Verbatim Transcript of Monthly Council Meeting

Washington State Energy Facility Site Evaluation Council

March 19, 2019

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WASHINGTON STATE

ENERGY FACILITY SITE EVALUATION COUNCIL

Olympia, Washington

Tuesday, March 19, 2019

1:30 p.m.

MONTHLY COUNCIL MEETING

Verbatim Transcript of Proceedings

REPORTED BY: TAYLER GARLINGHOUSE, CCR 3358

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A P P E A R A N C E S

Councilmembers:

KATHLEEN DREW, Chair
LIZ GREEN-TAYLOR, Department of Commerce
CULLEN STEPHENSON, Department of Ecology
STACEY BREWSTER, Utilities and Transportation Commission
DAN SIEMANN, Department of Natural Resources (via phone)
MIKE LIVINGSTON, Department of Fish & Wildlife (via phone)

Assistant Attorney General:

JON THOMPSON

Council Staff:

STEPHEN POSNER
SONIA BUMPUS
TAMMY MASTRO
AMI KIDDER
AMY MOON
CHRISTINA POTIS
JOAN AITKEN
STEW HENDERSON

In Attendance:

ERIC MELBARDIS, EDP Renewables (via phone)
JENNIFER DIAZ, Puget Sound Energy
CHRIS SHERIN, Grays Harbor Energy
MARY RAMOS, Energy Northwest (via phone)
BILL SHERMAN, The Environment (via phone)
JEREMY SMITH, Chehalis Generation Facility

* * * * *

OLYMPIA, WASHINGTON; MARCH 19, 2019

1:30 P.M.

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P R O C E E D I N G S

CHAIR DREW: Good afternoon. This is Kathleen Drew, Chair of the Energy Facility Site Evaluation Council, and this meeting will come to order. We'll start with the roll call.

MS. MASTRO: Department of Commerce?

MS. GREEN-TAYLOR: Liz Green-Taylor, here.

MS. MASTRO: Department of Ecology?

MR. STEPHENSON: Cullen Stephenson, here.

MS. MASTRO: Fish & Wildlife?

MR. LIVINGSTON: Mike Livingston, here, on the phone.

MS. MASTRO: Department of Natural Resources?

MR. SIEMANN: Dan Siemann is here on the phone.

MS. MASTRO: Utilities and Transportation Commission?

MS. BREWSTER: Stacey Brewster, here.

MS. MASTRO: Chair, there is a quorum of the EFSEC Council.

CHAIR DREW: Thank you.

Are there other people who are on the phone who would like to introduce themselves?

MR. SHERMAN: This is Bill Sherman from the Attorney General's Office as counsel for The Environment.

CHAIR DREW: Okay. So moving on to the proposed agenda. Is there a motion to adopt the agenda?

MS. GREEN-TAYLOR: I will move to adopt the agenda.

CHAIR DREW: Second?

MR. STEPHENSON: I'll second.

CHAIR DREW: All those in favor?

COUNCILMEMBERS: Aye.

CHAIR DREW: Opposed? The agenda is adopted.

And now for the meeting minutes from January 15th, which was our last regular meeting. You have them in your packets. They were sent to you electronically. Is there a motion to approve the meeting minutes from January 15th, 2019?

MS. GREEN-TAYLOR: I move to adopt the minutes from January 15th, 2019.

CHAIR DREW: Second?

MR. STEPHENSON: I'll second.

CHAIR DREW: Are there any -- is there any discussion or errors or changes? Hearing none, all those in favor of adopting the minutes from January 15th, say "aye."

COUNCILMEMBERS: Aye.

CHAIR DREW: All those opposed? Meeting minutes are adopted.

Moving on to the operational updates. We'll start with Kittitas Valley Wind Project.

MR. MELBARDIS: Good afternoon. This is Eric Melbardis with EDP Renewables for the Kittitas Valley Wind Power Project. You should have two project updates in your packets, but over both periods, we had nothing out of the ordinary to report.

CHAIR DREW: Okay. Thank you, Eric.

Wild Horse Wind Power Project, Ms. Diaz, in person.

MS. DIAZ: All right. There we are. All right. For the record, my name is Jennifer Diaz. I'm with Puget Sound Energy for the Wild Horse Wind Facility. And other than snow removal in January and February, we have nothing nonroutine to report for the month.

CHAIR DREW: Is the snow removed?

MS. DIAZ: No. Well, from the roads, yes.

It's still on site.

CHAIR DREW: It's still on the site.

MS. DIAZ: Yeah, it probably will be for another few weeks.

CHAIR DREW: You had that much?

MS. DIAZ: We did, yeah. Quite a bit of drifting.

CHAIR DREW: A high year for you?

MS. DIAZ: Yes, it was.

CHAIR DREW: Well, thank you. Good to see you.

MS. DIAZ: Thank you.

CHAIR DREW: Moving on to Grays Harbor Energy Center.

MR. SHERIN: Good afternoon, Chair Drew and Councilmembers. I'm Chris Sherin, the plant manager at Grays Harbor Energy Center. For January, the only nonroutine item I'll mention is that we did schedule RATA for February 27th and 28th, which in February, we rescheduled to March 13th and 14th due to pipeline, scheduled pipeline maintenance. And it will be in that next -- this month's report, but we did do that testing last week and it was successful.

CHAIR DREW: Great.

MR. SHERIN: Also in February, the Office of

the State Fire Marshal inspector was out to complete our reinspection, and Ms. Kidder, EFSEC Staff member, was also in attendance for that reinspection. That's all I have. Thank you.

CHAIR DREW: Okay. Thank you.

Chehalis Generation Facility?

MR. SMITH: Good afternoon, Chair Drew and Council. I'm Jeremy Smith. I'm the environmental analyst for the Chehalis Power Plant. For Chehalis, we do not have any abnormal reports for the month of February.

CHAIR DREW: Okay. Thank you.

Columbia Solar Project, Ms. Kidder?

MS. KIDDER: Thank you, Chair Drew. Good afternoon, Chair Drew and Councilmembers. For the record, my name is Ami Kidder. I just have a quick update for you on the Columbia Solar Project. Since the Council meeting in January, Staff have continued coordination with our contractors at Ecology to continue establishment of appropriate mitigation and monitoring for impacts as directed in the SCA and MDNS.

CHAIR DREW: Thank you.

Desert Claim, Ms. Moon?

MS. MOON: Good afternoon, Council Chair Drew and Councilmembers. For the record, this is Amy

Moon, and I am providing an update for the Desert Claim Project. EFSEC Staff continue to coordinate with Desert Claim working toward a construction date of 2021, and I have no further updates at this time.

CHAIR DREW: Okay. Thank you.

WNP-1/4?

MS. RAMOS: Good afternoon, Chair Drew and Councilmembers. This is Mary Ramos reporting for Energy Northwest. For WNP-1/4, there are no updates to report.

CHAIR DREW: Okay. Thank you. And for Columbia Generating Station.

MS. RAMOS: For Columbia Generating Station, I have two topics to update. First, is a transformer oil spill at Columbia. On February 27th of this year, Energy Northwest received a letter from Washington State Department of Ecology regarding the transformer oil spill at Columbia. The letter states that Ecology is not requiring additional follow-up regarding the spill event, and the dangerous waste compliance investigation is closed. The transformer repair has been included in our upcoming outage, which is scheduled from May 11th through June 15th.

And then my next update is regarding the fire inspection at Columbia. On the 26th of February, Energy Northwest provided a follow-up response to the

State Fire Marshal regarding the fire inspection of non-power block facilities at Columbia.

CHAIR DREW: Okay. Are there any questions?

Thank you.

And, Ms. Moon?

MS. MOON: Thank you, Chair Drew. For the record, again, this is Amy Moon, and I am providing an update for Columbia Generating Station. I have two issues. One, as Mary just spoke about, the transformer release. I'm just going to give a little more information on that.

Energy Northwest contractors performed a cleanup of the leaking transformer oil on January 21st. Mineral oil contaminated soil was removed and verification samples of the remaining soil did not detect PCBs. At the January 15th, 2019 Council meeting, Councilmember Stephenson asked if there is a concrete floor associated with the approximately 18-inch concrete berm that surrounds the transformer yard. The contractor dug to an approximate depth of two feet and was unable to find a concrete liner.

Councilmember Stephenson also asked how Energy Northwest determined that there's no water contamination associated with the transformer leak. Inspection of the underground -- well, the UIC wells

within the vicinity of the transformer, which is approximately 44 feet to the west is one well and 89 feet to the north is the other closest well, that's being done weekly to look for oily sheen, and no sheen has been observed. Do you have any questions on that?

CHAIR DREW: No questions. Thank you.

MS. MOON: Okay. And then I have an update on the NPDES Permit modification for Columbia Generating Station. As you recall, at the January 15th, 2019 EFSEC Council meeting, Staff presented the draft National Pollutant Discharge Elimination System Permit modification for the Columbia Generating Station, which is known as CGS, if I use that acronym, and that's Amendment No. 2.

The proposed NPDES Permit modification was to allow for a continuous halogenation/dehalogenation process to improve inhibition of biological fouling of the circulating water and plant service water systems at CGS.

The Council made a tentative determination for approval of the draft NPDES Permit and subsequently conducted a public comment period from January 19th to February 22nd, 2019. Additionally, a public hearing was held by the Council on February 19th in Olympia. The hearing was originally scheduled in Kennewick but was

moved to Olympia due to inclement weather. No comments were received during the public comment period or at the public hearing.

With no comments received on the draft permit modification, EFSEC Staff have prepared the final Permit Amendment No. 2. And the only change to the permit documents presented to the Council at the January 15th Council meeting and those presented to the public is that EFSEC Staff have added an errata sheet documenting the rescheduling of the public hearing and correcting three broken web links that are now all corrected in the final NPDES Permit documents.

So at this time, Staff are now requesting the Council take action to approve the NPDES Permit Modification Amendment No. 2. In EFSEC's regulations, WAC 463-76-062(5) state that for existing facilities under the jurisdiction of the Council, modifications of the NPDES Permit shall be effective when approved by the Council and signed by the Council Chair. If the Council approves a permit modification, the Council Chair will sign and the permit can go into effect immediately. Do you have any questions about the permit?

CHAIR DREW: Are there any questions about the permit?

MS. BUMPUS: Chair Drew, I just wanted to

add that the -- the NPDES Permit documents are all in your packets.

CHAIR DREW: Thank you.

I know everybody looked at the proposed -- the draft permit before the January meeting, and then we had the hearing in February, so I think you're all pretty familiar with what's in front of us. So without -- if there aren't any questions, if someone would like to make a motion to approve? Okay.

MR. STEPHENSON: I will move to approve the NPDES Permit Modification Amendment No. 2 for Columbia Generating Station.

CHAIR DREW: Thank you.

MS. GREEN-TAYLOR: I will second that motion.

CHAIR DREW: Any discussion? All those in favor, please say "aye."

COUNCILMEMBERS: Aye.

CHAIR DREW: Thank you. The NPDES Permit No. 2 for Columbia Generating Station is approved.

Now I will say that we have a few announcements to make and a resolution to consider. First I'll start with the announcements. The announcements are that, of course, Stephen Posner has decided to retire, for which we're all a little sorry,

and we can talk about that, but his last day will be April 4th in the office?

MR. POSNER: 5th.

CHAIR DREW: 5th. I'm kicking him out a day early. Not really. And I also want to announce that I think you all know, but Sonia Bumpus will be our new EFSEC manager, and she's already started training with Stephen. Of course you know they've worked very closely together over the past few years, so we're expecting a smooth transition and for Stephen to leave his current phone number on for a while.

And we have also named Ami Kidder as the new siting and compliance manager, so congratulations to Ami. And we're in the process of interviewing for another siting specialist. So a lot of changes here at EFSEC, but first of all, I'd like us to take up our resolution.

And I may do a full reading of it after the meeting, and we don't -- but it is resolution No. 345, commending the services of EFSEC manager, Stephen Posner. And a number of very good descriptive whereas clauses with -- Stephen's worried.

Now therefore be it resolved that the Energy Facility Site Evaluation Council hereby recognizes Stephen Posner's outstanding and faithful contribution

to the Council's siting and regulatory activities and gratefully expresses its gratitude for the commitment, dedication, effort, and hair loss he has shown over the past 12 years and 6 months.

So is there a motion to vote on the resolution No. 345?

MR. STEPHENSON: Chair Drew, having read the resolution myself and seeing that all Councilmembers have signed it, I will move that we approve this resolution.

MS. GREEN-TAYLOR: I will second the motion.

CHAIR DREW: Thank you.

All those in favor, please say "aye."

COUNCILMEMBERS: Aye.

CHAIR DREW: All those opposed? This one's going to get the gavel. The resolution is adopted. I do want to say as still a very new Chair of this Council, that I could not have come into this position with the -- without such a strong leader as Stephen has been to the EFSEC Staff and as manager.

And for the many, many conversations and discussions and education, every time I had a question, which trust me, there were many, Stephen, you've just been the most patient in getting me up to speed with my learning curve, but also I very much appreciate how

great a colleague you've been in working as a partner as we've looked at some -- quite a bit of new activities. And you -- you just have been a tremendous leader, and I have benefitted greatly from your leadership. And I want to thank you and wish you many good golf games in the future.

MR. POSNER: Well, thank you very much for those very kind words. And it's -- it's very rewarding to be receiving a resolution, considering how many I've been involved in writing for other people. I'll finally get my own. So I'm really looking forward to that.

And I just would like to thank the Council, the folks that are here in front of us, but other Councilmembers who have been here and who have left. And there have been many. They have all provided a lot of valuable input and helped me in doing my job better, and I really appreciate the support and the guidance the Council has provided to me.

And then also the Staff, every one of them, all the folks sitting here and past Staff. You know, we're a very small group. Everybody works very hard and, you know, it's the accomplishments, my accomplishments are, you know, are made up of efforts of all of us. So -- and I think that's the way it works here.

And so it's been a great place to work. I've met a lot of interesting people. And I wish you all the best of luck and look forward to staying in touch in the future.

CHAIR DREW: Thank you.

MR. POSNER: Thank you very much.

CHAIR DREW: Thank you. Well, with that, our meeting is adjourned.

(Adjourned at 1:49 p.m.)

C E R T I F I C A T E

STATE OF WASHINGTON

COUNTY OF THURSTON

I, Tayler Garlinghouse, a Certified Shorthand Reporter in and for the State of Washington, hereby certify that the foregoing transcript is true and accurate to the best of my knowledge, skill, and ability.

_____

Tayler Garlinghouse, CCR 3358

Washington State
Energy Facility Site Evaluation Council

AGENDA

MONTHLY MEETING
Tuesday March 19, 2019
1:30 PM

1300 S. Evergreen Park Drive S.W.
Olympia, WA 98504, Meeting Room 206
Conference number: (360) 664-3846

1. Call to Order ..... Kathleen Drew, EFSEC Chair

2. Roll Call ..... Tammy Mastro, EFSEC Staff

3. Proposed Agenda ..... Kathleen Drew, EFSEC Chair

4. Minutes

Meeting Minutes ..... Kathleen Drew, EFSEC Chair

- January 15, 2019

5. Projects

a. Kittitas Valley Wind Project

- Operational Updates ..... Eric Melbardis, EDP Renewables

b. Wild Horse Wind Power Project

- Operational Updates ..... Jennifer Diaz, Puget Sound Energy

c. Grays Harbor Energy Center

- Operational Updates ..... Chris Sherin, Grays Harbor Energy

d. Chehalis Generation Facility

- Operational Updates ..... Mark Miller, Chehalis Generation

e. Columbia Solar Project

- Project Updates ..... Ami Kidder, EFSEC Staff

f. Desert Claim

- Project Updates ..... Amy Moon, EFSEC Staff

g. WNP – 1/4

- Non-Operational Updates ..... Mary Ramos, Energy Northwest

h. Columbia Generating Station

- Operational Updates ..... Mary Ramos, Energy Northwest
- NPDES Permit Modification ..... Amy Moon, EFSEC Staff

  The Council may consider and take **FINAL ACTION** *on issuing Amendment No. 2 of the NPDES Permit.*

6. Adjourn ..... Kathleen Drew, EFSEC Chair

Note: "FINAL ACTION" means a collective positive or negative decision, or an actual vote by a majority of the members of a governing body when sitting as a body or entity, upon a motion, proposal, resolution, order, or ordinance. RCW 42.30.020

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Washington State Energy Facility Site Evaluation Council

January 15, 2019

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ENERGY FACILITY SITE EVALUATION COUNCIL
Olympia, Washington
Tuesday, January 15, 2019
1:30 P.M.

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REPORTED BY: TAYLER GARLINGHOUSE, CCR 3358

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APPEARANCES

Councilmembers:

KATHLEEN DREW, Chair
LIZ GREEN-TAYLOR, Department of Commerce
CULLEN STEPHENSON, Department of Ecology
STACEY BREWSTER, Utilities and Transportation Commission
DAN SIEMANN, Department of Natural Resources (via phone)
MIKE LIVINGSTON, Department of Fish & Wildlife (via phone)

Assistant Attorney General:

JON THOMPSON

Council Staff:

JOAN AITKEN
CHRISTINA POTIS
PATTY BETTS
AMY MOON
AMI KIDDER
STEPHEN POSNER
SONIA BUMPUS

In Attendance:

KATHY CONAWAY, Department of Ecology (via phone)
KATIE HALL, Department of Ecology (via phone)
ERIC MELBARDIS, EDP Renewables
JENNIFER DIAZ, Puget Sound Energy (via phone)
CHRIS SHERIN, Grays Harbor Energy Center
MARY RAMOS, Columbia Generating Station (via phone)
TIM MCMAHAN, Stoel Rives (via phone)
BILL SHERMAN, The Environment (via phone)
ANN ESSKO

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OLYMPIA, WASHINGTON; JANUARY 15, 2019
1:30 P.M.
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PROCEEDINGS

CHAIR DREW: Good afternoon. I'm Kathleen Drew, Chair of the Energy Facility Site Evaluation Council, and we will bring this meeting to order. We will start by calling the roll, Ms. Potis.

MS. POTIS: Department of Commerce?

MS. GREEN-TAYLOR: Liz Green-Taylor, here.

MS. POTIS: Department of Ecology?

MR. STEPHENSON: Cullen Stephenson, here.

MS. POTIS: Fish & Wildlife?

MR. LIVINGSTON: Mike Livingston, here.

MS. POTIS: Department of Natural Resources?

MR. SIEMANN: Dan Siemann is here on the phone.

