

**FACT SHEET FOR STATE WASTE DISCHARGE PERMIT NO. ST 6178**

**Simpson Door Company**

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**INTRODUCTION**

This fact sheet is a companion document to the draft State Waste Discharge Permit No. ST 6178. The Department of Ecology (Department) is proposing to issue this permit, which will allow discharge of wastewater to the McCleary Wastewater Treatment Plant. This fact sheet explains the nature of the proposed discharge, the Department’s decisions on limiting the pollutants in the wastewater, and the regulatory and technical bases for those decisions.

Washington State law (RCW 90.48.080 and 90.48.160) requires that a permit be issued before discharge of wastewater to waters of the state is allowed. This statute includes commercial or industrial discharges to sewerage systems operated by municipalities or public entities which discharge into public waters of the state. Regulations adopted by the state include procedures for issuing permits and establish requirements which are to be included in the permit (Chapter 173-216 WAC).

This fact sheet and draft permit are available for review by interested persons as described in Appendix A—Public Involvement Information.

The fact sheet and draft permit have been reviewed by the Permittee. Errors and omissions identified in these reviews have been corrected before going to public notice. After the public comment period has closed, the Department will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file on the permit and parties submitting comments will receive a copy of the Department’s response. The fact sheet will not be revised. Changes to the permit will be addressed in Appendix D—Response to Comments.

<b>GENERAL INFORMATION</b>	
Applicant:	The Simpson Door Company
Facility Name and Address:	400 Simpson Avenue, McCleary WA 98577
Type of Facility:	Door Manufacturing Plant
Facility Discharge Location:	Mill Outfall 001 Latitude: 47° 03' 21" N      Longitude: 123° 15' 55" W Mill Outfall 002 Latitude: 47° 03' 22" N      Longitude: 123° 16' 06" W POTW Outfall Latitude: 47° 03' 19" N      Longitude: 123° 16' 33" W
Treatment Plant Receiving Discharge:	The McCleary Wastewater Treatment Plant
Contact at Facility:	Name: Dan Holcombe Telephone #: (360) 427-4738
Responsible Official:	Name: Jim Fielder Title: General Manager Address: 400 Simpson Avenue, McCleary, WA 98577 Telephone #: (360) 495-3291 FAX # (360) 495-2074

**BACKGROUND INFORMATION**

*DESCRIPTION OF THE FACILITY*

HISTORY:

There has been a timber products mill at this location since at least 1917.

INDUSTRIAL PROCESSES:

The Simpson Door Company (Simpson Door) processes imported wood, green fir and hemlock lumber into finished wooden doors. The lumber is kiln dried, planed, re-moistened and sliced. This wood is then cut, shaped and glued into component door parts. The component parts are jointed, molded and shaped to their final form before assembly. Doors are then assembled, glazed if required, sanded and fitted to final dimensions. The sources of industrial wastewater are conditioning water from the veneer slicing operation, boiler blowdown, and equipment cleaning water.

Simpson Door is a Significant Industrial User since actual combined flow is 15,000 gallons per day, below the regulation thresholds of 25, 000 gallons per day, but above 5% of the average dry weather hydraulic capacity of the McCleary POTW (12,500 gallons per day). This flow also exceeds 5% of the TSS and BOD treatment capacity of the plant (20.55 lbs/day).

TREATMENT PROCESSES

Boiler blowdown is discharged to Outfall 004 (Manhole 5) along with sanitary sewage without treatment. Equipment washwater is treated by passage through an oil-water separator before joining the sanitary sewage and the boiler blowdown at Manhole 5. Slicer wastewater is treated by installing a treatment system that will allow re-circulating the wastestream until pollutant concentrations necessitate discharge to the POTW through Manhole 001. Discharge is by batch once weekly. Filter backwash will also be wasted through Outfall 001.

The re-circulation treatment is chilling followed by sand filtration and pH adjustment.

*PERMIT STATUS*

An application for a permit was submitted to the Department on April 1, 2004, and accepted by the Department on July 6, 2004.

*WASTEWATER CHARACTERIZATION*

For this table, BOD concentration, total suspended solids, and pH are taken from the permit application. Temperature and flow are taken from the DMRs.

