

Addendum to the Fact Sheet for State Waste Discharge Permit ST0008078

General Information

Facility: Nouryon Pulp & Performance Chemicals LLC
2701 Road N. NE, Moses Lake, WA 98837

Application and Compliance Review

Nouryon Pulp & Performance Chemicals LLC (Nouryon) submitted an application to Ecology on July 27, 2018 for permit reissuance, and Ecology accepted it on December 30, 2019. Ecology reviewed inspections and assessed compliance of the facility's discharge with the terms and conditions in the previous permit. Ecology has sufficiently reviewed the application, discharge monitoring reports, and other facility information in enough detail to ensure that:

- Nouryon has complied with most all of the terms, conditions, requirements and schedules of compliance of the expired permit. The violations were minor in nature and are described below:
 1. July 2017 – Average monthly flow violation
 2. May 2017 – Late DMR
 3. July 2016 - Average monthly flow violation
 4. July 2015 – Late DMR
- Ecology has up-to date information on the Nouryon's waste treatment practices, the facility's production levels; and the nature, content, volume, and frequency of its discharge. **Appendix C** contains graphs of discharge monitoring data collected over the life of the previous permit.
- The discharge meets applicable effluent standards and limits, City of Moses Lake local limits, and other legally applicable requirements.

Since the issuance of the current permit, Ecology has not received any additional information which indicates that environmental impacts from the discharge warrant a complete renewal of the permit. Therefore, Ecology chose to reauthorize this permit.

Permit Reauthorization

When Ecology reauthorizes a discharge permit it essentially reissues the permit with the existing limits, terms and conditions. Alternatively, when Ecology renews a permit it re-evaluates the impact of the discharge on the publicly owned treatment plant, which may lead to changes in the limits, terms and conditions of the permit.

The permit reauthorization process, along with the renewal of high priority permits, allows Ecology to reissue permits in a timely manner and minimize the number of active permits that have passed their expiration dates. Ecology assesses each permit that is expiring and due for reissuance and compares it with other permits due for reissuance when it plans its workload for the upcoming year.

This fact sheet addendum accompanies the permit, which Ecology proposes to reauthorize for the discharge of wastewater to the City of Moses Lake, Sand Dunes Treatment Plant. The previous fact sheet explains the basis for the discharge limits and conditions of the reauthorized permit and remains as part of the administrative record.

Permit Limits and Conditions

The reauthorized permit is virtually identical to the previous permit issued on August 1, 2014 with a few exceptions identified below. Ecology removed the completed report requirements that do not require additional or continued assessment. The proposed reauthorized permit includes:

- The discharge limits and conditions in effect at the time of expiration of the previous permit.
- An increase in the monthly average effluent flow limit from 150,000 to 165,000 gallons per day. This will accommodate the increased amounts of cooling tower blowdown during the warmer summer months.
- Changes to the submittal dates for reports from those in the previous permit.
- Adjusted dates for the other necessary compliance and submittal requirements carried over from the past permit.

Public Process

WAC 173-216-090(5) states that public notification requirements do not apply for permit renewal if there are no increases in volume or changes in the characteristics of discharge beyond those previously authorized. Since the reauthorization includes an increase in the permit limit for the monthly average flow, Ecology will public notice and take comment on the proposed permit.

Permit Appeal Process

Appendix B describes the permit appeal process.

Recommendation for Permit Issuance

Ecology proposes to reissue this permit for five years.

Appendix A - Public Involvement Information

Ecology proposes to reissue a permit to Nouryon. The permit includes wastewater discharge limits and other conditions. This fact sheet describes the facility and Ecology's reasons for requiring permit conditions.

Ecology issued a Public Notice of Draft on February 17, 2021 in the Columbia Basin Herald to inform the public and to invite comment on the proposed draft State Waste Discharge permit.

The notice:

- Tells where copies of the draft Permit is available for public evaluation (a local public library, the closest Regional or Field Office, posted on our website).
- Offers to provide the documents in an alternate format to accommodate special needs.
- Urges people to submit their comments, in writing, before the end of the Comment Period
- Tells how to request a public hearing of comments about the proposed state waste discharge permit.
- Explains the next step(s) in the permitting process.

For frequently asked questions about public comments, [Publication #03-07-023](#), **Effective Public Commenting**, is available on Ecology's website at <https://fortress.wa.gov/ecy/publications/documents/0307023.pdf>.

For more information, call the Department of Ecology Eastern Regional Office at (509) 329-3400 or [visit Ecology's website](#) at www.ecy.wa.gov.