MS. POTIS: Utilities and Transportation?

MS. BREWSTER: Stacey Brewster, here.

MS. POTIS: Chair, we have a quorum for the Council.

CHAIR DREW: Thank you.

And before we move on to our regular agenda, I would just like to welcome Stacey Brewster, who is the

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representative of the Utilities and Transportation Commission, and she did start with the UTC in September. She has a background in science from having received her BS, excuse me, from the Evergreen State College. And then spent several years studying and researching forestry practices on biodiversity with the Pacific Northwest Research Station of the Forest Service for five years before returning to Evergreen and then becoming the head of their serials and electronic resources department for the library. And she is here and working as a legal and library assistant with the administrative law division with the UTC. So she has a very diverse background, and we welcome her to our Council.

Welcome, Stacey.

MS. BREWSTER: Thank you.

CHAIR DREW: So moving on now to the agenda. Oh, first of all, before we go there, I will ask if there's anyone on the phone who wanted to introduce themselves as well.

MR. SHERMAN: Thank you, Chair. This is Bill Sherman as counsel for The Environment.

MS. CONAWAY: This is Kathy Conaway, and we have Katie Hall from Ecology Nuclear Waste Program --

CHAIR DREW: Thank you.

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MS. CONAWAY: -- in Richland.
MR. MCMAHAN: Tim McMahan with Stoel Rives.
MS. DIAZ: Jennifer Diaz with Puget Sound Energy.
MS. RAMOS: Mary Ramos with Energy Northwest.
CHAIR DREW: Okay. Thank you, everyone.
Our next item is our proposed agenda. Is there a motion to accept this meeting agenda?
MR. STEPHENSON: I will move to accept the agenda.
CHAIR DREW: Second?
MS. GREEN-TAYLOR: I'll second that.
CHAIR DREW: Okay. All those in favor?
COUNCILMEMBERS: Aye.
CHAIR DREW: Agenda's adopted.
Moving on to the meeting minutes from our last meeting, which was November 13th, 2018. Is there a motion to adopt the meeting minutes from November 13th?
MR. STEPHENSON: I will move to adopt those minutes.
MS. GREEN-TAYLOR: And I will second that motion.
CHAIR DREW: Thank you.
Any comments on the minutes? All those in

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favor of adopting the minutes, please say "aye."
COUNCILMEMBERS: Aye.
CHAIR DREW: All those opposed? Meeting minutes are adopted.
Okay. Moving on to the projects. We will start with the operational update from Kittitas Valley Wind Project, Mr. Melbardis?
MR. MELBARDIS: Good afternoon, Chair Drew, EFSEC Council. This is Eric Melbardis with EDP Renewables for the Kittitas Valley Wind Power Project. We finished out December the same as the rest of the year with nothing nonroutine to report.
CHAIR DREW: Thank you.
Wild Horse Wind Power Project, Ms. Diaz?
MS. DIAZ: Yes, thank you, Chair Drew and Councilmembers. For the record, this is Jennifer Diaz with Puget Sound Energy at the Wild Horse Wind and Solar Facility. The only nonroutine item I have for the month of December is that the Kittitas County Fire Marshal completed a fire, life, and safety inspection on December 14th, and the inspection passed with no violations.
CHAIR DREW: Thank you.
MS. DIAZ: And that's all I have.
CHAIR DREW: Grays Harbor Energy Center,

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Mr. Sherin?
MR. SHERIN: I'm good.
Afternoon, Chair Drew and Councilmembers. Chris Sherin, plant manager at Grays Harbor Energy Center. For December, everything we have to report, we have no nonroutine times. One item on there, we did have a State fire marshal inspection, and we did have a couple minor violations, which will come -- be in January's reports as we didn't get the violation notice until the 7th. But since then, we've corrected all of --
CHAIR DREW: Great.
MR. SHERIN: -- corrected all those violations.
CHAIR DREW: Thank you.
MR. SHERIN: Thank you.
CHAIR DREW: Chehalis Generation Facility? Mr. Miller, or is he unable --
MS. KIDDER: Chair Drew, if I may, Mr. Miller is unavailable to attend this month's Council meeting. The Facility update may be found in the packet on the blue paper. The only nonroutine item to report was that in December, Chehalis also had the State Fire Marshal's Office perform an inspection. They had some minor violations, which have mostly been corrected, if

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not completely corrected at this point, and we will receive an update on that with their next month's report and the follow-up inspection as well.
CHAIR DREW: Thank you, Ms. Kidder. Columbia Solar Project, Ms. Kidder.
MS. KIDDER: Thank you, Chair Drew. For the record, my name is Ami Kidder, and I just have a few items to update you on for the Columbia Solar Project. Staff are continuing coordination with our agency contractors to review preliminary draft plans as indicated in the Mitigated Determination of Nonsignificance and the Site Certification Agreement.
The certificate holder, Department of Fish & Wildlife and Ecology met in Ellensburg for a site visit on January 2nd to discuss planting and monitoring guidelines for planned vegetation at each site. And the certificate holder is still coordinating with both DFW and Ecology to establish appropriate mitigation and monitoring for impacts as directed in the MDNS and SCA.
Additionally, the Army Corps of Engineers have provided the certificate holder with a letter of authorization under Nationwide Permit 18 at the Typha site, which is necessary for stabilization of the access road to the site. Are there any questions?
CHAIR DREW: Any questions?

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Thank you, Ms. Kidder.
MR. POSNER: Chair Drew, I --
CHAIR DREW: Mr. Posner.
MR. POSNER: -- have a short update on the Kittitas County action related to Columbia Solar that I can provide to the Council.
CHAIR DREW: Thank you.
MR. POSNER: So just a little background for those who aren't aware who weren't on the Council while this project was under review, just a little background, the recommendation, the EFSEC recommendation to the governor was made in August on the 22nd. And the governor agreed with the decision or with the recommendation from EFSEC and approved the project on October 17th.
And then on the 15th of November, Kittitas County filed a petition for judicial review per RCW 80.50.140. So that triggered some actions that we had to take. We had to prepare the administrative record or put it together. We had been preparing it as we'd been reviewing the project. The administrative record was compiled and was submitted to the Thurston County Superior Court on 12/15/2018.
And at this point in time, there is a trial scheduling date set for the 22nd of March. And at that

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time, there will be further discussion in front of the Court with the various parties, including EFSEC and the AG's office, concerning the status of the petition and the next actions, if you will.
But essentially what has happened is that Kittitas County is -- is challenging the decision that the governor has made, and then ultimately it could end up being heard before the supreme court. That's typically how the process works in a situation like this.
CHAIR DREW: Thank you.
Are there any questions?
MR. SIEMANN: Chair Drew, this is Dan Siemann from DNR, and I do have one question which is, what is the basis of the complaint?
MR. POSNER: The -- the one issue that they cited in their petition was related to adequate potable water supply.
CHAIR DREW: And I believe those documents are on our SharePoint --
MR. POSNER: Right.
CHAIR DREW: -- site if you'd like to review them.
MR. POSNER: The documents are on the SharePoint site and they're also on the -- the EFSEC

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website as well.
CHAIR DREW: Mr. Cullen?
MR. STEPHENSON: Thank you, Chair Drew.
Question to Staff, what's the smart strategy here? Do we wait to let this play out or do we take more direct action?
MR. POSNER: Well, I think right now we're -- we're -- we're consulting with the AG's office and we're considering the various options as far as, you know, how to proceed at this point in time. But we fulfilled our obligation under the statute to provide the record to the superior court, it's there now, and then in March there'll be essentially another hearing where next steps will be decided by the Court.
CHAIR DREW: It's also my understanding that there's no prohibition on us continuing to work with the certificate holder and proceed with approving the application -- or approving the plans as they come forward.
MR. POSNER: Right.
CHAIR DREW: So we are continuing to do so.
MR. POSNER: That's correct.
MR. STEPHENSON: Thank you.
CHAIR DREW: Okay. Thank you.
Desert Claim Project update, Amy Moon.

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MS. MOON: Good afternoon, Council Chair Drew and Councilmembers. For the record, this is Amy Moon, and I will be providing an update for the Desert Claim Project. EFSEC Staff continues to coordinate with Desert Claim, however, I have no other updates at this time.
CHAIR DREW: Thank you.
And for background on that, that is, of course, with our -- our new member here, is the amendment to the project which the Council adopted in November.
Moving on to WNP 1/4, the non -- the nonoperational updates, Ms. Ramos?
MS. RAMOS: Good afternoon, Chair Drew and Councilmembers. My name is Mary Ramos, and I'm reporting for Energy Northwest WNP 1/4. For the month of December, the Office of the State Fire Marshal conducted a fire inspection of WNP 1/4. We received the report -- the inspection report on December 10th, and Energy Northwest responded to the inspection report on January 10th.
CHAIR DREW: Okay. Thank you. And then if you'd like to continue, then, on to the Columbia Generating Station update.
MS. RAMOS: Okay. For Columbia Generating

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Station, on November 28th, Energy Northwest notified EFSEC and Washington State Department of Ecology via telephone of a spill of transformer oil at Columbia Generating Station. A follow-up email was also sent to EFSEC and Ecology on December 4th.

To summarize the oil spill, in April of this -- of 2018, Energy Northwest discovered a slow drip of oil from the side of a transformer located near our cool -- our cooling towers. The leak progressed off of the transformer's concrete pad and onto the surrounding gravel.

In August of 2018, Energy Northwest Environmental and Regulatory Programs department learned that periodic integrity testing of the oil, which is performed by our engineering department. It revealed that the oil contained traces of polychlorinated biphenyls at 13 parts per million, and this was as a result of residual PCBs from the PCB oil that was used in the past.

There has been no discharge to ground water or to any water body as a result of the transformer oil spill. The oil spill is confined to the area immediately adjacent to the transformer and inside a concrete berm. And then also, entry to that transformer area is restricted by a fence, and it's also -- there's

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a sign posting the PCB content.

The spill area is being closely monitored, and we use absorbent pads placed along the bottom of the transformer to contain the spill.

We are actively working to find a resolution for repairing the leak. The oil drip is coming from an enclosed internal compartment of the transformer, and currently the station is unable to complete the necessary repairs while the station is online. This is due to industrial safety risk and plant operating conditions. Our engineering department is actively working to find a repair window offline or a strategy that would allow us to repair online.

In addition to that summary, on December 12th, the Washington State Department of Ecology, there were two inspectors who visited Columbia to discuss and observe the transformer oil spill area. And then on January 7th, Energy Northwest responded to a request for additional information regarding the transformer oil spill.

And then also for the month of December, the Office of the State Fire Marshal conducted a fire inspection of Columbia Generating Station's nonplant buildings, and similar to the WNP 1/4 update I provided, the inspection report was received on December 10th, and

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we responded to that report on January 10th.

CHAIR DREW: Thank you.

Are there any questions from Councilmembers? Mr. Stephenson?

MR. STEPHENSON: Thank you, Chair.

Thank you, Ms. Ramos. Maybe two questions. One is, you speak of a concrete berm, does that include some sort of concrete floor so that the -- the -- the spill is onto concrete or is the spill onto dirt?

And then the second, you say that there's no contamination of the water or -- or -- and how do you know that? Thank you.

MS. RAMOS: Thank you. So this is -- again, this is Mary Ramos responding for Energy Northwest. On the first question regarding the concrete berm, we do know there's an 18-inch concrete berm surrounding the transformer. We have asked our engineering department regarding whether or not they can determine based on design information if the con- -- if there's a concrete layer at the bottom of that gravel. And at this time, we do not know. We plan to look into that when we perform the cleanup by a vendor on January 21st.

And then on the second question regarding the statement I made that there has been no discharge to a water body, we continue to look at the spill area and

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closely monitor that, and there are two underground injection control wells in the vicinity of the transformer. Each time we observe the spill area, we also look inside the underground injection control well and make -- and see if there's any oil sheen observed inside the water that's contained in those IC wells.

MR. STEPHENSON: Thank you.

MS. RAMOS: Thank you.

CHAIR DREW: Any other questions?

Okay. Thank you very much.

We now will move on to discuss the -- since that was the operational update, the NPDES Permit modification draft, and that will be Ms. Moon.

MS. MOON: Thank you, Chair Drew. Again, for the record, this is Amy Moon, and I will be providing an update for the proposed National Pollutant Discharge Elimination System, referred to as the NPDES Permit, at the Columbia Generating Station. Energy Northwest submitted an application to modify the current NPDES Permit to allow for a continuous halogenation and dehalogenation process to improve inhibition of biological fouling of the circulating water and plant service water systems at the station on October 1st, 2018.

The proposed process modification will

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replace the batch halogenation process that currently occurs approximately two to three times per week. Moving to the continuous halogenation injection process will improve the biofouling control effectiveness. Biofouling includes an invasive Asiatic clam, various species of algae, and the bacterium legionella pneumophila.

Prior to submitting the application, an engineering report on a proposed halogenation and dehalogenation process was reviewed by Ecology and EFSEC and approved on October 19th, 2018, by EFSEC. The modification to the NPDES Permit retains the batch halogenation process of the cooling water system as a backup process in the event that continuous monitor becomes inoperable for any reason.

The proposed changes to the permit mean that the facility will continuously monitor the total residual halogens, also referred to as TRH, and require regular reporting of the TRH concentrations. The modification also clarifies the point of compliance for PH downstream of the dehalogenation tie-in to outfall 001.

In terms of compliance with the State Environmental Policy Act, or SEPA, the proposed modification of the NPDES Permit does not require a new

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SEPA threshold determination per the Revised Code of Washington 43.21(c)030(2)(c) as the proposed changes meet the intent and purpose of the existing NPDES Permit; and two, the monitoring requirements for the proposed change to the halogenation and dehalogenation system will not be less stringent than current monitoring requirements. Do you have any questions on that so far?

CHAIR DREW: Any questions? Go ahead.

MS. MOON: Thank you. So if there are no other questions, Staff will proceed with our request of the Council to take action on a tentative determination to approve the Draft NPDES Permit, which would allow Staff to notice the draft permit modification and draft fact sheet for a minimum 30-day public comment period.

CHAIR DREW: Okay. I think before we take up that action, Ms. Bumpus was going to talk about the process.

MS. BUMPUS: Yes. Thank you, Chair Drew and Councilmembers. Good afternoon. So as Ms. Moon discussed, this would allow us to move forward with a minimum 30-day public comment period. Staff is going to recommend that we have a public hearing on the NPDES Permit where we would hear oral comment. We would propose that we do that in the Richland, Washington,

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area near the Columbia Generating Station facility.

Right now, we are thinking that we should move the February Council meeting to Wednesday, February 20th. The 18th is a holiday, so normally our Council meeting would be that Tuesday, but we propose that we move the Council meeting, the monthly Council meeting, to February 20th, and go ahead and have our Council meeting there in Richland, Washington. That evening on the 20th, we would have the public hearing where we would take any public comment on the NPDES Permit.

And we also are aware that Councilmembers have expressed an interest in going to the Columbia Generating Station facility for a site tour, and we've been working with Energy Northwest staff on that. And we right now have plans to take you there on the Thursday after the meetings on February 21st, and it would be in the morning.

Joan will be sending an email out to Councilmembers with more details. We are still working to pin down the venues where the Council meeting will be held. We are thinking right now that the venue where the public hearing would be held in the evening is going to be different than where the Council meeting will be held. So she's going to be sending you more details about the locations and the times for those activities

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as well as more information about the site tour plan for the 21st.

CHAIR DREW: Okay. So what I'd like to do now is ask if there is a motion to approve the NPDES Permit modification draft in order to take public comment.

MS. GREEN-TAYLOR: Chair, I will move to approve the draft NPDES amendment in order to move forward with the public comment.

CHAIR DREW: Okay. Is there a second?

MR. STEPHENSON: I'll second.

CHAIR DREW: Are there questions about the permit modification draft? Okay. All those in favor, say "aye."

COUNCILMEMBERS: Aye.

CHAIR DREW: All those opposed? I think I heard everyone on aye, so the motion is adopted.

So with that, you've heard that the plan is -- so please take a look at your calendars, and we would plan to travel I think the morning of the 20th and return the afternoon of the 21st from Richland, Washington, overall to both have our Council meeting and this hearing and for those who are able to attend a tour of the Columbia Generating Station.

I would like to also mention that this is

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not open to the public facility because of the national security issues. So that would be a tour for Councilmembers and Staff only.

Is that correct?

MS. BUMPUS: That's correct.

CHAIR DREW: Okay. Any questions on that? We will continue to be in communication with you, then.

Moving on to the 3rd quarter cost allocation, Mr. Posner.

MR. POSNER: Good afternoon, Chair Drew, Councilmembers. So as we do at the beginning of each quarter, we recalculate our nondirect cost allocations. Those are the percentages that get charged to the different projects that EFSEC regulates. And we look at the -- the Staff technical work that's been done in the past quarter and then also looking at -- looking ahead to the anticipated work, and then we come up with these percentages. So I will go ahead and read off the percentages for the 3rd quarter fiscal year 2019, which runs January 1st, 2019, through March 31st, 2019.

So the percentages for this quarter are Kittitas Valley Wind Project, 9 percent; the Wild Horse Wind Project, 9 percent; Columbia Generating Station, 25 percent; the Columbia Solar Project, 13 percent; WNP 1, 4 percent; Whistling Ridge Energy Project, 3 percent;

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Grays Harbor 1&2, 13 percent; Chehalis Generation Project, 11 percent; Desert Claim Wind Project, 10 percent; and Grays Harbor Energy 3&4, 3 percent. And that concludes my presentation.

CHAIR DREW: Okay. Any questions?

Okay. Thank you.

We have one special presentation. In the chamber here is Ms. Ann Essko, and she went off and retired. So I will now read the resolution that we have in front of us.

Commending services of Senior Assistant Attorney General Ann Essko.

