

**Addendum to the Fact Sheet for
State Waste Discharge Permit No. ST0009193
December 20, 2016**

1. General Information

Facility: Farwest Fabricators
7537 Postma Road
Moxee, WA 98936

2. Application and Compliance Review

Farwest Fabricators submitted an application to Ecology on October 27, 2011 for permit reissuance, and Ecology accepted it on November 7, 2012. Ecology reviewed inspections and assessed compliance of the facility's discharge with the terms and conditions in the previous permit. Ecology issued a temporary permit effective November 1, 2012. Ecology has sufficiently reviewed the application, discharge monitoring reports, and other facility information in enough detail to ensure that:

- Farwest Fabricators has substantially complied with all of the terms, conditions, requirements and schedules of compliance of the expired permit. See violations record in Appendix C.
- Ecology has up-to-date information on the facility's waste treatment practices, the facility's production levels; and the nature, content, volume, and frequency of its discharge.
- Farwest Fabricators ultimately discharges to the City of Yakima's wastewater treatment plant. As a delegated city, Yakima will soon be administering the permit under its own permit program. Negotiations among the three parties, City of Yakima, the City of Union Gap, and the City of Moxee / Terrace Heights Sewer District during the permit term issued in September 2007 took longer than expected. The three parties reached agreement with Yakima on November 19, 2014. In light of this, Ecology believes a reauthorization of the permit is appropriate in recognition that Yakima will be taking control of the Farwest permit in the near future.

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.

3. 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. Ecology notifies the public and seeks input after it has tentatively established the permits it plans to renew and those it plans to reauthorize. Ecology considers all relevant comments and suggestions before it makes a final decision.

This fact sheet addendum accompanies the permit, which Ecology proposes to reauthorize for the discharge of wastewater to the City of Yakima Wastewater 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.

4. Local Limits Evaluation

The Farwest Fabricators' discharge is small and infrequent. Tank 2 discharges approximately 26,000 gallons per annum. Tank 1 holds 900 gallons and Tank 3 holds 500 gallons for total of 1,400 gallons that are discharged periodically to the Yakima wastewater treatment plant. These discharges occur usually 3-4 times a year.

5. Permit Limits and Conditions

The reauthorized permit is virtually identical to the previous permit issued on September 17, 2007 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.
- 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.
- A new requirement, Appendix A, which identifies the required test methods, detection levels and quantitation levels for the monitoring required in the proposed permit. Ecology added this requirement to ensure that facilities use test methods with detection levels that will detect pollutants at levels necessary to evaluate compliance with categorical limits (40 CFR Part 433.17).

6. Public Process

Ecology public notices the availability of the draft reauthorized permit at least 30 days before it reissues the permit. Ecology invites you to review and comment on its decision

to reauthorize the permit (see **Appendix A-Public Involvement Information** for more detail on the Public Notice procedures).

After the public comment period has closed, Ecology will prepare a *Response to Comments* document and attach it to this fact sheet addendum. Ecology will respond to each comment and describe the resultant changes to the permit in this document. Ecology sends a copy of the *Response to Comments* to all parties that submitted comments.

7. Permit Appeal Process

Appendix B describes the permit appeal process.

8. Recommendation for Permit Issuance

Ecology proposes to reissue this permit for 5 years.

Appendix A--Public Involvement Information

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

Ecology will place a Public Notice of Draft on September 29, 2016 in Yakima Herald Republic to inform the public and to invite comment on the proposed draft state waste discharge permit and fact sheet.

The notice:

- Tells where copies of the draft permit and fact sheet are 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.
- Asks people to tell us how well the proposed permit would protect the receiving water.
- Invites people to suggest fairer conditions, limits, and requirements for the permit.
- Invites comments on Ecology's determination of compliance with antidegradation rules.
- Urges people to submit their comments, in writing, before the end of the comment period.
- Tells how to request a public hearing about the proposed NPDES permit.
- Explains the next step(s) in the permitting process.