Parameter	Outfall	Monthly Average	Daily Maximum
Flow, gpd	001	11, 110	29,860
BOD <sub>5</sub> Concentration	001	386	880
pH, S.U.	001	N/A	6.0 to 8.9
Flow, gpd	004	2596	9653
pH, standard units	004	N/A	6.4 to 11.8
Temperature, ° C	004	49	60

A review of the MSDS sheets for the boiler treatment chemicals shows no proprietary chemicals and no regulated toxic chemicals.

### PROPOSED PERMIT LIMITATIONS

State regulations require that limitations set forth in a waste discharge permit must be based on the technology available to treat the pollutants (technology-based) or be based on the effects of the pollutants to the POTW (local limits). Wastewater must be treated using all known, available, and reasonable treatment (AKART) and not interfere with the operation of the POTW.

The minimum requirements to demonstrate compliance with the AKART standard and specific design criteria for this facility were determined in the engineering report.

The more stringent of the local limits-based or technology-based limits are applied to each of the parameters of concern. Each of these types of limits is described in more detail below.

#### TECHNOLOGY-BASED EFFLUENT LIMITATIONS

All waste discharge permits issued by the Department must specify conditions requiring available and reasonable methods of prevention, control, and treatment of discharges to waters of the state (WAC 173-216-110). Existing federal categorical limitations for this facility are found under 40 CFR Part 429.30, Timber Products Processing Point Source Category, Subpart B. The following permit limitations are necessary to satisfy the requirement for AKART for Outfall 001:

Pollutant or Pollutant Property	Maximum for 1 day Pounds per Cubic Foot of Production	Monthly Average Pounds per Cubic Foot of Production
BOD <sub>5</sub> <sup>1</sup>	0.045	0.015
pH, S.U.	6 to 9	6 to 9

<sup>1</sup> Taking the unit weight of Douglas Fir at 32 pounds per cubic foot, the following limits for discharge to the environment are identical to the limits above and more convenient to measure.

Pollutant or Pollutant Property	Maximum for 1 day Pounds per Pound of Production	Monthly Average Pounds per Pound of Production
BOD <sub>5</sub>	.0014	0.0005
pH, S.U.	6 to 9	6 to 9

The McCleary POTW has problems with exceeding their flow limits. As a result, it is necessary to set a flow limit on Outfall 004. The Ecology standard method for determining limits from past performance was used to statistically determine flow limits for this outfall. After eliminating obviously large flows (around three time average), limits were set at 3300 gpd for monthly average flow and 4100 gpd for a daily maximum flow.

#### EFFLUENT LIMITATIONS BASED ON LOCAL LIMITS

In order to protect the McCleary Wastewater Treatment Plant from pass-through, interference, concentrations of toxic chemicals that would impair beneficial or designated uses of sludge, or potentially hazardous exposure levels, limitations for certain parameters are necessary. These limitations are based

on local limits established by the McCleary Wastewater Treatment Plant and codified in ordinance. Applicable limits for this discharge include the following:

Pollutant or Pollutant Property	Maximum for 1 day
Temperature, °C	65
pH, S.U.	Minimum 5.5

No limits have been set for the discharge from the equipment wash rack since this facility meets the requirements Vehicle and Equipment Washwater Discharge, Department of Ecology Publication Q-R-95-6, June 1995. Pollutant concentrations in the proposed discharge with technology-based controls in place will not cause problems at the receiving POTW such as interference, pass-through or hazardous exposure to POTW workers nor will it result in unacceptable pollutant levels in the POTW's sludge.

### MONITORING REQUIREMENTS

Monitoring, recording, and reporting are specified to verify that the treatment process is functioning correctly, and that effluent limitations are being achieved (WAC 173-216-110).

The monitoring schedule is detailed in the proposed permit under Condition S1. Specified monitoring frequencies take into account the quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and cost of monitoring. Given the good performance of Simpson Door during the period January 1, 2002 through January 2004, the sampling interval is reduced from weekly to monthly.

### OTHER PERMIT CONDITIONS

#### *REPORTING AND RECORDKEEPING*

The conditions of S2 are based on the authority to specify any appropriate reporting and recordkeeping requirements to prevent and control waste discharges [WAC 273-216-110 and 40 CFR 403.12 (e),(g), and (h)].

