From: Dan Connally
To: "Poentis, Kris T"
Subject: RE: Kailua WWTP Reponse to City"s Comments
Date: Monday, December 02, 2013 9:59:00 AM

Hey Kris,

Sorry it's taken so long to get through this stuff, but I've now had a chance to review your questions.

I don't see any issues with either of the suggested revisions for 1 and 2. This does change the EPA provided text though.

I agree with you on number 3, the Discharger submitted the data under a signed certification statement. Further, the data is only being used to establish reasonable potential and not for enforcement purposes, there's enough concern based on the submitted results to retain reasonable potential. We made a similar response to their comments for one of the other facilities.

We did not use the TSD method for N+N and ammonia nitrogen. Our response on MCBK was the following: "The RPA for nutrients was based on receiving water concentrations at the edge of the ZOM and the use of the receiving water concentration would not be appropriate. Due to the application of nutrient criteria as a geomean over a calendar year and unknown dilution at the edge of the ZOM, EPA's TSD procedures were not used in evaluating reasonable potential for nutrients and a projected maximum concentration has not be determined. As explained in the fact sheet, a direct comparison of the ZOM data (geometric mean over a calendar year) to the water quality criteria was performed to evaluate reasonable potential. The TDS calculates a projected maximum that accounts for variation within the data and represents the expected 99th percentile of the data. Based on the 38 individual data points, and assuming a lognormal distribution, the 99th percentile of the observed data (total nitrogen – nitrate+nitrite) is 24,901 ug/L. DOH has determined that using the best estimate of the actual maximum effluent concentration provides an effluent limitation that is more reasonable given that the observed data is greater than the estimated 99th percentile. DOH believes the Permittee will be able to consistently comply with this effluent limitation."

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From: Poentis, Kris T [mailto:kris.poentis@doh.hawaii.gov]
Sent: Friday, November 15, 2013 4:21 PM
To: Dan Connally

Cc: Rossio, Marianne Fuji; Lum, Darryl C
Subject: Kailua WWTP Reponse to City's Comments

Hi Dan,
Marianne and I were going through the Kailua WWTP comments and was wondering if you could help us with the following:

1. The City wants to change this sentence on Page 27, Item D.2.k, 1st sentence:

   "The acute and chronic biological effect levels (b values of 20% and 25%, respectively) incorporated into the TST define EPA's unacceptable risks to aquatic organisms and substantially decrease the uncertainties associated with the results obtained from EPA's traditionally used statistical endpoints for WET."

   to:

   "The acute and chronic biological effect levels (effect levels of 20% and 25%, respectively, or b values of 0.80 and 0.75, respectively) incorporated into the TST define EPA's unacceptable risks to aquatic organisms."

   We checked the reference they gave (EPA 833-R-10-003) and the City's suggestion seems okay but we wanted to check with you first.

2. The City wants the equation in Part B.7.a on page 10 changed from:

   Percent mean response at IWC = ((Control mean response-IWC mean response)/Control mean response)) x 100

   to:

   % Effect at IWC = ((Mean Control Response – Mean Response at IWC)/(Mean Control Response)) x 100.

   Again, they referenced EPA 833-R-10-003. Is this ok?

3. The City is contending that their previous results for dieldrin is flawed based on false positives from EPA Method 608 (compared results of split sample with EPA Method SW8270SIM). Any thoughts? To me, if they believed the results were flawed, they should have been doing more testing to confirm.

4. The City also contends that the method used to determine RP for nitrate+nitrite and ammonia nitrogen is not the standard approach in the TSD. Please see Item 2 in Attachment A of the City's comments (attached). I think I can justify but was wondering if we should also compare with using discharge data compared to WQS x dilution used for

WET? I think they would be exceeding for all nutrients if we did it that way. What do you think?

Thanks Dan for all your help!
Kris