

RESPONSE TO COMMENTS
DRAFT NPDES PERMIT ID-002715-4
UNIVERSITY OF IDAHO AQUACULTURE LABORATORY

A draft National Pollutant Discharge Elimination System (NPDES) permit for the University of Idaho Aquaculture Laboratory was issued for public notice on August 17, 1998. The Public Notice initiated a 30-day public comment period. EPA received comment from Fred Hutchison, Safety Officer, University of Idaho, in a letter dated September 14, 1998. No other comments were received. The following summarizes the substantive comments and EPA's response.

Comment. Effluent Monitoring - Chlorine. The commentator stated that the laboratory does not normally require the use of chlorine to treat the discharge water and requests that the chlorine monitoring be conducted only when it is added to the discharge water.

Response. EPA agrees with this comment and will change the final permit accordingly.

Comment. Effluent Monitoring - Total Phosphorus as P. The commentator stated that the effluent limits for phosphorus are applicable during the period of May 15 through October 15, but the monitoring requirements apply continuously. The commentator requests that the monitoring coincide with the period that the limit applies.

Response. EPA agrees with this comment and will change the final permit accordingly.

Comment. Effluent Monitoring - Temperature. The commentator stated that the temperature monitoring requirement for a 24-hour composite would require the facility to purchase expensive sampling equipment and requests that a grab sample be allowed in lieu of the 24-hour composite.

Response. EPA agrees that a 24-hour composite sample is not necessary for this discharge and will allow the use of a grab sample, as long as it is taken during the hottest part of the day (i.e., late afternoon) to reflect the highest temperature discharge (See footnote number 3 with Table 2 of the permit).

Comment. Effluent Monitoring - Sample Frequency. The commentator stated that since the effluent discharge has not exceeded the permit limitations and discharges a relatively minor quantity, the facility requests a reduction in the monitoring frequency to alleviate operating costs as follows:

Parameter	Draft Permit Sample Frequency	Requested Sample Frequency
Dissolved Oxygen	2/month	1/month
Fecal Coliform Bacteria	2/month	1/month
pH	2/week	1/month
Temperature	1/week	1/month
Total Phosphorus as P	2/month	1/month

Response. EPA has reviewed the Discharge Monitoring Report (DMR) data of the facility and has determined that the following parameters may have reduced monitoring frequency: dissolved oxygen, fecal coliform bacteria, and pH. The parameters of temperature and total phosphorus will remain at the frequency developed for the draft permit. The following describes the basis for this decision for each parameter:

- Dissolved Oxygen: The DMR data showed that the value for dissolved oxygen had always exceeded 8.0 mg/L, as prescribed in the permit. Therefore, it is reasonable that the sample frequency be reduced from 2/month to 1/month.
- Fecal Coliform Bacteria: The DMR data showed that the value for fecal coliform bacteria had exceeded the limit of 100 colonies/100 mL only once during the previous permitting period. This presents a low probability that the permittee would exceed this limit in the future. Therefore, it is reasonable that the sample frequency be reduced from 2/month to 1/month.
- pH: The DMR data showed that the value for pH had always remained within the range of 6.5 to 8.5, as prescribed in the permit. Therefore, it is reasonable that the sample frequency be reduced from 2/week to 2/month.
- Temperature: Temperature monitoring was not required during the previous permitting period. Since this is a new requirement for the facility and temperature monitoring is not a high operating cost, it is reasonable for the sampling frequency to remain at 1/week.
- Total Phosphorus as P: Total phosphorus monitoring was only required during the first year of the previous permitting period. During that time, only four samples were taken. Due to the limited

amount of previous sampling and the low cost of phosphorus analysis, it is reasonable for the sampling frequency to remain at 2/month.

Comment. Effluent Monitoring - Sample Type. The commentor stated that the requirement for a 24-hour composite would require the facility to purchase expensive sampling equipment and requests that a composite sample comprised of a series of four grab samples be allowed in lieu of the 24-hour continuous composite.

Response. EPA agrees that a 24-hour composite sample is not necessary for this discharge and will change the composite sampling requirement to reflect the combining of four grab samples taken every two hours during a 24-hour period.

Comment. Effluent Monitoring - Sample Collection. The commentor stated that the final effluent discharges to a sump (hence forward referred to as the “discharge sump”) where it can be diverted to Paradise Creek or to the Moscow waste water treatment plan. Since no treatment occurs and no pollutants are added after this point, the commentor requested that sampling be conducted at a sump inside the laboratory instead of at the end of the discharge pipe.

Response. Even though the most logical monitoring point for an effluent is just prior to discharge to the receiving water, EPA agrees that sampling at the discharge sump is an acceptable alternate monitoring location and will specify this this alternate monitoring location in the final permit.

Comment. Effluent Monitoring - Sample Collection. The commentor stated that the requirement to coordinate sampling with the Moscow waste water treatment plant (WWTP) may provide some difficulties and requests that this requirement be removed.

Response. In the draft permit, the permittee is not required to conduct any instream monitoring. Due to the close proximity to the Moscow WWTP, the intent was to correlate the Moscow WWTP’s instream monitoring with the University’s effluent data. EPA agrees that there may be some difficulties in coordinating the sampling effort, but would still like to see the two facilities attempt to coordinate sampling activities. Therefore, the final permit will keep the sampling requirement, but add “to the extent practicable” to allow for any miscoordination between the two facilities.