



July 20, 2018

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

RE: Draft DRR Fruit Processing State Waste Discharge Permit No. ST0009218

Dear Ms. Huwe:

The Port of Sunnyside would like to take this opportunity to comment on the Draft DRR Fruit Processing State Waste Discharge Permit (No. ST0009218) and offer some additional information for your consideration.

Section S2.A. Monitoring Requirements

- **Oxygen Demand**  
At this time the Port of Sunnyside would like to change the monitoring, testing, and billing requirements of Oxygen Demand from BOD to COD. The intent of the Port's changes to DRR's Schedule A (Appendix B—User Contract, in the permit), is to replace BOD monitoring with COD monitoring. In order to fulfill the DMR requirements, the Port is requesting to make this change for future contractual changes within each industry's DMR.

Due to the amount of time it takes to perform BOD testing versus COD, our lab would be able to increase the number of COD tests ran per week resulting in a better statistical average of oxygen demand to the Port. This would provide both the Port and each industry a wider base to gather a more accurate representation of what is being sent to the Port. An additional benefit to the elimination of BOD testing is a more streamlined operation of the lab.

- **Sulfites**  
We would also like to note that the Port has sulfites listed on the Schedule A for DRR, so that we have recourse when they do send sulfites to the Port. DRR has not had a sulfite event in years that has triggered the Port to test for such. We are requesting that the testing requirement stay at a "when required" basis and not "bi-monthly" as proposed in the draft permit.

Sincerely,



Cory Wilson  
Plant Operator