

Fact Sheet for NPDES Permit WA0991028

Wanapum Dam

November 30, 2020

Purpose of this fact sheet

This fact sheet explains and documents the decisions the Department of Ecology (Ecology) made in drafting the proposed National Pollutant Discharge Elimination System (NPDES) permit for Wanapum Dam.

This fact sheet complies with [Section 173-220-060 of the Washington Administrative Code \(WAC\)](#), which requires Ecology to prepare a draft permit and accompanying fact sheet for public evaluation before issuing an NPDES permit.

Ecology makes the draft permit and fact sheet available for public review and comment at least thirty (30) days before issuing the final permit. Copies of the fact sheet and draft permit for Wanapum Dam, NPDES permit WA0991028, are available for public review and comment from December 8, 2020 until January 8, 2021. For more details on preparing and filing comments about these documents, please see **Appendix A - Public Involvement Information**.

Public Utility District No. 2 of Grant County (Grant PUD) reviewed the draft permit and fact sheet for factual accuracy. Ecology corrected any errors or omissions regarding the facility's location, history, discharges, or receiving water prior to publishing this draft fact sheet for public notice.

After the public comment period closes, Ecology will summarize substantive comments and provide responses to them. Ecology will include the summary and responses to comments in this fact sheet as **Appendix E - Response to Comments**, and publish it when issuing the final NPDES permit. Ecology generally will not revise the rest of the fact sheet. The full document will become part of the legal history contained in the facility's permit file.

Summary

Construction of Wanapum Dam, located on the Columbia River at river mile 415.8 near Beverly, WA, was completed in 1964. It is owned and operated by Grant County PUD. The facility discharges sump water and noncontact cooling water (point sources) to the Columbia River as part of its daily operations. The permit does not regulate non-point sources of pollution.

The permit sets effluent limits for flow, oil and grease, pH and temperature (heat load). The limit for temperature (heat load) will take effect after EPA issues the final Temperature TMDL

for the Columbia and Lower Snake Rivers. The permit requires the use of Environmentally Acceptable Lubricants (EALs) unless technically infeasible.

Ecology lists the Columbia River as impaired for high temperatures, as required by the Clean Water Act Section 303(d). On May 18, 2020, the U.S. Environmental Protection Agency (EPA) issued for public review and comment a Total Maximum Daily Load (TMDL) for water temperature in the Columbia and lower Snake Rivers. When water quality is impaired, TMDLs are required by Section 303(d) of the Clean Water Act (CWA) and its implementing regulations at Title 40 of the Code of Federal Regulations (CFR) Section 130.7. The EPA's TMDL proposes Waste Load Allocation (WLA) for the process water discharged from the facility.

Effluent discharges from the hydroelectric generating facilities may affect river's temperature. The Wanapum Dam hydroelectric generating facility has limited temperature and flow data from its effluent discharges. Therefore, the draft permit includes a Compliance Schedule to conduct temperature monitoring in order to accurately delineate the process water discharge.

Hydroelectric generating water may be exposed to turbine oil and other oil and grease used to operate and lubricate turbines, wicket gates, lubricated wire rope, and other related equipment. Added pollutants have potential to discharge to the tailrace.

Submittals for this permit cycle include:

- O/M Manual
- Oil and Grease Accountability Plan
- Oil and Grease Report
- Compliance Schedule Report
- Solid Waste Control Plan

Additionally, the dam is part of the Priest Rapids Hydroelectric Project, and is subject to Federal Energy Regulatory Commission (FERC) License No. P-2114. Non-point sources of pollution are addressed under this license.

The dam's operations are also subject to the following requirements:

- The Biological Opinion (BiOp) issued by the National Marine Fisheries Service (NMFS, NMFS 2008).
- The BiOp issued by the United States Fish and Wildlife (USFWS) regarding the effect of the Project on bull trout (USFWS 2007).
- The Clean Water Act (CWA) Section 401 Water Quality Certification (WQC) issued by the Washington State Department of Ecology (WDOE 2007). The WQC was amended on March 6, 2008.

- The Priest Rapids Hydroelectric Project (P-2114) 2019-2023 (5-Year) Total Dissolved Gas Abatement Plan.

Grant PUD operates the Project through agreements with fishery agencies, tribal representatives, and other operators to provide protection and improvement for a range of fisheries and other natural resources, both upstream and downstream. These agreements include the Hanford Reach Fall Chinook Protection Program Agreement (Grant PUD 2004) and the Priest Rapids Project Salmon and Steelhead Settlement Agreement (SSSA; Grant PUD 2006).

The facility's 401 WQC document addresses non-point sources of pollution and includes designated uses (aquatic life, recreation, wildlife habitat, harvest, aesthetics, commerce and navigation), numeric criteria (TDG, pH, DO, temperature), antidegradation policies, and Water Quality Attainment Plan. Ecology, by issuing the 401 WQC, determined that the facility meets the Best Technology Available standards set forth 40 CFR 125.94.

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I. Introduction

The Federal Clean Water Act (FCWA, 1972, and later amendments in 1977, 1981, and 1987) established water quality goals for the navigable (surface) waters of the United States. One mechanism for achieving the goals of the Clean Water Act is the National Pollutant Discharge Elimination System (NPDES), administered by the federal Environmental Protection Agency (EPA). The EPA authorized the state of Washington to manage the NPDES permit program in our state. Our state legislature accepted the delegation and assigned the power and duty for conducting NPDES permitting and enforcement to Ecology. The Legislature defined Ecology's authority and obligations for the wastewater discharge permit program in [90.48 RCW](#) (Revised Code of Washington).

The following regulations apply to industrial NPDES permits:

- Procedures Ecology follows for issuing NPDES permits ([chapter 173-220 WAC](#))
- Water quality criteria for surface waters ([chapter 173-201A WAC](#))
- Water quality criteria for ground waters ([chapter 173-200 WAC](#))
- Whole effluent toxicity testing and limits ([chapter 173-205 WAC](#))
- Sediment management standards ([chapter 173-204 WAC](#))
- Submission of plans and reports for construction of wastewater facilities ([chapter 173-240 WAC](#))

These rules require any industrial facility owner/operator to obtain an NPDES permit before discharging wastewater to state waters. They also help define the basis for limits on each discharge and for performance requirements imposed by the permit.

Under the NPDES permit program and in response to a complete and accepted permit application, Ecology must prepare a draft permit and accompanying fact sheet, and make them available for public review before final issuance. Ecology must also publish an announcement (public notice) telling people where they can read the draft permit, and where to send their comments, during a period of thirty days ([WAC 173-220-050](#)). (See **Appendix A-Public Involvement Information** for more detail about the public notice and comment procedures). After the public comment period ends, Ecology may make changes to the draft NPDES permit in response to comment(s). Ecology will summarize the responses to comments and any changes to the permit in **Appendix E**.

