

RESPONSE TO COMMENTS

Red River Ranger Station **NPDES Permit #ID-002069-9**

On December 14, 2011, the U.S. Environmental Protection Agency (EPA) issued a public notice for the proposed reissuance of the Red River Ranger Station Wastewater Treatment Plant (Facility) draft National Pollutant Discharge Elimination System (NPDES) Permit No. ID-002069-9. The Facility discharges to the South Fork Red River (River). The public comment period closed on January 13, 2012.

During the public comment period, EPA received comments from the Friends of the Clearwater (Friends) dated January 13, 2012. The following summarizes the comments that were received from Friends:

Comment 1: Since the permittee has been in violation with the previously issued NPDES permit, the commenter feels that the proposed NPDES Permit is inadequate in ensuring the permittee's compliance with permit conditions, including the requirements to properly operate and maintain equipment and the treatment plant. Friends suggested that additional permit language be inserted to ensure proper maintenance, operations of the plant and the adequate training of permittee's staff.

Response: The permittee is required to comply with the conditions in the Permit. This includes standard NPDES permit conditions, such as proper operation and maintenance of the facility, that are required to be included pursuant to 40 CFR 122.41. If the permittee violates the conditions of the Permit, the permittee may be subject to an enforcement action by EPA or a citizen suit by a third party. Therefore, no changes to the permit have been made as a result of this comment.

Comment 2: Friends provided a list of construction tasks that it believes the Forest Service plans to undertake to eliminate the authorized NPDES discharge by September 30, 2012. Suggesting that discharge may cease in 9 months, Friends urges EPA to consider issuing the permit for a shorter time period such as 1 year, rather than for 5 years as proposed in the draft permit.

Response: 40 CFR 122.46 states that NPDES permits shall be effective for a fixed term not to exceed 5 years. Although EPA understands that the permittee plans on eliminating the NPDES discharge at some point in the future, EPA has used its discretion to issue the Permit for a 5 years period. If the Facility ceases the discharge, the permittee may request that EPA terminate the Permit pursuant to 40 CFR 122.64. Therefore, no changes have been made to the Permit.