

RESPONSE TO COMMENTS

City of Winchester Wastewater Treatment Plant NPDES Permit #ID-002018-4 January 3, 2013

On August 9, 2012, the U.S. Environmental Protection Agency (EPA) issued a public notice for the issuance of the City of Winchester Wastewater Treatment Plant (WWTP) draft National Pollutant Discharge Elimination System (NPDES) Permit No. ID-002018-4. This Response to Comments provides a summary of significant comments and provides corresponding EPA responses. As a result of the comments, EPA made a few minor changes to the permit, including: changing influent and effluent sampling requirements from 24-hour composite to grab samples, correcting the permit to more accurately reflect E. coli monitoring requirements, and adjusting the frequency of ammonia monitoring.

Comments were received from Mike Haight, Maintenance Superintendent for the City of Winchester (City). No other comments were received. Comments from the City are provided verbatim.

1. Comment (City):

The BOD and TSS effluent lb. per day should be 8 lb. and 12 lbs. as these limits have been good for the past 40 years and should be whole numbers.

Response:

As explained in the Fact Sheet and according to 40 CFR 122.45(b), effluent limitations for POTWs are calculated based on the design flow of the facility. The mass based limits are expressed in pounds per day and are calculated as follows: Mass based limit (lb/day) = concentration limit (mg/L) × design flow (mgd) × 8.34¹.

The facility reported its design flow as 0.03 mgd in its most recent permit application (the previous permit's calculations were based on a design flow of 0.035 mgd). Since EPA based its calculations on the design flow from the most recent permit application, the technology based mass limits for BOD and TSS were calculated as follows:

$$\text{Average Monthly Limit} = 30 \text{ mg/L} \times 0.03 \text{ mgd} \times 8.34 = 7.51 \text{ lbs/day}$$

$$\text{Average Weekly Limit} = 45 \text{ mg/L} \times 0.03 \text{ mgd} \times 8.34 = 11.26 \text{ lbs/day}$$

The permit is not changed.

¹ 8.34 is a conversion factor with units (lb × L)/(mg × gallon × 10⁶)

2. Comment (City):

The Influent and Effluent concentrations sample type should be grab not 24 hour composite as listed in Table 2 of the Draft Fact Sheet.

Response:

EPA will require grab samples instead of 24-hour composite samples. The previous permit also required grab samples.

3. Comment (City):

The E. coli testing frequency should be 3 to 7 days not 3 to 5 days as listed in Table 1: Effluent Limitations and Monitoring Requirements #2.

Response:

The City is correct; IDAPA 58.01.02.251.01.a (the *E. coli* geometric mean criterion) requires a minimum of five samples taken every three to seven days over a 30 day period. EPA will update the permit to reflect this correction.

4. Comment (City):

The cost Chlorine Amperometric Titrator needed to measure Cl₂ at the ug/L level is \$1,846.00 for a test that may only be used a couple times a year.

Response:

As explained in the Fact Sheet, the water quality based effluent limit for chlorine is in micrograms. Since the new permit limit is in micrograms, the City must use sufficiently sensitive methods to be able to measure chlorine in micrograms. NPDES applicants and permittees must use analytical methods that are capable of detecting and measuring the pollutants at or below the respective water quality criteria or permit limits.

EPA would like to clarify that if the City does not use chlorine, it will not have to monitor for it.

The permit is not changed.

5. Comment (City):

The City of Winchester has tested for ammonia for the past 4-5 years voluntarily and feel that enough data has been recorded to reduce the frequency to 1/30 from the proposed 1/7 days.

Response:

The facility's ammonia levels have been fairly stable over the course of the last permit cycle, so EPA will reduce the City's ammonia monitoring to twice per month. This should not be overly onerous for the City and will still provide EPA with enough data to monitor compliance with this new permit limit. Monitoring twice monthly for five years will provide 120 samples; this quantity should provide enough data to perform a reasonable potential analysis for ammonia.

Note: EPA encourages more frequent sampling because it results in a more robust data set for the next permit cycle. If a permit writer lacks sufficient data, he or she has to make conservative assumptions about worst case conditions. Thus, it is to a facility's benefit to generate a more complete and robust data set.

6. Comment (City):

Catherine Gockel the contact person for our permit is currently unavailable. We would like an extension of time to discuss the permit in detail with Ms. Gockel.

Response:

Catherine Gockel, the permit writer, was on leave but will make herself available to discuss the permit with the City.