Whereas, Ann Essko has served as Senior Counsel for the Washington State Energy Facility Site Evaluation Council;

And whereas, Ann Essko served the Council with distinction as Senior Counsel from January 2003 through September 2006 and August 2012 through November 2018;

And whereas, Ann Essko has ably represented the interests of the citizens of the State of Washington by providing legal advice during her service to the Council;

And whereas, Ann Essko has participated in multiple Council meetings over approximately ten years

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of service to the Council;

And whereas, Ann Essko, upon her return to serve as EFSEC Senior Counsel in 2012, immediately began preparing for the difficult task of arguing before the Washington Supreme Court, the merits of a petition for judicial review on the Whistling Ridge Wind Project;

Whereas, Ann Essko, through her detailed review of an administrative record of several-thousand pages, was able to present thoughtful and legally convincing arguments before the Washington Supreme Court, which affirmed the Council's recommendation and the governor's decision for the Whistling Ridge Wind Project;

And whereas, Ann Essko actively participated with Council's activities during the review of the application filed by Tesoro Savage for the Vancouver Energy Project, including participation in public and State Environmental Policy Act, public meetings, and a five-week adjudicative hearing;

And whereas, Ann Essko tirelessly reviewed and analyzed the largest adjudicative record for an EFSEC project, and provided critical input to the development of a 430-page adjudicative order and 101-page recommendation report on the Vancouver Energy Project, both the longest in EFSEC history;

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And whereas, Ann Essko as lead attorney for the Office of the Attorney General worked in a dedicated, selfless manner under extremely tight time frames to provide the necessary input to assist the Council in completing the Vancouver Energy Project recommendation to the governor in December 2017;

And whereas, Ann Essko's work ethic, professionalism, patience, integrity, and attention to detail has contributed greatly to the Council's collaborative decision-making process;

And whereas, Ann Essko has served as an effective and dedicated attorney representing the Council for ten years.

And now, therefore, be it resolved that the Energy Facility Site Evaluation Council hereby recognizes Ann Essko's vital contribution to the Council over her years of service and expresses its gratitude for her exemplary service and devotion as Senior Counsel for EFSEC -- to EFSEC. Dated this 15th day of January 2019.

Is there a motion?

MR. STEPHENSON: I will move to approve this resolution.

CHAIR DREW: Thank you.

Is there a second?

MS. GREEN-TAYLOR: And I will be happy to second that motion.

CHAIR DREW: Any comments?

Mr. Stephenson.

MR. STEPHENSON: Thank you, Chair. Ann has been wonderful. She has also been sometimes slightly difficult for this Council, and I hope that her new -- the new counsel is just as difficult and just as clear on staying with the law and holding us -- our feet to the fire. Thank you.

CHAIR DREW: Thank you.

All those in favor, say "aye."

COUNCILMEMBERS: Aye.

CHAIR DREW: Resolution is adopted. Thank you.

And with that, we are adjourned.

(Adjourned at 2:02 p.m.)

CERTIFICATE

STATE OF WASHINGTON
COUNTY OF THURSTON

I, Tayler Garlinghouse, a Certified Shorthand Reporter in and for the State of Washington, do hereby certify that the foregoing transcript is true and accurate to the best of my knowledge, skill and ability.

_____

Tayler Garlinghouse, CCR 3358

ENERGY FACILITY SITE EVALUATION COUNCIL

Roll Call Checklist

Meeting Date: February 20, 2019 EFSEC Monthly Meeting

State Agency Members

Chair
Kathleen Drew ☑ Present ☐ Call

Commerce
Liz Green-Taylor ☑ Present ☐ Call

Ecology
Cullen Stephenson ☑ Present ☐ Call

Fish and Wildlife
Mike Livingston ☐ Present ☑ Call

Natural Resources
Dan Siemann ☐ Present ☑ Call

Utilities & Transportation Commission
Stacey Brewster ☑ Present ☐ Call

Local Gov't. and Optional State Agency for the Columbia Solar Project

Dept. of Health
Joe Laxson ☐ Present ☐ Call

Kittitas County
Ian Elliot ☐ Present ☐ Call

Assistant Attorney General

Jon Thompson ☑ Present ☐ Call
Stephanie Duvall ☐ Present ☐ Call

Administrative Law Judge

Laura Chartoff ☐ Present ☐ Call

Council Staff

☑ Stephen Posner ☐ Patty Betts
☑ Sonia Bumpus ☑ Christina Potis
☑ Tammy Mastro ☑ Joan Aitken
☑ Ami Kidder ☑ Stew Henderson
☑ Amy Moon

Court Reporter: _____

Operational Updates	Present	Call
Kittitas Valley Wind, EDP Renewables Eric Melbardis	☐	☑
Wild Horse Wind Power Project, Puget Sound Energy Jennifer Diaz	☑	☐
Grays Harbor Energy Center, Grays Harbor Energy Chris Sherin	☑	☐
Chehalis Generation Facility, PacifiCorp Mark Miller	☐	☐
Columbia Generating Station & WNP-1/4, Energy Northwest Mary Ramos	☐	☑

In attendance	Present	Call
1. Bill Sherman Org: CFE	☐	☑
2. Jeremy Smith Org: Chehalis	☑	☐
3. _____ Org:	☐	☐
4. _____ Org:	☐	☐
5. _____ Org:	☐	☐
6. _____ Org:	☐	☐
7. _____ Org:	☐	☐
8. _____ Org:	☐	☐
9. _____ Org:	☐	☐
10. _____ Org:	☐	☐

Kittitas Valley Wind Power Project
Monthly Operations Report

January 2019

Project Status Update

Production Summary:

Power generated:	7382 MWh
Wind speed:	3.7 m/s
Capacity Factor:	9.8%

Safety:
No incidents

Compliance:
Project is in compliance

Sound:
No complaints

Shadow Flicker:
No complaints

Environmental:
No incidents

Kittitas Valley Wind Power Project
Monthly Operations Report

February 2019

Project Status Update

Production Summary:

Power generated:	3083 MWh
Wind speed:	3.1 m/s
Capacity Factor:	4.6%

Safety:
No incidents

Compliance:
Project is in compliance

Sound:
No complaints

Shadow Flicker:
No complaints

Environmental:
No incidents

Wild Horse Wind Facility
January 2019

Safety
No lost-time accidents or safety injuries/illnesses.

Compliance/Environmental
Nothing to report.

Operations/Maintenance
Nothing to report.

Wind Production
January generation totaled 46,431 MWh for an average capacity factor of 22.89%.

Eagle Update
Nothing to report.

Wild Horse Wind Facility
February 2019

Safety
No lost-time accidents or safety injuries/illnesses.

Compliance/Environmental
Nothing to report.

Operations/Maintenance
Nothing to report.

Wind Production
February generation totaled 42,127 MWh for an average capacity factor of 23%.

Eagle Update
Nothing to report.

EFSEC Monthly Operational Report
Grays Harbor Energy Center

January 2019

Safety and Training

- There were no accidents or injuries during the month and the plant staff has achieved 3682 days without a lost time incident.

Environmental & Compliance

- There were no air emissions, outfall or storm water deviations, or spills during the month.
- All routine reporting was completed for the month and quarter.
- SPPC Plan reviewed and submitted to EFSEC.

Operations & Maintenance

- Grays Harbor Energy Center (GHEC) operated 31days during the month, with 1 start on U1, and 0 starts on U2.
- GHEC generated 385,271MWh during the month and 385,271MWh YTD.
- The plant capacity factor was 84% for the month and 84% YTD.
- U1 CEMS Sample Line Umbilical change out on 14JAN we triggered a RATA per the 40CFR75.
- GHEC gave EFSEC our 30days notice for the scheduled Relative Accuracy Test Audit (RATA), and submitted the test plan. It is scheduled for February 27-28. Following 40CRF75 protocol for diagnostic testing following the change out of Unit 1 Sample Umbilical line.

Noise and/or Odor

- None.

Site Visits

- None.

Other

- Grays Harbor Energy Center is staffed with 20 personnel.

EFSEC Monthly Operational Report
Grays Harbor Energy Center

February 2019

Safety and Training

- There were no accidents or injuries during the month and the plant staff has achieved 3710 days without a lost time incident.

Environmental & Compliance

- There were no air emissions, outfall or storm water deviations, or spills during the month.
- All routine reporting was completed for the month and quarter.
- Tier II Report was submitted.
- Annual Dangerous Waste Report submitted.
- Office of State Fire Marshal re-inspection was completed.

Operations & Maintenance

- Grays Harbor Energy Center (GHEC) operated 7days during the month, with 1 start on U1, and 1 starts on U2.
- GHEC generated 81,592MWh during the month and 466,863MWh YTD. The plant capacity factor was 19.6% for the month and 53.2% YTD.
- In January, GHEC gave EFSEC our 30days notice for the scheduled Relative Accuracy Test Audit (RATA) on February 27-28, and submitted the test plan. Due to schedule pipeline maintenance on the previous dates, the RATA was re-scheduled for March 13-14. Following 40CRF75 protocol, for diagnostic testing, following the change out of Unit 1 Sample Umbilical Line.

Noise and/or Odor

- None.

Site Visits

- On February 26, Office of State Fire Marshal inspector was present to re-inspect our corrections from the December inspection. Ami Kidder, EFSEC staff member, was also in attendance.

Other

- None.

PACIFICORP
A BERKSHIRE HATHAWAY ENERGY COMPANY

Chehalis Generation Facility
1813 Bishop Road
Chehalis, Washington 98532
Phone: 360-748-1300

Chehalis Generation Facility----Monthly Plant Report – January 2019
Washington Energy Facility Site Evaluation Council

02.01.2019

Safety:

- There were no recordable incidents this reporting period and the plant staff has achieved 1242 days without a Lost Time Accident.

Environment:

- There were no air emissions or stormwater deviations or spills during the month.
- Wastewater and Storm-water monitoring results were in compliance with the permit limits.

Operations and Maintenance Activities:

- The Plant generated 271,124 MW-hours in January for a 2019 YTD generation total of 271,124 MW-hours and a capacity factor of 65.26% for 2019.

Regulatory/Compliance:

- Nothing to report this period.

Sound monitoring:

- Nothing to report this period.

Carbon Offset Mitigation:

- Nothing to report this period.

Respectfully,

Mark A. Miller
Manager, Gas Plant
Chehalis Generation Facility

PACIFICORP
A BERKSHIRE HATHAWAY ENERGY COMPANY

Chehalis Generation Facility
1813 Bishop Road
Chehalis, Washington 98532
Phone: 360-748-1300

Chehalis Generation Facility----Monthly Plant Report – February 2019
Washington Energy Facility Site Evaluation Council

03.04.2019

Safety:

- There were no recordable incidents this reporting period and the plant staff has achieved 1270 days without a Lost Time Accident.

Environment:

- There were no air emissions or stormwater deviations or spills during the month.
- Wastewater and Storm-water monitoring results were in compliance with the permit limits.

Operations and Maintenance Activities:

- The Plant generated 97,259 MW-hours in February for a 2019 YTD generation total of 368,383 MW-hours and a capacity factor of 48.47% for 2019.

Regulatory/Compliance:

- EFSEC staff and an inspector from the Office of the State Fire Marshal conducted a follow-up inspection of the facility on February 26, 2019. The inspection noted all previous items had been corrected from the December 2018 inspection.

Sound monitoring:

- Nothing to report this period.

Carbon Offset Mitigation:

- Nothing to report this period.

Respectfully,

Mark A. Miller
Manager, Gas Plant
Chehalis Generation Facility

Energy Northwest
February 20, 2019 EFSEC Council Meeting
Operations Reporting Period for January 1-31, 2019
Site Contact: Mary Ramos

Washington Nuclear Project 1 and 4 (WNP-1/4)

Fire Protection and Life Safety Inspection of WNP-1/4
On January 10, 2019, Energy Northwest provided a response to the State Fire Marshal regarding the fire inspection of WNP-1/4. All actions noted on the inspection report for WNP-1/4 have been addressed and brought into compliance with the applicable code requirement.

Columbia Generating Station

Transformer oil spill at Columbia Generating Station- Update
Spill cleanup was performed on January 21, 2019 by a contractor. Oil buildup on the side of the transformer and concrete pad was removed prior to excavating the contaminated rock and soil. Following excavation, a verification composite soil sample was taken for analysis. Analytical results show that the PCB concentrations in the remaining soil are below detection limits.

Fire Protection and Life Safety Inspection of Columbia Generating Station
On January 10, 2019, Energy Northwest provided a response to the State Fire Marshal regarding the fire inspection of non-power block facilities at Columbia Generating Station. Items noted on the inspection report were grouped into three categories: 1) immediate corrective actions which have been addressed and brought into compliance with the applicable code requirement; 2) actions which can be addressed in the near term (by February 11, 2019); and 3) actions with complicated and/or long-term resolutions. A follow-up response regarding items with complicated and/or long term resolutions will be submitted by February 25, 2019.

Energy Northwest
March 19, 2019 EFSEC Council Meeting
Operations Reporting Period for February 1-28, 2019
Site Contact: Mary Ramos

Washington Nuclear Project 1 and 4 (WNP-1/4)
No updates to report

Columbia Generating Station

Transformer oil spill at Columbia Generating Station
On February 27, 2019, Energy Northwest received a letter from Washington State Department of Ecology regarding the transformer oil spill at Columbia Generating Station. The letter states that Ecology is not requiring additional follow-up regarding the spill event and the dangerous waste compliance investigation is closed.

The transformer repair has been included in the upcoming outage, which is scheduled from May 11 – June 15, 2019.

Fire Protection and Life Safety Inspection of Columbia Generating Station
On February 26, 2019, Energy Northwest provided a follow-up response to the State Fire Marshal regarding the fire inspection of non-power block facilities at Columbia Generating Station.

Issuance Date:	September 30, 2014
Amendment #1 Date:	February 8, 2016
Amendment #2 Date:	March 19, 2019
Effective Date:	November 1, 2014
Expiration Date:	October 31, 2019

National Pollutant Discharge Elimination System
Waste Discharge Permit No. WA002515-1

State of Washington
ENERGY FACILITY SITE EVALUATION COUNCIL (EFSEC)
P.O. Box 43172
Olympia, Washington 98504-3172

In compliance with the provisions of:
The State of Washington Water Pollution Control Law
Chapter 90.48 Revised Code of Washington
and
State of Washington Energy Siting Law
Chapter 80.50 Revised Code of Washington
and
The Federal Water Pollution Control Act
(The Clean Water Act)
Title 33 United States Code, Section 1342 et seq.

Energy Northwest's Columbia Generating Station
P.O. Box 968
Richland, Washington 99352-0968

is authorized to discharge in accordance with the Special and General Conditions that follow.

Facility Location: Latitude: 46.47170 Longitude: 119.33280	Receiving Water: Outfall 001: Columbia River (river mile 351.75) Outfall 002: Ground Water Latitude: 46.47389 Longitude: 119.32861
Treatment Type: Cooling, disinfection, neutralization (blowdown) Filtration, ion exchange (processed radwaste water)	SIC Code: 4911 NAICS Code: 221113
Industry Type: Steam-Electric Power Generation	Categorical Industry: 40 CFR Part 423 Steam Electric Power Generating Point Source Category

Kathleen Drew, Chair
Energy Facility Site Evaluation Council

Table of Contents

Summary of Permit Report Submittals

Refer to the Special and General Conditions of this permit for additional submittal requirements.

Permit Section	Submittal	Frequency	First Submittal Date
S3.A	Discharge Monitoring Report	Monthly	December 15, 2014
S3.E	Reporting Permit Violations	As necessary	
S3.F	Other Reporting	As necessary	
S4.A	Operations and Maintenance Manual	1/permit cycle	May 1, 2019
S4.A	Operations and Maintenance Manual Update	As necessary	
S4.B	Reporting Bypasses	As necessary	
S5.C	Solid Waste Control Plan	1/permit cycle	May 1, 2019
S5.C	Modification to Solid Waste Plan	As necessary	
S6	Application for Permit Renewal	1/permit cycle	May 1, 2019
S7	Compliance Schedule	As necessary	December 1, 2014
S7.1	Operations and Maintenance Manual (impoundment)	Once	December 1, 2014
S7.2	Notice of completion (impoundment)	Once	May 1, 2015
S7.3	Scope of work	Once	November 1, 2016
S7.4	Engineering report	Once	May 1, 2019
S7.5	Ground Water Quality Assurance Project Plan (QAPP) Update	Twice	May 1, 2015
S8	Non-Routine and Unanticipated Discharges	As necessary	
S9	Spill Plan	1/permit cycle, updates submitted as necessary	May 1, 2019
S10	Stormwater Pollution Prevention Plan	1/permit cycle	November 1, 2015
S11	Outfall Evaluation	1/permit cycle	May 1, 2019
S12.A	Operations and Maintenance Manual (cooling water intake structure (CWIS))	1/permit cycle	November 1, 2015
S12.A	Operations and Maintenance Manual (CWIS) Update	As necessary	
S12.B	Entrainment Characterization Study Design	Once	November 1, 2015
S12.B	Entrainment Characterization Study	Once	May 1, 2019
S12.B	Engineering Analysis	As necessary	
S13.A	Acute Toxicity Effluent Test Results	Quarterly	April 30, 2015
S14.A	Chronic Toxicity Effluent Test Results with Permit Renewal Application	Once	May 1, 2019
G1	Notice of Change in Authorization	As necessary	
G4	Permit Application for Substantive Changes to the Discharge	As necessary	
G5	Engineering Report for Construction or Modification Activities	As necessary	
G7	Notice of Permit Transfer	As necessary	
G10	Duty to Provide Information	As necessary	
G21	Compliance Schedules	As necessary	

Special Conditions

S1. Discharge limits

S1.A. Process wastewater discharges

All discharges and activities authorized by this permit must be consistent with the terms and conditions of this permit.

The discharge of any of the following pollutants more frequently than, or at a level in excess of that identified and authorized by this permit violates the terms and conditions of this permit.

There shall be no discharge of wastewater of radioactive materials in excess of the limitations on radioactive effluents established by the Nuclear Regulatory Commission in the facility operation license and in 10 CFR Parts 20 and 50.

Beginning on the effective date of this permit, the Permittee is authorized to discharge circulating cooling water blowdown, service water system blowdown, and radioactive wastewater treatment system effluent, to the Columbia River at the permitted location subject to complying with the following limits:

Effluent Limits for Circulating Water Blowdown: Outfall 001 Latitude 46.47139 Longitude 119.26250		
Parameter	**Average Monthly [a]**	**Maximum Daily [b]**
Flow	5.6 million gallons/day (mgd)	9.4 (mgd)
Total Residual Halogen (TRH) [c]	Not Applicable	0.1 milligrams/liter (mg/L)
Chromium (Total)	8.2 µg/L	16.4 µg/L
Zinc (Total)	53 µg/L	107 µg/L
Polychlorinated biphenyl compounds (PCBs)	No discharge	No discharge
The 126 priority pollutants (40 CFR 423 Appendix A) contained in chemicals added for cooling tower maintenance, except chromium and zinc	No detectable amount	No detectable amount
	Minimum	**Maximum**
pH [d]	6.5 standard units (SU)	9.0 SU
The effluent limit for acute toxicity is: No acute toxicity detected in a test concentration representing the acute critical effluent concentration (ACEC). The ACEC means the maximum concentration of effluent during critical conditions at the boundary of the acute mixing zone, defined in Section 1.B of this permit. The ACEC equals 11% effluent. See S13 for more information.		

