



STATE OF WASHINGTON

ENERGY FACILITY SITE EVALUATION COUNCIL

PO Box 43172 • Olympia, Washington 98504-3172

October 24, 2016

Mr. Kelly Flint
Sr. Vice President and General Counsel
Savage Companies
901 W. Legacy Center Way
Midvale, UT 84047

RE: Tesoro Savage Vancouver Energy Distribution Terminal Project- National Pollutant Discharge Elimination System Industrial Stormwater (SW NPDES) Permit Clarifications: Application No. 2013-01: Docket: EF-131590

Dear Mr. Flint,

The Energy Facility Site Evaluation Council (EFSEC), in consultation with its contractor at the Department of Ecology (Ecology) have received and reviewed the NPDES Permit Engineering Report (August 2016) and the updated Application for Site Certification (ASC), received by EFSEC on October 6, 2016. In light of this review, we have put together a few items for which Ecology has requested clarifications be made. In order to proceed with the NPDES Industrial Stormwater Discharge Permit we need you to provide the information indicated below.

1. Verify the hydraulic capacity of the oil/water separator.
2. The facility stormwater treatment system effluent should meet the anticipated water quality bench marks listed in Table 22 prior to mixing with stormwater from other sources.
3. Discharge of boiler blowdown to the Port of Vancouver stormwater treatment pond T5 is prohibited under the Ecology industrial stormwater general permit. The report should include a detailed plan showing how the boiler blowdown will be discharged to the Columbia River without affecting the Port of Vancouver stormwater treatment and disposal system.
4. The Anti-degradation analysis should include a conclusion section discussing there will be no measurable change to the receiving water (Columbia River) per WAC 173-201A-320.
 - a. **Sub-Section 2.9.5: Alternative 1, the anti-degradation analysis has not been approved at this point.**
5. The Ecology recommended analytical protocol of Copper is listed below which should be used to test copper concentration in the boiler blowdown.

Copper, Total	7440-50-8 (CAS No)	200.8 (Recommended test protocol)	0.4 (DL, $\mu\text{g/L}$)	2.0 (QL, $\mu\text{g/L}$)
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6. Section 2.7: Please specify the exact type of the temperature treatment system to be employed at the facility.
7. Sub-Section 2.8.1.1: Please explain the reason why the railyard is considered to be non-pollution-generating area, is there any data/information available to substantiate the statement? Also, the section should also include the information that boiler blowdown may be discharged to the Columbia River via the Terminal 5 stormwater system.
8. For the following clarifications, "Process Water" defined in the Industrial Stormwater General Permit: Process Wastewater means any non-stormwater which, during manufacturing or processing, comes into direct contact or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product. If stormwater commingles with process wastewater, the commingled water is considered process wastewater.
 - a. Sub-Section 2.6.4: Please explain the reason for changing the term "process water" to "non-process industrial water." Some industrial wastewater streams such as equipment wash water or boiler blowdown should be considered as process wastewater.
 - b. Sub-Section 2.8.1.4: Please explain the reason for changing the term "process water" to "water."
 - c. Sub-Section 2.8.2: Please explain the reason for replacing "process" wastewater with "wastewater." Please explain what is considered to be Area 30 fire pump "non-cooling" water.
 - d. Sub-Section 2.9.1: The title of the sub-section has been revised from "Process Wastewater Sources" to "Industrial Wastewater Sources," however, the section also states sources of process wastewater are.... Please clarify the difference between "Process" and "Industrial" wastewater. The sub-section states boiler blowdown is mixed with domestic wastewater from the administration building prior to being discharged to the sanitary sewer. Without a pretreatment permit from the City, the facility is not allowed to discharge boiler blowdown to the City sanitary sewer system. **Option2, the anti-degradation analysis has not been approved at this point.**

Please review and contact me if you have any questions on this matter.

Thank you,



Sonia Bumpus
EFSEC Siting Manager
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cc: Irina Makarow, BergerABAM
Brian Carrico, BergerABAM
David Corpron, Savage Companies
Chris Drechsel, Tesoro Corporation, Inc.
Gary Lee, Ecology- Water Quality Program