Appendix B - Your Right to Appeal

You have a right to appeal this permit to the Pollution Control Hearing Board (PCHB) within 30 days of the date of receipt of the final permit. The appeal process is governed by chapter 43.21B RCW and chapter 371-08 WAC. "Date of receipt" is defined in RCW 43.21B.001(2) (see glossary).

To appeal you must do the following within 30 days of the date of receipt of this permit:

- File your appeal and a copy of this permit with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this permit on Ecology in paper form - by mail or in person. (See addresses below.) E-mail is not accepted.

You must also comply with other applicable requirements in chapter 43.21B RCW and chapter 371-08 WAC.

ADDRESS AND LOCATION INFORMATION

Street Addresses	Mailing Addresses
Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503	Department of Ecology Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608
Pollution Control Hearings Board 1111 Israel RD SW STE 301 Tumwater, WA 98501	Pollution Control Hearings Board PO Box 40903 Olympia, WA 98504-0903

Appendix C – Effluent Data

Figure C1 – Effluent to the City of Moses Lake, Sand Dunes Treatment Plant: Chloride, Sodium, Conductivity, & TDS

Figure C2 – Effluent to the City of Moses Lake, Sand Dunes Treatment Plant: Alk-Bicarb, Alk-Carb, Ammonia & Nitrate

Figure C3 – Effluent to City of Moses Lake, Sand Dunes Treatment Plant: Calcium, Magnesium, Potassium & Sulfate

Figure C4 – Effluent to City of Moses Lake, Sand Dunes Treatment Plant: Effluent Turbidity

Figure C5 - Effluent to City of Moses Lake, Sand Dunes Treatment Plant: Sodium & TDS

Figure C6 - Effluent to City of Moses Lake, Sand Dunes Treatment Plant: Flow & pH

Figure C7 - Stormwater Evaporation Pond Results: Depth, pH, Antimony, & Chromium

Figure C8 - Stormwater Evaporation Pond Results: Chloride, Sodium, & TDS

Figure C1 - Effluent to City of Moses Lake, Sand Dunes Treatment Plant: Chloride, Sodium, Conductivity, & TDS