II. Background Information

Table 1 - Facility Information

Applicant	Grant County PUD
Facility Name and Address	Wanapum Dam 14353 HWY 243 S Beverly, WA 99321
Contact at Facility	Ross Hendrick (509)-793-1468
Responsible Official	Ross Hendrick Senior Manager of Environmental Affairs PO Box 878, Ephrata, WA 98823 (509)-793-1468 rhendr1@gcpud.org
Industry Type	Hydroelectric Power Generation
Type of Treatment	None
SIC Codes	4911
NAIC Codes	2211
Facility Location (NAD83/WGS84 reference datum)	Latitude: 46.875000 Longitude: -119.970979
Discharge Waterbody Name and Location (NAD83/WGS84 reference datum)	Columbia River W001-46.87680556, -119.97055556 W002-46.87658333, -119.97055556 W003-46.87638889, -119.97083333 W004-46.87613889, -119.97055556 W005-46.87586111, -119.97055556 W006-46.87561111, -119.97055556 W007-46.87533333, -119.97055556 W008-46.87522222, -119.97055556 W009-46.87488889, -119.97055556 W010-46.87461111, -119.97055556 W011-46.87436111, -119.97055556 W012-46.87086111, -119.97361111

Cooling Water Intake Structures	W002-46.87658333, -119.97111111 W003-46.87633333, -119.97111111 W004-46.87608611, -119.97111111 W005-46.87583611, -119.97111111 W006-46.87559167, -119.97111111 W007-46.87536666, -119.97111111 W008-46.87509722, -119.97111111 W009-46.87485278, -119.97111111 W010-46.87460278, -119.97111111 W011-46.87436667, -119.97111111
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Table 2 - Permit Status

Date of Ecology Acceptance of Application	10/16/2019
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Table 3- Inspection Status

Date of Last Non-sampling Inspection Date	Site Visit -03/26/2019
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Figure 1 - Facility Location Map



A. Facility description

History

Construction of Wanapum Dam began in 1959 with beneficial operation in 1963. The initial license expired in 2005. In 2008, the FERC issued a new 44-year license for continued operation of the Project. The new license was conditioned upon programs to modernize the power generation capability of the dam, protect and enhance fish, wildlife, and water quality resources, protect and preserve cultural resources, maintain and enhance shoreline and recreation sites, and protect, preserve and perpetuate the Wanapum relationship.

Wanapum Dam is located on the Columbia River downstream (south) from Vantage, Washington where Interstate 90 crosses the Columbia from Grant County into Kittitas County.

The dam was named Wanapum in honor of the band of Native Americans who live along a stretch of the Columbia River from Vantage south toward Pasco, WA. The rated capacity is 1,226 megawatts and annually generates over 4 million megawatt-hours.

Cooling Water Intakes

CWA § 316(b) requires the location, design, construction, and capacity of cooling water intake structures (CWIS) to reflect the best technology available for minimizing adverse environmental impact. Since July 2013, Ecology has required all applicants using a CWIS to submit a supplemental application (EPA Form 2-C).

Wanapum Dam has ten hydroelectric generators requiring non-contact cooling water for operation. There are ten Alstom Generators having a total design intake flow (DIF) based on the nameplate nominal cooling water flowrate of 1,000 gallons per minute (gpm). Total Design Intake Flow (DIF) from the application is 17,827,200 gallons per day of NCCW.

The CWIS's are located approximate to each hydroelectric generator, with each intake located in the forebay and discharges to the tailrace. The cooling water is gravity-fed. The CWIS's represent Best Technology Available (BTA) for through-screen velocity. The maximum design velocities of the Wanapum Dam CWIS are 0.5 feet per second and the actual velocities are below 0.5 feet per second.

Impingement and entrainment concerns for this facility are fully addressed by the FERC License issued for the Priest Rapids Hydroelectric Project, which includes the 401 WQC and Biological Opinion. The Project is subject to a No-Net Impact (NNI) requirement. NNI is the condition whereby the facility operation does not produce unmitigated project related mortality of a covered species.

Wanapum Dam was designed and constructed, and is now being operated, in a manner that meets or exceeds the statutory requirement of using “the best technology available for minimizing adverse environmental impact.” the design and operation of the CWIS meet the requirement of CWA Section 316(b) to minimize adverse environmental impacts.

Industrial Processes

Grant PUD is seeking coverage under a NPDES Permit addressing potential discharges of pollutants at Wanapum Dam. Machinery, drainage sumps, unwatering sumps, drains, turbines, wicket gate bearings, lubricant contact points, and discharges of cooling water systems are potential point sources of pollution.

Wanapum Dam is 8,637-foot-long by 186.5-foot-high concrete structure, spanning the Columbia River. The dam consists of left and right embankment sections; left and right concrete gravity dam sections; a left and right fish passage structure, each with an upstream fish ladder; a gated spillway; a downstream fish passage structure; and a powerhouse containing ten vertical shaft integrated Kaplan turbine/generator sets with a total authorized installed capacity of 1226 MW. The dam forms a 14,680-acre reservoir.