#### *OPERATIONS AND MAINTENANCE*

The proposed permit contains condition S.4. as authorized under Chapter 173-240-150 WAC and Chapter 173-216-110 WAC. It is included to ensure proper operation and regular maintenance of equipment, and to ensure that adequate safeguards are taken so that constructed facilities are used to their optimum potential in terms of pollutant capture and treatment.

#### *PROHIBITED DISCHARGES*

Certain pollutants are prohibited from being discharged to the POTW. These include substances that cause pass-through or interference, pollutants which may cause damage to the POTW or harm to the POTW workers (Chapter 173-216 WAC) and the discharge of designated dangerous wastes not authorized by this permit (Chapter 173-303 WAC).

***DILUTION PROHIBITED***

The Permittee is prohibited from diluting its effluent as a partial or complete substitute for adequate treatment to achieve compliance with permit limitations.

***SPILL PLAN***

The Department has determined that the Permittee stores a quantity of chemicals that have the potential to cause water pollution if accidentally released. The Department has the authority to require the Permittee to develop best management plans to prevent this accidental release under section 402(a)(1) of the Federal Water Pollution Control Act (FWPCA) and RCW 90.48.080.

The spill plan submitted with the permit application is accepted as current for the proposed permit.

***GENERAL CONDITIONS***

General Conditions are based directly on state laws and regulations and have been standardized for all industrial waste discharge to POTW permits issued by the Department.

Condition G1 requires responsible officials or their designated representatives to sign submittals to the Department. Condition G2 requires the Permittee to allow the Department to access the treatment system, production facility, and records related to the permit. Condition G3 specifies conditions for modifying, suspending or terminating the permit. Condition G4 requires the Permittee to apply to the Department prior to increasing or varying the discharge from the levels stated in the permit application. Condition G5 requires the Permittee to construct, modify, and operate the permitted facility in accordance with approved engineering documents. Condition G6 prohibits the Permittee from using the permit as a basis for violating any laws, statutes or regulations. Conditions G7 and G8 relate to permit renewal and transfer. Condition G9 requires the Permittee to control production or wastewater discharge in order to maintain compliance with the permit. Condition G10 prohibits the reintroduction of removed pollutants into the effluent stream for discharge. Condition G11 requires the payment of permit fees. Condition G12 describes the penalties for violating permit conditions.

**PUBLIC NOTIFICATION OF NONCOMPLIANCE**

A list of all industrial users which were in significant noncompliance with Pretreatment Standards or Requirements during any of the previous four quarters may be annually published by the Department in a local newspaper. Accordingly, the Permittee is apprised that noncompliance with this permit may result in publication of the noncompliance.

**RECOMMENDATION FOR PERMIT ISSUANCE**

This proposed permit meets all statutory requirements for authorizing a wastewater discharge, including those limitations and conditions believed necessary to control toxics. The Department proposes that the permit be issued for a period corresponding to the cycle established for the watershed but not to exceed five years.

## **APPENDICES**

### *APPENDIX A—PUBLIC INVOLVEMENT INFORMATION*

The Department has tentatively determined to reissue a permit to the applicant listed on page 1 of this fact sheet. The permit contains conditions and effluent limitations which are described in the rest of this fact sheet.

Public notice of application was published on March 21, 2004, and March 28, 2004, in Aberdeen's *The Daily World* to inform the public that an application had been submitted and to invite comment on the reissuance of this permit.

The Department will publish a Public Notice of Draft (PNOD) on November 2, 2004 in Aberdeen's *The Daily World* to inform the public that a draft permit and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 4:30 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Industrial Unit Permit Coordinator  
Department of Ecology  
Southwest Region - Water Quality  
P.O. Box 47775  
Olympia, WA 98504-7775

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the thirty (30) day comment period to the address above. The request for a hearing shall indicate the interest of the party and reasons why the hearing is warranted. The Department will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-216-100). Public notice regarding any hearing will be circulated at least thirty (30) days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing.

The Department 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. The Department'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 the Department by telephone, (360) 407-6285 or by writing to the address listed above.