NOTICE: **ANNOUNCEMENT OF AVAILABILITY OF DRAFT PERMIT**
PERMIT NO.: **ST0009193**
APPLICANT: **Farwest Fabricators**

Farwest Fabricators, Inc. has applied for renewal of State Waste Discharge Permit No. ST0009193 in accordance with the provisions of Chapter 90.48 Revised Code of Washington (RCW), Chapter 173-216 Washington Administrative Code (WAC), and the Federal Water Pollution Control Act as amended.

Following evaluation of the application and other available information, a draft permit has been developed which would allow the discharge of wastewater of approximately 18,000 gallons per year to the City of Moxee collection system and the City of Yakima POTW to from its facility located at 7537 Postma Road, Moxee, WA. All discharges to be in compliance with the Department of Ecology's Water Quality Standards for a permit to be issued.

A tentative determination has been made to reissue this permit based on the effluent limitations and special permit conditions that will prevent and control pollution. A final determination will not be made until all timely comments received in response to this notice have been evaluated.

PUBLIC COMMENT AND INFORMATION

The draft permit and fact sheet may be viewed at the Department of Ecology (Department) website: <http://www.ecy.wa.gov/programs/wq/permits/paris/paris.html>. The application and other related documents are available at Ecology's Central Regional Office for inspection and copying between the hours of 8:00 a.m. and 4:30 p.m., weekdays. To obtain a copy or to arrange to view copies at the Central Regional Office, please call 509/575-2490 or write to the address below.

Interested persons are invited to submit written comments regarding the proposed permit. All comments must be submitted by October 29, 2016 to be considered for the final determination. E-mail comments should be sent to cynthia.huwe@ecy.wa.gov. Comments should be sent to:

Cynthia Huwe, Permit Coordinator
Department of Ecology
Central Regional Office
1250 West Alder Street
Union Gap, WA 98903-0009

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. Ecology 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.

If you require special accommodations or need this document in a format for the visually impaired, call Cynthia Huwe at 509-457-7105. Persons with hearing loss can call 711 for Washington Relay Service. Persons with a speech disability can call 877-833-6341.

Publication date of this Notice is September 29, 2016.

Ecology has published a document entitled *Frequently Asked Questions about Effective Public Commenting*, which is available on our website at <http://www.ecy.wa.gov/biblio/0307023.html>.

You may obtain further information from Ecology by telephone, 509-457-7105 or by writing to the address listed below.

Water Quality Permit Coordinator
Department of Ecology
Central Regional Office
1250 W. Alder St.
Union Gap, WA 98903-0009

The primary author of this permit and fact sheet is Richard Marcley.

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 Pollution Control Hearings Board 1111 Israel RD SW STE 301 Tumwater, WA 98501	Department of Ecology Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608 Pollution Control Hearings Board PO Box 40903 Olympia, WA 98504-0903