Figure 2 - Wanapum Dam Aerial

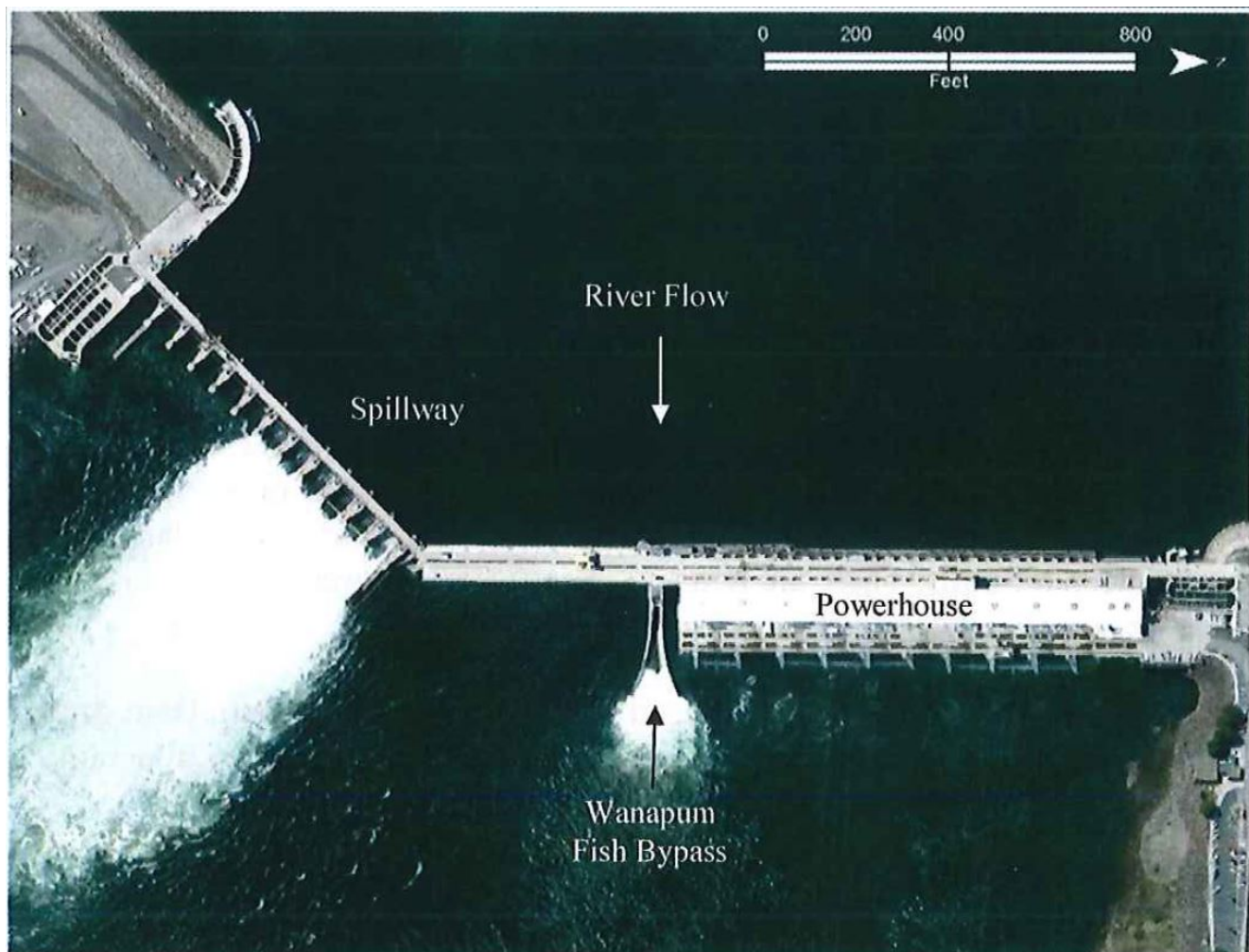
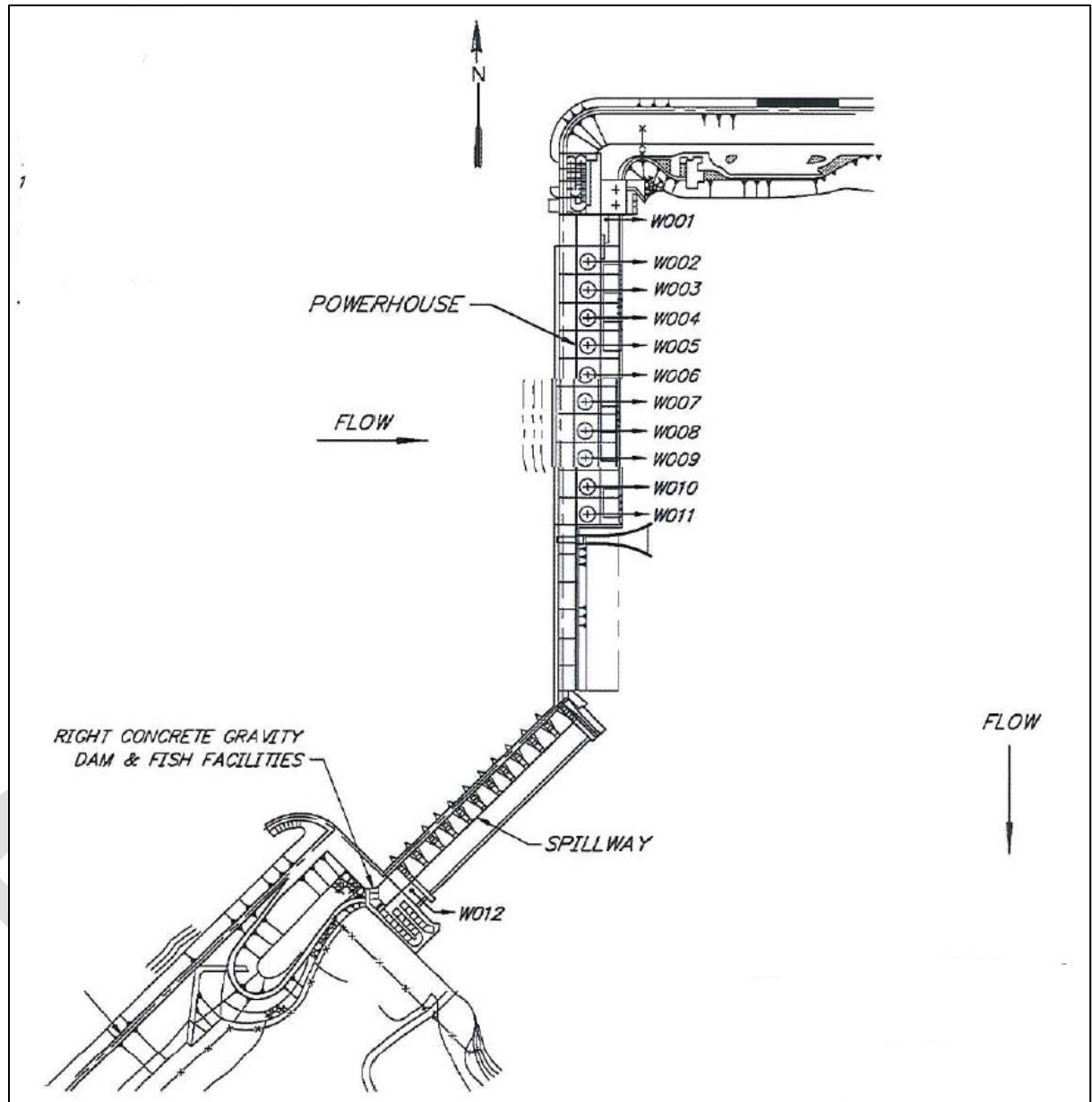


Figure 3 - Outfall Locations: W001 - W012



Wastewater Treatment processes

The facility does not treat wastewater. Wastewater handling appurtenances are described as follows:

The facility has a Left Bank Sump (W001) and Right Bank Sump (W012).

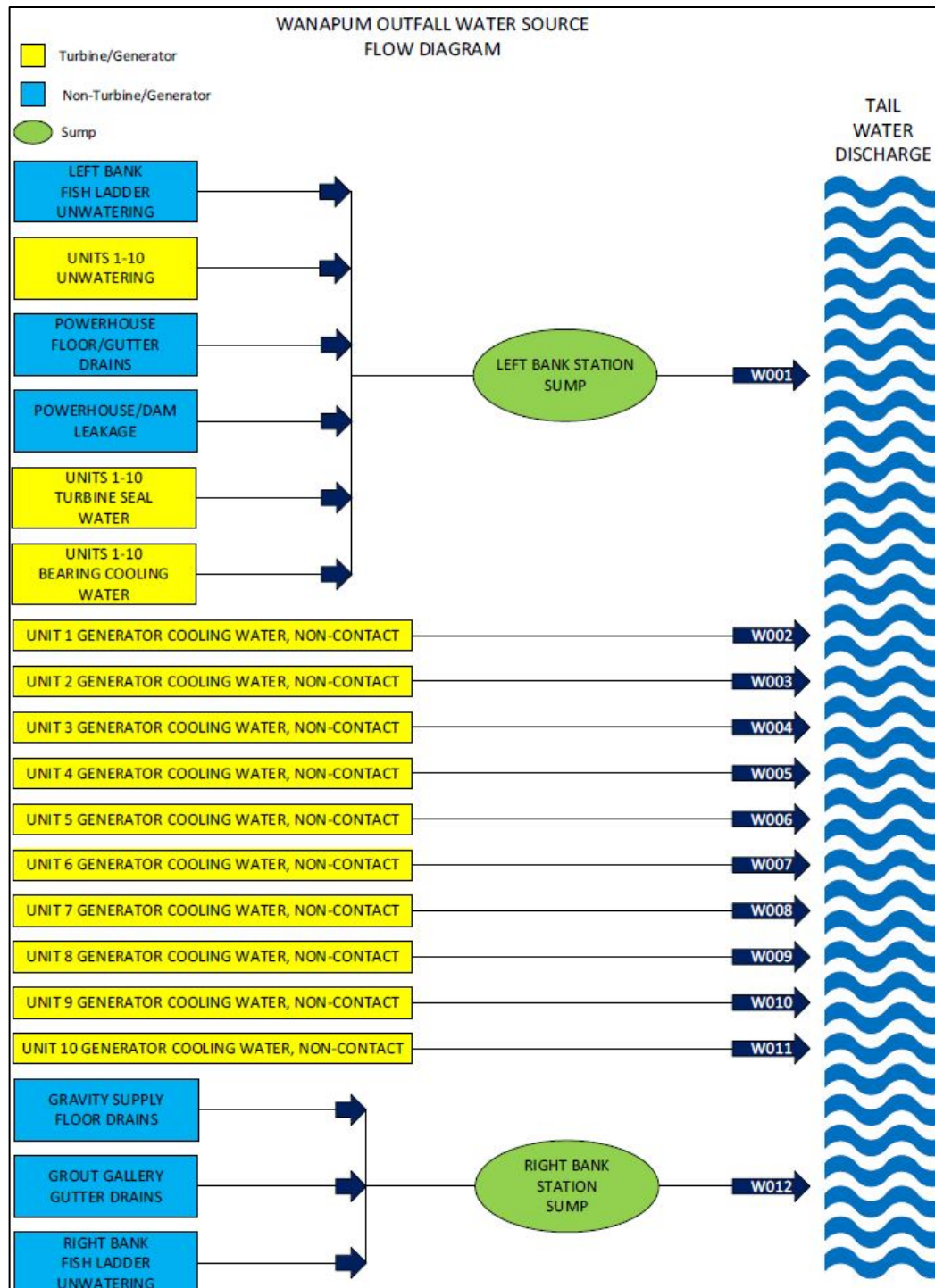
The Left Bank Sump receives water from Left Bank Fish Ladder unwatering, Unit 1-10 unwatering, Powerhouse Floor/Gutter drains, Powerhouse/Dam leakage, Units 1-10 Turbine Seal Water, and Units 1-10 Upper Guide Bearing Cooling Water. The sump has a maximum capacity of 151,593 gallons, discharges intermittently 44 feet above the river bottom, and parallel to the bank. The sump has oil detection equipment that alarms at 10 parts per million (ppm). If the alarm sounds, the sump goes into Oil Mode. This raises the pump setpoints to a much higher level so any oil or grease, which would float at the top of the sump, are not pumped to the tailrace. The facility will deploy oil control and countermeasures in accordance with established SPCC procedures when oil is detected in the sump.

