

Fact Sheet Amendment for State Waste Discharge Permit ST0005362 Washington State University (WSU) - Environmental Health and Safety

Public Notice Date: 12/8/2022

Effective Date: 2/23/2023

Purpose of this Fact Sheet Amendment

This fact sheet amendment explains and documents the modifications to the permit issued to WSU on February 1, 2021. The fact sheet that accompanied the 2021 permit has detailed information about the wastewater treatment plant and Ecology's permit decisions.

State law requires any commercial or industrial facility to obtain a permit before discharging waste or chemicals to a municipal sanitary sewer collection and treatment system.

Ecology makes the draft modified permit available for public review and comment at least 30 days before issuing the final permit. Copies of the draft documents for WSU, State Waste Discharge permit ST0005362, are available for public review and comment from December 8, 2022 until the close of business January 9, 2023. For more details on preparing and filing comments about these documents, please see **Appendix A - Public Involvement Information**.

After the public comment period closes, Ecology will summarize substantive comments and our responses to them. Ecology will include our summary and responses to comments to this fact sheet amendment as **Appendix C - Response to Comments**, and publish it when we issue the final State Waste Discharge permit. Ecology will not revise the rest of the fact sheet, but the full document including all appendices will become part of the legal history contained in the facility's permit file.

This fact sheet amendment explains the regulatory and technical basis for the amended conditions contained in the permit.

Introduction

The legislature defined Ecology's authority and obligations for the wastewater discharge permit program in the Water Pollution Control law, chapter 90.48 RCW (Revised Code of Washington).

Ecology adopted rules describing how it exercises its authority:

- State waste discharge program (chapter 173-216 WAC)
- Submission of plans and reports for construction of wastewater facilities (chapter 173-240 WAC)

These rules require any industrial facility owner or operator to obtain a State Waste Discharge permit before discharging wastewater to state waters. This rule includes commercial or industrial discharges to sewerage systems operated by municipalities or public entities which discharge into public waters of the state. They also help define the basis for limits on each discharge and for performance requirements imposed by the permit.

1. GENERAL INFORMATION

Table 1: Facility Information

Applicant	Washington State University – WSU
Facility Name and Address	WSU – Environmental Health and Safety P.O. Box 641172, Pullman, WA 99164
Industry Type	Food service, campus power and water, Colleges, Universities, and Professional School
Type of Treatment	pH adjustment by chemical addition, flow measurements, and oil and grease removal through grease interceptor.
Treatment plant receiving discharge	City of Pullman Wastewater Treatment Facility
Responsible Official	Jason Sampson, Director, EHS Operations WSU, Environmental Health and Safety (509) 335-9564

2. BACKGROUND

Washington State University (WSU), located in Pullman, Washington, discharges wastewater to the City of Pullman's publicly owned treatment works (POTW) under State Waste Discharge Permit ST0005362. WSU has approximately 25,000 students and staff combined. The campus includes numerous buildings, which house different types of activities. The buildings consist of resident halls for students, classrooms, utilities, food service, physical education, and many more. All the buildings discharge wastewater to the WSU's sewer system. This sewer system discharges to the City of Pullman's (City) sewer system at different points, which ultimately discharge to the City's POTW.

WSU manages the discharges from the manufacturing process and products, commercial activities, and monitoring stations. Lake Street monitoring station is located off campus on Lake Street and discharges wastewater from Cougar Way, North Fairway Road, and a few other WSU streets. The monitoring station discharges to the City sewer system.

Grimes Way monitoring station (GWMS) is located at the intersection of Grimes Way and Terre View Drive and became a single point of compliance effective March 1, 2020, for the following facilities combined: Pre-treatment facility, Deionized water regeneration facility, Grimes Way steam plant stormwater containment sump, and Cattle feeding lab annex (#145).

3. DISCUSSION

On November 2, 2022, WSU submitted a letter requesting a reduction in monitoring for the Grimes Way Sampling Station once per quarter sampling; WSU requested that the sampling frequency be reduced to twice per year. Section S2.E of WSU's permit allows for a reduction in monitoring if approved by Ecology. WSU submitted the request based on consistent sampling results from 2020 to present. WSU also requested that silver be removed from sampling since WSU is no longer operating silver recovery systems and past results have been below the practical quantitation limit. The request letter is located at the end of this amendment. The proposed request for a reduction in monitoring has been approved based on performance and process changes.

