

**Response to Comments**  
**Draft NPDES Permit No. ID-002029-0**  
**City of Weiser, Idaho**

On March 26, 2001, EPA issued a notice of proposed reissuance of a National Pollutant Discharge Elimination System (NPDES) permit for a discharge from the City of Weiser's wastewater treatment plant. The treatment plant provides secondary treatment, serves a population of 4,900, and currently has an annual average flow rate of 1.67 mgd. The public review and comment period expired on April 25, 2001.

Written comments regarding the proposed permit were received from the City of Weiser, through a letter from Michael Holladay of Holladay Engineering Co., and from the Idaho Department of Environmental Quality (IDEQ). The following summarizes and responds to each comment raised.

City of Weiser Comments

1.     Comment:     The latitude and longitude in the draft permit are incorrect and should be listed as latitude 44° 14' 56" and longitude 116° 58' 53".

          Response:    The correct latitude and longitude have been incorporated into the final permit.
2.     Comment:     The design values listed in the "Facility Planning Requirements" section of the draft permit need to be updated to reflect modifications and changes that have taken place to the existing treatment plant. The BOD value should be 1750 and the TSS value should be 1950.

          Response:    The design values for BOD and TSS have been revised in the final permit to reflect the above values.
3.     Comment:     The City requested that they be allowed a 180 day period of compliance for all new permit requirements. This would give the City the opportunity to fine tune their system without any violation of the initial date of the new permit.

          Response:    The requirements in the final permit have been changed to the following: the Quality Assurance Plan must be developed within 90 days of the effective date of the permit and implemented within 180 days. The Facility Planning Requirements must start 180 days after the effective date of the permit.
4.     Comment:     The City stated that they will be starting the river monitoring program as soon as possible after May 1<sup>st</sup> so that they can have additional data to add to the Snake River/Hells Canyon TMDL.

Response: Since the City will start receiving water monitoring as soon as possible, the requirements in the final permit have been revised to allow the permittee to start the 2 year monitoring program within 6 months of the effective date of the permit. The requirement to collect receiving water samples on the same day as effluent samples are collected has been deleted from the permit, since the time frame for receiving water and effluent monitoring will be different. Additionally, the results of the monitoring only have to be submitted with the permittee's renewal application and upon request from IDEQ or EPA. They do not need to be submitted on the monthly DMR.

5. Comment: A table in the fact sheet lists the total residual chlorine limit as 0.5 : g/L rather than 0.5 mg/L. The City requested that this be corrected.

Response: The fact sheet is a final document that cannot be revised. However, the permittee's comment letter will be retained in the administrative record for this permit so that an official record will exist about the permittee's clarifications on the fact sheet. Additionally, the final permit which is the legal document that the permittee has to comply with reflects the correct limit of 0.5 mg/L.

6. Comment: The City stated that they will be using a lab that has a detection level of 0.0002 : g/L for mercury which should correspond with the EPA approved test method 1631 for mercury.

Response: The permit requires the detection level for mercury to be 0.005 : g/L or less, however, EPA supports the use of lower detection levels whenever possible.

7. Comment: All notations for wastewater sludge should be changed to biosolids.

Response: The final permit has been revised and now refers to sludge as biosolids.

#### IDEQ Comments

1. Comment: IDEQ requested to know why both fecal coliform bacteria and E. Coli bacteria were being required in the permit

Response: The E.Coli monitoring is required because it is a water quality standard, and the fecal coliform is required because it is a state technology based limitation.

2. Comment: IDEQ recommended effluent monitoring for total phosphorus, once a week, to help determine the City's phosphorus loading and to help determine the proper wasteload allocation for the City in the Snake River/Hells Canyon TMDL.

Once a month receiving water monitoring for total phosphorus is recommended to help develop the TMDL.

Response: EPA agrees with IDEQ and has included the monitoring in the final permit.

**Corrections to the final permit**

1. On page 4 of the draft permit it stated that the Quality Assurance Plan must be submitted to EPA. The Quality Assurance Plan is not required to be submitted to EPA, therefore, this has been removed from the final permit.
2. On page 5 of the draft permit footnotes 3 and 4 were referenced for total residual chlorine. These footnotes are not applicable to total residual chlorine, therefore, they have been deleted from the final permit.