The Right Bank Sump receives Gravity Supply Floor Drains, Grout Gallery Gutter Drains, and Right Bank Fish Ladder unwatering. See Figure #3. This sump does not have an alarm, as there is no oil containing equipment. It discharges intermittently eleven feet above river bottom, flush to the dam, and parallel to the bank. Biosolids do not accumulate in either sump.

Discharge outfalls

The facility discharge consists of the Left Bank Sump (W001), Right Bank Sump (W012), and NCCW (W002-W011). Outfall W001 is located in the tailrace. It discharges flush to the dam and parallel to the bank 44 feet above river bottom. Outfall W012 is located in the tailrace. It discharges flush to the dam and parallel to the bank 11 feet above river bottom. The discharge of the NCCW (W002-W011) occurs approximate to the location of each generator along the tailrace. See Figure #4 below for a schematic of the outfalls.

Figure 4 - Water Source Diagram



Solid wastes

This facility generates solid waste from the debris removal in the spillway and forebay, and spill cleanup/recovery materials. The permit will require an accounting of these solid wastes disposed from the site.

B. Description of the receiving water

Wanapum Dam discharges to the Columbia River at river mile 415.8 near Beverly, WA. Under the existing 401 Certification, the facility monitors river water for Total Dissolved Gas (TDG), Temperature, Dissolved Oxygen (DO), and pH, at two Fixed Site Monitoring Stations (FSMS). Grant PUD also monitors turbidity, water depth, and barometric pressure as part of its Ecology-approved QAPP.

The Forebay FSMS is located near Turbine Unit 10 and is affixed to the catwalk about mid-channel. The Tailrace FSMS is located about 3.2 miles downstream and is attached to the downstream side of Beverly Bridge.

Table 4 - 401 WQ Monitoring

Parameter	Location	Metric
Total Dissolved Gas	Forebay and Tailrace	Mm Hg; converted to % SAT
Water Temperature	Forebay and Tailrace	Degrees C
Turbidity	Forebay and Tailrace	Nephelometric turbidity unit (NTU)
pH	Forebay and Tailrace	Standard units 6.5-8.5
Dissolved Oxygen	Forebay and Tailrace	mg/L

The ambient background data reviewed in the development of this permit includes the following from the facility Fixed Site Monitoring Program Water Quality Report 2018 (Keeler; 03/2019). Considering the temporal and spatial variation of temperature in the impounded (forebay) and free-flowing (tailrace) river, FSMS data from the tailrace was used as representative of ambient background data. River flow data is taken from streamflow USGS gauge #12472800 located 2.6 river miles downstream of Priest Rapids Dam. Monitoring methods and quality assurance/ quality control (QA/QC) procedures follow methods outlined in the Quality Assurance Project Plan for Monitoring

Selected Water Quality Parameters within the Priest Rapids Hydroelectric Project (QAPP 2018).

Table 5 - Ambient Background Data – Columbia River 2018

Parameter	Value Used
Flow (7Q10 Low Flow) ^a	47,787 cfs
Temperature (highest annual 1-DMax)	20.8 °C
Temperature (highest annual 7-DADMax)	20.3 °C
pH (Maximum / Minimum)	8.2/ 7.8 standard units
Dissolved Oxygen (Maximum)	12.4 mg/L
Turbidity (Maximum)	4.8 NTU
Total Dissolved Gas ^b (non-fish spill) (Maximum)	125.3 % Saturation
Total Dissolved Gas (fish spill) (Maximum)	142.7 % Saturation
^a Lowest 7-day average flow that occurs (on average) once every 10 years. https://water-quality.shinyapps.io/D-Flow-Update/ Additional information in Appendix D.	
^b Section 5.0(b) of the 401 WQC and WAC 73-201A-200(f)(i) provide that the TDG standard for Wanapum dam shall be waived if flows exceed the 7Q10 Flood Flow (highest seven consecutive day average flow with a ten-year recurrence frequency), calculated to be 264,000 cubic feet per second (170,628 mgd).	

C. Wastewater characterization

Wanapum Dam reported the concentration of pollutants in the discharge in the permit application. Characterization of the discharge is limited to data reported in the permit application.

NCCW outfalls W002-W010 are observed by Ecology to be substantively similar. Wastewater characterization data in Table 9 is considered representative of all NCCW at this time. The wastewater effluent is characterized as follows:

Table 6 - Wastewater Characterization Left Bank Sump W001

Parameter	Units	Value
Flow	GPM	800
Temperature (Intake)	Degrees C	11.2

Parameter	Units	Value
Temperature	Degrees C	12.7
pH	standard units	7.16
Biochemical Oxygen Demand (BOD ₅) (Intake)	mg/L	<2
Biochemical Oxygen Demand (BOD ₅)	mg/L	2.0
Chemical Oxygen Demand (COD)	mg/L	<10
Total Organic Carbon (TOC) (Intake)	mg/L	1.7
Total Organic Carbon (TOC)	mg/L	15
Total Suspended Solids (TSS)	mg/L	<1
Ammonia	mg/L	0.062
Chlorine	mg/L	<0.1
Oil and Grease (Intake)	mg/L	3.9
Oil and Grease	mg/L	2.2
Surfactants	mg/L	0.029
Antimony	µg/L	<0.3
Arsenic	µg/L	0.584
Beryllium	µg/L	<0.05
Cadmium	µg/L	<0.05
Chromium	µg/L	0.45
Copper (Intake)	µg/L	0.69
Copper	µg/L	1.44
Lead	µg/L	0.139
Mercury	µg/L	<0.0005
Nickel	µg/L	0.46
Selenium	µg/L	0.40
Silver	µg/L	<0.1
Thallium	µg/L	<0.05

