

Response to Comments Specific to Eagle Oil and Gas Sheldon Dome WY-0020338
March 9, 3015

1. Comment stated that the methods and frequencies of sampling for many if not all of the toxins, chemicals, and other residues in section 1.3.2 are neither sufficient nor performed frequently enough. "Grab" and "visual" samples on a weekly basis alone would not seem to be adequate to evaluate the toxicity of the water or impact on the environment, let alone monthly or quarterly sampling.

Response: *EPA is providing below, a more detailed explanation of the monitoring requirements in the permit below. Responses are grouped with respect to changes in monitoring requirements from the previously issued permit. These include previously limited pollutants as well as new effluent limits for sulfide (as H₂S), Whole Effluent Toxicity (WET), and monitoring for a Toxic Pollutants Screen.*

New Requirements: There are new requirements in the permits including monitoring and limits for pollutants which were not previously limited (i.e., sulfide (as H₂S) and WET), monitoring for pollutants which were previously limited but have more stringent limitations proposed (i.e., chloride, sulfate), and monitoring for pollutants that are not limited (i.e. Toxic Pollutants Screen).

For the newly limited parameters, sulfide (as H₂S) and WET, EPA has determined the discharge has the reasonable potential to cause an excursion of the Tribes' numeric water quality criterion for sulfide (as H₂S) and narrative requirements for toxicity, and has therefore included limits for WET and sulfide as required under 40 CFR § 122.44(d). The quarterly monitoring frequency in the permit for sulfide (as H₂S) and WET is sufficient to establish compliance with the limitation for these parameters. In the event there is a WET test failure, the permit requires an expedited additional retest and contains requirements for identifying and reducing toxicants. The quarterly monitoring requirements are contained in Section 1.3.2 of the final permit.

For pollutants previously limited but having more stringent final limitations in the permit, chloride and sulfate, EPA kept the monitoring frequency of these pollutants at the same frequency as in the previous permit. EPA has sufficient data from previous permit monitoring requirements to estimate the expected variability of the pollutant in the discharge. This same monitoring frequency is adequate to demonstrate compliance with the new limitations in the final permit.

EPA has also included new or additional monitoring for certain pollutants that do not have effluent limits. Thus, there are now Toxic Pollutant Screen requirements in the permit.