Appendix C--Technical Calculations

DMR RECORD

06/02/2016

Printed: 12:04pm

Publically Owned Treatment Works													
Outfall 001													
Monitoring Point 001													
Tank 1													
Parameter	Barium, Total (As Ba) (Total)	Cadmium (Total)	Cadmium (Total)	Chromium (Total)	Chromium (Total)	Copper (Total)	Copper (Total)	Cyanide (Total)	Cyanide (Total)	Flow	Lead (Total)	Lead (Total)	Molybdenum (Total)
Units	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Gallons/Day (gpd)	Milligrams /L (mg/L)	Milligrams /L (mg/L)	Milligrams/L (mg/L)
Statistical Base	Maximum	Average Monthly	Daily Maximum	Average Monthly	Daily Maximum	Average Monthly	Daily Maximum	Average Monthly	Daily Maximum	Maximum	Average Monthly	Daily Maximum	Maximum
Limits	- / -	- / .07	- / .11	- / 1.71	- / 2.77	- / 2.07	- / 3.38	- / .65	- / 1.2	- / -	- / .43	- / .69	- / -
Benchmarks	- / -	- / -	- / -	- / -	- / -	- / -	- / -	- / -	- / -	- / -	- / -	- / -	- / -
Design Limit													
Date	Value	Value	Value	Value	Value	Value	Value	Value	Value	Value	Value	Value	Value
2/1/2011	0.064	0.0004	0.0004	0.476	0.476	0.0985	0.0985	0.005	0.005	1200	0.0004	0.0008	0.2125
8/1/2012	0.021	0.0015	0.0015	0.0451	0.0451	0.15	0.15	0.005	0.005	1000	0.0006	0.0006	m
2/1/2013	0.026	0.008	0.008	0.0725	0.0725	0.088	0.088	0.005	0.005	1000	0.005	0.005	0.18
8/1/2013	0.073	0.001	0.001	0.076	0.076	0.00154	0.00154	0.005	0.005	1000	0.0008	0.0008	0.368
2/1/2014	0.017	0.0006	0.0006	0.0595	0.0595	0.212	0.212	0.029	0.029	1200	0.0005	0.0005	0.482
8/1/2014	0.056	0.0006	0.0006	0.132	0.132	0.184	0.184	0.015	0.015	1200	0.0005	0.0005	0.62
2/1/2015	0.045	0.0006	0.0006	0.0635	0.0635	0.178	0.178	0.003	0.003	1200	0.0005	0.0005	0.1645
8/1/2015	0.124	0.0015	0.0015	0.186	0.186	0.157	0.157	0.005	0.005	1200	0.01	0.01	0.481
Min	0.017	0.0004	0.0004	0.0451	0.0451	0.00154	0.00154	0.003	0.003	1000	0.0004	0.0005	0.1645
Max	0.124	0.008	0.008	0.476	0.476	0.212	0.212	0.029	0.029	1200	0.01	0.01	0.62
Avg	0.053	0.002	0.002	0.139	0.139	0.134	0.134	0.009	0.009	1125	0.002	0.003	0.358
STDV	0.035	0.003	0.003	0.144	0.144	0.068	0.068	0.009	0.009	104	0.003	0.004	0.178