Parameter	Units	Value
Zinc (Intake)	µg/L	3.59
Zinc	µg/L	5.56
PCB-1242	µg/L	<0.48
PCB-1254	µg/L	<0.48
PCB-1221	µg/L	<0.48
PCB-1232	µg/L	<0.48
PCB-1248	µg/L	<0.48
PCB-1260	µg/L	<0.48
PCB-1016	µg/L	<0.48
Toxaphene	µg/L	<0.238
Dioxin	NA	Not detected at or above the reporting limit

Table 7 - Wastewater Characterization Right Bank Sump W012

Parameter	Units	Value
Flow	GPM	800
Temperature (Intake)	Degrees C	11.2
Temperature	Degrees C	12.5
pH	standard units	6.85
Biochemical Oxygen Demand (BOD ₅) (Intake)	mg/L	<2
Biochemical Oxygen Demand (BOD ₅)	mg/L	4.2
Chemical Oxygen Demand (COD)	mg/L	<10
Total Organic Carbon (TOC)	mg/L	0.99
Total Suspended Solids (TSS)	mg/L	2.0
Ammonia	mg/L	<0.02
Chlorine	mg/L	<0.1

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XX/XX/XXXX (Permit effective date)

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Parameter	Units	Value
Oil and Grease(Intake)	mg/L	3.9
Oil and Grease	mg/L	3.8
Surfactants	mg/L	0.025
Antimony	µg/L	<0.3
Arsenic	µg/L	0.567
Beryllium	µg/L	<0.05
Cadmium	µg/L	<0.05
Chromium	µg/L	0.45
Copper	µg/L	0.79
Lead	µg/L	0.161
Mercury	µg/L	<0.0005
Nickel	µg/L	0.31
Selenium	µg/L	0.36
Silver	µg/L	<0.1
Thallium	µg/L	<0.05
Zinc (Intake)	µg/L	3.59
Zinc	µg/L	6.86
PCB-1242	µg/L	<0.48
PCB-1254	µg/L	<0.48
PCB-1221	µg/L	<0.48
PCB-1232	µg/L	<0.48
PCB-1248	µg/L	<0.48
PCB-1260	µg/L	<0.48
PCB-1016	µg/L	<0.48
Toxaphene	µg/L	<0.238
Dioxin	NA	Not detected at or above the reporting limit

Table 8 - Wastewater Characterization NCCW W010

Parameter	Units	Value
Flow	GPM	600
Temperature (Intake)	Degrees C	13.68
Temperature	Degrees C	18.13

III. Proposed Permit Limits

Federal and state regulations require that effluent limits in an NPDES permit must be either technology- or water quality-based.

- Technology-based limits are based upon the treatment methods available to treat specific pollutants. Technology-based limits are set by the EPA and published as a regulation, or Ecology develops the limit on a case-by-case basis ([40 CFR 125.3](#), and [chapter 173-220 WAC](#)).
- Water quality-based limits are calculated so that the effluent will comply with the Surface Water Quality Standards ([chapter 173-201A WAC](#)), Ground Water Standards ([chapter 173-200 WAC](#)), Sediment Quality Standards ([chapter 173-204 WAC](#)), or the Federal Water Quality Criteria Applicable to Washington ([40 CFR 131.45](#)).
- Chapter 90.56 RCW Oil And Hazardous Substance Spill Prevention And Response
- Ecology must apply the most stringent of these limits to each parameter of concern. These limits are described below.

The limits in this permit reflect information received in the application and from supporting reports (engineering, hydrogeology, etc.). Ecology evaluated the permit application and determined the limits needed to comply with the rules adopted by the state of Washington. Ecology does not develop effluent limits for all reported pollutants. Some pollutants are not treatable at the concentrations reported, are not controllable at the source, are not listed in regulation, and do not have a reasonable potential to cause a water quality violation.

Ecology does not usually develop limits for pollutants not reported in the permit application but may be present in the discharge. The permit does not authorize discharge of the non-reported pollutants. During the five-year permit term, the facility's effluent discharge conditions may change from those conditions reported in the permit application. The facility must notify

Ecology if significant changes occur in any constituent [[40 CFR 122.42\(a\)](#)]. Until Ecology modifies the permit to reflect additional discharge of pollutants, a permitted facility could be violating its permit.

A. Design criteria

Under [WAC 173-220-150 \(1\) \(g\)](#), flows must not exceed approved design criteria. The table below includes sump manufacturers design criteria.

Table 9 - Design Criteria for Left Bank and Right Bank Sump

Flows	Left Bank	Right Bank
Peak Instantaneous Pump Rate	18,700 gal/min 26.9 MGD	5,190 gal/min 7.5 MGD

B. Technology-based effluent limits

Effluent limitation guidelines have not yet been developed by the EPA for hydroelectric generating facility discharges. The facility does not treat wastewater.

Ecology must ensure that facilities provide all known, available, and reasonable methods of prevention, control, and treatment (AKART) when it issues a permit.

C. Surface water quality-based effluent limits

Water Quality-Based Effluent Limits for Wanapum Dam include Oil and Grease, pH, Temperature and, Total Dissolved Gas.

The Washington State surface water quality standards ([chapter 173-201A WAC](#)) are designed to protect existing water quality and preserve the beneficial uses of Washington's surface waters. Waste discharge permits must include conditions that ensure the discharge will meet the surface water quality standards ([WAC 173-201A-510](#)).

Numerical criteria for the protection of aquatic life and recreation

Numerical water quality criteria are listed in the water quality standards for surface waters ([chapter 173-201A WAC](#)). They specify the maximum levels of pollutants allowed in receiving water to protect aquatic life and recreation in and on the water. Ecology uses numerical criteria along with chemical and physical data for the

wastewater and receiving water to derive the effluent limits in the discharge permit. When surface water quality-based limits are more stringent or potentially more stringent than technology-based limits, the discharge must meet the water quality-based limits.

Numerical criteria for the protection of human health

In 1992, U.S. EPA published 91 numeric water quality criteria for the protection of human health that are applicable to dischargers in Washington State in its National Toxics Rule 40 CFR 131.36 (EPA, 1992). Ecology submitted a standards revision for 192 new human health criteria for 97 pollutants to EPA on August 1, 2016. In accordance with requirements of [CWA section 303\(c\) \(2\) \(B\)](#), EPA finalized 144 new and revised Washington specific human health criteria for priority pollutants, to apply to waters under Washington's jurisdiction. EPA approved 45 human health criteria as submitted by Washington. The EPA took no action on Ecology submitted criteria for arsenic, dioxin, and thallium. The existing criteria for these three pollutants remain in effect and were included in [40 CFR 131.45](#), Revision of certain Federal Water quality criteria applicable to Washington.

These newly adopted criteria, located in [WAC 173-201A-240](#), are designed to protect humans from exposure to pollutants linked to cancer and other diseases, based on consuming fish and shellfish and drinking contaminated surface waters. The water quality standards also include radionuclide criteria to protect humans from the effects of radioactive substances.

Narrative criteria

Narrative water quality criteria (e.g., [WAC 173-201A-240\(1\); 2006](#)) limit the toxic, radioactive, or other deleterious material concentrations that the facility may discharge to levels below those which have the potential to:

- Adversely affect designated water uses.
- Cause acute or chronic toxicity to biota.
- Impair aesthetic values.
- Adversely affect human health.

Narrative criteria protect the specific designated uses of all fresh waters ([WAC 173-201A-200, 2016](#)) and of all marine waters ([WAC 173-201A-210, 2016](#)) in the state of Washington.