The following table shows the previous and proposed sampling frequencies:

Table 2: Previous and Proposed Sampling Frequencies

Parameter	Previous Sampling Frequency	Proposed Sampling Frequency
Biochemical Oxygen Demand (BOD ₅)	1/quarter	2/year
Total Suspended Solids (TSS)	1/quarter	2/year
TSS	1/quarter	2/year
pH	1/quarter	2/year
Arsenic	1/quarter	2/year
Cadmium	1/quarter	2/year
Copper	1/quarter	2/year
Lead	1/quarter	2/year
Molybdenum	1/quarter	2/year
Nickel	1/quarter	2/year
Silver	1/quarter	Remove
Selenium	1/quarter	2/year
Zinc	1/quarter	2/year
Total Phosphorus	1/quarter	2/year
Nitrogen	1/quarter	2/year

4. PERMIT MODIFICATION

Ecology made the following changes to the permit:

1. Page 5, Table 2, Experimental Animal Lab (Bldg. #814) was deleted from footnote b.
2. Page 5, Table 3, Effluent Limits Grimes Way Monitoring Station (GWMS)– table removed.
3. Pages 5,6 & 7, Table 4, Effluent Wastewater, Grimes Way Monitoring Station (GWMS):
 - Lake Street Monitoring Station was added to the table
 - BOD lbs/day was added to the table
 - 1/quarter sampling is reduced to 2/year sampling
 - The requirement for Silver mg/L once per quarter is removed.
 - The unit for Mercury is changed from ng/L to µg/L
 - Footnote 'a' was updated to define monitoring periods for 2/year sampling
4. Page 7, Table 5, Monitoring Requirements – Effluent Wastewater Animal Management, Experimental Animal Lab Bldg. (#814) is removed
5. Page 8, Table 6, Monitoring Requirements – Effluent Wastewater Lake Street (East) Sampling Point is removed and monitoring is combined with Table 4.

Because text was removed as a result of the corrections, page numbers in the corrected copy may not match the page numbers listed in this amendment. The corrections above reference page numbers in the original unedited version.

5. CONCLUSION

Ecology proposes to modify Washington State University's permit as discussed in sections 3 & 4 above.

No other condition or requirement of the 2021 permit is hereby affected by this amendment.

APPENDIX A – PUBLIC INVOLVEMENT

APPENDIX B - YOUR RIGHT TO APPEAL

APPENDIX C - RESPONSE TO COMMENTS

APPENDIX D – REQUEST FOR REDUCTION IN MONITORING

APPENDIX A - PUBLIC INVOLVEMENT INFORMATION

Ecology proposes to modify Washington State University Environmental Health Service State Waste Discharge permit. The permit modifications are described in this fact sheet amendment.

Ecology will place a public notice in the Whitman County Gazette on December 8, 2022 to inform the public and to invite comments on the proposed draft modified permit. Interested persons are invited to submit written comments regarding the modifications. Ecology is only accepting comments on the modified portions.

The modified permit and related documents can be viewed using [PARIS](#), Ecology's Permitting and Reporting Information System database at <https://apps.ecology.wa.gov/paris/DocumentSearch.aspx> or between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below; call (509) 329-3400 to make an appointment. Submit comments to Ecology no later than January 9, 2023.

Mail written comments to: Vijay Kubsad
Water Quality Program
Department of Ecology
4601 N. Monroe Street
Spokane, Washington 99205-1265

Email comments to: Vijay.Kubsad@ecy.wa.gov

URL for Ecology event listing: <https://ecology.wa.gov/Events/WQ/Waste-Discharge-Permits/Washington-State-University-Public-Notice>

Any interested party may request a public hearing on the proposed permit within 30 days of the publication date of this notice. The request for a hearing shall state the interest of the party and the reasons why a hearing is necessary. The request should be sent to the above address. The Department will hold a hearing if it determines that there is significant public interest. If a hearing is to be held, public notice will be published at least 30 days in advance of the hearing date. Any party responding to this notice with comments will be mailed a copy of a hearing public notice.

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

Ecology is an equal opportunity agency. If you need this publication in an alternate format, please contact us at (509) 329-3400 or TTY (for the speech and hearing impaired) at 711 or 1-800-833-6388.

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

APPENDIX B - YOUR RIGHT TO APPEAL

You have a right to appeal this permit to the Pollution Control Hearing Board (P.C.H.B.) within 30 days of the date of receipt of the final permit. **You may only file an appeal on the modified portions of the 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 P.C.H.B. (see addresses below). Filing means actual receipt by the P.C.H.B. during regular business hours.
- +
- Serve a copy of your appeal and this permit on Ecology in paper form, by mail or in person at the addresses below.

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

ADDRESS AND LOCATION INFORMATION

Deliver in person

Department of Ecology
Attn: Appeals Processing Desk
300 Desmond Drive SE
Lacey, Washington 98503

Pollution Control Hearings Board
1111 Israel Road Southwest, Suite 301
Tumwater, Washington 98501

Deliver by mail

Department of Ecology
Attn: Appeals Processing Desk
P.O. Box 47608
Olympia, Washington 98504-7608

Pollution Control Hearings Board
P.O. Box 40903
Olympia, Washington 98504-0903

*Effective February 17, 2015, you can file with the PCHB by e-mail at the following address provided you follow-up with required hard copies postmarked the same day they are e-mailed (See WAC 371-08-305(6) and 335(3)); PCHB-SHBappeals@eluhho.wa.gov.