COV	0.661	1.437	1.437	1.037	1.037	0.508	0.508	0.987	0.987	0.092	1.524	1.193	0.496
Red indicates 1/2 of the lab MDL is used in calculations													
Outfall 001													
Monitoring Point 001													
Tank 1													
Tank #1	Nickel, Total (As Ni) (Total)	Nickel, Total (As Ni) (Total)	Oil & Grease	Phenolics (Total Phenols (Total)	Phosphate (Ortho- phosphate) (Total)	Selenium (Total)	Silver (Total)	Silver (Total)	TTO Part 413	Zinc (Total)	Zinc (Total)	pH	pH
Units	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligrams/ L (mg/L)	Milligrams/L (mg/L)	Milligrams/ L (mg/L)	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligram s/L (mg/L)	Milligram s/L (mg/L)	Milligrams/L (mg/L)	Standard Units	Standard Units
Statistical Base	Average Monthly	Daily Maximum	Maximum	Maximum	Maximum	Maximum	Average Monthly	Daily Maximum	Maximum	Average Monthly	Daily Maximum	Maximum	Minimum
Limits	- / 2.38	- / 3.98	- / -	- / -	- / -	- / -	- / .24	- / .43	- / -	- / 1.48	- / 2.61	- / 9.5	5.5 / -
Benchmarks	- / -	- / -	- / -	- / -	- / -	- / -	- / -	- / -	- / -	- / -	- / -	- / -	- / -
Design Limit													
Date	Value	Value	Value	Value	Value	Value	Value	Value	Value	Value	Value	Value	Value
2/1/2011	0.22	0.22	33.3	0.048	1200	0.0025	0.00235	0.00235	M	2.2	2.2	5.34	5.34
8/1/2012	0.204	0.204	31.7	m	1180	0.027	0.00235	0.00235		0.545	0.545	5.35	5.35
2/1/2013	0.198	0.198	52.2		1490	0.0175	0.0047	0.0047		3.53	3.53	4.93	4.93
8/1/2013	0.416	0.416	53.8		1590	0.007	0.00235	0.00235		0.75	0.75	5.65	5.65
2/1/2014	0.348	0.348	32.7		1430	0.0208	0.00235	0.00235		0.432	0.432	5.82	5.82
8/1/2014	0.326	0.326	49.9		2.68	0.0192	0.0047	0.0047		1.16	1.16	5.8	5.8
2/1/2015	0.254	0.254	46.2		1820	0.0206	0.0047	0.0047		0.264	0.264	6.11	6.11
8/1/2015	0.258	0.258	36.7		2860	0.01	0.00235	0.00235		2.02	2.02	5	5
Min	0.198	0.198	31.7	0.048	2.68	0.0025	0.00235	0.00235		0.264	0.264		4.93
Max	0.416	0.416	53.8	0.048	2860	0.027	0.0047	0.0047		3.53	3.53	6.11	
Avg	0.278	0.278	42.0625	0.048	1446.585	0.0156	0.0032	0.0032		1.3626	1.3626		
Median	0.078	0.078	9.409	#DIV/0!	790.718	0.008	0.001	0.001		1.133	1.133		
95th %	0.280	0.280	0.224	#DIV/0!	0.547	0.529	0.376	0.376		0.832	0.832		