Effluent Limits for Circulating Water Blowdown: Outfall 001 Latitude 46.47139 Longitude 119.26250	
a	Average monthly effluent limit means the highest allowable average of daily discharges over a calendar month. To calculate the discharge value to compare to the limit, you add the value of each daily discharge measured during a calendar month and divide this sum by the total number of daily discharges measured.
b	Maximum daily effluent limit is the highest allowable daily discharge. The daily discharge is the average discharge of a pollutant measured during a calendar day. This does not apply to pH or temperature.
c	In the event of an equipment failure, CGS will operate using a batch halogenation process of the cooling water system. When the batch halogenation process is utilized, the circulating water blowdown isolation valves must be closed during biofouling treatments and remain closed until the concentration of total residual halogen is less than 0.1 mg/L for at least 15 minutes.
d	When pH is continuously monitored, excursions between 5.0 and 6.5, or 9.0 and 10.0 will not be considered violations if no single excursion exceeds 60 minutes in length and total excursions do not exceed 7 hours and 30 minutes per month. Any excursions below 5.0 and above 10.0 at any time are violations.

S1.B. Mixing zone authorization

Mixing zone for Outfall 001

The paragraphs below define the maximum boundaries of the mixing zones.

Chronic mixing zone

The width of the chronic mixing zone is limited to a distance of 175 feet (53 meters). The length of the chronic mixing zone extends 100 feet (30 meters) upstream and 308 feet (94 meters) downstream of the outfall. The mixing zone extends from the discharge port to the top of the water surface. The concentration of pollutants at the edge of the chronic zone must meet chronic aquatic life criteria and human health criteria.

Acute mixing zone

The width of the acute mixing zone is limited to a distance of 18 feet (5 meters) in any horizontal direction from the outfall. The length of the acute mixing zone extends 10 feet (3 meters) upstream and 31 feet (9 meters) downstream of the outfall. The mixing zone extends from the discharge port to the top of the water surface. The concentration of pollutants at the edge of the acute zone must meet acute aquatic life criteria.

Available Dilution (dilution factor)	
Acute Aquatic Life Criteria	9
Chronic Aquatic Life Criteria	93
Human Health Criteria - Carcinogen	93
Human Health Criteria - Non-carcinogen	93

S1.C. Process wastewater and stormwater discharges to Outfall 002

Beginning on the effective date of this permit, the Permittee is authorized to discharge stormwater runoff, wastewater from potable and demineralized water production, intake air wash unit blowdown, and water from non-radioactive equipment dewatering, leakage, testing, cleaning, and flushing to ground at the permitted location identified on the cover sheet. The discharge shall not cause a violation of the ground water standards (Chapter 173-200 WAC). Existing and beneficial uses of ground water shall be protected. This authorization expires when the flows identified in this section are redirected to the double-lined impoundment required in S7.2 of this permit.

S1.D Stormwater discharges to ground

Beginning on the effective date of this permit, the Permittee is authorized to discharge stormwater runoff to underground injection control wells identified in the permit application and any amendments to the application approved by EFSEC. The discharge shall not cause a violation of the ground water standards (Chapter 173-200 WAC). Existing and beneficial uses of ground water shall be protected.

S2. Monitoring requirements

S2.A. Monitoring schedule

The Permittee must monitor in accordance with the following schedule and the requirements specified in **Appendix A**.

Parameter	Units & Speciation	Minimum Sampling Frequency	Sample Type
(1) Circulating Water Blowdown: Outfall 001			
Flow	million gallons/day (mgd)	Continuous [1]	Metered/recorded
pH [2, 3, 17]	standard units	Continuous	Metered/recorded
Temperature [4 and 5]	degrees centigrade (°C)	Continuous	Metered/recorded
Turbidity	NTU	Monthly [6]	Grab [7]
Total Residual Halogen (TRH)[16]	milligrams/liter (mg/L)	Continuous[1]	Metered/recorded
Total Residual Halogen	milligrams/liter (mg/L)	2/treatment, as needed[15]	Grab
Copper (Total)	micrograms/liter (µg/L)	Monthly	24-Hour composite [8]
Chromium (Total)	µg/L	Monthly	24-Hour composite [8]
Zinc (Total)	µg/L	Monthly	24-Hour composite [8]
Priority Pollutants (PP) – Total Metals	µg/L; ng/L for mercury	Annually [9]	24-Hour composite Grab for mercury
PP – Volatile Organic Compounds	µg/L	Annually [9]	Grab
PP – Acid-extractable Compounds	µg/L	Annually [9]	24-Hour composite
PP – Base-neutral Compounds	µg/L	Annually [9]	24-Hour composite

Parameter	Units & Speciation	Minimum Sampling Frequency	Sample Type
PP – Dioxin	pg/L	Annually [9]	24-Hour composite
Asbestos	million fibers/liter (MFL)	1/Permit Cycle [10]	Grab
(2) Standby Service Water Discharges to Blowdown Line Outfall 001: Pond to be discharged			
Volume	mgd	Continuous [1] or volume estimate [11]	Metered/estimated
pH	SU	Daily [12]	Grab
(3) Outfall 002 – The Permittee must monitor until flows are redirected to the evaporative pond.			
Chromium (Total)	µg/L	2/year [13]	24-hour composite
Lead (Total)	µg/L	2/year	24-hour composite
Fluoride	mg/L	2/year	24-hour composite
Nitrate-Nitrite (as N)	mg/L	2/year	24-hour composite
Copper (Total)	µg/L	2/year	24-hour composite
Nickel (Total)	µg/L	2/year	24-hour composite
Iron (Total)	µg/L	2/year	24-hour composite
Manganese (Total)	µg/L	2/year	24-hour composite
Zinc (Total)	µg/L	2/year	24-hour composite
Chloride	mg/L	2/year	24-hour composite
Sulfate	mg/L	2/year	24-hour composite
Total Dissolved Solids	mg/L	2/year	24-hour composite
pH	SU	2/year	Grab
Conductivity	µS/cm	2/year	Grab
(4) Evaporative Pond			
Volume	gallons	1/day – recorded but not reported [14]	Calculated [14]
(5) Evaporative Pond Leak Detection System – The Permittee must monitor in accordance with the approved Leak Detection Plan required in S7.1 and report in accordance with S3.			
(6) Permit Renewal Application Requirements – Outfall 001			
Cyanide	µg/L	Once in the last year	Grab
Total Phenolic Compounds	µg/L	Once in the last year	Grab
(7) Whole Effluent Toxicity Testing – Circulating Water Blowdown: Outfall 001			
Acute Toxicity Testing	As specified in Special Condition S13		
Chronic Toxicity Testing	As specified in Special Condition S14		
(8) Cooling water withdrawal			
Flow	million gallons/day (mgd)	Continuous [1]	Metered/recorded

1	Continuous means uninterrupted except for brief lengths of time for calibration, power failure, or unanticipated equipment repair or maintenance. The Permittee must sample daily when continuous monitoring is not possible.
2	The Permittee must report the instantaneous maximum and minimum pH monthly. Do not average pH values.
3	The Permittee must record and report the: • Number of minutes the pH value measured between 5.0 and 6.5 and between 9.0 and 10.0 for each day. • Total minutes for the month.

Parameter	Units & Speciation	Minimum Sampling Frequency	Sample Type
	• Monthly instantaneous maximum and minimum pH. If multiple excursions occur during the day, note the duration for each excursion. If submitting electronic DMRs, include this additional information in the parameter notes.		
4	Temperature grab sampling must occur when the effluent is at or near its daily maximum temperature, which usually occurs in the late afternoon. If measuring temperature continuously, the Permittee must determine and report a daily maximum from half-hour measurements in a 24-hour period. Continuous monitoring instruments must achieve an accuracy of 0.2 degrees C and the Permittee must verify accuracy annually.		
5	The sampling point for temperature is at the Circulating Water Pumphouse (CWP) until monitoring equipment is operational in the River Pumphouse (RP). The Permittee may maintain temperature monitoring equipment at the CWP for use during maintenance and outages of equipment at the RP. The Permittee must inform EFSEC on the monthly report when the RP is operational, and thereafter when reported results contain data from the CWP.		
6	Monthly means once every calendar month.		
7	Grab means an individual sample collected over a fifteen (15) minute, or less, period.		
8	A Grab sample may be substituted for 24-Hour composite sampling until equipment installed as required in Section S7.8 is operational. The Permittee must inform EFSEC on the monthly report of the sample type.		
9	If the Permittee submits engineering calculations which demonstrate that the regulated pollutants are not detectable in the final discharge by the analytical methods in 40 CFR part 136, annual monitoring is not required. The Permittee must, at a minimum, sample once in the last year to meet permit renewal application requirements. See Appendix A to identify the specific pollutants in the priority pollutant groups listed.		
10	Asbestos grab sampling must occur once during the permit cycle when the circulating water cooling system is operating at an average number of cycles of concentration and only blowdown is being discharged. Test results must be submitted with the application for permit renewal.		
11	Volumes of batch releases of water for pond draining may be estimated based on level measurements. Feed-and-bleed discharges made directly to the blowdown line must be measured by flow meter.		
12	Prior to commencement of discharges, the Permittee must verify that pH is within specified limits. Measurements must be taken daily while discharge is in progress.		
13	Samples must represent a typical facility discharge to Outfall 002. The Permittee must collect one sample annually between March 15 – May 15 and one sample annually between September 15 – November 15.		
14	Monitor all pond influent flows, add, and report total volume for the month on the discharge monitoring report.		
15	Conduct batch sampling procedure prior to commencing discharge in the event the continuous monitor becomes inoperable for any reason.		
16	Report maximum daily concentration of TRH.		
17	The compliance point for pH is downstream of the dehalogenation tie-in to Outfall 001.		

S2.B. Sampling and analytical procedures

Samples and measurements taken to meet the requirements of this permit must represent the volume and nature of the monitored parameters, including representative sampling of any unusual discharge or discharge condition, including bypasses, upsets, and maintenance-related conditions affecting effluent quality.

Sampling and analytical methods used to meet the monitoring requirements specified in this permit must conform to the latest revision of the *Guidelines Establishing Test Procedures for the Analysis of Pollutants* contained in 40 CFR Part 136 (or as applicable in 40 CFR subchapters N [Parts 400–471] or O [Parts 501-503]) unless otherwise specified in this permit. EFSEC may only specify alternative methods for parameters without limits and for those parameters without an EPA approved test method in 40 CFR Part 136.

S2.C. Flow measurement, field measurement, and continuous monitoring devices

The Permittee must:

1. Select and use appropriate flow measurement, field measurement, and continuous monitoring devices and methods consistent with accepted scientific practices.
2. Install, calibrate, and maintain these devices to ensure the accuracy of the measurements is consistent with the accepted industry standard and the manufacturer's recommendation for that type of device.
3. Calibrate continuous monitoring instruments for the following parameters weekly unless it can demonstrate a longer period is sufficient based on monitoring records. The Permittee:
    a. May calibrate apparatus for continuous monitoring of dissolved oxygen by air calibration.
    b. Must calibrate continuous pH measurement instruments using a grab sample analyzed in the lab with a pH meter calibrated with standard buffers and analyzed within 15 minutes of sampling.
    c. Must calibrate continuous chlorine measurement instruments using a grab sample analyzed in the laboratory within 15 minutes of sampling.
4. Use field measurement devices as directed by the manufacturer and do not use reagents beyond their expiration dates.
5. Calibrate flow-monitoring devices at a minimum frequency of at least one calibration per year.
6. Maintain calibration records for at least three years.

S2.D. Laboratory accreditation

The Permittee must ensure that all monitoring data required by EFSEC for permit specified parameters is prepared by a laboratory registered or accredited under the provisions of chapter 173-50 WAC, *Accreditation of Environmental Laboratories*. Flow, temperature, settleable solids, conductivity, pH, and internal process control parameters are exempt from this requirement.

S2.E. Request for reduction in monitoring

The Permittee may request a reduction of the sampling frequency after twelve (12) months of monitoring. EFSEC will review each request and at its discretion grant the request when it reissues the permit or by a permit modification.

The Permittee must:

1. Provide a written request.
2. Clearly state the parameters for which it is requesting reduced monitoring.
3. Clearly state the justification for the reduction.

S3. Reporting and recording requirements

The Permittee must monitor and report in accordance with the following conditions. Falsification of information submitted to Council is a violation of the terms and conditions of this permit.

S3.A. Reporting

The first monitoring period begins on the effective date of the permit. The Permittee must:

1. Summarize, report, and submit monitoring data obtained during each monitoring period on the electronic Discharge Monitoring Report (DMR) form provided by Ecology within WQWebDMR. Include data for each of the parameters tabulated in Special Condition S2 and as required by the form. Report a value for each day sampling occurred (unless specifically exempted in the permit) and for the summary values (when applicable) included on the electronic form.

   To find out more information and to sign up for WQWebDMR go to: http://www.ecy.wa.gov/programs/wq/permits/paris/webdmr.html
2. Enter the "no discharge" reporting code for an entire DMR, for a specific monitoring point, or for a specific parameter as appropriate, if the Permittee did not discharge wastewater or a specific pollutant during a given monitoring period.
3. Report single analytical values below detection as "less than the detection level (DL)" by entering < followed by the numeric value of the detection level (e.g. < 2.0) on the DMR. If the method used did not meet the minimum DL and quantitation level (QL) identified in the permit, report the actual QL and DL in the comments or in the location provided.
4. Report the test method used for analysis in the comments if the laboratory used an alternative method not specified in the permit and as allowed in Appendix A.
5. Calculate average values (unless otherwise specified in the permit) using:

a. The reported numeric value for all parameters measured between the agency-required detection value and the agency-required quantitation value.

b. One-half the detection value (for values reported below detection) if the lab detected the parameter in another sample for the reporting period.

c. Zero (for values reported below detection) if the lab did not detect the parameter in another sample for the reporting period.

6. Report single-sample grouped parameters (for example priority pollutants, PAHs, pulp and paper chlorophenolics, TTOs) on the WQWebDMR form and include: sample date, concentration detected, detection limit (DL) (as necessary), and laboratory quantitation level (QL) (as necessary). The Permittee must also submit an electronic PDF copy of the laboratory report using WQWebDMR.

   If the Permittee has obtained a waiver from electronic reporting or if submitting prior to the compliance date, the Permittee must submit a paper copy of the laboratory report providing the following information: date sampled, sample location, date of analysis, parameter name, CAS number, analytical method/number, detection limit (DL), laboratory quantitation level (QL), reporting units, and concentration detected.

   The contract laboratory reports must also include information on the chain of custody, QA/QC results, and documentation of accreditation for the parameter.

7. Ensure that DMRs are electronically submitted no later than the dates specified below, unless otherwise specified in this permit.

   If the Permittee has obtained a waiver, it must ensure that paper forms are postmarked or received by EFSEC no later than the dates specified below, unless otherwise specified in this permit.

8. Submit DMRs for parameters with the monitoring frequencies specified in S2 (monthly, quarterly, annual, etc.) at the reporting schedule identified below. The Permittee must:

   a. Submit **monthly** DMRs by the 15th day of the following month.

   b. Submit **annual DMRs**, unless otherwise specified in the permit, by January 15 for the previous calendar year. The annual sampling period is the calendar year.

   c. Submit **semiannual DMRs**, unless otherwise specified in the permit, by July 15 and January 15 of each year. Semiannual sampling periods are January through June, and July through December.

   d. Submit permit renewal application monitoring data in WQWebDMR as required in Special Condition S2 by 5/1/2019. If the Permittee has

obtained a waiver from EFSEC, it must submit the permit renewal application monitoring data in a report by 5/1/2019.

9. Submit reports to EFSEC online using Ecology's electronic WQWebDMR submittal forms (electronic DMRs) as required above. Send paper reports to:

EFSEC
P.O. Box 43172
Olympia, WA 98504-3172

Department of Ecology
Richland Office
Attn: Columbia Generating Station Monitoring
3100 Port of Benton Blvd.
Richland, WA 99354

S3.B. Records retention

The Permittee must retain records of all monitoring information for a minimum of three (3) years. Such information must include all calibration and maintenance records and all original recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit. The Permittee must extend this period of retention during the course of any unresolved litigation regarding the discharge of pollutants by the Permittee or when requested by EFSEC.

S3.C. Recording of results

For each measurement or sample taken, the Permittee must record the following information:

1. The date, exact place, method, and time of sampling or measurement.
2. The individual who performed the sampling or measurement.
3. The dates the analyses were performed.
4. The individual who performed the analyses.
5. The analytical techniques or methods used.
6. The results of all analyses.

S3.D. Additional monitoring by the Permittee

If the Permittee monitors any pollutant more frequently than required by Special Condition S2 of this permit, then the Permittee must include the results of such monitoring in the calculation and reporting of the data submitted in the Permittee's DMR unless otherwise specified by Special Condition S2.

S3.E. Reporting permit violations

The Permittee must take the following actions when it violates or is unable to comply with any permit condition:

1. Immediately take action to stop, contain, and cleanup unauthorized discharges or otherwise stop the noncompliance and correct the problem.
2. If applicable, immediately repeat sampling and analysis. Submit the results of any repeat sampling to EFSEC within thirty (30) days of sampling.

a. Immediate reporting

The Permittee must immediately report to the Department of Ecology, EFSEC, and the Department of Health, Drinking Water Program (at the numbers listed below), all:

- Failures of the disinfection system.
- Plant bypasses discharging to a waterbody used as a source of drinking water.

