



# Public Utility District No. 1 of Douglas County

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Via Electronic Filing – [keith.primm@ecy.wa.gov](mailto:keith.primm@ecy.wa.gov)

July 17, 2024

Keith Primm  
Permit Writer/Facility Manager  
Water Quality Program  
Ecology at Central Regional Office  
Union Gap, WA  
(509) 575-2490

DEPARTMENT OF ECOLOGY  
CENTRAL REGIONAL OFFICE

RECEIVED

07/17/2024

Received via: [keith.primm@ecy.wa.gov](mailto:keith.primm@ecy.wa.gov)

Subject: **Wells Dam's NPDES Wastewater Discharge Permit No. WA0991031  
Notification of Change to Outfall No. 24**

Dear Mr. Primm,

The Public Utility District No. 1 of Douglas County (Douglas PUD) respectfully submits to Washington State Department of Ecology (Ecology) a notification of a change in the outfall discharge locations listed in our Wells Dam National Pollutant Discharge Elimination System (NPDES) Wastewater Discharge Permit No. WA0991031, per Section G4 (Page 27) of the permit.

#### *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 Ecology 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.*

Pursuant to Section G4 and beginning 180 days after submission of this letter, Outfall 24, the Mechanics Shop HVAC system will be replaced with an air-cooled system and will no longer be discharging cooling water into the river.

Douglas PUD is not proposing a production or point source increase, adding new sources, or changing the quantity of pollutants discharged and, therefore, Douglas PUD believes that, pursuant to Section G4 of the permit, only a notification is required to stay compliant with our permit terms. Since there are no meaningful changes to the wastewater system, instead a minor change to plumbing that will result in a reduction of point source discharge, Douglas PUD also believes we are exempt from submitting an engineering report and detailed plans for review (NPDES Permit No. WA0991031, Section G5, Page 27):

*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 Ecology 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 Ecology. Facilities must be constructed and operated in accordance with the approved plans.*

Following the completion of this change, Douglas PUD will submit monthly Discharge Monitoring Reports for Outfall 24 indicating “no discharge” for the balance of permit implementation. Should you have additional questions, please contact Mariah Mayfield, Aquatic Resource Biologist ([mariah.mayfield@dcpud.org](mailto:mariah.mayfield@dcpud.org), 509-881-2326) or Andrew Gingerich, Natural Resources Supervisor ([andrew.gingerich@dcpud.org](mailto:andrew.gingerich@dcpud.org), 509-881-2323).

Sincerely,



Andrew Gingerich  
Natural Resources Supervisor

Cc: Andrea Jedel – Ecology  
Tyler Evans – Douglas PUD  
Matt Mullins – Douglas PUD  
Gary Ivory – Douglas PUD  
Shane Bickford – Douglas PUD  
Mariah Mayfield – Douglas PUD