Red indicates 1/2 of the lab MDL is used in calculations

Addendum to the Fact Sheet
For State Waste Discharge Permit No. ST0009193
Page 8

Monitoring Point 002	Tank 2			
Parameter	Flow	Phosphate (Ortho-phosphate) (Total)	pH	pH
Units	Gallons/Day (gpd)	Milligrams/L (mg/L)	Standard Units	Standard Units
Statistical Base	Maximum	Maximum	Maximum	Minimum
Limits	- / -	- / -	- / 9	6 / -
Benchmarks	- / -	- / -	- / -	- / -
Design Limit				
Date	Value	Value	Value	Value
2/1/2011	700	60.8	7	7
8/1/2011	500	283	6.37	6.37
8/1/2012	500	74.9	7.15	7.15
2/1/2013	700	85.8	6.77	6.77
8/1/2013	500	2.69	7.1	7.1
2/1/2014	500	272	7	7
8/1/2014	500	54.6	7.5	7.5
2/1/2015	500	11.6	7.66	7.66
8/1/2015	500	12.5	7.71	7.71
Min	500	2.69		6.37
Max	700	283	7.71	
Avg	544.444	95.321		
STDV	88.192	107.381		
COV	0.162	1.127		

Addendum to the Fact Sheet
For State Waste Discharge Permit No. ST0009193
Page 9

Monitoring Point 003	Tank 3														
Parameter	Barium, Total (As Ba) (Total)	Cadmium (Total)	Cadmium (Total)	Chromium (Total)	Chromium (Total)	Copper (Total)	Copper (Total)	Cyanide (Total)	Cyanide (Total)	Flow	Lead (Total)	Lead (Total)	Molybdenum (Total)	Nickel, Total (As Ni) (Total)	Nickel, Total (As Ni) (Total)
Units	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Gallons/Day (gpd)	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligrams/L (mg/L)
Statistical Base	Maximum	Average Monthly	Daily Maximum	Average Monthly	Daily Maximum	Average Monthly	Daily Maximum	Average Monthly	Daily Maximum	Maximum	Average Monthly	Daily Maximum	Maximum	Average Monthly	Daily Maximum
Limits	-/-	-/.07	-/.11	-/1.71	-/2.77	-/2.07	-/3.38	-/.65	-/1.2	-/-	-/.43	-/.69	-/-	-/2.38	-/3.98
Benchmarks	-/-	-/-	-/-	-/-	-/-	-/-	-/-	-/-	-/-	-/-	-/-	-/-	-/-	-/-	-/-
Design Limit															
Date	Value	Value	Value	Value	Value	Value	Value	Value	Value	Value	Value	Value	Value	Value	Value
2/1/2011	0.009	0.0015	0.0015	0.0062	0.0062	0.00915	0.00915	0.009	0.009	1000	0.0025	0.0025	0.092	0.0192	0.0192
8/1/2011	0.02	0.0003	0.0003	0.047	0.047	0.02	0.02	0.009	0.009	1000	0.0005	0.0005	0.184	0.0005	0.0005
8/1/2012	0.006	0.0015	0.0015	0.00235	0.00235	0.0111	0.0111	0.009	0.009	1000	0.0005	0.0005		0.118	0.118
2/1/2013	0.008	0.0003	0.0003	0.0047	0.0047	0.0047	0.0047	0.0085	0.0085	1000	0.0005	0.0005	0.0354	0.0052	0.0052
8/1/2013	0.034	0.0015	0.0015	0.00235	0.00235	0.0126	0.0126	0.009	0.009	1000	0.0025	0.0025	0.0855	0.0147	0.0147
2/1/2014	0.027	0.0015	0.0015	0.0068	0.0068	0.0155	0.0155	0.009	0.009	1000	0.0025	0.0025	0.098	0.0226	0.0226
8/1/2014	0.03	0.0003	0.0003	0.008	0.008	0.0116	0.0116	0.01	0.01	1000	0.0005	0.0005	0.132	0.0106	0.0106
2/1/2015	0.018	0.0003	0.0003	0.0047	0.0047	0.0024	0.0024	e	e	1000	0.0006	0.0006	0.0184	0.005	0.005
8/1/2015	0.021	0.0015	0.0015	0.00235	0.00235	0.0027	0.0027	0.012	0.012	1000	0.0025	0.0025	0.026	<0.005	<0.005
Min	0.006	0.0003	0.0003	0.00235	0.00235	0.0024	0.0024	0.005	0.005	1000	0.0005	0.0005	0.0184	0.0005	0.0005
Max	0.034	0.0015	0.0015	0.047	0.047	0.02	0.02	0.012	0.012	1000	0.0025	0.0025	0.184	0.118	0.118
Avg	0.019	0.001	0.001	0.009	0.009	0.010	0.010	0.007	0.007	1000.000	0.001	0.001	0.084	0.024	0.024
STDV	0.010	0.001	0.001	0.014	0.014	0.006	0.006	0.003	0.003	0.000	0.001	0.001	0.057	0.039	0.039
COV	0.522	0.654	0.654	1.519	1.519	0.594	0.594	0.408	0.408	0.000	0.698	0.698	0.677	1.574	1.574

Red indicates 1/2 of the lab MDL is used in calculations

Addendum to the Fact Sheet
For State Waste Discharge Permit No. ST0009193
Page 10