Ecology, Central Regional Office	509-575-2490	
EFSEC	360-664-1345	
Department of Health, Drinking Water Program	800-521-0323 877-481-4901	(business hours) (after business hours)

b. Twenty-four-hour reporting

The Permittee must report the following occurrences of noncompliance by telephone, to EFSEC at the telephone number listed above, within 24 hours from the time the Permittee becomes aware of any of the following circumstances:

1. Any noncompliance that may endanger health or the environment, unless previously reported under immediate reporting requirements.
2. Any unanticipated bypass that causes an exceedance of any effluent limit in the permit (See Part S4.B., "Bypass Procedures").
3. Any upset that causes an exceedance of an effluent limit in the permit (See G.15, "Upset").
4. Any violation of a maximum daily or instantaneous maximum discharge limit for any of the pollutants in Section S1.A of this permit.
5. Any overflow prior to the treatment works, whether or not such overflow endangers health or the environment or exceeds any effluent limit in the permit.

c. Report within five days

The Permittee must also submit a written report within five days of the time that the Permittee becomes aware of any reportable event under subparts a or b, above. The report must contain:

1. A description of the noncompliance and its cause.

2. The period of noncompliance, including exact dates and times.
3. The estimated time the Permittee expects the noncompliance to continue if not yet corrected.
4. Steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.
5. If the noncompliance involves an overflow prior to the treatment works, an estimate of the quantity (in gallons) of untreated overflow.

d. Waiver of written reports

EFSEC may waive the written report required in subpart c, above, on a case-by-case basis upon request if the Permittee has submitted a timely oral report.

e. All other permit violation reporting

The Permittee must report all permit violations, which do not require immediate or within 24 hours reporting, when it submits monitoring reports for S3.A ("Reporting"). The reports must contain the information listed in subpart c, above. Compliance with these requirements does not relieve the Permittee from responsibility to maintain continuous compliance with the terms and conditions of this permit or the resulting liability for failure to comply.

f. Report Submittal

The Permittee must submit reports to the address listed in S3.

S3.F. Other reporting

a. Spills of Oil or Hazardous Materials

The Permittee must report a spill of oil or hazardous materials in accordance with the requirements of RCW 90.56.280 and chapter 173-303-145 WAC. You can obtain further instructions at the following website: http://www.ecy.wa.gov/programs/spills/other/reportaspill.htm .

b. Failure to submit relevant or correct facts

Where the Permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application, or in any report to EFSEC, it must submit such facts or information promptly.

S3.G. Maintaining a copy of this permit

The Permittee must keep a copy of this permit at the facility and make it available upon request to EFSEC or Ecology inspectors.

S4. Operation and maintenance

The Permittee must, at all times, properly operate and maintain all facilities or systems of treatment and control (and related appurtenances), which are installed to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance also includes keeping a daily operation logbook (paper or electronic), adequate laboratory controls, and appropriate quality assurance procedures. This provision of the permit requires the Permittee to operate backup or auxiliary facilities or similar systems only when the operation is necessary to achieve compliance with the conditions of this permit.

S4.A. Operations and maintenance (O&M) manual

a. O&M manual submittal and requirements

The Permittee must:

1. Prepare an O&M Manual for the evaporative pond system and associated piping that meets the requirements of 173-240-150 WAC and submit it to EFSEC for approval by December 1, 2014. The Permittee must submit a paper copy and an electronic copy (preferably in a portable document format (PDF)).
2. Submit to EFSEC for review substantial changes or updates to the O&M Manual whenever it incorporates them into the manual. The Permittee must submit a paper copy and an electronic copy (preferably as a PDF).
3. Submit to EFSEC the latest version of the evaporative pond and circulating water system O&M Manual with the next application for permit renewal (May 1, 2019).
4. Keep the approved O&M Manual at the permitted facility.
5. Follow the instructions and procedures of this manual.

S4.B. Bypass procedures

This permit prohibits a bypass, which is the intentional diversion of waste streams from any portion of a treatment facility.

EFSEC may take enforcement action against a Permittee for a bypass unless one of the following circumstances (1, 2, or 3) applies.

1. Bypass for essential maintenance without the potential to cause violation of permit limits or conditions.

   This permit authorizes a bypass if it allows for essential maintenance and does not have the potential to cause violations of limits or other conditions of this permit, or adversely impact public health as determined by EFSEC prior to the bypass. The Permittee must submit prior notice, if possible, at least ten (10) days before the date of the bypass.

2. Bypass is unavoidable, unanticipated, and results in noncompliance of this permit.

   This permit authorizes such a bypass only if:

   a. Bypass is unavoidable to prevent loss of life, personal injury, or severe property damage. "Severe property damage" means substantial physical damage to property, damage to the treatment facilities which would cause them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass.

   b. No feasible alternatives to the bypass exist, such as:

      - The use of auxiliary treatment facilities.
      - Retention of untreated wastes.
      - Stopping production.
      - Maintenance during normal periods of equipment downtime, but not if the Permittee should have installed adequate backup equipment in the exercise of reasonable engineering judgment to prevent a bypass.
      - Transport of untreated wastes to another treatment facility or preventative maintenance), or transport of untreated wastes to another treatment facility.

   c. The Permittee has properly notified EFSEC of the bypass as required in Special Condition S3.E of this permit.

3. If bypass is anticipated and has the potential to result in noncompliance of this permit.

   a. The Permittee must notify EFSEC at least thirty (30) days before the planned date of bypass. The notice must contain:

      - A description of the bypass and its cause.
      - An analysis of all known alternatives which would eliminate, reduce, or mitigate the need for bypassing.
      - A cost-effectiveness analysis of alternatives including comparative resource damage assessment.
      - The minimum and maximum duration of bypass under each alternative.
      - A recommendation as to the preferred alternative for conducting the bypass.
      - The projected date of bypass initiation.
      - A statement of compliance with SEPA.
      - A request for modification of water quality standards as provided for in WAC 173-201A-410, if an exceedance of any water quality standard is anticipated.
      - Details of the steps taken or planned to reduce, eliminate, and prevent reoccurrence of the bypass.

b. For probable construction bypasses, the Permittee must notify EFSEC of the need to bypass as early in the planning process as possible. The Permittee must consider the analysis required above during preparation of the engineering report or facilities plan and plans and specifications and must include these to the extent practical. In cases where the Permittee determines the probable need to bypass early, the Permittee must continue to analyze conditions up to and including the construction period in an effort to minimize or eliminate the bypass.

c. EFSEC will consider the following prior to issuing an administrative order for this type of bypass:

- If the bypass is necessary to perform construction or maintenance-related activities essential to meet the requirements of this permit.
- If feasible alternatives to bypass exist, such as the use of auxiliary treatment facilities, retention of untreated wastes, stopping production, maintenance during normal periods of equipment down time, or transport of untreated wastes to another treatment facility.
- If the Permittee planned and scheduled the bypass to minimize adverse effects on the public and the environment.

After consideration of the above and the adverse effects of the proposed bypass and any other relevant factors, EFSEC will approve or deny the request. EFSEC will give the public an opportunity to comment on bypass incidents of significant duration, to the extent feasible. EFSEC will approve a request to bypass by issuing an administrative order under RCW 90.48.120.

S5. Solid wastes

S5.A. Solid waste handling

The Permittee must handle and dispose of all solid waste material in such a manner as to prevent its entry into state ground or surface water.

The Permittee must follow the procedures in EFSEC Resolution No. 299 or the most current resolution pertaining to the disposal of sediments from the cooling water system and double-lined impoundment.

S5.B. Leachate

The Permittee must not allow leachate from its solid waste material to enter state waters without providing all known, available, and reasonable methods of treatment, nor allow such leachate to cause violations of the State Surface Water Quality Standards, Chapter 173-201A WAC, or the State Ground Water Quality Standards, Chapter 173-200 WAC. The Permittee must apply for a permit or permit modification as may be required for such discharges to state ground or surface waters.

S5.C. Solid waste control plan

The Permittee must submit all proposed revisions or modifications to the solid waste control plan to EFSEC for review and approval at least 30 days prior to implementation. The Permittee must comply with the approved solid waste control plan and any modifications once approved. The Permittee must submit an update of the solid waste control plan by May 1, 2019. The Permittee must submit a paper copy and an electronic copy (preferably as a PDF).

S6. Application for permit renewal or modification for facility changes

The Permittee must submit an application for renewal of this permit by May 1, 2019. The Permittee must submit a paper copy and an electronic copy (preferably as a PDF).

The Permittee must also submit a new application or supplement at least one hundred eighty (180) days prior to commencement of discharges, resulting from the activities listed below, which may result in permit violations. These activities include any facility expansions, production increases, or other planned changes, such as process modifications, in the permitted facility.

S7. Compliance schedule

By the dates tabulated below, the Permittee must complete the following tasks and submit a report describing, at a minimum:

- Whether it completed the task and, if not, the date on which it expects to complete the task.
- The reasons for delay and the steps it is taking to return the project to the established schedule.

	Tasks	Date Due
Outfall 002		
1.	Submit an Operation and Maintenance (O&M) Manual for the planned double-lined impoundment to EFSEC for review and approval. In addition to the requirements of Chapter 173-240-150 WAC, the O&M Manual must include a leak detection plan to monitor or test for the structural integrity of the impoundment liner.	December 1, 2014
2.	Complete installation of the double-lined impoundment and submit a Notice of Completion to EFSEC.	May 1, 2015
Circulating cooling water system losses		
3.	Submit a scope of work for analysis of circulating cooling water system losses to EFSEC for review and approval.	November 1, 2016

	Tasks	Date Due
	The scope of work must include plans for how the analysis will be conducted. The analysis must include a methodology to estimate the quantity of water losses. The methodology must include a proposal for mounding analysis, as well as recommendations for water quality sampling and water level measurements based on previous findings.	
4.	Submit an approvable engineering report in accordance with Chapter 173-240 WAC for circulating cooling water system losses to EFSEC for review and approval.	May 1, 2019
Groundwater monitoring		
5.	Submit an update to the *Ground Water Quality Study Quality Assurance Project Plan* (QAPP) prepared as a requirement under the previous permit to EFSEC for review and approval. The update must address changes to the QAPP required due to both on-the-ground changes and findings of studies completed to-date.	May 1, 2015
6.	Submit an update to the *Ground Water Quality Study Quality Assurance Project Plan* (QAPP) to EFSEC for review and approval. The update must address the findings of Tasks 1-5 above.	May 1, 2019
Outfall 001 temperature monitoring		
7.	Relocate temperature monitoring and reporting location to the River Pumphouse. Update the O&M Manual to address this change.	November 1, 2015
Outfall 001 composite sampling		
8.	Install sampling equipment capable of collecting 24-Hour composite and grab samples for parameters specified in Section S2 and begin sampling using this method as soon as possible following installation. Update the O&M Manual to address this change.	November 1, 2015

S8. Non-routine and unanticipated discharges

1. Beginning on the effective date of this permit, the Permittee is authorized to discharge non-routine wastewater on a case-by-case basis if approved by EFSEC. Prior to any such discharge, the Permittee must contact EFSEC and at a minimum provide the following information:

   a. The proposed discharge location

b. The nature of the activity that will generate the discharge

c. Any alternatives to the discharge, such as reuse, storage, or recycling of the water

d. The total volume of water it expects to discharge

e. The results of the chemical analysis of the water

f. The date of proposed discharge

g. The expected rate of discharge discharged, in gallons per minute

2. The Permittee must analyze the water for all constituents limited for the discharge and report them as required by subpart 1.e above. The analysis must also include any parameter deemed necessary by EFSEC. All discharges must comply with the effluent limits as established in Special Condition S1 of this permit, water quality standards, and any other limits imposed by EFSEC.

3. The Permittee must limit the discharge rate, as referenced in subpart 1.g above, so it will not cause erosion of ditches or structural damage to culverts and their entrances or exits.

4. The discharge cannot proceed until EFSEC has reviewed the information provided and has authorized the discharge by letter to the Permittee or by an Administrative Order. Once approved and if the proposed discharge is to a municipal storm drain, the Permittee must obtain prior approval from the municipality and notify it when it plans to discharge.

S9. Spill control plan

S9.A. Spill control plan submittals and requirements

The Permittee must:

1. Submit to EFSEC an update to the existing *Oil and Hazardous Substances Spill Prevention, Control and Counter-Measure Plan* by May 1, 2019. The Permittee must submit a paper copy and an electronic copy (preferably as a PDF).

2. Update the spill plan as needed.

3. Send changes to the plan to EFSEC.

4. Follow the plan and any supplements throughout the term of the permit.

S9.B. Spill control plan components

The spill control plan must include the following:

1. A list of all bulk oil and petroleum products and other materials used and/or stored on-site, which when spilled, or otherwise released into the environment, designate as Dangerous Waste (DW) or Extremely Hazardous Waste (EHW) by the procedures set forth in WAC 173-303-070. Include other materials used and/or stored on-site which may become pollutants or cause pollution upon reaching state's waters.

2. A description of preventive measures and facilities (including an overall facility plot showing drainage patterns) which prevent, contain, or treat spills of these materials.
3. A description of the reporting system the Permittee will use to alert responsible managers and legal authorities in the event of a spill.
4. A description of operator training to implement the plan.

The Permittee may submit plans and manuals required by 40 CFR Part 112, contingency plans required by Chapter 173-303 WAC, or other plans required by other agencies, which meet the intent of this section.

S10. Stormwater pollution prevention plan

The Permittee must prepare and implement a Stormwater Pollution Prevention Plan (SWPPP) in accordance with the requirements of this permit. The SWPPP must be submitted to EFSEC by November 1, 2015. The SWPPP and all of its modifications must be signed in accordance with General Condition G1. Retain the SWPPP on-site.

S10.A. Stormwater pollution prevention plan (SWPPP) general requirements

The Permittee must:

1. Provide all known, available, and reasonable methods of prevention, control, and treatment (AKART) of stormwater pollution.
2. Prevent violations of surface water quality, ground water quality, or sediment management standards.
3. Comply with applicable federal technology-based treatment requirements under 40 CFR 125.3.
4. Modify the SWPPP whenever there is a change in design, construction, operation, or maintenance at the facility that significantly changes the nature of pollutants discharged in stormwater from the facility, or significantly increases the quantity of pollutants discharged.
5. Send modifications to the plan to EFSEC.
6. Follow the plan and any supplements throughout the term of the permit.

S10.B. SWPPP components

The Permittee must prepare the SWPPP in accordance with the guidance provided in the *Stormwater Pollution Prevention Planning for Industrial Facilities (Ecy Pub. No. 04-10-030, https://fortress.wa.gov/ecy/publications/SummaryPages/0410030.html)*. The SWPPP may include applicable portions of plans prepared for other purposes at the facility. Plans or portions of plans incorporated into the SWPPP become enforceable requirements of this permit.

The SWPPP must include the following elements:

1. A site map.

2. Assessment and description of existing and potential pollutant sources.
3. A description of the operational best management practices (BMPs).
4. A description of the selected source-control BMPs.
5. When necessary, a description of the erosion and sediment control BMPs.
6. When necessary, a description of the treatment BMPs.
7. An implementation schedule.

S10.C. SWPPP implementation

The Permittee must conduct two inspections per year – one during the wet season (October 1 – April 30) and the other during the dry season (May 1 – September 30).

1. The wet season inspection must be conducted during a rainfall event by personnel named in the SWPPP to verify that the description of potential pollutant sources required under this permit are accurate; the site map as required in the SWPPP has been updated or otherwise modified to reflect current conditions; and the controls to reduce pollutants in stormwater discharges associated with industrial activities identified in the SWPPP are being implemented and are adequate. The wet weather inspection must include observations of the presence of floating materials, suspended solids, oil and grease, discolorations, turbidity, odor, etc. in the stormwater discharge(s).
2. Personnel named in the SWPPP must conduct the dry season inspection. The inspection must determine the presence of unpermitted non-stormwater discharges such as domestic wastewater, noncontact cooling water, or process water to the stormwater system. If an unpermitted, non-stormwater discharge is discovered, the Permittee must immediately notify EFSEC.

S10.D. SWPPP evaluation

The Permittee must evaluate whether measures to reduce pollutant loadings identified in the SWPPP are adequate and properly implemented in accordance with the terms of the permit or whether additional controls are needed. A record must be maintained summarizing the results of inspections and include a certification, in accordance with General Condition G1, that the facility is in compliance with the plan and in compliance with the permit. The record must identify any incidents of noncompliance.

S11. Outfall evaluation

The Permittee must inspect, every five years, the submerged portion of the outfall line and diffuser to document its integrity and continued function. If conditions allow for a photographic verification, the Permittee must include such verification in the report. By May 1, 2019, the Permittee must submit the inspection report to EFSEC.

S12. Cooling water intake structure

The Permittee must ensure that the cooling water intake structure (CWIS) is designed, operated, and maintained to minimize adverse environmental impact as follows.

S12.A. Operations and maintenance (O&M) manual

The Permittee must, at all times, properly operate and maintain the CWIS including any technology used to minimize impingement and entrainment.

1. O&M manual submittal and requirements

The Permittee must:

a. Prepare an O&M Manual for the CWIS and submit it to EFSEC for approval by November 1, 2015. The Permittee must submit a paper copy and an electronic copy (preferably in a portable document format (PDF)).

b. Submit to EFSEC for review substantial changes or updates to the O&M Manual whenever it incorporates them into the manual. The Permittee must submit a paper copy and an electronic copy (preferably as a PDF).

c. Keep the approved O&M Manual at the permitted facility.

d. Follow the instructions and procedures of this manual.

2. O&M manual components

The O&M manual must include:

a. Procedures for evaluating impingement as required in S12.A.3.

b. Procedures for evaluating entrainment as required in S12.A.4.

c. Procedures for reporting any significant impingement or entrainment to EFSEC by telephone at 360-956-2121 within 24 hours.

3. Impingement evaluation

The O&M manual must include procedures for evaluating impingement of any life stages of fish and shellfish on the outer surface of the intake structure, including where feasible:

a. Visual or remote monitoring during times when the cooling water intake structure is operational, at least weekly.

   1. If conditions allow for a photographic verification, the Permittee must include such verification in the inspection.

b. Document inspection dates, findings, and any maintenance performed.

4. Entrainment evaluation

Following completion of the entrainment characterization study required in S12.B, the O&M manual must be revised to include procedures for on-going

evaluation of entrainment of any life stages of fish and shellfish downstream of the outer surface of the intake structure, including where feasible:

a. Visual or remote monitoring during times when the cooling water intake structure is operational, at least weekly.

    1. If conditions allow for a photographic verification, the Permittee must include such verification in the inspection.

b. Document inspection dates, findings, and any maintenance performed.

S12.B. Entrainment Characterization Study

The Permittee must prepare and conduct an entrainment characterization study consistent with the content requirements in 40 CFR 122.21(r) (9).

1. Study design

The Permittee must:

a. Prepare documentation of the proposed entrainment characterization study design and submit it to EFSEC for approval by November 1, 2015. The Permittee must submit a paper copy and an electronic copy (preferably in a portable document format (PDF)).

2. Study implementation

The Permittee must:

a. Following EFSEC approval of the study design referenced in S12.B.1, conduct the entrainment characterization study according to the approved design.

b. Submit the final entrainment characterization study to EFSEC by May 1, 2019. The Permittee must submit a paper copy and an electronic copy (preferably in a portable document format (PDF)).

