

ADDENDUM TO THE FACT SHEET FOR
ORBIT INDUSTRIES, LLC
STATE WASTE DISCHARGE PERMIT ST0006227
July 19, 2016

1. GENERAL INFORMATION

Facility: Orbit Industries, LLC (Orbit)
778 South 27th Street
Washougal, WA 98671

2. APPLICATION AND COMPLIANCE REVIEW

Orbit submitted an application to Ecology on June 20, 2016, for permit reissuance, and Ecology accepted it on July 13, 2016. 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:

- Orbit has complied with all of the terms, conditions, requirements and schedules of compliance of the expired permit.
- Ecology has up-to date information on the facility's waste treatment practices; and the nature, content, volume, and frequency of its discharge.
- The discharge meets applicable effluent standards and limits, 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.

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 Washougal Publicly Owned Treatment Works (POTW). 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. PERMIT LIMITS AND CONDITIONS

The reauthorized permit is virtually identical to the previous permit issued on February 15, 2012, 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 for a Slug Discharge Control Plan as required by 40 CFR 403.8(f)(2)(vi).

5. 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.

6. PERMIT APPEAL PROCESS

Appendix B describes the permit appeal process.

7. 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 Orbit Industries, LLC. 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 October 6, 2016, in the *Camas-Washougal Post* 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.

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, 360-407-6280, or by writing to the address listed below.

Water Quality Permit Coordinator
Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

The primary author of this permit and fact sheet is Jacek Anuszewski, P.E.

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 Southeast Lacey, WA 98503	Department of Ecology Attn: Appeals Processing Desk P.O. Box 47608 Olympia, WA 98504-7608
Pollution Control Hearings Board 1111 Israel Road Southwest, Suite 301 Tumwater, WA 98501	Pollution Control Hearings Board P.O. Box 40903 Olympia, WA 98504-0903

Appendix C--Response to Public Comments

Scott Worrall submitted comments to Ecology on October 27, 2016. The following are the comments and Ecology responses.

Comments:

Mr. Anuszewski,

Orbit Industries, LLC has a wastewater permit # ST0006227. We have been operating under this permit for over 4 years. We request that the following tests be eliminated from our permit as we have a track record showing that these items are not found or are significantly below our industry benchmarks for process wastewater.

Biochemical Oxygen Demand (BOD5) (always below benchmark or non detect)

Total Suspended Solids (TSS) (always below benchmark)

Arsenic (non detect / not used in any process at our facility)

Total Toxic Organics (TTO) (always below benchmark or non detect)

Cadmium (non detect / not used in any process at our facility)

Mercury (non detect / not used in any process at our facility)

Selenium (non detect / not used in any process at our facility)

Silver (not used in any process at our facility)

Cyanide (not used in any process at our facility)

*Chromium**

*Molybdenum**

**While we have not had a detect for Chromium or Molybdenum, they are both components in steel which is our industry.*

We appreciate your time in considering this matter.

Scott Worrall

General Manager

Orbit Industries, LLC

778 South 27th Street

Washougal, Washington 98671

Phone: 360-835-8526

Fax: 360-835-8890

Web: www.orbitindustries.com

Ecology Response:

Biochemical Oxygen Demand (BOD5) (always below benchmark or non detect)

BOD₅ of 2,236 milligrams per liter (mg/L) was reported in sample taken on February 11, 2014, therefore Ecology cannot eliminate BOD₅'s sampling at this time.

Total Suspended Solids (TSS) (always below benchmark)

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TSS was always below a detection limit, therefore Ecology concurs with the request and eliminates TSS from the permit.

Arsenic (non detect / not used in any process at our facility)
Cadmium (non detect / not used in any process at our facility)
Mercury (non detect / not used in any process at our facility)
Selenium (non detect / not used in any process at our facility)
Silver (not used in any process at our facility)
Cyanide (not used in any process at our facility)
*Chromium**
*Molybdenum**

Orbit Industries is a significant Industrial User (CIU), therefore Ecology cannot eliminate monitoring for the listed above pollutants; however, Ecology can reduce monitoring to twice a year.

Total Toxic Organics (TTO) (always below benchmark or non detect)

Ecology concurs with the request; however, 40 CFR 433.12 requires the following:

“(a) In lieu of requiring monitoring for TTO, the permitting authority (or, in the case of indirect dischargers, the control authority) may allow dischargers to make the following certification statement: “Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation [or pretreatment standard] for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the permitting [or control] authority.”[...]

(b) In requesting the certification alternative, a discharger shall submit a solvent management plan that specifies to the satisfaction of the permitting authority (or, in the case of indirect dischargers, the control authority) the toxic organic compounds used; the method of disposal used instead of dumping, such as reclamation, contract hauling, or incineration; and procedures for ensuring that toxic organics do not routinely spill or leak into the wastewater. [...]

As soon as the solvent management plan is received and approved by Ecology the TTO monitoring will be removed from the permit.

Meantime, “...to measure compliance with the TTO standard, the industrial discharger need analyse for only those pollutants which would reasonably be expected to be present.” 40 CFR 433.12