Antidegradation

Description – The purpose of Washington's Antidegradation Policy ([WAC 173-201A-300-330; 2016](#)) is to:

- Restore and maintain the highest possible quality of the surface waters of Washington.
- Describe situations under which water quality may be lowered from its current condition.
- Apply to human activities that are likely to have an impact on the water quality of surface water.
- Ensure that all human activities likely to contribute to a lowering of water quality, at a minimum, apply all known, available, and reasonable methods of prevention, control, and treatment (AKART).
- Apply three tiers of protection (described below) for surface waters of the state.

Tier I: ensures existing and designated uses are maintained and protected and applies to all waters and all sources of pollutions.

Tier II: ensures that waters of a higher quality than the criteria assigned are not degraded unless such lowering of water quality is necessary and in the overriding public interest. Tier II applies only to a specific list of polluting activities.

Tier III: prevents the degradation of waters formally listed as "outstanding resource waters," and applies to all sources of pollution.

A facility must prepare a Tier II analysis when all three of the following conditions are met:

- The facility is planning a new or expanded action.
- Ecology regulates or authorizes the action.
- The action has the potential to cause measurable degradation to existing water quality at the edge of a chronic mixing zone.

Facility Specific Requirements — This facility must meet Tier I requirements.

- Dischargers must maintain and protect existing and designated uses. Ecology must not allow any degradation that will interfere with, or become injurious to, existing or designated uses, except as provided for in chapter [173-201A WAC](#).

Mixing zones

A mixing zone is the defined area in the receiving water surrounding the discharge port(s), where wastewater mixes with receiving water. Within mixing zones, the pollutant concentrations may exceed water quality numeric standards, so long as the discharge doesn't interfere with designated uses of the receiving water body (for example, recreation, water supply, and aquatic life and wildlife habitat, etc.) The pollutant concentrations outside of the mixing zones must meet water quality numeric standards.

State and federal rules allow mixing zones because the concentrations and effects of most pollutants diminish rapidly after discharge, due to dilution. Ecology defines mixing zone sizes to limit the amount of time any exposure to the end-of-pipe discharge could harm water quality, plants, or fish.

The state's water quality standards allow Ecology to authorize mixing zones for the facility's permitted wastewater discharges only if those discharges already receive all known, available, and reasonable methods of prevention, control, and treatment (AKART). Mixing zones typically require compliance with water quality criteria within a specified distance from the point of discharge and must not use more than 25% of the available width of the water body for dilution [[WAC 173-201A-400 \(7\)\(a\)\(ii-iii\)](#)].

Ecology uses modeling to estimate the amount of mixing within the mixing zone. Through modeling, Ecology determines the potential for violating the water quality standards at the edge of the mixing zone and derives any necessary effluent limits. Steady-state models are the most frequently used tools for conducting mixing zone analyses. Ecology chooses values for each effluent and for receiving water variables that correspond to the time period when the most critical condition is likely to occur (see Ecology's [Permit Writer's Manual](#)). Each critical condition parameter, by itself, has a low probability of occurrence and the resulting dilution factor is conservative. The term "reasonable worst-case" applies to these values.

The mixing zone analysis produces a numerical value called a dilution factor (DF). A dilution factor represents the amount of mixing of effluent and receiving water that occurs at the boundary of the mixing zone. For example, a dilution factor of 4 means the effluent is 25% and the receiving water is 75% of the total volume of water at the boundary of the mixing zone. Ecology uses dilution factors with the water quality criteria to calculate reasonable potentials and effluent limits. Water quality standards include both aquatic life-based criteria and human health-based criteria. The former are applied at both the acute and chronic mixing zone boundaries; the latter are applied only at the chronic boundary. The concentration of pollutants at the boundaries of any of these mixing zones may not exceed the numerical criteria for that zone.

Each aquatic life *acute* criterion is based on the assumption that organisms are not exposed to that concentration for more than one hour and more often than one exposure in three years. Each aquatic life *chronic* criterion is based on the assumption that organisms are not exposed to that concentration for more than four consecutive days and more often than once in three years.

The two types of human health-based water quality criteria distinguish between those pollutants linked to non-cancer effects (non-carcinogenic) and those linked to cancer effects (carcinogenic). The human health-based water quality criteria incorporate several exposure and risk assumptions. These assumptions include:

- A 70-year lifetime of daily exposures.
- An ingestion rate for fish or shellfish measured in kg/day.
- An ingestion rate of two and four tenths (2.4) liters/day for drinking water (increased from two liters/day in the 2016 Water Quality Standards update).
- A one-in-one-million cancer risk for carcinogenic chemicals.

This permit does not authorize a mixing zone. The Permittee may submit a Mixing Zone Study, for Ecology's consideration, to evaluate whether or not a mixing zone is warranted for the discharge. If considering conducting and submitting a study the Permittee should discuss the applicable requirements with Ecology.

D. Designated uses and surface water quality criteria

Applicable designated uses and surface water quality criteria are defined in [chapter 173-201A WAC](#). In addition, the U.S. EPA set human health criteria for toxic pollutants (EPA 1992). The table included below summarizes the criteria applicable to this facility's discharge.

Aquatic Life Uses are designated based on the presence of, or the intent to provide protection for the key uses. All indigenous fish and non-fish aquatic species must be protected in waters of the state in addition to the key species. The Aquatic Life Uses for this receiving water are identified below.

IV. Freshwater Aquatic Life Uses and Associated Criteria

Table 10 - Salmonid Spawning, Rearing, and Migration

Criteria	Value
Temperature Criteria – Highest 7-DAD MAX	17.5°C (63.5°F)
Dissolved Oxygen Criteria – Lowest 1-Day Minimum	8.0 mg/L
Turbidity Criteria	<ul style="list-style-type: none"> • 5 NTU over background when the background is 50 NTU or less; or • A 10 percent increase in turbidity when the background turbidity is more than 50 NTU.
Total Dissolved Gas Criteria	Total dissolved gas must not exceed 110 percent of saturation at any point of sample collection. Higher saturation levels are allowed for dams on the Columbia and Snake rivers when spilling water to aid fish passage.
pH Criteria	The pH must measure within the range of 6.5 to 8.5 with a human-caused variation within the above range of less than 0.5 units.

- The *recreational uses* for this receiving water are identified below.

Table 11 - Recreational Uses and Associated Criteria

Recreational Use	Criteria
Primary Contact Recreation	Fecal coliform organism levels must not exceed a geometric mean value of 100 colonies /100 mL, with not more than 10 percent of all samples (or any single sample when less than ten sample points exist) obtained for calculating the geometric mean value exceeding 200 colonies /100 mL.

- The water supply uses are domestic, agricultural, industrial, and stock watering.
- The miscellaneous freshwater uses are wildlife habitat, harvesting, commerce and navigation, boating, and aesthetics.

E. Water quality impairments

The Columbia River, near and downstream from the Wanapum Dam, is listed on the current 303(d) for impairment. The river is impaired (Category 5) for the following parameters: temperature, 4,4'-DDD, 4,4'-DDE, and PCBs.

The Columbia River has a TMDL for Total Dissolved Gas, which is a Category 4a listing. A category 4a listing means an EPA-approved TMDL plan is in place and implemented.

Table 12 - Water Quality Impairments

<u>Listing ID</u>	<u>Parameter</u>	<u>Medium</u>	<u>Category</u>
40945	Temperature	Water	5
51661	4,4'-DDD	Tissue	5
51722	4,4'-DDE	Tissue	5
52658	Polychlorinated Biphenyls (PCBs)	Tissue	5
36391	Total Dissolved Gas	Water	4a

F. Total Maximum Daily Load (TMDL)

The Columbia River is on the State's current 303(d) list and as impaired for Temperature.

