idaho provided certification that the requirements set forth in the NPDES comply with the Idaho water quality standards. As part of the certification, the State required that monitoring for E. Coli bacteria be incorporated into the permit during the fourth year of the permit term. This requirement has been added to the final permit. The certification also required the pH limit to be amended to reflect the Idaho water quality standards of 6.5 - 9.5 standard units. The limit in the draft permit was 6.0 - 9.0 standard units, this limit was based on technology standards set out in 40 CFR 133. In the final permit the lower limit has been amended to reflect the State's certification requirement, however, the upper limit cannot be made less stringent than the technology based standard. Therefore, the final limit in the permit is 6.5 - 9.0 standard units.