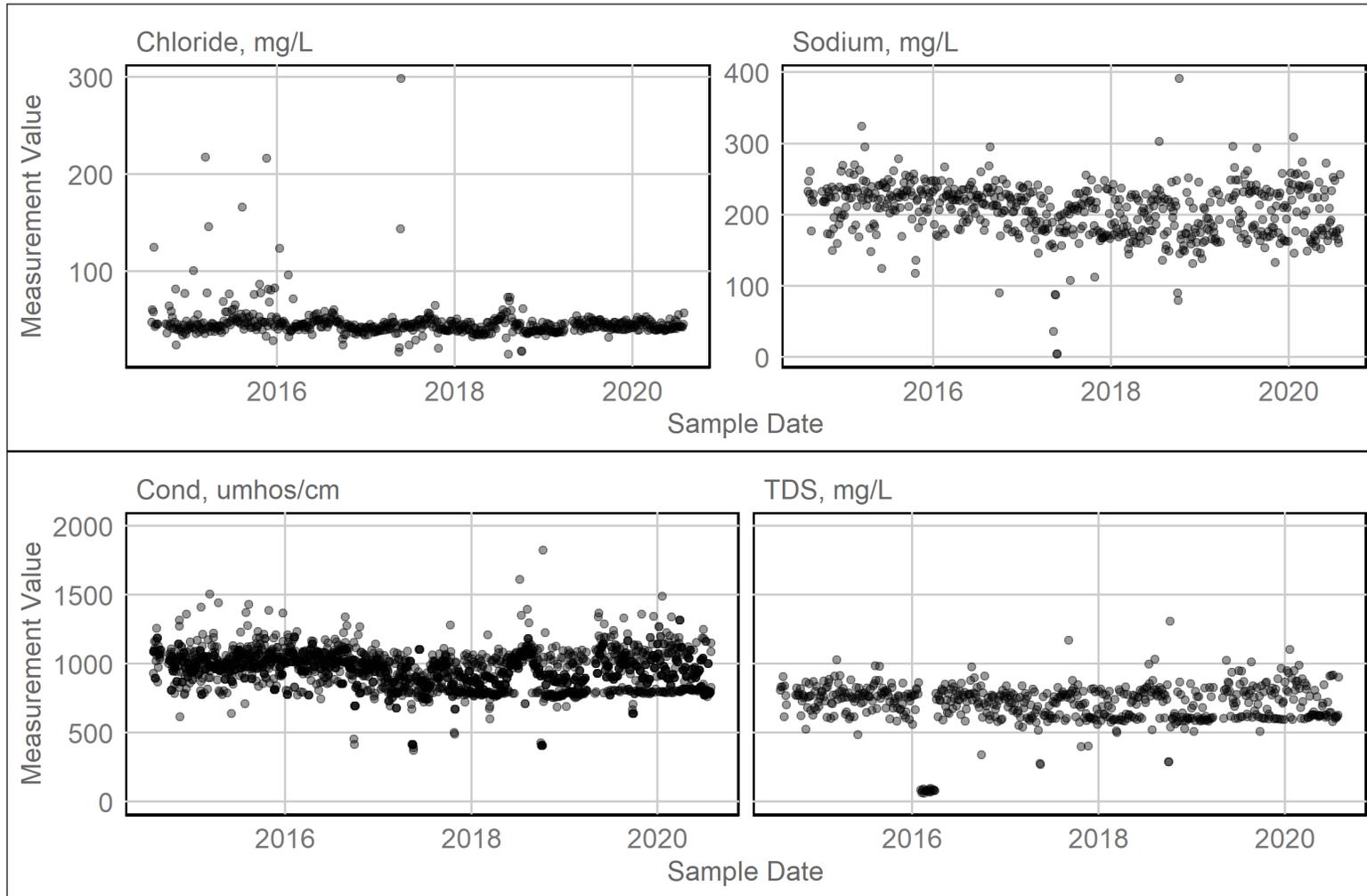


Figure C2 – Effluent to City of Moses Lake, Sand Dunes Treatment Plant: Alk-Bicarb, Alk-Carb, Ammonia, & Nitrate