3. Engineering analysis

If the final entrainment characterization study report, or any other monitoring, indicates significant entrainment or impingement of federally-listed threatened and endangered species, the Permittee must:

a. Prepare an engineering analysis, including costs and benefits associated with replacement of the intake structure consistent with approvable design criteria.

b. Submit the final engineering analysis report to EFSEC by May 1, 2019. The Permittee must submit a paper copy and an electronic copy (preferably in a portable document format (PDF)).

4. Suspension of Entrainment Characterization Study

If, at any time during the permit term, the Permittee elects to proceed with the above engineering analysis and replace the intake structure with approvable design criteria, the entrainment characterization study can be suspended.

S12.C. Closed-cycle recirculating system

The Permittee must continue to operate a closed-cycle recirculating system as defined at 40 CFR 125.92(c):

1. Monitor closed-cycle operation in accordance with S2.A (8).

S12.D. Endangered Species Act

Nothing in this permit authorizes take for the purposes of a facility's compliance with the Endangered Species Act.

S13. Acute toxicity

S13.A. Effluent limit for acute toxicity

The effluent limit for acute toxicity is:

No acute toxicity detected in a test concentration representing the acute critical effluent concentration (ACEC).

The ACEC means the maximum concentration of effluent during critical conditions at the boundary of the acute mixing zone, defined in Section S1.B of this permit. The ACEC equals 11% effluent.

S13.B. Compliance with the effluent limit for acute toxicity

Compliance with the effluent limit for acute toxicity means the results of the testing specified in Section C show no statistically significant difference in survival between the control and the ACEC.

If the test results show a statistically significant difference in survival between the control and the ACEC, and EFSEC has not determined the test result to be anomalous under Section D, and the test is otherwise valid, the result is a violation of the effluent limit for acute toxicity. The Permittee must immediately conduct the additional testing described in Section D.

The Permittee must determine the statistical significance by conducting a hypothesis test at the 0.05 level of significance (Appendix H, EPA/600/4-89/001). If the difference in survival between the control and the ACEC is less than 10%, the Permittee must conduct the hypothesis test at the 0.01 level of significance.

S13.C. Compliance testing for acute toxicity

The Permittee must:

1. Perform the acute toxicity tests with 100% effluent, the ACEC, and a control, or with a full dilution series.

2. Conduct quarterly acute toxicity testing on the final effluent. Testing must begin by January 1, 2015. Quarters means January through March, April through June, July through September, and October through December.
3. Submit a quarterly written report to EFSEC within 45 days of sampling and starting no later than April 30, 2015. Each subsequent report is due on April 30th, July 30th, October 30th, and January 30th of each year. Further instructions on testing conditions and test report content are in Section E below.
4. The Permittee must perform compliance tests using each of the species and protocols listed below on a rotating basis:

Acute Toxicity Tests	Species	Method
Fathead minnow 96-hour static-renewal test	*Pimephales promelas*	EPA-821-R-02-012
Daphnid 48-hour static test	*Ceriodaphnia dubia, Daphnia pulex,* or *Daphnia magna*	EPA-821-R-02-012

S13.D. Response to noncompliance with the effluent limit for acute toxicity

If a toxicity test conducted under Section C determines a statistically significant difference in response between the ACEC and the control, using the statistical test described in Section B, the Permittee must begin additional testing within one week from the time of receiving the test results. The Permittee must:

1. Conduct one additional test each week for four consecutive weeks, using the same test and species as the failed compliance test.
2. Test at least five effluent concentrations and a control to determine appropriate point estimates. One of these effluent concentrations must equal the ACEC. The results of the test at the ACEC will determine compliance with the effluent limit for acute toxicity as described in Section B.
3. Return to the original monitoring frequency in Section C after completion of the additional compliance monitoring.

Anomalous test results: If a toxicity test conducted under Section C indicates noncompliance with the acute toxicity limit and the Permittee believes that the test result is anomalous, the Permittee may notify EFSEC that the compliance test result may be anomalous. The Permittee may take one additional sample for toxicity testing and wait for notification from EFSEC before completing the additional testing. The Permittee must submit the notification with the report of the compliance test result and identify the reason for considering the compliance test result to be anomalous.

If EFSEC determines that the test result was not anomalous, the Permittee must complete all of the additional monitoring required in this section. Or,

If the one additional sample fails to comply with the effluent limit for acute toxicity, then the Permittee must complete all of the additional monitoring required in this section. Or,

If EFSEC determines that the test result was anomalous, the one additional test result will replace the anomalous test result.

If all of the additional testing in S13.D.1 and 2 complies with the permit limit, the Permittee must submit a report to EFSEC on possible causes and preventive measures for the transient toxicity event, which triggered the additional compliance monitoring. This report must include a search of all pertinent and recent facility records, including:

a. Operating records
b. Monitoring results
c. Inspection records
d. Spill reports
e. Weather records
f. Production records
g. Raw material purchases
h. Pretreatment records, etc.

If the additional testing in this section shows another violation of the acute toxicity limit, the Permittee must submit a Toxicity Identification/Reduction Evaluation (TI/RE) plan to EFSEC within sixty (60) days after the sample date (WAC 173-205-100(2)).

S13.E. Sampling and reporting requirements

1. The Permittee must submit all reports for toxicity testing in accordance with the most recent version of Ecology Publication No. WQ-R-95-80, *Laboratory Guidance and Whole Effluent Toxicity Test Review Criteria.* Reports must contain bench sheets and reference toxicant results for test methods. If the lab provides the toxicity test data in electronic format for entry into Ecology's database, then the Permittee must send the data to Ecology along with the test report, bench sheets, and reference toxicant results.

2. The Permittee must collect grab samples for toxicity testing. The Permittee must cool the samples to 0 - 6 degrees Celsius during collection and send them to the lab immediately upon completion. The lab must begin the toxicity testing as soon as possible but no later than 36 hours after sampling was completed.

3. The laboratory must conduct water quality measurements on all samples and test solutions for toxicity testing, as specified in the most recent version of Ecology Publication No. WQ-R-95-80, *Laboratory Guidance and Whole Effluent Toxicity Test Review Criteria.*

4. All toxicity tests must meet quality assurance criteria and test conditions specified in the most recent versions of the EPA methods listed in Subsection C and the Ecology Publication No. WQ-R-95-80, *Laboratory Guidance and*

Whole Effluent Toxicity Test Review Criteria. If EFSEC determines any test results to be invalid or anomalous, the Permittee must repeat the testing with freshly collected effluent.

5. The laboratory must use control water and dilution water meeting the requirements of the EPA methods listed in Section A or pristine natural water of sufficient quality for good control performance.
6. The Permittee must chemically dechlorinate final effluent samples for whole effluent toxicity testing with sodium thiosulfate just prior to test initiation. Do not add more sodium thiosulfate than is necessary to neutralize the chlorine. Provide in the test report the calculations to determine the amount of sodium thiosulfate necessary to just neutralize the chlorine in the sample.

S14. Chronic toxicity

S14.A. Testing

The Permittee must:

1. Conduct chronic toxicity testing on final effluent once per quarter in the year prior to submission of the application for permit renewal.
2. Submit the results to EFSEC May 1, 2019 (with the permit renewal application).
3. Conduct chronic toxicity testing on a series of at least five concentrations of effluent and a control. This series of dilutions must include the acute critical effluent concentration (ACEC). The ACEC equals 11% effluent. The series of dilutions should also contain the CCEC of 1% effluent.
4. Compare the ACEC to the control using hypothesis testing at the 0.05 level of significance as described in Appendix H, EPA/600/4-89/001.
5. Perform chronic toxicity tests with all of the following species and the most recent version of the following protocols:

Freshwater Chronic Test	Species	Method
Fathead minnow survival and growth	*Pimephales promelas*	EPA-821-R-02-013
Water flea survival and reproduction	*Ceriodaphnia dubia*	EPA-821-R-02-013

S14.B. Sampling and reporting requirements

1. The Permittee must submit all reports for toxicity testing in accordance with the most recent version of Ecology Publication No. WQ-R-95-80, *Laboratory Guidance and Whole Effluent Toxicity Test Review Criteria.* Reports must contain bench sheets and reference toxicant results for test methods. If the lab provides the toxicity test data in electronic format for entry into Ecology's database, then the Permittee must send the data to Ecology along with the test report, bench sheets, and reference toxicant results.

2. The Permittee must collect grab samples for toxicity testing. The Permittee must cool the samples to 0 - 6 degrees Celsius during collection and send them to the lab immediately upon completion. The lab must begin the toxicity testing as soon as possible but no later than 36 hours after sampling was completed.
3. The laboratory must conduct water quality measurements on all samples and test solutions for toxicity testing, as specified in the most recent version of Ecology Publication No. WQ-R-95-80, *Laboratory Guidance and Whole Effluent Toxicity Test Review Criteria.*
4. All toxicity tests must meet quality assurance criteria and test conditions specified in the most recent versions of the EPA methods listed in Section C. and the Ecology Publication no. WQ-R-95-80, *Laboratory Guidance and Whole Effluent Toxicity Test Review Criteria.* If Ecology determines any test results to be invalid or anomalous, the Permittee must repeat the testing with freshly collected effluent.
5. The laboratory must use control water and dilution water meeting the requirements of the EPA methods listed in Subsection C. or pristine natural water of sufficient quality for good control performance.
6. The Permittee must chemically dechlorinate final effluent samples for whole effluent toxicity testing with sodium thiosulfate just prior to test initiation. Do not add more sodium thiosulfate than is necessary to neutralize the chlorine. Provide in the test report the calculations to determine the amount of sodium thiosulfate necessary to just neutralize the chlorine in the sample.

General Conditions

G1. Signatory requirements

1. All applications, reports, or information submitted to EFSEC must be signed and certified.

   a. In the case of corporations, by a responsible corporate officer. For the purpose of this section, a responsible corporate officer means:

      - A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation, or
      - The manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
      - In the case of a partnership, by a general partner.
      - In the case of sole proprietorship, by the proprietor.
      - In the case of a municipal, state, or other public facility, by either a principal executive officer or ranking elected official.

      Applications for permits for domestic wastewater facilities that are either owned or operated by, or under contract to, a public entity shall be submitted by the public entity.

2. All reports required by this permit and other information requested by EFSEC must be signed by a person described above or by a duly authorized representative of that person. A person is a duly authorized representative only if:

   a. The authorization is made in writing by a person described above and submitted to EFSEC.

   b. The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility, such as the position of plant manager, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters. (A duly authorized representative may thus be either a named individual or any individual occupying a named position.)

3. Changes to authorization. If an authorization under paragraph G1.2, above, is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of

paragraph G1.2, above, must be submitted to EFSEC prior to or together with any reports, information, or applications to be signed by an authorized representative.

4. Certification. Any person signing a document under this section must make the following certification:

   "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 gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering information, 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."

G2. Right of inspection and entry

The Permittee must allow an authorized representative of EFSEC, upon the presentation of credentials and such other documents as may be required by law:

1. To enter upon the premises where a discharge is located or where any records must be kept under the terms and conditions of this permit.
2. To have access to and copy, at reasonable times and at reasonable cost, any records required to be kept under the terms and conditions of this permit.
3. To inspect, at reasonable times, any facilities, equipment (including monitoring and control equipment), practices, methods, or operations regulated or required under this permit.
4. To sample or monitor, at reasonable times, any substances or parameters at any location for purposes of assuring permit compliance or as otherwise authorized by the Clean Water Act.

G3. Permit actions

This permit may be modified, revoked and reissued, or terminated either at the request of any interested person (including the permittee) or upon EFSEC's initiative. However, the permit may only be modified, revoked and reissued, or terminated for the reasons specified in 40 CFR 122.62, 122.64 or WAC 173-220-150 according to the procedures of 40 CFR 124.5.

1. The following are causes for terminating this permit during its term, or for denying a permit renewal application:
   a. Violation of any permit term or condition.
   b. Obtaining a permit by misrepresentation or failure to disclose all relevant facts.
   c. A material change in quantity or type of waste disposal.

d. A determination that the permitted activity endangers human health or the environment, or contributes to water quality standards violations and can only be regulated to acceptable levels by permit modification or termination.

e. A change in any condition that requires either a temporary or permanent reduction, or elimination of any discharge or sludge use or disposal practice controlled by the permit.

f. Nonpayment of fees assessed pursuant to RCW 90.48.465.

g. Failure or refusal of the Permittee to allow entry as required in RCW 90.48.090.

2. The following are causes for modification but not revocation and reissuance except when the Permittee requests or agrees:

a. A material change in the condition of the waters of the state.

b. New information not available at the time of permit issuance that would have justified the application of different permit conditions.

c. Material and substantial alterations or additions to the permitted facility or activities which occurred after this permit issuance.

d. Promulgation of new or amended standards or regulations having a direct bearing upon permit conditions, or requiring permit revision.

e. The Permittee has requested a modification based on other rationale meeting the criteria of 40 CFR Part 122.62.

f. EFSEC has determined that good cause exists for modification of a compliance schedule, and the modification will not violate statutory deadlines.

g. Incorporation of an approved local pretreatment program into a municipality's permit.

3. The following are causes for modification or alternatively revocation and reissuance:

a. When cause exists for termination for reasons listed in 1.a through 1.g of this section, and EFSEC determines that modification or revocation and reissuance is appropriate.

b. When EFSEC has received notification of a proposed transfer of the permit. A permit may also be modified to reflect a transfer after the effective date of an automatic transfer (General Condition G7) but will not be revoked and reissued after the effective date of the transfer except upon the request of the new Permittee.

G4. Reporting planned changes

The Permittee must, as soon as possible, but no later than one hundred eighty (180) days prior to the proposed changes, give notice to EFSEC of planned physical alterations or additions to the permitted facility, production increases, or process modification which will result in:

1. The permitted facility being determined to be a new source pursuant to 40 CFR 122.29(b)
2. A significant change in the nature or an increase in quantity of pollutants discharged.
3. A significant change in the Permittee's sludge use or disposal practices. Following such notice, and the submittal of a new application or supplement to the existing application, along with required engineering plans and reports, this permit may be modified, or revoked and reissued pursuant to 40 CFR 122.62(a) to specify and limit any pollutants not previously limited. Until such modification is effective, any new or increased discharge in excess of permit limits or not specifically authorized by this permit constitutes a violation.

G5. Plan review required

Prior to constructing or modifying any wastewater control facilities, an engineering report and detailed plans and specifications must be submitted to EFSEC for approval in accordance with chapter 173-240 WAC. Engineering reports, plans, and specifications must be submitted at least one hundred eighty (180) days prior to the planned start of construction unless a shorter time is approved by EFSEC. Facilities must be constructed and operated in accordance with the approved plans.

G6. Compliance with other laws and statutes

Nothing in this permit excuses the Permittee from compliance with any applicable federal, state, or local statutes, ordinances, or regulations.

G7. Transfer of this permit

In the event of any change in control or ownership of facilities from which the authorized discharge emanate, the Permittee must notify the succeeding owner or controller of the existence of this permit by letter, a copy of which must be forwarded to EFSEC.

1. Transfers by Modification
   Except as provided in paragraph (2) below, this permit may be transferred by the Permittee to a new owner or operator only if this permit has been modified or revoked and reissued under 40 CFR 122.62(b)(2), or a minor modification made under 40 CFR 122.63(d), to identify the new Permittee and incorporate such other requirements as may be necessary under the Clean Water Act.
2. Automatic Transfers
   This permit may be automatically transferred to a new Permittee if:
   a. The Permittee notifies EFSEC at least thirty (30) days in advance of the proposed transfer date.
   b. The notice includes a written agreement between the existing and new Permittees containing a specific date transfer of permit responsibility, coverage, and liability between them.

c. EFSEC does not notify the existing Permittee and the proposed new Permittee of its intent to modify or revoke and reissue this permit. A modification under this subparagraph may also be minor modification under 40 CFR 122.63. If this notice is not received, the transfer is effective on the date specified in the written agreement.

G8. Reduced production for compliance

The Permittee, in order to maintain compliance with its permit, must control production and/or all discharges upon reduction, loss, failure, or bypass of the treatment facility until the facility is restored or an alternative method of treatment is provided. This requirement applies in the situation where, among other things, the primary source of power of the treatment facility is reduced, lost, or fails.

G9. Removed substances

Collected screenings, grit, solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters must not be resuspended or reintroduced to the final effluent stream for discharge to state waters.

G10. Duty to provide information

The Permittee must submit to EFSEC, within a reasonable time, all information which EFSEC may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. The Permittee must also submit to EFSEC upon request, copies of records required to be kept by this permit.

G11. Other requirements of 40 CFR

All other requirements of 40 CFR 122.41 and 122.42 are incorporated in this permit by reference.

G12. Additional monitoring

EFSEC may establish specific monitoring requirements in addition to those contained in this permit by administrative order or permit modification.

G13. Payment of fees

The Permittee must submit payment of fees associated with this permit as assessed by EFSEC.

G14. Penalties for violating permit conditions

Any person who is found guilty of willfully violating the terms and conditions of this permit is deemed guilty of a crime, and upon conviction thereof shall be punished by a fine of up to ten thousand dollars ($10,000) and costs of prosecution, or by imprisonment in the discretion of the court. Each day upon which a willful violation occurs may be deemed a separate and additional violation.

Any person who violates the terms and conditions of a waste discharge permit may incur, in addition to any other penalty as provided by law, a civil penalty in the amount of up to ten thousand dollars ($10,000) for every such violation. Each and every such violation is a separate and distinct offense, and in case of a continuing violation, every day's continuance is deemed to be a separate and distinct violation.

G15. Upset

Definition – "Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology-based permit effluent limits because of factors beyond the reasonable control of the Permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

An upset constitutes an affirmative defense to an action brought for noncompliance with such technology-based permit effluent limits if the requirements of the following paragraph are met.

A Permittee who wishes to establish the affirmative defense of upset must demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:

1. An upset occurred and that the Permittee can identify the cause(s) of the upset.
2. The permitted facility was being properly operated at the time of the upset.
3. The Permittee submitted notice of the upset as required in Special Condition S3.E.
4. The Permittee complied with any remedial measures required under S3.E of this permit.

In any enforcement action the Permittee seeking to establish the occurrence of an upset has the burden of proof.

G16. Property rights

This permit does not convey any property rights of any sort, or any exclusive privilege.

G17. Duty to comply

The Permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Water Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application.

G18. Toxic pollutants

The Permittee must comply with effluent standards or prohibitions established under Section 307(a) of the Clean Water Act for toxic pollutants within the time provided in the regulations that establish those standards or prohibitions, even if this permit has not yet been modified to incorporate the requirement.

