

STATEMENT OF BASIS

CITY OF TACOMA CENTRAL WASTEWATER TREATMENT PLANT NDPES PERMIT NO. WA0037087

The purpose of this statement of basis is to explain the need to modify the discharge permit and provides the basis for changes to its limitations and conditions.

I. GENERAL INFORMATION

Permittee: City of Tacoma
2201 Portland Avenue
Tacoma, WA 98421

Discharge Location: Commencement Bay, Puget Sound
Latitude: 47° 16' 41.7" N
Longitude: 122° 25' 09" W

II. REQUEST FOR MODIFICATION

During permit development for the City of Tacoma Central Wastewater Treatment Facility, the Department of Ecology (Ecology) used a simple mixing model and a fecal coliform background concentration from water quality monitoring station CMB003. The modeling showed a predicted violation of the fecal coliform water quality standard for the receiving water using technology-based limits for effluent concentrations. Therefore, to be protective of the receiving water the water quality standard for fecal coliform was placed in the permit.

At that time, Ecology acknowledged that it was possible that the ambient monitoring station did not closely represent the conditions in the vicinity of the Central Wastewater Treatment Facility outfall. Tacoma was given the option of performing a receiving water study to show that there was sufficient assimilative capacity in the vicinity of the outfall for the technology limits for fecal coliform to be protective of water quality standards.

In June of 2004, the City of Tacoma undertook a year long receiving water study to determine if using the technology-based limits and the ambient conditions around the Central wastewater facility outfall would be protective of the water quality standards. The results of the Commencement Bay Fecal Coliform Study, prepared by Cosmopolitan Engineering Group, August 2005, showed that the technology-based limits for fecal coliform were protective of the water quality.

As a result, in March 2006, we modified the permit and replaced the water quality-based permit limits for fecal coliform (100 cfu/100 mL monthly average; 200 cfu/100 mL weekly average) with technology-based limits (200 cfu/100 mL monthly average; 400 cfu/100 mL weekly average).

However, in modifying the permit, we inadvertently changed only the interim effluent limits (before upgrades). This modification corrects that typographical error and changes the final effluent limits (after upgrades) as well. We consider this a minor modification under 40 Code of Federal Regulations (CFR) 122.63(a).

This statement of Basis will serve as an amendment to the Fact Sheet and Permit.

7/21/08