This permit was written by Gary Anderson

*APPENDIX B—GLOSSARY*

**Ammonia**—Ammonia is produced by the breakdown of nitrogenous materials in wastewater. Ammonia is toxic to aquatic organisms, exerts an oxygen demand, and contributes to eutrophication. It also increases the amount of chlorine needed to disinfect wastewater.

**Average Monthly Discharge Limitation**—The average of the measured values obtained over a calendar month's time.

**Best Management Practices (BMPs)**--Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the State. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

**BOD<sub>5</sub>**--Determining the Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of organic material present in an effluent that is utilized by bacteria. The BOD<sub>5</sub> is used in modeling to measure the reduction of dissolved oxygen in a receiving water after effluent is discharged. Stress caused by reduced dissolved oxygen levels makes organisms less competitive and less able to sustain their species in the aquatic environment. Although BOD is not a specific compound, it is defined as a conventional pollutant under the federal Clean Water Act.

**Bypass**—The intentional diversion of waste streams from any portion of the collection or treatment facility.

**Categorical Pretreatment Standards**—National pretreatment standards specifying quantities or concentrations of pollutants or pollutant properties which may be discharged to a POTW by existing or new industrial users in specific industrial subcategories.

**Compliance Inspection - Without Sampling**--A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

**Compliance Inspection - With Sampling**--A site visit to accomplish the purpose of a Compliance Inspection - Without Sampling and as a minimum, sampling and analysis for all parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Additional sampling may be conducted.

**Composite Sample**—A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be "time-composite"(collected at constant time intervals) or "flow-proportional" (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots.

**Construction Activity**—Clearing, grading, excavation and any other activity which disturbs the surface of the land. Such activities may include road building, construction of residential houses, office buildings, or industrial buildings, and demolition activity.

**Engineering Report**—A document, signed by a professional licensed engineer, which thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater facility. The report shall contain the appropriate information required in WAC 173-240-060 or 173-240-130.

**Grab Sample**—A single sample or measurement taken at a specific time or over as short period of time as is feasible.

**Industrial User**—A discharger of wastewater to the sanitary sewer which is not sanitary wastewater or is not equivalent to sanitary wastewater in character.

**Industrial Wastewater**—Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business, from the development of any natural resource, or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated storm water and, also, leachate from solid waste facilities.

**Interference**— A discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal and;

Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to subtitle D of the SWDA), sludge regulations appearing in 40 CFR Part 507, the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.

**Local Limits**—Specific prohibitions or limits on pollutants or pollutant parameters developed by a POTW.

**Maximum Daily Discharge Limitation**—The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.

**Method Detection Level (MDL)**--The minimum concentration of a substance that can be measured and reported with 99% confidence that the analyte concentration is above zero and is determined from analysis of a sample in a given matrix containing the analyte.

**Pass-through**— A discharge which exits the POTW into waters of the—State in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation), or which is a cause of a violation of State water quality standards.

**pH**—The pH of a liquid measures its acidity or alkalinity. A pH of 7 is defined as neutral, and large variations above or below this value are considered harmful to most aquatic life.

**Potential Significant Industrial User**--A potential significant industrial user is defined as an Industrial User which does not meet the criteria for a Significant Industrial User, but which discharges wastewater meeting one or more of the following criteria:

- a. Exceeds 0.5 % of treatment plant design capacity criteria and discharges <25,000 gallons per day or;
- b. Is a member of a group of similar industrial users which, taken together, have the potential to cause pass through or interference at the POTW (e.g. facilities which develop photographic film or paper, and car washes).

The Department may determine that a discharger initially classified as a potential significant industrial user should be managed as a significant industrial user.

**Quantitation Level (QL)**-- A calculated value five times the MDL (method detection level).

**Significant Industrial User (SIU)**--

1) All industrial users subject to Categorical Pretreatment Standards under 40 CFR 403.6 and 40 CFR Chapter I, Subchapter N and;

2) Any other industrial user that: discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, noncontact cooling, and boiler blow-down wastewater); contributes a process wastestream that makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the Control Authority\* on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement (in accordance with 40 CFR 403.8(f)(6)).