G19. Penalties for tampering

The Clean Water Act provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under this permit shall, upon conviction, be punished by a fine of not more than $10,000 per violation, or by imprisonment for not more than two (2) years per violation, or by both. If a conviction of a person is for a violation committed after a first conviction of such person under this condition, punishment shall be a fine of not more than $20,000 per day of violation, or by imprisonment of not more than four (4) years, or by both.

G20. Reporting requirements applicable to existing manufacturing, commercial, mining, and silvicultural dischargers

The Permittee belonging to the categories of existing manufacturing, commercial, mining, or silviculture must notify EFSEC as soon as they know or have reason to believe:

1. That any activity has occurred or will occur which would result in the discharge, on a routine or frequent basis, of any toxic pollutant which is not limited in this permit, if that discharge will exceed the highest of the following "notification levels:"
    a. One hundred micrograms per liter (100 μg/L).
    b. Two hundred micrograms per liter (200 μg/L) for acrolein and acrylonitrile; five hundred micrograms per liter (500 μg/L) for 2,4-dinitrophenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter (1 mg/L) for antimony.
    c. Five (5) times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 CFR 122.21(g)(7).
    d. The level established by the Director in accordance with 40 CFR 122.44(f).
2. That any activity has occurred or will occur which would result in any discharge, on a non-routine or infrequent basis, of a toxic pollutant which is not limited in this permit, if that discharge will exceed the highest of the following "notification levels:"
    a. Five hundred micrograms per liter (500μg/L).
    b. One milligram per liter (1 mg/L) for antimony.
    c. Ten (10) times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 CFR 122.21(g)(7).
    d. The level established by the Director in accordance with 40 CFR 122.44(f).

G21. Compliance schedules

Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit must be submitted no later than fourteen (14) days following each schedule date.

Appendix A

LIST OF POLLUTANTS WITH ANALYTICAL METHODS, DETECTION LIMITS AND QUANTITATION LEVELS

The Permittee must use the specified analytical methods, detection limits (DLs) and quantitation levels (QLs) in the following table for permit and application required monitoring unless:

- Another permit condition specifies other methods, detection levels, or quantitation levels.
- The method used produces measurable results in the sample and EPA has listed it as an EPA-approved method in 40 CFR Part 136.

If the Permittee uses an alternative method, not specified in the permit and as allowed above, it must report the test method, DL, and QL on the discharge monitoring report or in the required report.

If the Permittee is unable to obtain the required DL and QL in its effluent due to matrix effects, the Permittee must submit a matrix-specific detection limit (MDL) and a quantitation limit (QL) to EFSEC with appropriate laboratory documentation.

When the permit requires the Permittee to measure the base neutral compounds in the list of priority pollutants, it must measure all of the base neutral pollutants listed in the table below. The list includes EPA required base neutral priority pollutants and several additional polynuclear aromatic hydrocarbons (PAHs). The Water Quality Program added several PAHs to the list of base neutrals below from Ecology's Persistent Bioaccumulative Toxics (PBT) List. It only added those PBT parameters of interest to Appendix A that did not increase the overall cost of analysis unreasonably.

EFSEC added this appendix to the permit in order to reduce the number of analytical "non-detects" in permit-required monitoring and to measure effluent concentrations near or below criteria values where possible at a reasonable cost.

CONVENTIONAL PARAMETERS

Pollutant & CAS No. ***(if available)***	**Recommended Analytical Protocol**	**Detection (DL)[1]** ***µg/L unless specified***	**Quantitation Level (QL)[2]** ***µg/L unless specified***
Biochemical Oxygen Demand	SM5210-B		2 mg/L
Soluble Biochemical Oxygen Demand	SM5210-B [3]		2 mg/L
Chemical Oxygen Demand	SM5220-D		10 mg/L
Total Organic Carbon	SM5310-B/C/D		1 mg/L
Total Suspended Solids	SM2540-D		5 mg/L
Total Ammonia (as N)	SM4500-NH3-B and C/D/E/G/H		20
Flow	Calibrated device		
Dissolved oxygen	SM4500-OC/OG		0.2 mg/L
Temperature (max. 7-day avg.)	Analog recorder or Use micro-recording devices known as thermistors		0.2° C
pH	SM4500-H^+ B	N/A	N/A

NONCONVENTIONAL PARAMETERS

Pollutant & CAS No. (if available)	Recommended Analytical Protocol	Detection (DL)[1] µg/L unless specified	Quantitation Level (QL)[2] µg/L unless specified
Total Alkalinity	SM2320-B		5 mg/L as CaCO3
Bromide (24959-67-9)	EPA 300.0		500
Chlorine, Total Residual	SM4500 Cl G		50.0
Color	SM2120 B/C/E		10 color units
Fecal Coliform	SM 9221E,9222	N/A	Specified in method - sample aliquot dependent
Fluoride (16984-48-8)	SM4500-F E	25	100
Nitrate + Nitrite Nitrogen (as N)	SM4500-NO3- E/F/H		100
Nitrogen, Total Kjeldahl (as N)	SM4500-N_{org}B/C and SM4500NH_3-B/C/D/EF/G/H		300
Soluble Reactive Phosphorus (as P)	SM4500- PE/PF	3	10
Phosphorus, Total (as P)	SM 4500 PB followed by SM4500-PE/PF	3	10
Oil and Grease (HEM)	1664 A or B	1,400	5,000
Radioactivity			
Alpha, Total	SM 7110 B		
Beta, Total	SM 7110 B		
Radium, Total	SW 7500-Ra C		
Salinity	SM2520-B		3 practical salinity units or scale (PSU or PSS)
Settleable Solids	SM2540 -F		500 (or 0.1 mL/L)
Sulfate (as mg/L SO_4)	SM4110-B		200
Sulfide (as mg/L S)	SM4500-S^2F/D/E/G		200
Sulfite (as mg/L SO_3)	SM4500-SO3B		2000
Total Coliform	SM 9221B, 9222B, 9223B	N/A	Specified in method - sample aliquot dependent
Total dissolved solids	SM2540 C		20 mg/L
Total Hardness	SM2340B		200 as CaCO3
Aluminum, Total (7429-90-5)	200.8	2.0	10
Barium Total (7440-39-3)	200.8	0.5	2.0
BTEX (benzene +toluene + ethylbenzene + m,o,p xylenes)	EPA SW 846 8021/8260	1	2
Boron Total (7440-42-8)	200.8	2.0	10.0
Cobalt, Total (7440-48-4)	200.8	0.05	0.25
Iron, Total (7439-89-6)	200.7	12.5	50
Magnesium, Total (7439-95-4)	200.7	10	50
Molybdenum, Total (7439-98-7)	200.8	0.1	0.5
Manganese, Total (7439-96-5)	200.8	0.1	0.5
NWTPH Dx [4]	Ecology NWTPH Dx	250	250
NWTPH Gx [5]	Ecology NWTPH Gx	250	250

Pollutant & CAS No. (if available)	Recommended Analytical Protocol	Detection (DL)[1] µg/L unless specified	Quantitation Level (QL)[2] µg/L unless specified
Tin, Total (7440-31-5)	200.8	0.3	1.5
Titanium, Total (7440-32-6)	200.8	0.5	2.5

PRIORITY POLLUTANTS

Pollutant & CAS No. *(if available)*	Recommended Analytical Protocol	Detection (DL)[1] *µg/L unless specified*	Quantitation Level (QL)[2] *µg/L unless specified*
METALS, CYANIDE & TOTAL PHENOLS			
Antimony, Total (7440-36-0)	200.8	0.3	1.0
Arsenic, Total (7440-38-2)	200.8	0.1	0.5
Beryllium, Total (7440-41-7)	200.8	0.1	0.5
Cadmium, Total (7440-43-9)	200.8	0.05	0.25
Chromium (hex) dissolved (18540-29-9)	SM3500-Cr EC	0.3	1.2
Chromium, Total (7440-47-3)	200.8	0.2	1.0
Copper, Total (7440-50-8)	200.8	0.4	2.0
Lead, Total (7439-92-1)	200.8	0.1	0.5
Mercury, Total (7439-97-6)	1631E	0.0002	0.0005
Nickel, Total (7440-02-0)	200.8	0.1	0.5
Selenium, Total (7782-49-2)	200.8	1.0	1.0
Silver, Total (7440-22-4)	200.8	0.04	0.2
Thallium, Total (7440-28-0)	200.8	0.09	0.36
Zinc, Total (7440-66-6)	200.8	0.5	2.5
Cyanide, Total (57-12-5)	335.4	5	10
Cyanide, Weak Acid Dissociable	SM4500-CN I	5	10
Cyanide, Free Amenable to Chlorination (Available Cyanide)	SM4500-CN G	5	10
Phenols, Total	EPA 420.1		50

Pollutant & CAS No. *(if available)*	Recommended Analytical Protocol	Detection (DL)[1] *µg/L unless specified*	Quantitation Level (QL)[2] *µg/L unless specified*
ACID COMPOUNDS			
2-Chlorophenol (95-57-8)	625	1.0	2.0
2,4-Dichlorophenol (120-83-2)	625	0.5	1.0
2,4-Dimethylphenol (105-67-9)	625	0.5	1.0
4,6-dinitro-o-cresol (534-52-1) (2-methyl-4,6,-dinitrophenol)	625/1625B	1.0	2.0
2,4 dinitrophenol (51-28-5)	625	1.0	2.0
2-Nitrophenol (88-75-5)	625	0.5	1.0
4-nitrophenol (100-02-7)	625	0.5	1.0
Parachlorometa cresol (59-50-7) (4-chloro-3-methylphenol)	625	1.0	2.0
Pentachlorophenol (87-86-5)	625	0.5	1.0
Phenol (108-95-2)	625	2.0	4.0

Pollutant & CAS No. *(if available)*	Recommended Analytical Protocol	Detection (DL)[1] *µg/L unless specified*	Quantitation Level (QL) [2] *µg/L unless specified*
2,4,6-Trichlorophenol (88-06-2)	625	2.0	4.0

PRIORITY POLLUTANTS (continued)

Pollutant & CAS No. *(if available)*	Recommended Analytical Protocol	Detection (DL)[1] *µg/L unless specified*	Quantitation Level (QL) [2] *µg/L unless specified*
VOLATILE COMPOUNDS			
Acrolein (107-02-8)	624	5	10
Acrylonitrile (107-13-1)	624	1.0	2.0
Benzene (71-43-2)	624	1.0	2.0
Bromoform (75-25-2)	624	1.0	2.0
Carbon tetrachloride (56-23-5)	624/601 or SM6230B	1.0	2.0
Chlorobenzene (108-90-7)	624	1.0	2.0
Chloroethane (75-00-3)	624/601	1.0	2.0
2-Chloroethylvinyl Ether (110-75-8)	624	1.0	2.0
Chloroform (67-66-3)	624 or SM6210B	1.0	2.0
Dibromochloromethane (124-48-1)	624	1.0	2.0
1,2-Dichlorobenzene (95-50-1)	624	1.9	7.6
1,3-Dichlorobenzene (541-73-1)	624	1.9	7.6
1,4-Dichlorobenzene (106-46-7)	624	4.4	17.6
Dichlorobromomethane (75-27-4)	624	1.0	2.0
1,1-Dichloroethane (75-34-3)	624	1.0	2.0
1,2-Dichloroethane (107-06-2)	624	1.0	2.0
1,1-Dichloroethylene (75-35-4)	624	1.0	2.0
1,2-Dichloropropane (78-87-5)	624	1.0	2.0
1,3-dichloropropene (mixed isomers) (1,2-dichloropropylene) (542-75-6) [6]	624	1.0	2.0
Ethylbenzene (100-41-4)	624	1.0	2.0
Methyl bromide (74-83-9) (Bromomethane)	624/601	5.0	10.0
Methyl chloride (74-87-3) (Chloromethane)	624	1.0	2.0
Methylene chloride (75-09-2)	624	5.0	10.0
1,1,2,2-Tetrachloroethane (79-34-5)	624	1.9	2.0
Tetrachloroethylene (127-18-4)	624	1.0	2.0
Toluene (108-88-3)	624	1.0	2.0
1,2-Trans-Dichloroethylene (156-60-5) (Ethylene dichloride)	624	1.0	2.0
1,1,1-Trichloroethane (71-55-6)	624	1.0	2.0
1,1,2-Trichloroethane (79-00-5)	624	1.0	2.0
Trichloroethylene (79-01-6)	624	1.0	2.0

Pollutant & CAS No. *(if available)*	Recommended Analytical Protocol	Detection (DL)[1] *µg/L unless specified*	Quantitation Level (QL)[2] *µg/L unless specified*
VOLATILE COMPOUNDS			
Vinyl chloride (75-01-4)	624/SM6200B	1.0	2.0

PRIORITY POLLUTANTS (continued)

Pollutant & CAS No. *(if available)*	Recommended Analytical Protocol	Detection (DL)[1] *µg/L unless specified*	Quantitation Level (QL)[2] *µg/L unless specified*
BASE/NEUTRAL COMPOUNDS (compounds in bold are Ecology PBTs)			
Acenaphthene (83-32-9)	625	0.2	0.4
Acenaphthylene (208-96-8)	625	0.3	0.6
Anthracene (120-12-7)	625	0.3	0.6
Benzidine (92-87-5)	625	12	24
Benzyl butyl phthalate (85-68-7)	625	0.3	0.6
Benzo(*a*)anthracene (56-55-3)	625	0.3	0.6
Benzo(b)fluoranthene (3,4-benzofluoranthene) (205-99-2)[7]	610/625	0.8	1.6
Benzo(j)fluoranthene (205-82-3)[7]	625	0.5	1.0
Benzo(k)fluoranthene (11,12-benzofluoranthene) (207-08-9)[7]	610/625	0.8	1.6
Benzo(r,s,t)pentaphene (189-55-9)	625	0.5	1.0
Benzo(*a*)pyrene (50-32-8)	610/625	0.5	1.0
Benzo(*ghi*)Perylene (191-24-2)	610/625	0.5	1.0
Bis(*2-chloroethoxy*)methane (111-91-1)	625	5.3	21.2
Bis(*2-chloroethyl*)ether (111-44-4)	611/625	0.3	1.0
Bis(*2-chloroisopropyl*)ether (39638-32-9)	625	0.3	0.6
Bis(*2-ethylhexyl*)phthalate (117-81-7)	625	0.1	0.5
4-Bromophenyl phenyl ether (101-55-3)	625	0.2	0.4
2-Chloronaphthalene (91-58-7)	625	0.3	0.6
4-Chlorophenyl phenyl ether (7005-72-3)	625	0.3	0.5
Chrysene (218-01-9)	610/625	0.3	0.6
Dibenzo (a,h)acridine (226-36-8)	610M/625M	2.5	10.0
Dibenzo (a,j)acridine (224-42-0)	610M/625M	2.5	10.0
Dibenzo(a-*h*)anthracene (53-70-3)(1,2,5,6-dibenzanthracene)	625	0.8	1.6
Dibenzo(a,e)pyrene (192-65-4)	610M/625M	2.5	10.0
Dibenzo(a,h)pyrene (189-64-0)	625M	2.5	10.0

Pollutant & CAS No. *(if available)*	Recommended Analytical Protocol	Detection (DL)[1] *µg/L unless specified*	Quantitation Level (QL)[2] *µg/L unless specified*
BASE/NEUTRAL COMPOUNDS (compounds in bold are Ecology PBTs)			
3,3-Dichlorobenzidine (91-94-1)	605/625	0.5	1.0
Diethyl phthalate (84-66-2)	625	1.9	7.6
Dimethyl phthalate (131-11-3)	625	1.6	6.4
Di-n-butyl phthalate (84-74-2)	625	0.5	1.0
2,4-dinitrotoluene (121-14-2)	609/625	0.2	0.4
2,6-dinitrotoluene (606-20-2)	609/625	0.2	0.4

PRIORITY POLLUTANTS (continued)

Pollutant & CAS No. *(if available)*	Recommended Analytical Protocol	Detection (DL)[1] *µg/L unless specified*	Quantitation Level (QL)[2] *µg/L unless specified*
BASE/NEUTRAL COMPOUNDS (compounds in bold are Ecology PBTs)			
Di-n-octyl phthalate (117-84-0)	625	0.3	0.6
1,2-Diphenylhydrazine (*as Azobenzene*) (122-66-7)	1625B	5.0	20
Fluoranthene (206-44-0)	625	0.3	0.6
Fluorene (86-73-7)	625	0.3	0.6
Hexachlorobenzene (118-74-1)	612/625	0.3	0.6
Hexachlorobutadiene (87-68-3)	625	0.5	1.0
Hexachlorocyclopentadiene (77-47-4)	1625B/625	0.5	1.0
Hexachloroethane (67-72-1)	625	0.5	1.0
Indeno(*1,2,3-cd*)Pyrene (193-39-5)	610/625	0.5	1.0
Isophorone (78-59-1)	625	0.5	1.0
3-Methyl cholanthrene (56-49-5)	625	2.0	8.0
Naphthalene (91-20-3)	625	0.3	0.6
Nitrobenzene (98-95-3)	625	0.5	1.0
N-Nitrosodimethylamine (62-75-9)	607/625	2.0	4.0
N-Nitrosodi-n-propylamine (621-64-7)	607/625	0.5	1.0
N-Nitrosodiphenylamine (86-30-6)	625	0.5	1.0
Perylene (198-55-0)	625	1.9	7.6
Phenanthrene (85-01-8)	625	0.3	0.6
Pyrene (129-00-0)	625	0.3	0.6
1,2,4-Trichlorobenzene (120-82-1)	625	0.3	0.6

Pollutant & CAS No. *(if available)*	Recommended Analytical Protocol	Detection (DL)[1] *µg/L unless specified*	Quantitation Level (QL) [2] *µg/L unless specified*
DIOXIN			
2,3,7,8-Tetra-Chlorodibenzo-P-Dioxin (176-40-16) (2,3,7,8 TCDD)	1613B	1.3 pg/L	5 pg/L

PRIORITY POLLUTANTS (continued)

Pollutant & CAS No. *(if available)*	Recommended Analytical Protocol	Detection (DL)[1] *µg/L unless specified*	Quantitation Level (QL) [2] *µg/L unless specified*
PESTICIDES/PCBs			
Aldrin (309-00-2)	608	0.025	0.05
alpha-BHC (319-84-6)	608	0.025	0.05
beta-BHC (319-85-7)	608	0.025	0.05
gamma-BHC (58-89-9)	608	0.025	0.05
delta-BHC (319-86-8)	608	0.025	0.05
Chlordane (57-74-9) [8]	608	0.025	0.05
4,4'-DDT (50-29-3)	608	0.025	0.05
4,4'-DDE (72-55-9)	608	0.025	0.05[10]
4,4' DDD (72-54-8)	608	0.025	0.05
Dieldrin (60-57-1)	608	0.025	0.05
alpha-Endosulfan (959-98-8)	608	0.025	0.05
beta-Endosulfan (33213-65-9)	608	0.025	0.05
Endosulfan Sulfate (1031-07-8)	608	0.025	0.05
Endrin (72-20-8)	608	0.025	0.05
Endrin Aldehyde (7421-93-4)	608	0.025	0.05
Heptachlor (76-44-8)	608	0.025	0.05
Heptachlor Epoxide (1024-57-3)	608	0.025	0.05
PCB-1242 (53469-21-9) [9]	608	0.25	0.5
PCB-1254 (11097-69-1)	608	0.25	0.5
PCB-1221 (11104-28-2)	608	0.25	0.5
PCB-1232 (11141-16-5)	608	0.25	0.5
PCB-1248 (12672-29-6)	608	0.25	0.5
PCB-1260 (11096-82-5)	608	0.13	0.5
PCB-1016 (12674-11-2) [9]	608	0.13	0.5
Toxaphene (8001-35-2)	608	0.24	0.5

1. Detection level (DL) or detection limit means the minimum concentration of an analyte (substance) that can be measured and reported with a 99% confidence that the analyte concentration is greater than zero as determined by the procedure given in 40 CFR part 136, Appendix B.
2. Quantitation Level (QL) also known as Minimum Level of Quantitation (ML) – The lowest level at which the entire analytical system must give a recognizable signal and acceptable calibration point for the analyte. It is equivalent to the concentration of the lowest calibration standard, assuming that the lab has used all method-specified sample weights, volumes, and cleanup procedures. The QL is calculated

by multiplying the MDL by 3.18 and rounding the result to the number nearest to (1, 2, or 5) x 10^n, where n is an integer. (64 FR 30417).
ALSO GIVEN AS:
The smallest detectable concentration of analyte greater than the Detection Limit (DL) where the accuracy (precision & bias) achieves the objectives of the intended purpose. (Report of the Federal Advisory Committee on Detection and Quantitation Approaches and Uses in Clean Water Act Programs Submitted to the US Environmental Protection Agency December 2007).

