

November 21, 2001

Response to Comments

Draft NPDES Permit for:  
City of Sandpoint  
Wastewater Treatment Facility  
NPDES No.: ID-002084-2

On May 2, 2001, the Environmental Protection Agency (EPA) issued a draft National Pollutant Discharge Elimination System (NPDES) permit to the City of Sandpoint for the discharge from a wastewater treatment facility. The City of Sandpoint owns and operates the facility which treats domestic sewage from local residents and commercial establishments. Following treatment the effluent is discharged to the Pend Oreille River. The public comment period for the draft permit extended thirty days from May 2 to June 1, 2001. No comments were received on the draft permit.

On July 26, 2001, EPA received a final certification from the State of Idaho pursuant to the provisions of Section 401 of the Clean Water Act. The Section 401 certification finds that if the facility complies with the terms and conditions imposed by the permit, there is reasonable assurance that the discharge will comply with Idaho Water Quality Standards and Wastewater Treatment Requirements (Idaho standards). This certification was provided in a letter to Mr. Robert Robichaud, EPA, from Mr. Gwen P. Fransen, Regional Administrator, Idaho Department of Environmental Quality, Coeur d'Alene. The certification did include stipulations, discussed below, which resulted in two relatively minor revisions to the draft permit.

The draft permit includes limitations for both E.coli and fecal coliform bacteria based upon the Idaho standards. As discussed further in the certification letter, the Idaho Department of Environmental Quality (IDEQ) believes that both limitations provide approximately equivalent levels of protection. Therefore, IDEQ will interpret the E.coli limitation as a surrogate for fecal coliform for the purposes of evaluating compliance with Idaho standards. As a result of this interpretation, the fecal coliform limitation in the permit is redundant and has been removed from the final permit. IDEQ request that E.coli limitations be retained in the final permit as proposed with a sampling frequency of five (5) samples taken every three (3) to five (5) days over a thirty (30) day period as required by the standards. EPA has included the E.coli limitation as proposed in the final permit.

The draft permit also includes a receiving water sampling program which requires monitoring for a number of parameters including flow. IDEQ points out in their certification letter that the width of the river upstream of the discharge makes it

very difficult to obtain reliable flow recordings without significant equipment purchase and personnel training. IDEQ request that flow measurements not be required in the final permit. EPA concurs with this recommendation and has removed flow measurement from the receiving monitoring provisions of the final permit.