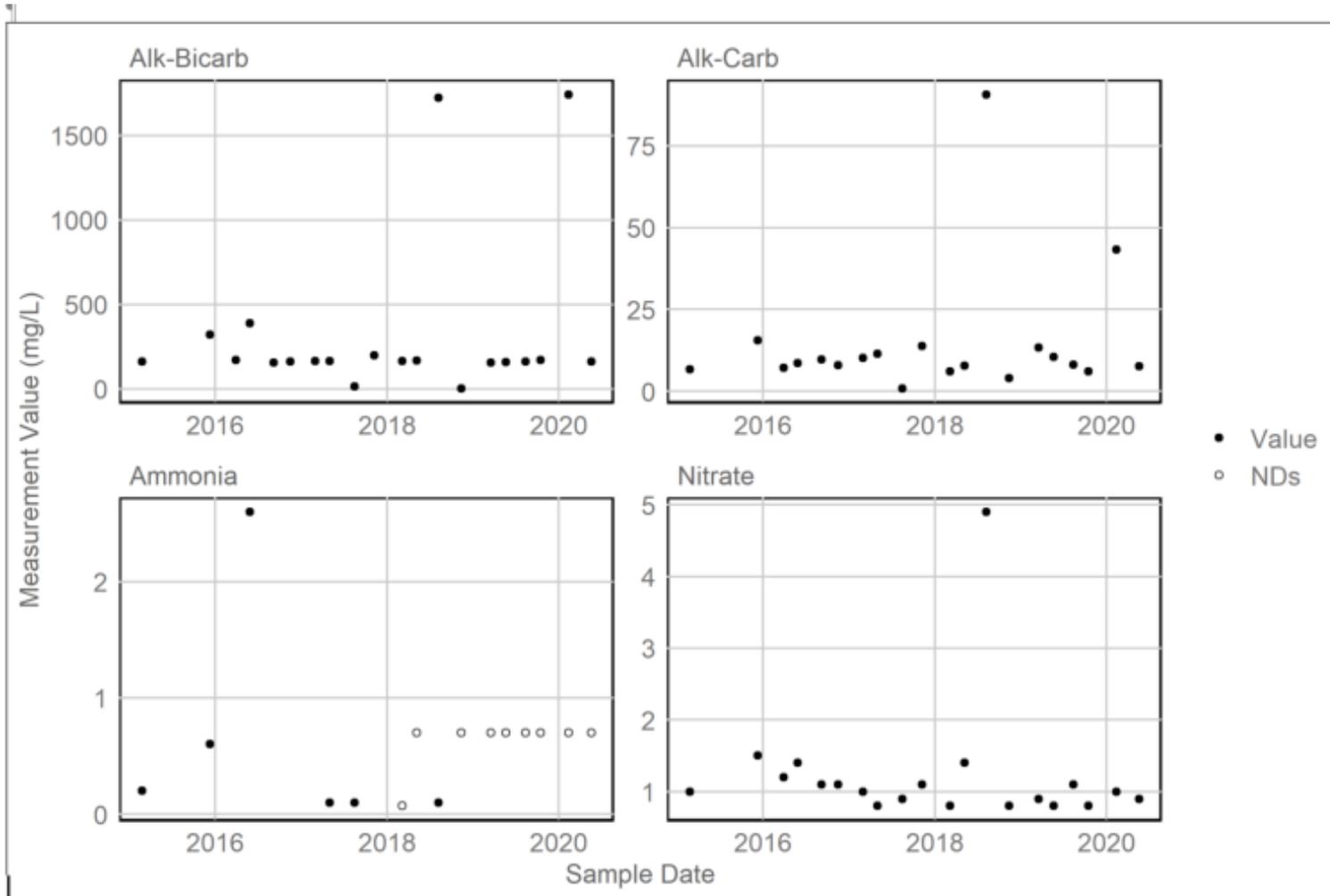


Figure C3 – Effluent to City of Moses Lake, Sand Dunes Treatment Plant: Calcium, Magnesium, Potassium & Sulfate

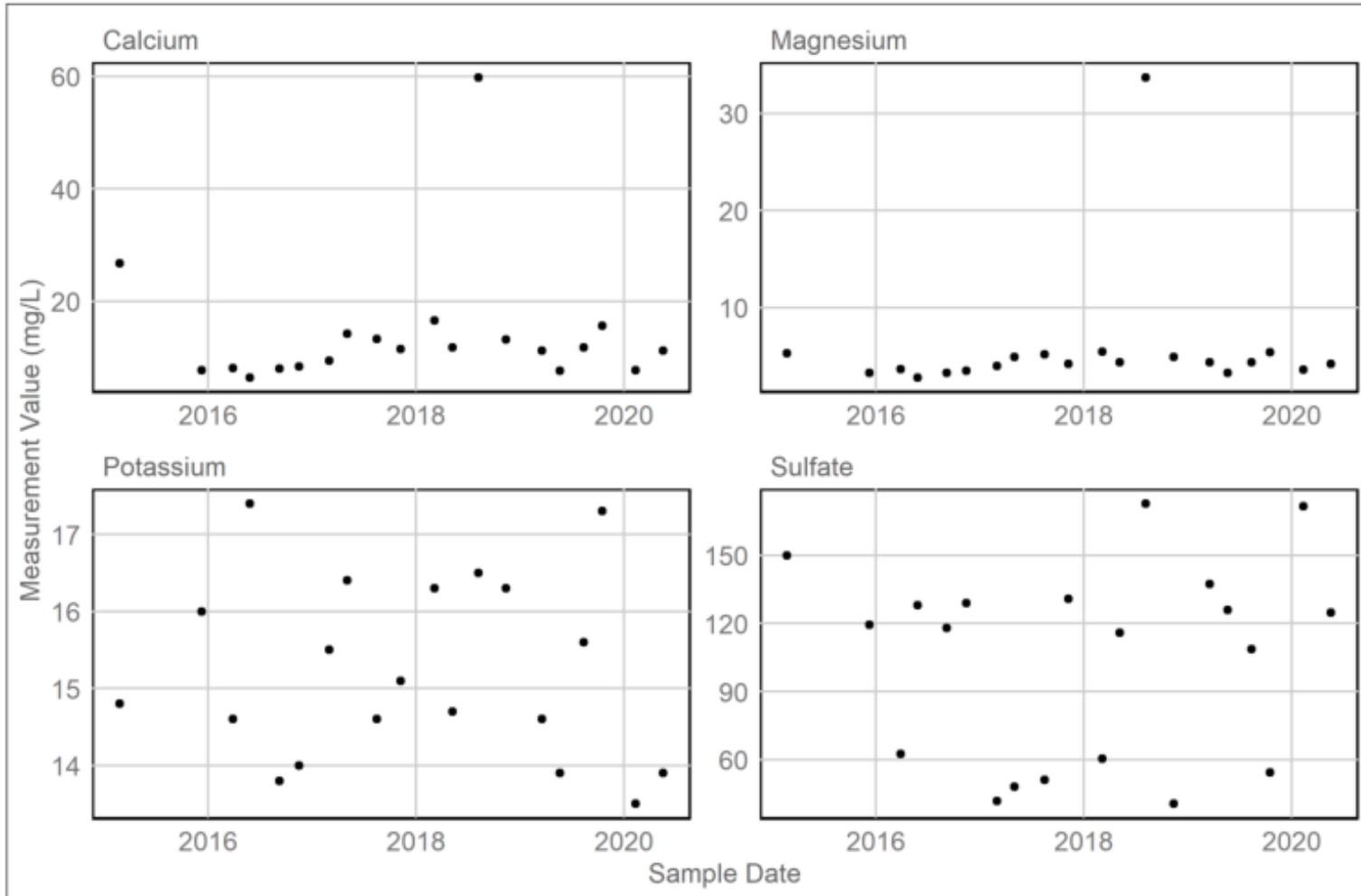


Figure C4 – Effluent to City of Moses Lake, Sand Dunes Treatment Plant: Effluent Turbidity