The Federal Clean Water Act specifies that when a water body is impaired, a Total Maximum Daily Load (TMDL) study must be conducted to restore the waterbody's function. A Total Maximum Daily Load specifies the maximum amount of a pollutant that a waterbody can receive and still meet applicable Water Quality Standards.

USEPA issued for public review and comment the TMDL for temperature in the Columbia and Lower Snake Rivers, May 18, 2020. The TMDL includes a waste load allocation (WLA) for Temperature. The draft permit requires implementation of the WLA once finalized by EPA. The permit includes a two-year compliance schedule allowing the PUD to plan and install temperature monitoring devices needed to measure and calculate the heat load released from the dam.

The proposed permit will limit both the industrial wastewater and non-contact cooling water's temperature discharged from the dam. Water quality-based effluent limits for temperature will be based on the WLA to be determined by the Final TMDL for Temperature in the Columbia and Lower Snake Rivers (USEPA; May 2020). The Final

TMDL is expected to assign a WLA (expressed as a heat load in kcal/day) to all point source discharges to the Columbia River. The proposed permit (S12) includes a 2-year compliance schedule, intended to give GCPUD time to install monitoring equipment and any necessary controls to meet the WLA. The effluent limit for temperature will take effect 2 years after the effective date of the permit, or 30 days after EPA issues the final TMDL, whichever is later.

The Mid-Columbia River and Lake Roosevelt also have a Total Dissolved Gas (TDG) TMDL, (<https://fortress.wa.gov/ecy/publications/documents/0403002.pdf>). The facility currently implements a 401 Water Quality Certification (WQC) approved 2019-2023 Gas Abatement Plan. According to section 6.4.1(f) of the 401 WQC, Grant PUD complies with the TDG TMDL if it conforms to the 401 WQC requirements. The Certification lists requirements to remain in compliance.

G. Evaluation of surface water quality-based effluent limits for narrative criteria

Ecology must consider the narrative criteria described in WAC 173-201A-160 when it determines permit limits and conditions. Narrative water quality criteria limit the toxic, radioactive, or other deleterious material concentrations that the facility may discharge which have the potential to adversely affect designated uses, cause acute or chronic toxicity to biota, impair aesthetic values, or adversely affect human health.

“Aesthetic values must not be impaired by the presence of materials of their effects, excluding those of natural origin, which offend the senses of sight, smell, touch, or taste (WAC 173-201A-260-2(b)).”

Oil discharges are limited by the following State laws: *RCW 90.56.320 Unlawful for oil to enter waters* (formerly RCW 90.48.320) and *RCW 90.48.200 Waste disposal permits*.

RCW 90.56.320

Unlawful for oil to enter waters—Exceptions.

It shall be unlawful, except under the circumstances hereafter described in this section, for oil to enter the waters of the state from any ship or any fixed or mobile facility or installation located offshore or onshore whether publicly or privately operated, regardless of the cause of the entry or fault of the person having control over the oil, or regardless of whether it be the result of intentional

or negligent conduct, accident or other cause. This section shall not apply to discharges of oil in the following circumstances:

(1) The person discharging was expressly authorized to do so by the department prior to the entry of the oil into state waters; or

*(2) The person discharging was authorized to do so by operation of law as provided in **RCW 90.48.200**.*

RCW 90.48.200 Waste disposal permits required of counties, municipalities and public corporations — Nonaction upon application — Temporary permit — Duration.

Ecology considers narrative criteria when it evaluates the characteristics of the wastewater and when it implements all known, available, and reasonable methods of treatment and prevention (AKART) as described above in the technology-based limits section. When Ecology determines if a facility is meeting AKART it considers the pollutants in the wastewater and the adequacy of the treatment to prevent the violation of narrative criteria.

The proposed permit addresses and limits oil and grease discharges from the dam based on narrative criteria.

Appendix A states EPA Method 1664A is the only approved method for Oil and Grease detection in wastewater. The detection limit is 1.4 mg/L. The quantitation limit is 5 mg/L. A daily maximum effluent limit of 5 mg/L ensures narrative criteria for are met for no visible oil sheen.

In addition, Ecology considers the toxicity of the wastewater discharge by requiring whole effluent toxicity (WET) testing when there is a reasonable potential for the discharge to contain toxics. Ecology's analysis of the need for WET testing for this discharge is described later in the fact sheet.

H. Evaluation of surface water quality-based effluent limits for numeric criteria

Ecology has not authorized a mixing zone in the permit.

The derivation of surface water quality-based limits also takes into account the variability of pollutant concentrations in both the effluent and the receiving water.

Temperature --The state temperature standards (WAC 173-201A, WAC 173-201A-200, WAC 173-201A-600, and WAC 173-201A-602) include multiple elements:

- Annual summer maximum threshold criteria (June 15 to September 15)
- Supplemental spawning and rearing season criteria (September 15 to June 15)
- Incremental warming restrictions
- Protections against acute effects
- Ecology evaluates each criterion independently to determine reasonable potential and derive permit limits.
- Annual summer maximum and supplementary spawning/rearing criteria

Each water body has an annual maximum temperature criterion [WAC 173-201A-200(1)(c), WAC 173-201A-210(1)(c), and WAC 173-201A-602, Table 602]. These threshold criteria (e.g., 12, 16, 17.5, 20°C) protect specific categories of aquatic life by controlling the effect of human actions on summer temperatures.

Some waters have an additional threshold criterion to protect the spawning and incubation of salmonids (9°C for char and 13°C for salmon and trout) [WAC 173-201A-602, Table 602]. These criteria apply during specific date-windows.

The threshold criteria apply at the edge of the chronic mixing zone. Criteria for most fresh waters are expressed as the highest 7-Day average of daily maximum temperature (7-DADMax). The 7-DADMax temperature is the arithmetic average of seven consecutive measures of daily maximum temperatures. Criteria for marine waters and some fresh waters are expressed as the highest 1-Day annual maximum temperature (1-DMax).

- Incremental warming criteria

The water quality standards limit the amount of warming human sources can cause under specific situations [WAC 173-201A-200(1)(c)(i)-(ii), WAC 173-201A-210(1)(c)(i)-(ii)]. The incremental warming criteria apply at the edge of the chronic mixing zone.

At locations and times when background temperatures are cooler than the assigned threshold criterion, point sources are permitted to warm the water by only a defined increment. These increments are permitted only to the extent doing so does not cause temperatures to exceed either the annual maximum or supplemental spawning criteria.

At locations and times when a threshold criterion is being exceeded due to natural conditions, all human sources, considered cumulatively, must not warm the water more than 0.3°C above the naturally warm condition.

When a TMDL is not completed, Ecology policy allows each point source to warm water at the edge of the chronic mixing zone by 0.3°C. This is true regardless of the background temperature and even if doing so would cause the temperature at the edge of a standard mixing zone to exceed the numeric threshold criteria. Allowing a 0.3°C warming for each point source is reasonable and protective where the dilution factor is based on 25% or less of the critical flow. This is because the fully mixed effect on temperature will only be a fraction of the 0.3°C cumulative allowance (0.075°C or less) for all human sources combined.

- Protections for temperature acute effects

Instantaneous lethality to passing fish: The upper 99th percentile daily maximum effluent temperature must not exceed 33°C, unless a dilution analysis indicates ambient temperatures will not exceed 33°C two seconds after discharge.

