



September 14, 2022

Mr. Jeff Kennedy
Idaho Department of Environmental Quality
650 Addison Avenue West, Suite 110
Twin Falls, ID 83301

Re: Responses to DEQ Review Comments – City of Ketchum/Sun Valley Water and Sewer District; Facility Planning Study

Dear Mr. Kennedy,

Thank you for taking the time to review the Facility Planning Study for the shared City of Ketchum / Sun Valley Water and Sewer District (SVWSD) Water Reclamation Facility (WRF). On behalf of the City of Ketchum and the SVWSD, HDR Engineering, Inc. (HDR) is submitting the following responses to your letter dated September 2, 2022.

Review Comments

Comment 1. Reuse Improvements. The report discusses the potential to expand reuse delivery but does not identify potential sites or the impact of expanding reuse delivery to those sites.

Response to Comment 1: The Reuse Permit, attached in Appendix B of the FPS, allows the City of Ketchum and SVWSD to apply reuse water following Class A *Recycled Water Rules* within each entity's respective Areas of Impact (City wide permit). At present time, excess water for expanded reuse is not available; the committed reuse sites utilize all the available supply. But as flows increase each entity will evaluate potential sites for future land application of reuse water. When doing so they intend to hold community outreach events to support these evaluations.

Comment 2. Infiltration and Inflow (I/I) Analysis. Please explain why 100 gallons per capita per day (gcpd) and 255 gcpd are used for Dry Weather Flow and Wet Weather Flow instead of 120 gcpd and 275 gcpd as outlined in the referenced EPA publication and regulations.

Response to Comment 2: The discussion within the paragraph referring to 100 gpcd and 255 gpcd rather than 120 gpcd and 275 gpcd is a typo. As shown in Table 2-1, the I&I analysis used 120 gpcd and 275 gpcd for DWF and WWF.

Comment 3. Footnotes and References.

- i. *Page 18 of the report in section 2.3.2 contains a footnote reference to footnote 4, which appears to be intended for footnote 14.*

Response to Comment 3i: This footnote reference is a typo that should refer to footnote 14.

- ii. *Page 24 of the report in section 2.5 references 40 CFR, Part 35, Subpart E, Appendix A, which does not exist in current regulations. Please update or remove this reference.*

Response to Comment 3ii: This reference has been removed.

Report Recommendations

Comment 4. Collection Systems. *The report identifies the existing collection system conditions and references improvements made since the last study but does not include considerations I through v below. Please be aware that these requirements must be addressed only if the report is intended to provide planning for the collection systems in addition to the treatment facility.*

- i. *The report should analyze the existing networks and provide recommendations for improvements across a 50-year design period.*
- ii. *The report should provide a collection system map.*
- iii. *The report should consider build out flow conditions in the collection systems.*
- iv. *The report should discuss any known or potential unknown direct connections of the sewer systems to stormwater collection.*
- v. *The report should discuss the ongoing collection system improvements being performed by the City of Ketchum and the Sun Valley Water and Sewer District (SVWSD) and how these actions reduce I/I into the sewer system.*

Response to Comment 4: The City of Ketchum and the SVWSD intend to produce a separate FPS for their collections systems. The information requested in items i through v will be included in these studies. The Wastewater Treatment FPS will clarify that collections planning studies will be included in separate documents (Executive Summary and Section 2.3.2).

Comment 5. Environmental Review. *Please discuss the intent of the City of Ketchum and SVWSD in performing an environmental review with this facility planning study. An environmental review is not required for approval of this report but may be required as a condition of future funding options.*

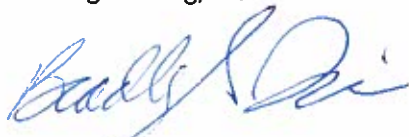
Response to Comment 5: The City of Ketchum and SVWSD understand an environmental review may be required depending on funding source. An Environmental Information Document (EID), it will be completed when required for specific funding sources.

Comment 6. Public Participation. Please provide the date(s) and advertising media of the public presentation given in Appendix E of the report.

Response to Comment 6: The presentation and open house for the FPS delivered to DEQ, including the presentation slides in Appendix E, were presented on July 13, 2022 at 12:00 p.m. and July 14, 2022 at 5:00 p.m. (both local time) for the City of Ketchum. The public meeting were advertised in the Idaho Mountain Express on July 8th and 13th. The meetings were also advertised on the City's webpage. HDR presented the slides to the SVWSD Board on June 21, 2022 at 8:30 a.m. (local time).

Please contact me at 208-387-7073 or brad.bjerke@hdrinc.com to confirm these responses address the comments adequately. If so, we will modify the FPS accordingly and resubmit to DEQ for approval.

Sincerely,
HDR Engineering, Inc.



Bradley Bjerke, PE
Project Manager

Cc: Joe Otero, PE, DEQ
Raphael Erickson, EI, DEQ
Jeremiah "J.J." Fenton, DEQ
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