



**American Samoa
Power Authority**

In reply refer to:

Wastewater Division

P.O. Box PPB
Pago Pago, American Samoa 96799
Facsimile No. (684) 633-5451
Phone: (684) 633-5200

4 May 2004

Mr. Douglas Eberhardt
Water Permits - Mail Stop WTR-3
U. S. Environmental Protection Agency - Region 9
75 Hawthorne Street
San Francisco, CA 94105

Mr. Eberhardt:

RE: Application for renewal of 301(h) modified NPDES permit for the Tafuna Sewage Treatment Plant, American Samoa - Permit Number AS0020010

Enclosed is the application for renewal of the NPDES permit for the Tafuna Sewage Treatment Plant. The current permit expires November 1, 2004. Also enclosed is the required 301(h) questionnaire for small discharges, required to renew the 301(h) waiver associated with the NPDES permit.

The enclosed application includes the following elements:

- Form 1 of the NPDES Application
- Form 2A of the NPDES Application
- The 301(h) Questionnaire required for the 301(h) modification to the permit
- Attached maps and drawings required by the three elements above
- A Supporting Technical Analysis document providing additional information and calculations supporting many of the responses in the 301(h) Questionnaire

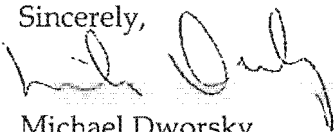
The attached application proposes an increase in annual average flow from 2 million gallons per day (mgd) to 3 mgd to serve a projected increase in population. Increases in BOD and TSS loading are proposed consistent with the increased flow, but with the concentrations of these parameters maintained at the existing values. The information and analyses provided address the effects of the existing and increased average discharge flow as well as the expected peak design flow. The following points are of particular importance in reviewing the application and proposed limitations and conditions for the permit renewal:

- The diffuser has been improved considerably since much of the analyses for the previous permit and waiver were submitted. A substantially higher initial dilution in relatively deep water is achieved. The critical initial dilution is 190:1 even at the peak flow rates for the facility and nearly double that for the average flow rates. The discharge is 1550 feet from shore and in 95 feet of water in a high energy, well flushed, unconfined open coastal setting.
- The discharge is not near any, and does not affect, any distinctive or sensitive biological habitats.
- There are no toxic constituents in the discharge, which is entirely domestic sanitary wastes and does not serve any industrial areas. Toxicity testing based on chronic bioassay tests has consistently met the toxicity targets in the current permit.
- The information and analyses provided are based on the most recent (1994) EPA 301(h) Technical Support Document.
- A revised and substantially different receiving water monitoring program is proposed to reflect the best technical approaches to determining if the discharge is having any measurable effect on the environment.

The existing NPDES permit did not require priority pollutant testing of the effluent and therefore no data are available to prepare Part D and much of Part B.6 of Form 2A. During the previous application, for the now current permit, it was determined by EPA that a single priority pollutant scan was sufficient for each of the Territorial Pacific Island discharges under the NPDES program. Such a scan was done, by EPA, and results indicated that there were no toxic concentrations of particular concern. EPA - Region 9 had indicated, in correspondence with the American Samoa Power Authority during the previous permit renewal process, that the EPA laboratory would conduct any additional priority pollutant scans, if necessary. EPA did not include the requirement for additional scans in the permit, nor did EPA determine it was necessary to run any scans in conjunction with the bioassay toxicity testing. It is recognized that a follow-up scan may be desirable and required by EPA in the renewal process and the American Samoa Power Authority has tentatively made arrangements for such testing to be conducted by our consultants, if so directed by EPA.

Please call me with questions or requested for additional information,

Sincerely,



Michael Dworsky
Sanitary Engineer

011-684-699-1462



**American Samoa
Power Authority**

Wastewater Division

P.O. Box PPB
Pago Pago, American Samoa 96799
Facsimile No. (684) 699-8070
Phone: (684) 699-1462

In reply refer to:

May 4, 2004

Suesan Saucerman
USEPA Region 9, WTR-5
75 Hawthorne St.
San Francisco, CA 94105

RE: 301(h) permit re-issuance for the Tafuna Wastewater Treatment Plant, Fogagogo,
American Samoa

Dear Ms. Saucerman:

Attached is the American Samoa Power Authority (ASPA) application for the 301(h) permit re-issuance for small dischargers for the Tafuna Wastewater Treatment Plant, located in the Territory of American Samoa. The application follows the guidance document "Amended Section 301(h) Technical Support Document" 1994, along with more current updates for completing Form 2A (Federal Register 8/4/99), and forms downloaded from the internet.

The following items are contained in this application

- ✓ This cover letter signed by the responsible official for the ASPA;
- ✓ The statement of completeness and accuracy mandated in § 122.22(d), signed by the responsible official for the POTW [§ 125.59©(3)];
- ✓ A table of contents for the application, including any appendices;
- ✓ A list of figures for the application;
- ✓ A list of tables for the application;
- ✓ A signed, completed NPDES application EPA Form 3510-1;
- ✓ A signed, completed NPDES application form 3510-2A;
- ✓ A completed Applicant Questionnaire; and
- ✓ Any accessory documents (e.g., technical reports) considered necessary for an independent review of the application.

If you have any questions or need any additional information, please contact Michael Dworsky, P.E., Sanitary Engineer, at (684) 699-1462.

Sincerely,

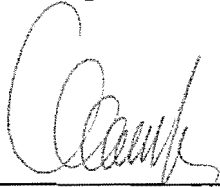
Utu A. Malae, Executive Director
American Samoa Power Authority

Cc: Peter Peshut, Acting Director, ASEPA
Michael Dworsky, ASPA

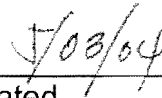
Statement of completeness and accuracy

As mandated in §122.22(d), and signed
by the responsible official for the POTW [§ 125.59©(3)]

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person and persons who manage the system, or those persons directly responsible for gathering the information, I certify that the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."



Ne'emia Mareko, Manager
ASPA Wastewater Division



Dated