Effluent Turbidity

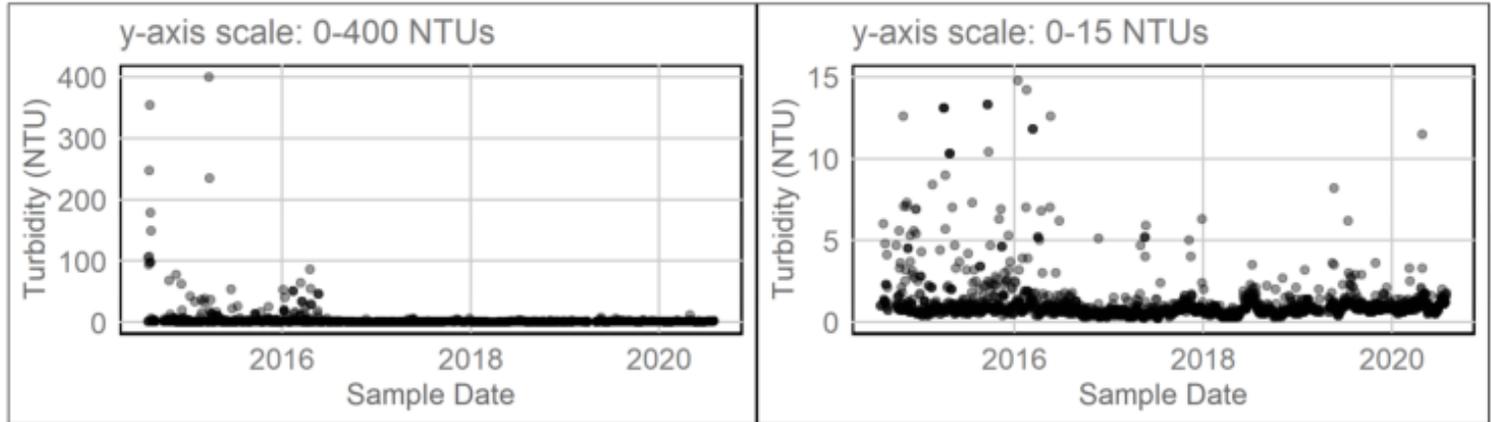


Figure C5 – Effluent to City of Moses Lake, Sand Dunes Treatment Plant: BOD5, Chloride, & TSS

