

RESPONSE TO COMMENTS

City of Marsing Wastewater Treatment Plant NPDES Permit ID0021202 August 13, 2015

On July 13, 2015, the U.S. Environmental Protection Agency (EPA) issued a public notice for the reissuance of the City of Marsing Wastewater Treatment Plant (WWTP) National Pollutant Discharge Elimination System (NPDES) Permit No. ID0021202. This Response to Comments provides a summary of significant comments and provides corresponding EPA responses. The comments resulted in no changes to the permit.

Comments were received from the following:

Justin Hayes, Program Director, Idaho Conservation League (ICL)

Comment (ICL): Year Round TP Effluent Limits Needed

The Oregon Department of Environmental Quality's 303(d) list from the year 2010 reports that the Snake River in Oregon – downstream from the point of discharge from the Marsing WWTP – is out of compliance with Oregon State water quality standards for Chlorophyll a in the Spring, Summer and Fall and for Dissolved Oxygen all year round. Total Phosphorus discharges to the Snake River cause or contribute to exceedances in chlorophyll a and dissolved oxygen standards in these downstream waters.

The draft NPDES permit for the Marsing WWTP contains limits on total phosphorus discharges only during the May-Sept period. Because Oregon's water quality standards are being exceeded during periods outside of the May-Sept period, the EPA must develop limits for TP discharges which limit these discharges beyond the May-Sept time period.

Response: The downstream Middle-Snake Powder TMDL will address chlorophyll a and total phosphorus in the Oregon segment of the Snake River. Currently Oregon is conducting necessary monitoring to support TMDL development for these parameters. Analysis began in 2015 and the target date for completion of the TMDL is 2017. It is premature to establish any chlorophyll a or total phosphorus effluent limits for the City of Marsing until this watershed management plan is completed. If any allocations are provided to Marsing by the Middle-Snake Powder TMDL the EPA will utilize them in permit development.