Monitoring Point 003	Tank 3								
	Oil & Grease	Phosphate (Ortho-phosphate) (Total)	Selenium (Total)	Silver (Total)	Silver (Total)	Zinc (Total)	Zinc (Total)	pH	pH
	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Milligrams/L (mg/L)	Standard Units	Standard Units
Statistical Base	Maximum	Maximum	Maximum	Average Monthly	Daily Maximum	Average Monthly	Daily Maximum	Maximum	Minimum
Limits	- / -	- / -	- / -	- / .24	- / .43	- / 1.48	- / 2.61	- / 9.5	5.5 / -
Benchmarks	- / -	- / -	- / -	- / -	- / -	- / -	- / -	- / -	- / -
Design Limit									
Date	Value	Value	Value	Value	Value	Value	Value	Value	Value
2/1/2011	1.8	103	0.0025	0.00235	0.00235	0.0482	0.0482	6.29	6.29
8/1/2011	5.4	92	0.002	0.047	0.047	0.05	0.05	7.96	7.96
8/1/2012	1.9	95.3	0.001	0.00235	0.00235	0.0064	0.0064	7.81	7.81
2/1/2013	1.47	45.1	0.002	0.0047	0.0047	0.0068	0.0068	7.68	7.68
8/1/2013	0.7	91.6	0.001	0.00235	0.00235	0.031	0.031	8.04	8.04
2/1/2014	0.0034	153	0.001	0.00235	0.00235	0.0278	0.0278	7.96	7.96
8/1/2014	2.6	271	0.002	0.0047	0.0047	0.036	0.036	7.13	7.13
2/1/2015	1.5	10.3	0.002	0.0047	0.0047	0.00675	0.00675	8.11	8.11
8/1/2015	1.7	13.2	0.001	0.00235	0.00235	0.0102	0.0102	6	6
Min	0.0034	10.3	0.001	0.00235	0.00235	0.0064	0.0064		6
Max	5.4	271	0.0025	0.047	0.047	0.05	0.05	8.11	
Avg	1.897	97.167	0.002	0.008	0.008	0.025	0.025		
Median	1.507	79.638	0.001	0.015	0.015	0.018	0.018		
95th %	0.794	0.820	0.373	1.808	1.808	0.721	0.721		

Red indicates 1/2 of the lab MDL is used in calculations

Addendum to the Fact Sheet
For State Waste Discharge Permit No. ST0009193
Page 11

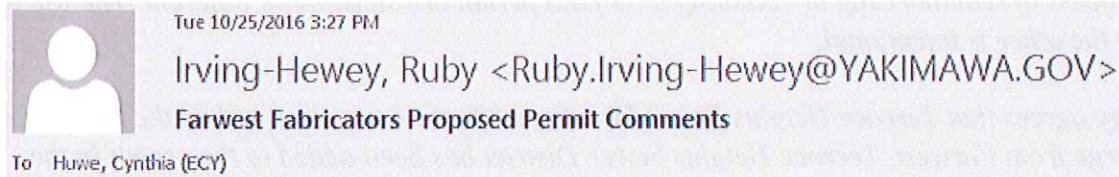
Violations:

	<u>Date</u>	<u>Parameter</u>	<u>Units</u>	<u>Fraction</u>	<u>Address</u>	<u>Monitor Point</u>	<u>DMR Value</u>	<u>Min Limit</u>	<u>Max Limit</u>	<u>Category</u>	<u>Event Category</u>
Numeric effluent violation	8/1/2015	Zinc	Milligrams /L (mg/L)	Total	N	1	2.02	-	1.48	Permit Violation	Effluent Violations
Numeric effluent violation	8/1/2015	pH (Hydrogen Ion)	Standard Units	Not Applicable	N	1	5	5.5	-	Permit Violation	Effluent Violations
Numeric effluent violation	2/1/2013	Zinc	Milligrams /L (mg/L)	Total	Y	1	3.53	-	1.48	Permit Violation	Effluent Violations
Numeric effluent violation	2/1/2013	pH (Hydrogen Ion)	Standard Units	Not Applicable	Y	1	4.93	5.5	-	Permit Violation	Effluent Violations
Numeric effluent violation	2/1/2013	Zinc	Milligrams /L (mg/L)	Total	Y	1	3.53	-	2.61	Permit Violation	Effluent Violations
Numeric effluent violation	8/1/2012	pH (Hydrogen Ion)	Standard Units	Not Applicable	N	1	5.35	5.5	-	Permit Violation	Effluent Violations
Numeric effluent violation	2/1/2011	Zinc	Milligrams /L (mg/L)	Total	N	1	2.2	-	1.48	Permit Violation	Effluent Violations
Numeric effluent violation	2/1/2011	pH (Hydrogen Ion)	Standard Units	Not Applicable	N	1	5.34	5.5	-	Permit Violation	Effluent Violations
Numeric effluent violation	8/1/2010	pH (Hydrogen Ion) Daily Min	Standard Units	Not Applicable	Y	1	5.44	5.5	-	Permit Violation	Effluent Violations
Numeric effluent violation	8/1/2008	pH (Hydrogen Ion) Daily Min	Standard Units	Not Applicable	Y	1	5.14	5.5	-	Permit Violation	Effluent Violations
Late Submittal of DMRs	8/1/2011	-	-	-	Y	-	-	-	-	Permit Violation	Reporting Violations
Late Submittal of DMRs	2/1/2010	-	-	-	Y	-	-	-	-	Permit Violation	Reporting Violations
Late Submittal of DMRs	2/1/2010	-	-	-	Y	-	-	-	-	Permit Violation	Reporting Violations
Failure to submit required report (non-DMR, non-pretreatment)	12/8/2011	-	-	-	N	-	-	-	-	Permit Violation	Reporting Violations
Analysis not Conducted	2/1/2015	Cyanide	Milligrams /L (mg/L)	Total	N	3	-	-	-		
Analysis not Conducted	2/1/2015	Cyanide	Milligrams /L (mg/L)	Total	N	3	-	-	1.2	Permit Violation	Monitoring Violations
Analysis not Conducted	2/1/2009	Total Toxic Organics (TTO) CFR Part 413	Milligrams /L (mg/L)	Total	Y	1	-	-	-		