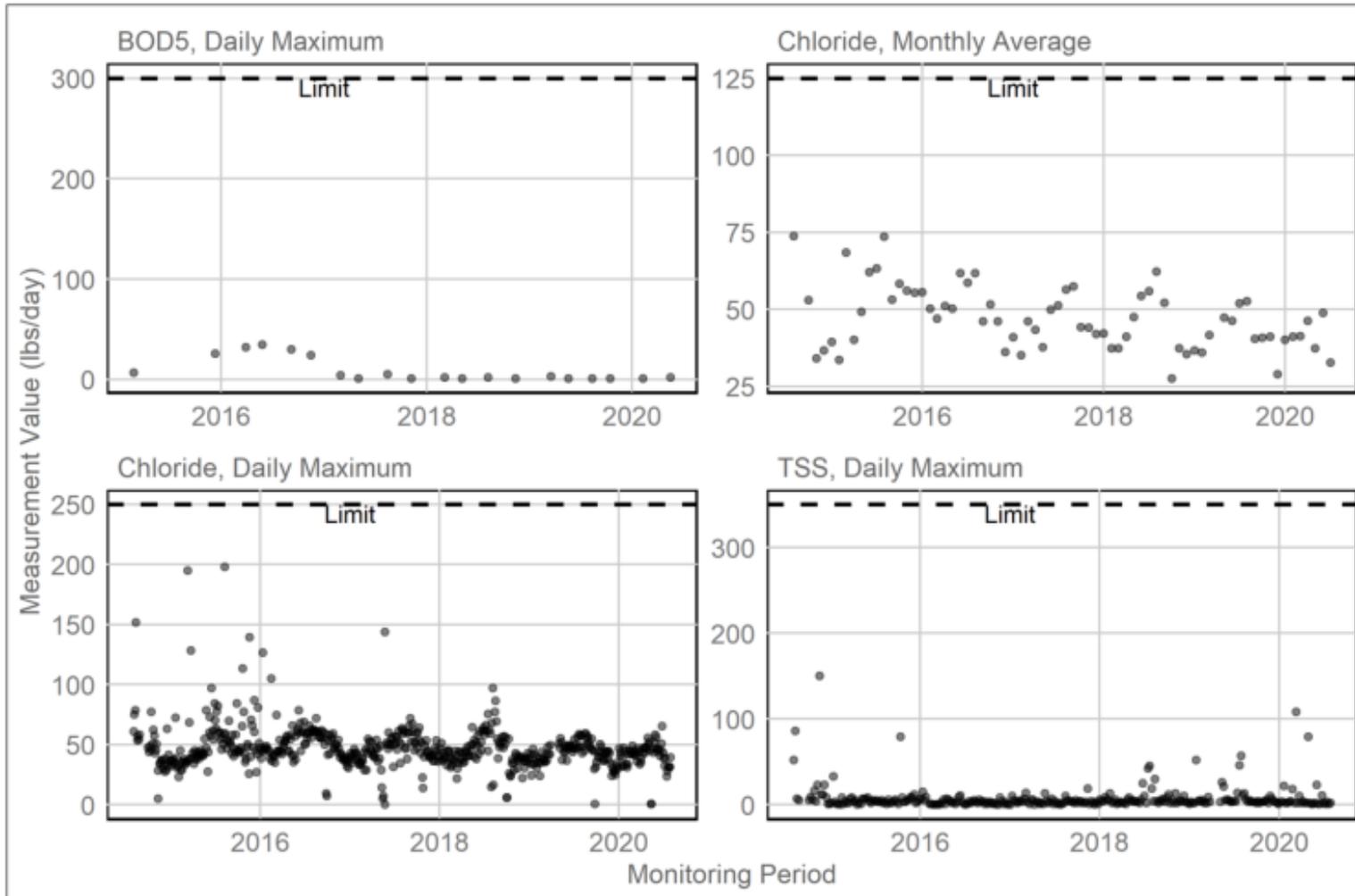


Figure C5 – Effluent to City of Moses Lake, Sand Dunes Treatment Plant: Sodium & TDS

