

Response to Comments on the Draft NPDES Permit for the City of St. Anthony, Idaho

NPDES Permit No. ID-0020401

October 2009

On July 22, 2009, EPA issued a draft permit for the City of St. Anthony for public review and comment. The public comment period expired on August 21, 2009. EPA received comments from Marvin Fielding, P.E., of Schiess and Associates, on behalf of the City of St. Anthony.

Comment #1

Mr. Fielding requested that the monitoring frequency for BOD₅, TSS, and ammonia be reduced to once per month from the proposed frequency of twice per month, based on the performance of the facility since it was upgraded in November 2005.

Mr. Fielding stated that, since that time, exceedances of the proposed BOD₅ effluent limits have been very infrequent. Mr. Fielding also stated that “TSS concentrations have not exceeded permit limits since November 2005.” Mr. Fielding requested that the monitoring frequency for ammonia be reduced to once per month as well, so that ammonia monitoring could coincide with BOD₅ and TSS monitoring.

Response #1

A review of effluent data collected since December 2005 shows that effluent concentrations of BOD₅, TSS, and ammonia were less than the monthly average effluent limits proposed in the final permit 98%, 92%, and 100% of the time, respectively.

Since the upgrades were completed, the effluent concentrations of BOD₅ and ammonia were less than the monthly average effluent limits nearly all of the time. Therefore, EPA agrees with the commenter that once per month sampling of BOD₅ and ammonia is adequate to characterize the discharge, for those parameters.

The effluent concentrations of TSS were greater than the effluent limits in the final permit about 8% of the time, since December 2005. Mr. Fielding’s statement that “TSS concentrations have not exceeded permit limits since November 2005” is correct, but the TSS effluent limits in the reissued permit are more stringent than those in the previous permit. The basis for the more-stringent TSS effluent limits in the reissued permit is stated in Appendix C of the fact sheet.

Since effluent TSS concentrations are greater than the monthly average effluent limit, for a significant part of the time, even following the completion of upgrades, EPA has not reduced the monitoring frequency for TSS to once per month, from the proposed frequency of twice per month.

Revisions to the Draft Permit

The required monitoring frequency for BOD₅ and ammonia was changed to once per month from the proposed frequency of twice per month.

Correction of Errors in the Draft Permit

Sample Type for Oil and Grease

EPA has changed the sample type for oil and grease from 8-hour composite in the draft permit to grab in the final permit. Oil and grease cannot be properly measured using a composite sample; the specification of a composite sample in the draft permit was an error. Note that the table of monitoring requirements in the fact sheet (Table 3 on Page 13) states the sample type for oil and grease as “grab.”

Compliance Schedule

The draft permit contained an item labeled “compliance schedule” in the schedule of submissions on Page 2. Neither the draft nor the final permit contains a compliance schedule. Therefore, the reference to compliance schedules in the schedule of submissions has been deleted. Other items in the schedule of submissions have been re-numbered.

Surface Water Monitoring Frequency

The fact sheet stated that the draft permit required quarterly surface water monitoring (see Page 14), but the draft permit did not state a required surface water monitoring frequency. In the final permit, Table 2 has been edited to include the quarterly monitoring frequency stated in the fact sheet.