

Response to Comments on the Draft NPDES Permit for Mountain Home Air Force Base

NPDES Permit #ID-0027642

October 2009

Overview

On August 27, 2009, EPA issued a draft permit for the Mountain Home Air Force Base (AFB) wastewater system. The public comment period ended on September 28, 2009. EPA received comments from Mountain Home Air Force Base.

Comment #1

Regarding paragraph I.B.10 on page 5 of the draft permit, the commenter stated that the Mountain Home AFB wastewater treatment plant (WWTP) discharge pipe is located downstream of the United States Geological Survey (USGS) flow measuring station #131610556, thus it is not possible to calculate flow rate from that station. The WWTP currently measures discharge flow rates via the weir at the end of the plant's chlorine contact basin discharge pipe. The commenter asked whether this practice may be continued under the new permit.

Response #1

The draft permit proposed to require monitoring and reporting of both the effluent and the downstream receiving water flow rate (see the draft permit at Table 1). Paragraph I.B.10, on page 5 of the draft permit, refers only to the calculation and reporting of the downstream flow rate.

EPA understands that the discharge pipe is downstream of the USGS flow monitoring station. Thus, the effluent flow rate cannot be monitored at the USGS flow monitoring station. However, the downstream flow rate may be calculated by summing the effluent flow rate (which may be measured as described by the commenter) and the upstream flow rate measured at the USGS station (effluent plus upstream equals downstream). This is what paragraph I.B.10 requires.

It is necessary to calculate the downstream flow rate because the effluent limits for dissolved oxygen and pH vary based on the downstream flow rate. These effluent limits vary based on the downstream flow rate because Idaho's water quality standards state that numeric water quality criteria for aquatic life uses only apply to intermittent waters at times when the flow rate is at least 1 CFS (IDAPA 58.01.02.070.06). See also the fact sheet at Pages C-3 through C-5.

Revisions to the Draft Permit

It is apparent from the comment that the draft permit language is unclear. Therefore, EPA has edited paragraph I.B.10 for clarity. The substance of the permit requirements is unchanged from the draft permit.

Comment #2

Regarding Table 1 on Page 6, commenters stated that the fact sheet stated that the required oil & grease sample type is a grab sample, while in the permit it is listed as a 24-hour composite sample. Commenters asked EPA to please confirm the sample type for oil & grease.

Response #2

The requirement for a 24-hour composite sample for oil and grease in Table 1 of the draft permit was an error. The fact sheet's statement that oil and grease is to be measured using a grab sample was correct.

Revisions to the Draft Permit

The final permit has been corrected, so that the required sample type for oil and grease is a grab sample, consistent with the fact sheet.

Correction of Errors in the Draft Permit

Footnote #1 to Table 1

In the draft permit, the first sentence of footnote #1 to Table 1 read "(t)he average monthly E. Coli bacteria counts must not exceed a geometric mean of 126/100 ml based on a minimum of five samples taken every 3-5 days within a calendar month." This should have read "...five samples taken every 3-7 days..." consistent with IDAPA 58.01.02.251.01.a.

Sample Types in Table 1

Table 1 has been edited to specify that effluent loadings (lb/day or lb/year) are to be calculated from the effluent flow and the effluent concentration on the day of sampling.