

MEMORANDUM

TO: Larry Waters, P.E., Engineering Manager, Wastewater Program
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Valerie Greear, P.E., Technical Engineer, Boise Regional Office

FROM: Wendy Waudby, P.E., Staff Engineer, Boise Regional Office

DATE: August 9, 2016

SUBJECT: M-240-01, City of Kuna, Staff Analysis Supporting Permit Modification 1 for Extensions of Compliance Activities Due Dates

PURPOSE

The purpose of this memorandum is to describe the basis for issuing a Reuse Permit Modification to the City of Kuna (City) to extend the due dates of the Plan of Operation (PO) and Quality Assurance Project Plan (QAPP) Compliance Activities required by Reuse Permit M-240-01. This staff analysis is provided with the draft reuse permit modification for a 15-day period during which the public and the permittee can review and comment upon the proposed permit modification. After the public review period is closed, the Idaho Department of Environmental Quality (DEQ) will provide written responses to all comments received, and prepare a final permit modification.

DISCUSSION

The City of Kuna began operating the North Wastewater Treatment Plant (WWTP) in August of 2009. The North WWTP has always discharged to Indian Creek under the City's NPDES permit. In December 2015, DEQ issued a city-wide reuse permit to the City to utilize Class A recycled water from the North WWTP in their pressurized irrigation system. This permit, M-240-01, requires the City to receive approval from DEQ for compliance activities related to public education and disinfection prior to utilizing recycled water in the pressurized irrigation system. This permit requires the City to submit a PO and QAPP six months after permit issuance or June 7, 2016. The City has not started design or construction of the facilities/modifications to produce and utilize Class A Recycled Water.

On June 27, 2016, DEQ received a letter requesting extensions of the due dates for the PO and QAPP Compliance Activities. The City's request stated, "During design, we will have better knowledge of the equipment to be used, sampling locations, and disinfection methods and procedures to operate the system in accordance with permit requirements." The City has essentially requested the due dates for the PO and QAPP Compliance Activities be the same as the due dates for the compliance activities related to public education and disinfection, which require the activities to be completed and appropriate approvals received prior to recycled water being utilized in the pressurized irrigation system.

CONCLUSIONS

The Recycled Water Rules, IDAPA 58.01.17.700, lay out the requirements for issuing permit modifications. Subsection 01 defines the circumstances for which DEQ may initiate a permit modification, of which Subsection 01.c states, "Compliance schedules. The Department determines good cause exists for modification of a compliance schedule or terms and conditions of a permit." Extending a compliance activity due date beyond six months is considered a major permit modification since it is not a minor permit modification as indicated in IDAPA 58.01.17.700, Subsection 02.d.

Since receiving Reuse Permit M-240-01, the City has not modified operations and the City continues to discharge to Indian Creek under their NPDES permit. The City has not started designing the facilities/modifications to produce and utilize Class A Recycled Water. Modifying the reuse permit from requiring the City to submit the PO and QAPP within six months of permit issuance to requiring the City to obtain approval and acceptance of the PO and QAPP, respectively, prior to recycled water being utilized in the pressurized irrigation system will not pose any increased risk to human health or the environment. Extending the due dates will allow the City to prepare the PO and QAPP once they have critical information from the design process.

RECOMMENDATION

Staff recommends the issuance of this permit modification, which extends the due dates of the PO and QAPP Compliance Activities.