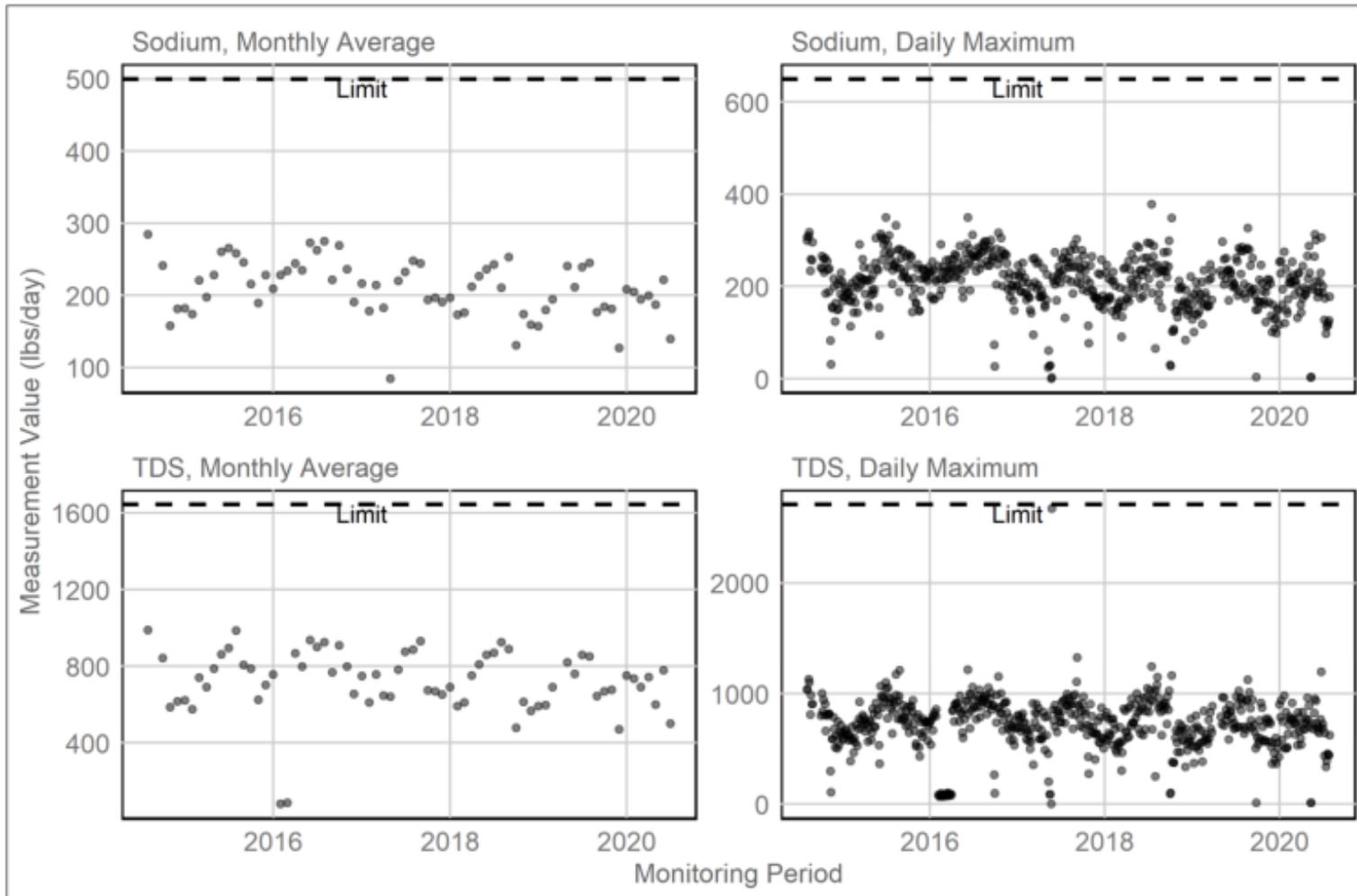


Figure C6 – Effluent to City of Moses Lake, Sand Dunes Treatment Plant: Flow & pH

