

EPA Region IX
Ugum Surface Water Treatment Facility
NPDES Permit No. GU0020371
Response to Comments
April 2010

Response to comments made by Guam Waterworks Authority (the applicant) and signed by Paul J. Kemp, Assistant General Manager for Compliance and Safety. January 22, 2010 and March 5, 2010.

COMMENT: The applicant cannot meet all of the conditions specified in I.C. of the permit, specifically items I.C.7-13, due to ambient and variable composition of the Ugum River being not sufficiently characterized.

The applicant later indicated that it was satisfied with the language in I.C.

RESPONSE: Item I.C.20. states “whenever natural concentrations of any toxic substance shall occur and exceed the limits established in these standards, this greater concentration shall constitute the limit, provided that this natural concentration was not directly affected by human-induced causes.” This applies to all parameters described in I.C.

Additionally, specific receiving water monitoring and reporting at upstream and downstream sampling locations described in Part II have been incorporated into the permit in order to ensure receiving water limits integrate flexibility pertaining to ambient pollutant concentrations. Section VIII of the Fact Sheet describes further the specific monitoring requirements and EPA enforcement discretion concerning ambient conditions.

COMMENT: Part II.A(2)(a), which states, “Monthly DMR forms shall be submitted quarterly on the 15th of the month following the previous quarterly reporting period.” should be adjusted to the time frame of all of GWA’s NPDES permits: reported on the 28th day of the month following the preceding quarterly reporting period.

RESPONSE: The reporting requirement has been adjusted.

COMMENT: Turbidity should be a schedule of regular grab samples rather than a continuous metered reading due to anticipated on line turbidity instrumentation error as a result of intermittent discharge.

RESPONSE: A series of discrete samples is an acceptable substitute to continuous monitoring if instrument error would provide misleading results. The applicant must take four turbidity readings at intervals of at least 15 minutes during each discharge. One of

the readings must be made in the first thirty minutes of discharge and one during the course of the discharge when the turbidity is expected to be at its highest.

**Response to comments made by Guam Environmental Protection Agency.
December 15, 2009.**

COMMENT: The permit should include receiving water monitoring to ensure compliance with items I.C.6-16.

RESPONSE: Receiving water monitoring for total suspended solids, pH, temperature, orthophosphate, nitrate-nitrogen, ammonia, dissolved oxygen, total dissolved solids and turbidity have been incorporated into the permit.