Addendum to the Fact Sheet
For State Waste Discharge Permit No. ST0009193
Page 12

	Date	Parameter	Units	Fraction	Address	Monitor Point	DMR Value	Min Limit	Max Limit	Category	Event Category
Numeric effluent violation	8/1/2015	Zinc	Milligrams /L (mg/L)	Total	N	1	2.02	-	1.48	Permit Violation	Effluent Violations
Numeric effluent violation	8/1/2015	pH (Hydrogen Ion)	Standard Units	Not Applicable	N	1	5	5.5	-	Permit Violation	Effluent Violations
Numeric effluent violation	2/1/2013	Zinc	Milligrams /L (mg/L)	Total	Y	1	3.53	-	1.48	Permit Violation	Effluent Violations
Numeric effluent violation	2/1/2013	pH (Hydrogen Ion)	Standard Units	Not Applicable	Y	1	4.93	5.5	-	Permit Violation	Effluent Violations
Numeric effluent violation	2/1/2013	Zinc	Milligrams /L (mg/L)	Total	Y	1	3.53	-	2.61	Permit Violation	Effluent Violations
Numeric effluent violation	8/1/2012	pH (Hydrogen Ion)	Standard Units	Not Applicable	N	1	5.35	5.5	-	Permit Violation	Effluent Violations
Numeric effluent violation	2/1/2011	Zinc	Milligrams /L (mg/L)	Total	N	1	2.2	-	1.48	Permit Violation	Effluent Violations
Numeric effluent violation	2/1/2011	pH (Hydrogen Ion)	Standard Units	Not Applicable	N	1	5.34	5.5	-	Permit Violation	Effluent Violations
Numeric effluent violation	8/1/2010	pH (Hydrogen Ion) Daily Min	Standard Units	Not Applicable	Y	1	5.44	5.5	-	Permit Violation	Effluent Violations
Numeric effluent violation	8/1/2008	pH (Hydrogen Ion) Daily Min	Standard Units	Not Applicable	Y	1	5.14	5.5	-	Permit Violation	Effluent Violations
Late Submittal of DMRs	8/1/2011	-	-	-	Y	-	-	-	-	Permit Violation	Reporting Violations
Late Submittal of DMRs	2/1/2010	-	-	-	Y	-	-	-	-	Permit Violation	Reporting Violations
Late Submittal of DMRs	2/1/2010	-	-	-	Y	-	-	-	-	Permit Violation	Reporting Violations
Failure to submit required report (non-DMR, non-pretreatment)	12/8/2011	-	-	-	N	-	-	-	-	Permit Violation	Reporting Violations
Analysis not Conducted	2/1/2015	Cyanide	Milligrams /L (mg/L)	Total	N	3	-	-	-		
Analysis not Conducted	2/1/2015	Cyanide	Milligrams /L (mg/L)	Total	N	3	-	-	1.2	Permit Violation	Monitoring Violations
Analysis not Conducted	2/1/2009	Total Toxic Organics (TTO) CFR Part 413	Milligrams /L (mg/L)	Total	Y	1	-	-	-		