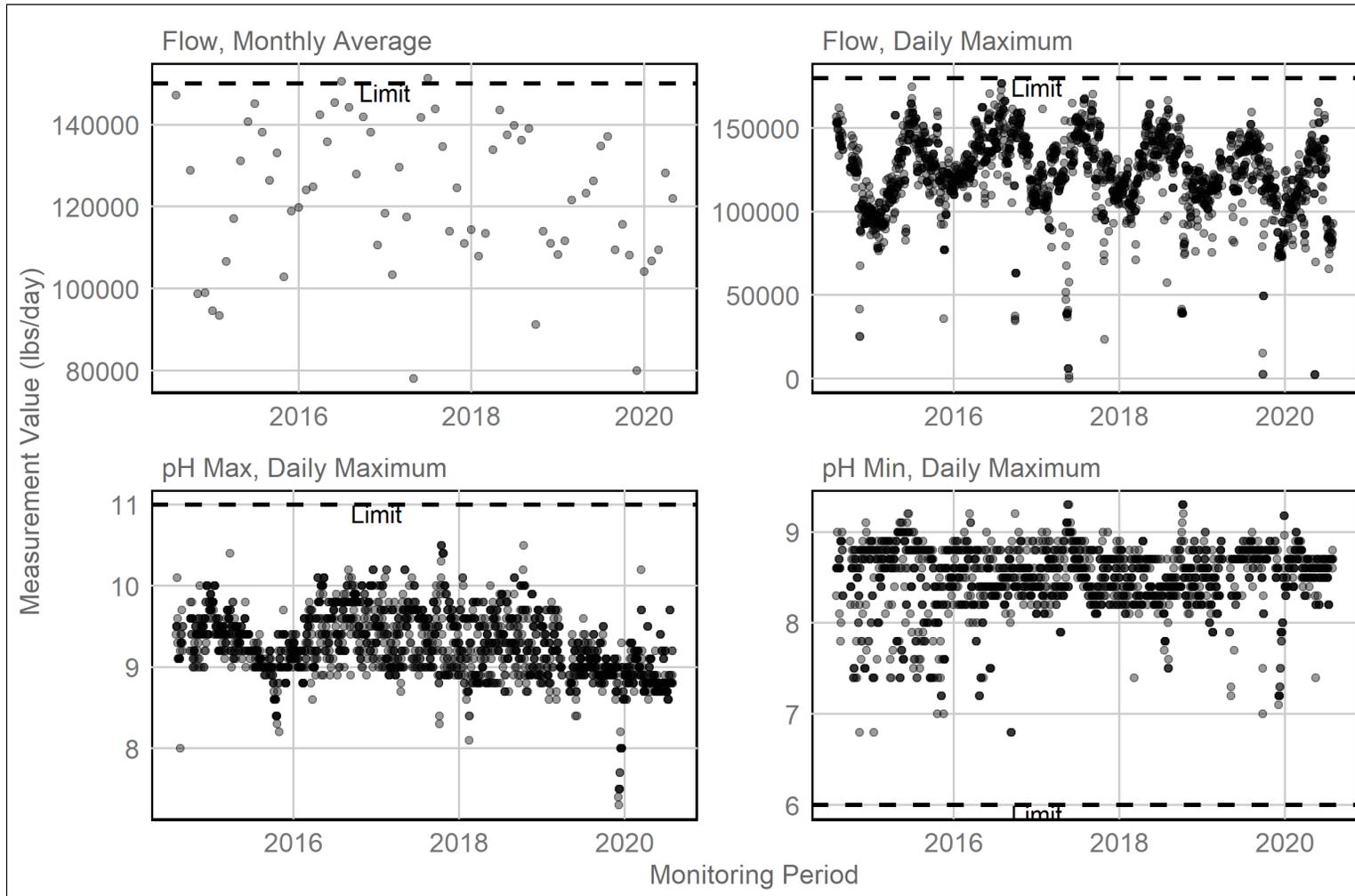


Figure C7 – Stormwater Evaporation Pond Results: Depth, pH, Antimony, & Chromium

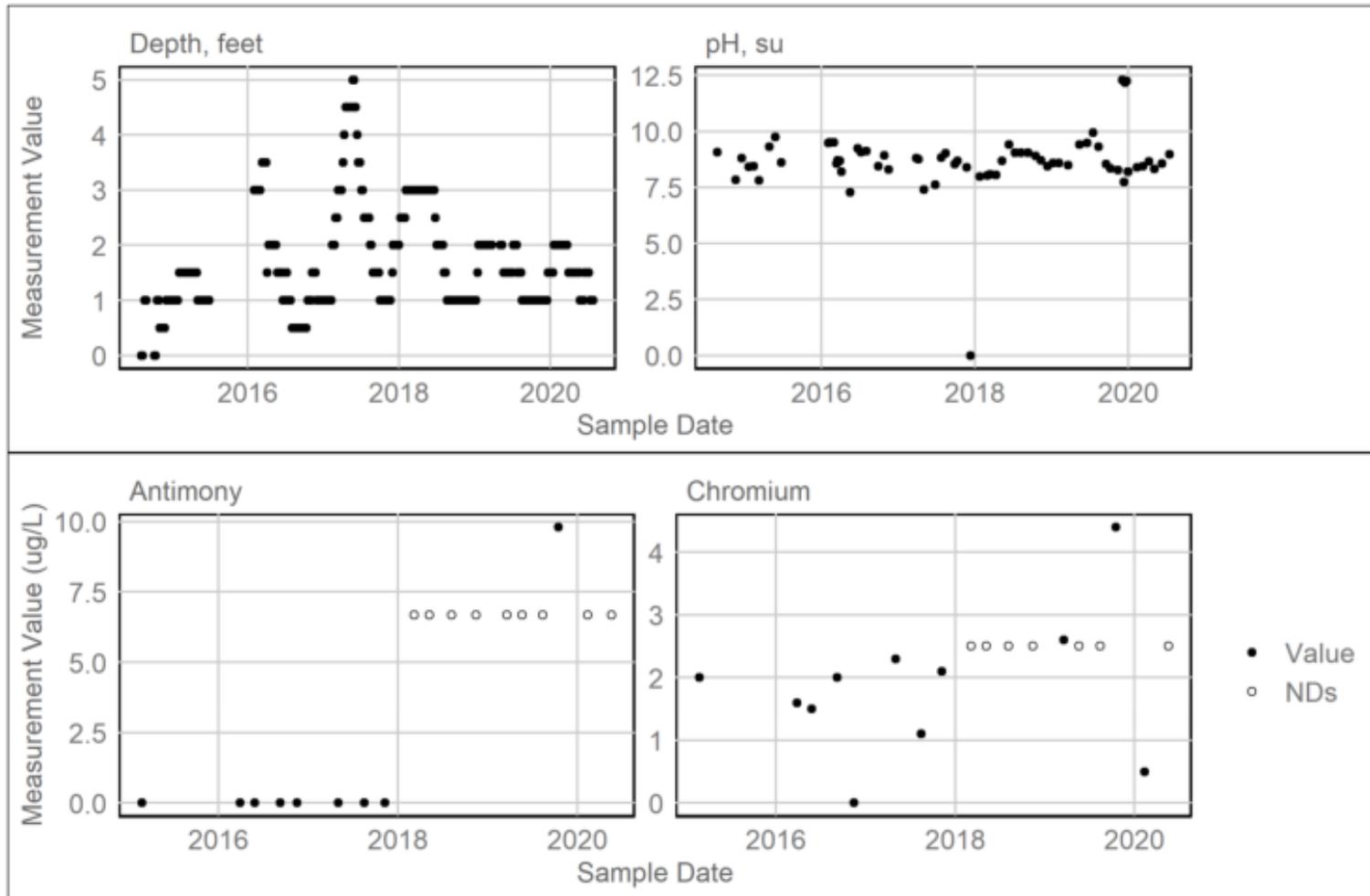


Figure C8 – Stormwater Evaporation Pond Results: Chloride, Sodium, & TDS

