

RESPONSE TO COMMENTS

Elk City Water and Sewer Association
Elk City, Idaho
NPDES Permit No.: ID-002201-2
Public Comment Period: February 27 - March 27, 2002

During the public comment period specified above, only the State of Idaho, Department of Environmental Quality (DEQ) submitted comments. This document summarizes the comments and the EPA responses to the comments.

1. Comment: The commenter clarified that because the facility discharges to a water quality-limited water body, any interim increases in existing loads may result in the need for greater load reduction once a total maximum daily loading (TMDL) is developed and implemented.

 Response: EPA has noted the comment. The permit has not been revised to include this language. EPA believes that noting the comment in the record is sufficient.
2. Comment: IDEQ requested that IDEQ participate in the selection of surface water monitoring stations.

 Response: The permit has been revised to require that IDEQ participate in selection of the surface water monitoring stations.
3. Comment: IDEQ requested that monitoring for *E. coli* be reduced from five times per month to once per week based on potential economic hardship to the communities. In addition, the requirement for once per week will still ensure that 52 samples yearly will be collected.

 Response: EPA agrees that 52 weekly samples per year will adequately ensure compliance with the Idaho water quality standard for *E. coli*. The permit has been revised to require monitoring for *E. coli* once per week instead of five times per month.

In addition to the changes discussed above, EPA has revised the permit (section IV.A.) to include a reopener to address the outcome of the final TMDL developed for the South Fork. In a letter dated July 9, 2002, IDEQ certified that the terms and conditions of the NPDES permit for Elk City will not violate Idaho water quality standards.