Appendix D--Response to Comments



City of Yakima Comments:

Good Afternoon. Thank you so much for the opportunity to comment. Below you will find our comments and suggestions. Please feel free to contact me or Arlene Carter if you need any clarification or comments in return.

Comments on the proposed Farwest Fabricators Permit #ST0009193

Fact Sheet:

2. Application and Compliance Review (3rd bullet point)

- “Farwest Fabricators ultimately discharges..... As a delegated city, Yakima will soon be administering the permit under its own permit program in the near future”.
Redundant.

Ecology Response to Comments:

Ecology agrees. Redundancy removed.

City of Yakima Comments:

General question/comment- The use of ‘reauthorizes’ and ‘renews’ is interchanged frequently – though it means relatively the same thing, there should be consistency throughout using one or the other to avoid confusion. The other area of uniformity should be the use of all entities ‘City of Yakima, City of Terrace Heights, and City of Moxee’. The City of Moxee discharges to the Lift station in Terrace Heights before Terrace Heights discharges it to the City of Yakima. Lastly, there are occasional grammatical errors throughout the text – Not a big deal since it doesn’t change the basis of the Permit (but thought you would like to know).

Pages 11 and 12 are the same

Ecology Response to Comments:

The process of reauthorizing or reissuing a NPDES permit are substantial different. The use of one or the other is intentional.

Ecology agrees that Terrace Heights Sewer District needs more mention, as it is the first site of discharge from Farwest. Terrace Heights Sewer District has been added to the permit in the appropriate locations.

City of Yakima Comments:

Permit:

S1. Discharge Limits – Second sentence structure is odd and disjoints the meaning of the sentence (“...in excess of, that authorized by this permit violates the terms and conditions of this permit.”) Third (and last) sentence”The Permittee is required to notify the POTW at least 24 hours before discharge of wastewater tanks 1 and 3”. We are the final destination but I believe they need to notify Moxee and then Terrace Heights prior to us (or concurrently with us) since they are the first point of discharge.

S3. A. Reporting (pg. 9) – Ruby Irving-Hewey (change to Pretreatment Office) – Also, should Terrace Heights be included? Or Moxee?

Terrace Heights Sewer District Manager
186 Ironhorse Court, Suite #100
Yakima, WA. 98901

Ecology Response to Comments:

The language in the permit is boiler plate language which has been vetted by attorneys and the permit writer’s workgroup. Ecology appreciates your comments and interest.

Ecology agrees with the inclusion of Terrace Heights Sewer District. Ruby Irving-Hewey has been removed from the City of Yakima contact list and replaced with Pretreatment Office.

Farwest Fabricators' Comments:

Fact Sheet Addendum:

On January 3, 2017, Debbie Dougherty from Farwest Fabricators reported errors to Section 4. Local Limits Evaluation - Tank 2 discharge is about 500 gallons, once a week (26,000 gallons per annum).

Should be Tanks 1 and 3 (not 1 and 2) and Tank 1 holds 900 gallons and Tank 3 holds 500 gallons for total of 1400 gallons (not 1000 gallons). Figures were checked during the draft review and reported to Ecology, but changes were not made to the Fact Sheet Addendum.

Ecology Response to Comments:

Corrections have been made to the Fact Sheet Addendum.

