

REAUTHORIZATION ADDENDUM TO THE FACT SHEET FOR NPDES PERMIT WA0040819

December 16, 2019

1. FACILITY GENERAL INFORMATION

Riverence LLC	Renewal Date of Previous Permit: July 27, 2015	Effective Date: August 1, 2015
10414 173 rd Avenue SW Rochester, WA 98579	Expiration Date: July 31, 2020	

2. APPLICATION AND COMPLIANCE REVIEW

Riverence LLC submitted an application to Ecology on December 31, 2018 for permit reissuance, and Ecology accepted it on September 10, 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:

- Riverence LLC has complied with all of the terms, conditions, and requirements of the expired permit
- The discharge meets applicable effluent standards and limits, water quality standards, and other legally applicable requirements.
- Ecology has up-to date information on the Riverence LLC waste treatment practices, the facility's production levels; and the nature, content, volume, and frequency of its discharge.
- The receiving water body impairment status has not changed.
- 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. SUMMARY OF COMPLIANCE WITH PREVIOUS PERMIT ISSUED

Riverence LLC has complied with the effluent limits and permit conditions throughout the duration of the permit issued on July 27, 2015. Ecology assessed compliance based on its review of the facility's information in the Ecology Permitting and Reporting Information System (PARIS), discharge monitoring reports (DMRs) and on inspections.

4. EFFLUENT CHARACTERIZATION

Riverence LLC reported the concentration of pollutants in the discharge in the permit application and in discharge monitoring reports. The tabulated data represents the quality of the wastewater effluent discharged from August 1, 2015 – December 16, 2019. The wastewater effluent is characterized as follows:

Wastewater Effluent Characterization

Parameter	Units	# of Samples	Average Value	Maximum Value
Biochemical Oxygen Demand (BOD ₅)	mg/L	21	3.09	8.4
BOD ₅	lbs/day	21	269.3	88
Total Suspended Solids (TSS)	mg/L	49	2.15	5.4
TSS	lbs/day	49	1.76	3.9
Ammonia, Total	mg/L	21	0.648	1.9
Ammonia, Total	lbs/day	21	23.06	79
Phosphorus, Total	mg/L	21	0.204	0.71
Phosphorus, Total	lbs/day	21	6.11	16.8

5. SURFACE WATER QUALITY STANDARDS AND IMPAIRMENTS

Ecology evaluated the impairment status of the Black River since the issuance of the previous permit. The impairment status has not changed from the previous permit issued on July 27, 2015. The previous permit that Ecology issued on July 27, 2015 has addressed and implemented the total maximum daily load (TMDL) study of June 1994 on the Black River to this discharger.

6. PERMIT LIMITS AND CONDITIONS

The reauthorized permit is virtually identical to the previous permit issued on July 27, 2015, 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 and other submittal requirements

carried over from the previous permit.

- 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 sufficiently sensitive, federally approved (40 CFR Part 136) test methods with detection levels that provide usable analytical data for purposes of water quality standards compliance assessments.
- A requirement to submit monitoring data obtained during each monitoring period on the electronic DMR form and any other required permit submittal within the Water Quality Permitting Portal

7. PUBLIC PROCESS

Ecology must public notice the availability of the draft reauthorized permit at least 30 days before it reissues the permit [[Washington Administrative Code \(WAC\) 173-220-050](#)]. 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.

8. PERMIT APPEAL PROCESS

Appendix B describes the permit appeal process.

9. RECOMMENDATION FOR PERMIT ISSUANCE

Ecology proposes to reissue this permit for five years.

APPENDIX A — PUBLIC INVOLVEMENT INFORMATION

Ecology proposes to reauthorize a permit to Riverence 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 May 8, 2020, in *The Olympian* to inform the public and to invite comment on the proposed draft National Pollutant Discharge Elimination System 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](https://fortress.wa.gov/ecy/publications/SummaryPages/0307023.html), available on our website:

<https://fortress.wa.gov/ecy/publications/SummaryPages/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 Aziz Mahar, 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 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 — RESPONSE TO COMMENTS

[Ecology will complete this section after the public notice of draft period.]