Ecology only accepts copies of appeals by hand delivery or by mail. Email is not accepted.

APPENDIX C - RESPONSE TO COMMENTS

Ecology received comments on the draft modified permit following the 30-day public comment period. Below are the comments and Ecology's responses:

Comment #1: Page 6, Table 2 Footnote b: Delete Experimental Animal Lab (Bldg. #814) per attached email request from 2020.

Ecology's Response: Deleted Experimental Animal Lab (Bldg. #814) from the permit. A copy of the email request is located at the end of this fact sheet amendment.

Comment #2: Page 7, Table 4: Is monitoring supposed to be the same for Grimes Way as Lake St. in Table 6? If so the tables are different as follows:

- BOD lbs/day not in Table 4

- Mercury Units are ng/L in Table 4 and ug/L in Table 6

- 2,3,7,8 TCDF, – 2,3,7,8 TCDD, Oil & Grease and Temperature are in Table 4 but not in Table 6.

- If both tables are supposed to be the same, delete Table 6 and combine Grimes Way and Lake St. into 1 table.

Ecology's Response: BOD lbs/day added to Table 4; Mercury units changed to ug/L; Table 4 Grimes Way and Table 6 Lake St. merged into one table; Table 4. Table 6 was deleted.

APPENDIX D – REQUEST FOR REDUCTION IN MONITORING

- Figure D1 – Grimes Way Monitoring Station reduced sampling request
- Figure D2 – Email request to remove Experimental Animal Lab from the permit
- Figure D3 – WSU email comments on draft modified permit during 30-day public Comment period

Figure D1: Grimes Way Monitoring Station Reduced Sampling Request



Environmental Health and Safety

November 2, 2022

Water Quality Program
Department of Ecology
Eastern Regional Office
4601 N. Monroe
Spokane, WA 99205-1295

Re: State Waste Discharge Permit No. ST-5362
Grimes Way Monitoring Station Reduced Sampling Request

Dear Ecology:

Per Special Conditions S2.E. Request for Reduction in Monitoring, WSU requests that the Grimes Way Monitoring Station sampling schedule be reduced from quarterly to biannual (2/year) sampling. This request is based on consistent sample results from 2020 to the present. WSU is also requesting that silver be removed from sampling since WSU is no longer operating silver recovery systems and past results have been below the practical quantitation limit.

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.

If you have any questions, please contact me at 509-335-3041.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gene Patterson".

Gene Patterson
Water Quality Manager

pc: Trevor Cook, City of Pullman

Figure D2: Email Request to Remove Experimental Animal Lab (#814) From the Permit

From: [Patterson, Gene](#)
To: [Kubsad, Vijay \(ECY\)](#)
Cc: [Hagihara, Dwight](#); [Sampson, Jason T](#); [Speargas Whiteman, Amy](#)
Subject: Draft Permit Comments
Date: Friday, December 11, 2020 2:50:00 PM
Attachments: [ST0005362 Washington State University DRAFT Permit 2020-12-10-WSU Comments.pdf](#)

Hi Vijay

I had a few additional comments on the Permit (see page 4, 6-8, 11 and 23).

Please note that the Experimental Animal Lab Building (#814) will close and no longer house livestock in 2021. Can this facility be removed from the permit?

Thank you

Gene Patterson
Environmental Health & Safety
Pullman, WA 99164-1172
509-335-5510

Figure D3: WSU Email Comments on Draft Modified Permit During 30-Day Public Comment

From: Patterson, Gene <gpatters@wsu.edu>
Sent: Wednesday, December 21, 2022 10:17 AM
To: Kubsad, Vijay (ECY) <VKUB461@ECY.WA.GOV>
Cc: sampsonj <sampsonj@wsu.edu>; Speargas Whiteman, Amy <aspeargas@wsu.edu>; Joy, Shara-Li (ECY) <STRA461@ECY.WA.GOV>
Subject: Draft State Waste Discharge Permit Comments

Hi Vijay

Attached are my comments in blue in the draft permit as follows:

Page 6, Table 2 Footnote b: Delete Experimental Animal Lab (Bldg. #814) per attached email request from 2020.

Page 7, Table 4: Is monitoring supposed to be the same for Grimes Way as Lake St in Table 6? If so the tables are different as follows:

- BOD lbs / day not in Table 4
- Mercury Units are ng/L in Table 4 and ug/L in Table 6.
- 2,3,7,8 TCDF, - 2,3,7,8 TCDD, Oil & Grease and Temperature are in Table 4 but not in Table 6.
- If both tables are supposed to be the same, delete Table 6 and combine Grimes Way and Lake St into 1 table.

Thank you.

Gene Patterson
Environmental Health & Safety
Pullman, WA 99164-1172
509-335-5510
