

Loon Mountain Recreation Corporation Kancamagus Highway Facility Response to Comments on Draft National Pollutant Discharge Elimination System (NPDES) Permit No. NH0023302

INTRODUCTION

In accordance with the provisions of 40 CFR § 124.17, this document presents EPA's response to comments (RTC) received on the Draft NPDES Permit (NH0023302). The RTC explains and supports EPA's determinations that form the basis of the final Permit. The Loon Mountain Recreation Corporation Kancamagus Highway Facility draft Permit public comment period began April 5, 2006, and ended on May 16, 2006. Comments were received from:

1. Rick Kelley, Loon Mountain Recreation Corporation, NH;
2. Marguerite Denoncourt, Environmental Liaison, Loon Mountain Recreation Corporation, NH.

This document refers to the above Commenters by designated numbers.

Based on comments received, the final Permit has changed from the draft Permit only to clarify one provision. While EPA's decision-making process has benefited from the comments received, the comments did not result in any substantial new changes to the permit. The one change is detailed in this document and is reflected in the final Permit. A summary of the change made in the final Permit is listed below. An explanation of the change is provided in the response to the individual comment. The change is followed by a number that correlates to a specific response.

1. Wording of Section A.11 was changed to reflect the fact that background sampling of Loon Pond is required only during the months that water is being withdrawn from the source water (Loon Pond).

RESPONSE TO COMMENTS ON THE DRAFT NPDES PERMIT

Comment 1: Commenter 1 requested that a statement be added to Section A.11 of the draft Permit, which references the background sampling for Loon Pond. Commenter 1 would like the statement to clarify that this background sample is required only when water is being withdrawn from the source water (Loon Pond) as is indicated for the other two background samples for the East Branch Pemigewasset River and for Boyle Brook. Commenter 1 expects that Loon Pond will not be used by the Loon Mountain Recreation Corporation in 2007, and starting in 2008, Connector Pond, an alternate source of snowmaking water will be operational since Loon Pond can no longer be used as per the ROD.

Response to Comment 1: The statement that sampling these receiving waters is required only for months during which a discharge has occurred is contained in superscript 2 on page 7. Superscript 2 applies to the monthly receiving water samples from Loon Pond

(Section I.A.5) as well as for receiving water samples from the East Branch Pemigewasset River and from Boyle Brook. In response to this comment, further clarification has been made in Section I.A.11 of the final Permit. A sentence has been added: “As described more fully in superscript 2 on page 7, the requirements to sample each of these receiving waters apply only if a discharge to the receiving water occurs in a given month.” Please see Response to Comment 2 regarding the schedule to terminate the use of Loon Pond as a source for snowmaking in 2007.

Comment 2: An application was made to EPA and accepted in the Spring of 2000 with respect to the Connector Pond outfalls to be included in the permit. Commenter 2 requested that these outfalls be included in the reissue of the permit.

Response to Comment 2: In issuing this Permit, EPA did not consider the application for permit modification submitted in February 2000 to discharge water to Connector Pond associated with the use of Connector Pond for water storage and snowmaking. Based on communication with the facility, including during EPA’s site visit of October 6, 2005, EPA did not include Connector Pond discharges associated with the South Mountain expansion in this Permit reissuance.

After the issuance of the final permit, EPA will consider modification of the permit to include specific conditions appropriate for discharges to Connector Pond as well as for the scheduled termination of discharges of snowmaking water to Loon Pond described in Comment 1.

EPA anticipates working with the facility in the coming months to appropriately describe and regulate discharges to Connector Pond in a permit modification.