3. Soluble Biochemical Oxygen Demand method note: First, filter the sample through a Millipore Nylon filter (or equivalent) - pore size of 0.45-0.50 um (prep all filters by filtering 250 ml of laboratory grade deionized water through the filter and discard). Then, analyze sample as per method 5210-B.
4. NWTPH Dx - Northwest Total Petroleum Hydrocarbons Diesel Extended Range – see https://fortress.wa.gov/ecy/publications/publications/97602.pdf
5. NWTPH Gx - Northwest Total Petroleum Hydrocarbons Gasoline Extended Range – see https://fortress.wa.gov/ecy/publications/publications/97602.pdf
6. 1, 3-dichloroproylene (mixed isomers) You may report this parameter as two separate parameters: cis-1, 3-dichlorpropropene (10061-01-5) and trans-1, 3-dichloropropene (10061-02-6).
7. Total Benzofluoranthenes - Because Benzo(b)fluoranthene, Benzo(j)fluoranthene and Benzo(k)fluoranthene co-elute you may report these three isomers as total benzofluoranthenes.
8. Chlordane – You may report alpha-chlordane (5103-71-9) and gamma-chlordane (5103-74-2) in place of chlordane (57-74-9). If you report alpha and gamma-chlordane, the DL/PQLs that apply are 0.025/0.050.

   PCB 1016 & PCB 1242 – You may report these two PCB compounds as one parameter called PCB 1016/1242.

Fact Sheet Amendment No. 2 for National Pollutant Discharge Elimination System Permit No. WA002515-1 Columbia Generating Station

PURPOSE OF THIS FACT SHEET AMENDMENT

This fact sheet amendment explains and documents the modifications to the permit issued to Columbia Generating Station (CGS) on November 1, 2014 and modified on February 8, 2016. The fact sheet that accompanied the 2014 permit and 2016 permit modification has detailed information about the wastewater treatment plant and The Energy Facility Site Evaluation Council's (EFSEC) permit decisions.

This fact sheet amendment complies with Section 173-220-060 of the Washington Administrative Code (WAC), which requires EFSEC to prepare a draft permit and accompanying fact sheet for public evaluation before issuing a National Pollutant Discharge Elimination System (NPDES) permit.

EFSEC makes the draft permit and fact sheet amendment available for public review and comment at least thirty (30) days before issuing the final permit. Copies of the draft documents for CGS, Permit No. WA0025151, are available for public review and comment from January 19, 2019 until February 22nd, 2019. For more details on preparing and filing comments about these documents, please see **Appendix A - Public Involvement Information**.

Energy Northwest reviewed the draft permit and fact sheet for factual accuracy. EFSEC corrected any errors or omissions regarding the facility's location, history, discharges, or receiving water prior to publishing this draft fact sheet for public notice.

After the public comment period closes, EFSEC will summarize substantive comments and provide responses to them. EFSEC will include the summary and responses to comments in this fact sheet amendment as **Appendix C - Response to Comments**, and publish it when issuing the final NPDES permit. EFSEC will not revise the rest of the fact sheet, but the full document will become part of the legal history contained in the facility's permit file.

EFSEC is proposing to issue this permit modification. This fact sheet amendment explains the regulatory and technical basis for the amended conditions contained in the permit.

INTRODUCTION

The Federal Clean Water Act (FCWA, 1972, and later amendments in 1977, 1981, and 1987) established water quality goals for the navigable (surface) waters of the United States. One mechanism for achieving the goals of the Clean Water Act is the NPDES, administered by the federal Environmental Protection Agency (EPA). The EPA authorized the state of Washington to manage the NPDES permit program in our state. Our state legislature accepted the delegation and assigned the power and duty for conducting NPDES permitting and enforcement to EFSEC. The Legislature defined EFSEC's authority and obligations for the wastewater discharge permit program in 90.48 RCW (Revised Code of Washington).

The following regulations apply to industrial NPDES permits:

- EFSEC regulations for NPDES permits (chapter 463-76 WAC)
- Procedures EFSEC follows for issuing NPDES permits (chapter 173-220 WAC)

- Water quality criteria for surface waters (chapter 173-201A WAC)
- Water quality criteria for ground waters (chapter 173-200 WAC)
- Whole effluent toxicity testing and limits (chapter 173-205 WAC)
- Sediment management standards (chapter 173-204 WAC)
- Submission of plans and reports for construction of wastewater facilities (chapter 173-240 WAC)

These rules require any industrial facility owner/operator to obtain an NPDES permit before discharging wastewater to state waters. They also help define the basis for limits on each discharge and for performance requirements imposed by the permit.

Under the NPDES permit program and in response to a complete and accepted permit application, EFSEC must prepare a draft permit and accompanying fact sheet, and make them available for public review before final issuance. EFSEC must also publish an announcement (public notice) telling people where they can read the draft permit, and where to send their comments, during a period of thirty days (WAC 173-220-050). (See **Appendix A - Public Involvement Information** for more detail about the public notice and comment procedures). After the public comment period ends, EFSEC may make changes to the draft NPDES permit in response to comment(s). EFSEC will summarize the responses to comments and any changes to the permit in **Appendix C**.

I. GENERAL INFORMATION

Applicant	Energy Northwest
Facility Name and Address	Columbia Generating Station P.O. Box 968 (Mail Drop PE03) Richland, WA 99352
Industry Type	Electric Services
Type of Facility	40 CFR Part 423 Steam Electric Power Generating Point Source Category
Type of Treatment	Cooling, disinfection, neutralization (blowdown) Filtration, ion exchange (processed rad wastewater)
Responsible Official	Shannon E. Khounnala Energy Northwest Environmental and Regulatory Programs Manager P.O. Box 968 (Mail Drop PE03) Richland, WA 99352-0968

II. BACKGROUND

Energy Northwest operates the Columbia Generating Station (CGS) a 1,170- megawatt boiling water reactor that uses nuclear fission to produce heat. It is owned and operated by Energy Northwest and is located on the U.S. Department of Energy Hanford site in Benton County about 12 miles north of Richland, Washington.

The Columbia Generating Station's Standard Industrial Classification (SIC) Code is 4911, Electric Services. The North American Industry Classification System (NAICS) Code is 221113, Nuclear Electric Power Generation. The facility is subject to EPA Categorical Pretreatment Standards 40 Code of Federal Regulations (CFR) Part 423 Steam Electric Power Generating Point Source Category.

Discharge to Outfall 001 include circulating non-contact cooling water blowdown and service water system blowdown. Batch discharge of effluent from the radioactive wastewater treatment system may also be released through this outfall; however, this is an infrequent discharge, last occurring on September 19, 1998.

III. PERMIT MODIFICATION

This permit modification revises S2.A. Monitoring schedule to reflect a non-contact cooling water disinfection process modification at the facility. Additional monitoring is necessary to capture the discharge quality in the new continuous halogenation/dehalogenation process.

No other condition or requirement of the 2014 Permit or the 2016 Permit Modification is hereby affected by this amendment.

IV. DISCUSSION

Energy Northwest proposed a process modification to improve inhibition of biological fouling of the circulating water and plant service water systems at the Columbia Generating Station. These systems provide non-contact cooling water (CW) to condense the steam generated by the CGS nuclear reactor and provide indirect cooling to other plant equipment. The process modification will replace the batch cooling water halogenation process with a continuous halogenation/dehalogenation feed prior to discharge to the Columbia River. EFSEC, after a joint report review by Ecology, approved the engineering report describing the process change on October 19, 2018.

The current batch halogenation using both sodium hypochlorite and sodium bromide requires the blowdown to cease while allowing the halogen residuals to decay. This currently occurs approximately two to three times per week. Moving to the continuous halogenation injection process will improve biofouling control effectiveness. Biofouling experienced in the cooling water and plant service water systems includes the presence of an invasive Asiatic clam, various species of algae, and the bacterium *Legionella pneumophila.*

Both sodium hypochlorite and sodium bromide will continue to be used for disinfection of the open cooling water system. Two additional chemical agents, a biodispersant and

an antifoaming agent will also be added when sampling indicates that they are necessary. In addition, the facility also proposes to use sodium bisulfite as a continuous dehalogenation agent to neutralize the chlorine and bromine derivatives prior to discharge.

An additional continuous pH analyzer and a new total residual halogen (TRH) analyzer will be installed to monitor the effluent discharge line. This modification changes the pH compliance point. The new pH compliance point will be downstream of the dehalogenation tie-in on the CW blowdown line to Outfall 001. The change in process will not result in revised effluent limits for pH or TRH. These effluent limits will remain 6.5 - 9.0 and <0.1 mg/L, respectively. Rather, the frequency of the TRH monitoring will change to continuous with a requirement to report the maximum daily TRH concentration. In the event of an equipment failure, CGS will resume the batch halogenation process currently described in the discharge permit. Existing acute whole effluent toxicity (WET) limits and chronic WET testing requirements remain in effect.

V. CONCLUSION

Based on the information and documentation presented, EFSEC proposes to modify Columbia Generating Station's permit as discussed above.

APPENDIX A – PUBLIC INVOLVEMENT

APPENDIX B - YOUR RIGHT TO APPEAL

APPENDIX C - RESPONSE TO COMMENTS

APPENDIX A - PUBLIC INVOLVEMENT INFORMATION

EFSEC proposes to modify the Columbia Generating Station NPDES Permit WA002515-1. The permit modifications are described in this fact sheet amendment.

EFSEC will place a Public Notice of Draft on January 18, 2019 in the Tri-City Herald to inform the public and to invite comments on the proposed draft permit and fact sheet amendment. Interested persons are invited to submit written comments regarding the modifications.

The modified permit and related documents can be viewed on EFSEC's website: http://www.efsec.wa.gov/CGS/Permits.html and at the Department of Ecology Water Quality Permitting and Reporting Information System (PARIS) website at https://fortress.wa.gov/ecy/paris/PermitLookup.aspx . The documents are also available at the EFSEC Office for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m., weekdays. To obtain a copy or to arrange to view copies, please contact EFSEC at (360) 664-1345.

Paper documents may be viewed at the EFSEC office:

1300 S. Evergreen Park Dr. SW
Olympia, WA 98504-3172

The public may comment on the proposed permits from January 19, 2019 until February 22nd, 2019, at http://www.efsec.wa.gov/CGS/Permits.html.

Any interested party may comment on the draft permit within the thirty (30) day comment period to the address above. EFSEC will hold a hearing on this matter on Wednesday, February 20th, 2019 at Benton County PUD located at 2721 W 10th Ave, Kennewick, WA 99336.

Speaker sign up will begin at 4:30 PM. Staff presentations will begin at 5 PM then the floor will be open to public comment until 7 PM or last speaker, whichever comes first. These times may vary depending on public attendance.

Comments should reference specific text followed by proposed modification or concern when possible. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from issuance of this permit.

EFSEC will consider all comments received within thirty (30) days from the date of public notice of draft indicated above, in formulating a final determination to issue, revise, or deny the permit. EFSEC's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from EFSEC by telephone at (360) 664-1362 or by writing to the address listed above.

Appendix B - Your Right to Appeal

You have a right to appeal the modified portions of this permit only. Pursuant to WAC 463-76-063(1), a decision to issue this permit is subject to judicial review pursuant to the Administrative Procedure Act, Chapter 34.05 RCW. The Administrative Procedure Act can be found on-line at http://apps.leg.wa.gov/RCW/default.aspx?cite=34.05

Appendix C - Response to Comments

The public comment period for this permit extended from January 19, 2019 through 5pm on February 22, 2019. No comments were received.

Errata for Amendment No. 2
National Pollutant Discharge Elimination System Permit
No. WA002515-1
Columbia Generating Station

Issued on September 30, 2014, Modified on March 19, 2019

1. **Fact Sheet Appendix A – Public Involvement Information.** Due to inclement weather the public hearing was moved to Tuesday, February 19, 2019 at the Utilities and Transportation Commission building located at 1300 S. Evergreen Park Drive S.W., Olympia, WA 98504. Interested parties were notified by U.S. Mail and electronically and the change in hearing date, location, and time was published in the Tri-City Herald on February 15, 2019.

2. **Corrected scrivener's errors: broken internet links in the NPDES permit.**

   S10.B. SWPPP components. Publication link to the *http://www.ecy.wa.gov/biblio/0410030.html* was corrected to https://fortress.wa.gov/ecy/publications/SummaryPages/0410030.html.

   NPDES Appendix A – List of Pollutants with Analytical Methods, Detection limits and Quantitation Levels Footnote 4. NWTPH-Dx Northwest Total Petroleum Hydrocarbons Diesel Extended Range publication link http://www.ecy.wa.gov\biblio/97602.html was corrected to https://fortress.wa.gov/ecy/publications/publications/97602.pdf.

   NPDES Appendix A – List of Pollutants with Analytical Methods, Detection limits and Quantitation Levels Footnote 4. NWTPH-Gx Northwest Total Petroleum Hydrocarbons Gasoline Extended Range publication link http://www.ecy.wa.gov\biblio/97602.html was corrected to https://fortress.wa.gov/ecy/publications/publications/97602.pdf.

STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY
3100 Port of Benton Blvd • Richland, WA 99354 • (509) 372-7950
711 for Washington Relay Service • Persons with a speech disability can call 877-833-6341

February 27, 2019 19-NWP-010

By certified mail

Shannon Khounnala
Environmental and Regulatory Programs
Energy Northwest
PO BOX 968
Mailbox Code: PE03
Richland, Washington 99352

Re: Department of Ecology (Ecology) Review of Response to Requested Information for Columbia Generating Station Transformer E-TR-6/61 Oil Spill, Index No. 18.654

Reference: Letter GO2-19-006, DIC 405.11 received on January 3, 2019, "Requested Information for Columbia Generating Station Transformer E-TR-6/61 Oil Spill"

Dear Shannon Khounnala:

Ecology has reviewed your response letter and enclosures, received by Ecology on January 3, 2019 (Reference 1). Your letter included:

- A chronological timeline of events of the Transformer E-TR-6/61Oil Spill (transformer)
- Control and mitigation of the release
- Proposed timeline to implement cleanup and initiate repair of the transformer
- Frequency at which the two underground injection wells located in the vicinity are inspected for sheen
- Laboratory test results identifying the Polychlorinated Biphenyls (PCB) residuals
- Figures and design information of the transformer area

As of January 10, 2019, Ecology is in agreement with Energy Northwest's (EN) responses contained in your letter.

Per EFSEC's request, Ecology conducted a field visit at EN on December 12, 2018. The purpose of Ecology's visit was to verify, on behalf of EFSEC, reported information provided by EN for the November 28, 2018, notification to EFSEC, to discuss the facility's sample results, and to gather additional information about the notification gap between August and November. During that visit Ecology staff also discussed a cleanup plan and schedule with EN. In light of the information provided in your Janurary 3, 2019, response letter, combined with the information gathered during Ecology's field visit, Ecology has verified the corrective actions put in place will ensure that any future oil leaks from the four operating transformers with potential PCB residuals are reported immediately to EN's Environmental and Regulatory Program.

At this time, Ecology is not requiring additional follow-up regarding this event and considers this dangerous waste compliance investigation closed. This does not relieve you of your continuing responsibility to comply with the regulations at all times.

If you have questions or need further information, please contact me at katie.hall@ecy.wa.gov or (509) 372-7885.

Sincerely,

Katie Hall
Environmental Specialist
Nuclear Waste Program

kh/ajm

cc electronic:
Sonia Bumpus, EFSEC
Amy Moon, EFSEC
Stephen Posner, EFSEC
Dave Bartus, EPA
Jack Boller, EPA
Dave Einan, EPA
Brian Crisp, EN
Shannon Khounnala, EN
Steve McNutt, EN
Corey O'Donnell, EN
Mary Ramos, EN
Shawna Berven, WDOH
John Martell, WDOH
Kathy Conaway, Ecology
Katie Hall, Ecology
Theresa Howell, Ecology
Jared Mathey, Ecology
John Price, Ecology
Stephanie Schleif, Ecology
Alex Smith, Ecology
Environmental Portal

cc: NWP Central File
NWP Compliance Index File 18.654