Upon finding that the industrial user meeting the criteria in paragraph 2, above, has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, the Control Authority\* may at any time, on its own initiative or in response to a petition received from an industrial user or POTW, and in accordance with 40 CFR 403.8(f)(6), determine that such industrial user is not a significant industrial user.

\*The term "Control Authority" refers to the Washington State Department of Ecology in the case of non-delegated POTWs or to the POTW in the case of delegated POTWs.

**Slug Discharge**—Any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge to the POTW. This may include any pollutant released at a flow rate which may cause interference with the POTW.

**State Waters**—Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the state of Washington.

**Stormwater**—That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a storm water drainage system into a defined surface water body, or a constructed infiltration facility.

**Technology-based Effluent Limit**—A permit limit that is based on the ability of a treatment method to reduce the pollutant.

**Total Coliform Bacteria**—A microbiological test which detects and enumerates the total coliform group of bacteria in water samples.

**Total Dissolved Solids**—That portion of total solids in water or wastewater that passes through a specific filter.

**Total Suspended Solids (TSS)**--Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic effects attributable to substances leached out by water, suspended solids may kill fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of various aquatic fauna. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

**Water Quality-based Effluent Limit**—A limit on the concentration of an effluent parameter that is intended to prevent the concentration of that parameter from exceeding its water quality criterion after it is discharged into a receiving water.

APPENDIX C – PERFORMANCE BASED LIMITS

Parameter	Units	Value	Viol	Dmr Date	LN Value
FLOW	GPD	2215	N	1-Dec-01	7.703008
FLOW	GPD	2014	N	1-Jan-02	7.607878
FLOW	GPD	3510	N	1-Feb-02	8.163371
FLOW	GPD	1898	N	1-Mar-02	7.548556
FLOW	GPD	1944	N	1-Apr-02	7.572503
FLOW	GPD	1307	N	1-May-02	7.17549
FLOW	GPD	1040	N	1-Jun-02	6.946976
FLOW	GPD	1825	N	1-Jul-02	7.509335
FLOW	GPD	1248	N	1-Aug-02	7.129298
FLOW	GPD	1939	N	1-Sep-02	7.569928
FLOW	GPD	2997	N	1-Oct-02	8.005367
FLOW	GPD	2623	N	1-Nov-02	7.872074
FLOW	GPD	2406	N	1-Dec-02	7.785721
FLOW	GPD	1384	N	1-Mar-03	7.232733
FLOW	GPD	3015	N	1-Apr-03	8.011355
FLOW	GPD	2689	N	1-May-03	7.896925
FLOW	GPD	1692	N	1-Jun-03	7.433667
FLOW	GPD	2287	N	1-Jul-03	7.734996
FLOW	GPD	2379	N	1-Aug-03	7.774436
FLOW	GPD	2601	N	1-Sep-03	7.863651
FLOW	GPD	1702	N	1-Oct-03	7.439559
FLOW	GPD	1786	N	1-Nov-03	7.487734
FLOW	GPD	1275	N	1-Dec-03	7.150701
<b>Average</b>		<b>2077.217</b>			<b>7.591968</b>
<b>Variance</b>					<b>0.100839</b>

PERFORMANCE-BASED EFFLUENT LIMITS

LOGNORMAL TRANSFORMED MEAN =	7.5920
'LOGNORMAL TRANSFORMED VARIANCE =	0.1008
NUMBER OF SAMPLES/MONTH FOR COMPLIANCE MONITORING =	1
AUTOCORRELATION FACTOR( ne)(USE 0 IF UNKNOWN) =	0
E(X) =	2084.7412
V(X) =	460932.274
VARn	0.1008
MEANn=	7.5920
VAR(Xn)=	460932.274
MAXIMUM DAILY EFFLUENT LIMIT =	4148.417
AVERAGE MONTHLY EFFLUENT LIMIT =	3341.822

3341.822 3201.564

*APPENDIX D – RESPONSE TO COMMENTS*

Comment 1.

A storm drain from the Simpson Door plant runs through the property of Jim and Jill Gravatt. This storm drain is in a state of disrepair, causing flooding on the Gravatt property.

Response:

Since Simpson Door discharges its waste water through the City of McCleary's sewer system, the flooding problem is outside the scope of this permit.