General lethality and migration blockage: Measurable (0.3°C) increases in temperature at the edge of a chronic mixing zone are not allowed when the receiving water temperature exceeds either a 1DMax of 23°C or a 7DADMax of 22°C.

Lethality to incubating fish: Human actions must not cause a measurable (0.3°C) warming above 17.5°C at locations where eggs are incubating.

Toxic Pollutants -- Federal regulations (40 CFR 122.44) require Ecology to place limits in NPDES permits on toxic chemicals in an effluent whenever there is a reasonable potential for those chemicals to exceed the surface water quality criteria. Ecology does not exempt facilities with technology-based effluent limits from meeting the surface water quality standards.

- Reasonable Potential Analysis

Data Collection Required: Ecology does not have sufficient information on the temperature of the effluent or the receiving water to determine compliance with water quality criteria for temperature. The proposed permit requires Wanapum Dam to monitor effluent and report the results to Ecology.

A reasonable potential analysis was conducted using zero dilution and with the limited data provided in the application. Using this data, the facility does not exhibit reasonable potential to pollute.

The permit includes additional requirements for determining the concentrations of their discharges.

I. Human health

Washington's water quality standards include numeric human health-based criteria for 97 priority pollutants that Ecology must consider when writing NPDES permits.

Ecology evaluated the discharge's potential to violate the water quality standards as required by [40 CFR 122.44\(d\)](#) by following the procedures published in the [Technical Support Document for Water Quality-Based Toxics Control \(EPA/505/2-90-001\)](#) and Ecology's [Permit Writer's Manual](#) to make a reasonable potential determination. The evaluation showed that the discharge has no reasonable potential to cause a violation of water quality standards, and an effluent limit is not needed.

J. Sediment quality

The aquatic sediment standards ([chapter 173-204 WAC](#)) protect aquatic biota and human health. Under these standards Ecology may require a facility to evaluate the potential for its discharge to cause a violation of sediment standards ([WAC 173-204-400](#)). You can obtain additional information about sediments at the [Aquatic Lands Cleanup Unit](#) available at: <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Sediment-cleanups>

Through a review of the discharger characteristics and of the effluent characteristics, Ecology determined that this discharge has no reasonable potential to violate the sediment management standards.

K. Groundwater quality limits

The groundwater quality standards ([chapter 173-200 WAC](#)) protect beneficial uses of groundwater. Permits issued by Ecology must not allow violations of those standards ([WAC 173-200-100](#)).

Wanapum Dam does not discharge wastewater to the ground. No permit limits are required to protect groundwater.

L. Whole effluent toxicity

The water quality standards for surface waters forbid discharge of effluent that has the potential to cause toxic effects in the receiving waters. Many toxic pollutants cannot be

measured by commonly available detection methods. However, laboratory tests can measure toxicity directly by exposing living organisms to the wastewater and measuring their responses. These tests measure the aggregate toxicity of the whole effluent, so this approach is called whole effluent toxicity (WET) testing. Some WET tests measure acute toxicity and other WET tests measure chronic toxicity.

Using the screening criteria in [chapter 173-205-040 WAC](#), Ecology determined that toxic effects caused by unidentified pollutants in the effluent are unlikely. Therefore, this permit does not require WET testing. Ecology may require WET testing in the future if it receives information indicating that toxicity may be present in this effluent.

V. Monitoring Requirements

Ecology requires monitoring, recording, and reporting ([WAC 173-220-210](#) and [40 CFR 122.41](#)) to verify that the treatment process is functioning correctly and that the discharge complies with the permit's effluent limits.

If a facility uses a contract laboratory to monitor wastewater, it must ensure that the laboratory uses the methods and meets or exceeds the method detection levels required by the permit. The permit describes when facilities may use alternative methods. It also describes what to do in certain situations when the laboratory encounters matrix effects. When a facility uses an alternative method as allowed by the permit, it must report the test method, detection level (DL), and quantitation level (QL) on the discharge monitoring report or in the required report.

A. Wastewater monitoring

Wanapum Dam will monitor for pH, flow, Oil and Grease, and Temperature to characterize the effluent. These pollutant(s) could have an impact on the quality of the surface water.

Special Condition S2 details the monitoring schedule in the proposed permit. Specified monitoring frequencies take into account the quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and cost of monitoring.

B. Lab accreditation

Ecology requires that facilities must use a laboratory registered or accredited under the provisions of [chapter 173-50 WAC](#), Accreditation of Environmental Laboratories, to prepare all monitoring data (with the exception of certain parameters).

Amtest Laboratories (accreditation # C554-18a) performed analysis for parameters in Table #'s 5 and 6. Sampling was conducted in accordance with the facility "Sampling Plan for a NPDES Permit Application" (Grant County PUD, May 2019).

VI. Other Permit Conditions

A. Reporting and record keeping

Ecology based Special Condition S3 on its authority to specify any appropriate reporting and record keeping requirements to prevent and control waste discharges ([WAC 173-220-210](#)).

Permit Condition S3.F.b requires reporting several conditions to Ecology, including:

1. Turbine Runner Hub leakage, failure, or emergency maintenance, and
2. Any Alarm conditions in the sump and the circumstances causing the alarm.

Leakage is determined by the visual confirmation of the pressure tank and sump sight glasses at the beginning of each shift (SPCC pg. 400-4).

B. Non routine and unanticipated wastewater

Occasionally, this facility may generate wastewater which was not characterized in the permit application because it is not a routine discharge and was not anticipated at the time of application. These wastes typically consist of waters used to pressure-test storage tanks or fire water systems or of leaks from drinking water systems.

The permit authorizes the discharge of non-routine and unanticipated wastewater under certain conditions. The facility must characterize these waste waters for pollutants and examine the opportunities for reuse. Depending on the nature and extent of pollutants in this wastewater and on any opportunities for reuse, Ecology may:

- Authorize the facility to discharge the wastewater.
- Require the facility to treat the wastewater.
- Require the facility to reuse the wastewater.

C. Spill plan

This facility stores a quantity of chemicals on-site that have the potential to cause water pollution if accidentally released. Ecology can require a facility to develop best

management plans to prevent this accidental release [[Section 402\(a\)\(1\) of the Federal Water Pollution Control Act \(FWPCA\)](#) and [RCW 90.48.080](#)].

As required by the facility 401 WQC, Wanapum Dam developed a Spill Prevention, Control, and Countermeasures Plan (SPCC- Revised 02/2019) for preventing the accidental release of pollutants to state waters and for minimizing damages if such a spill occurs. The SPCC was signed and stamped by a Professional Engineer (PE). The proposed permit requires the facility to follow the SPCC Plan and to submit any revised SPCC Plan to Ecology.

D. Solid waste control plan

Wanapum Dam could cause pollution of the waters of the state through inappropriate disposal of solid waste or through the release of leachate from solid waste.

This proposed permit requires this facility to develop a solid waste control plan to prevent solid waste from causing pollution of waters of the state. The facility must submit the plan to Ecology for approval ([RCW 90.48.080](#)). You can obtain an Ecology guidance document, which describes how to develop a [Solid Waste Control Plan](#), at: <https://fortress.wa.gov/ecy/publications/documents/0710024.pdf>

E. Operation and maintenance manual

Ecology requires industries to take all reasonable steps to properly operate and maintain their system in accordance with state and federal regulations [[40 CFR 122.41\(e\)](#) and [WAC 173-220-150 \(1\)\(g\)](#)]. The facility will prepare and submit an operation and maintenance manual as required by state regulation for industrial wastewater treatment facilities ([WAC 173-240-150](#)). Implementation of the procedures in the operation and maintenance manual ensures the facility's compliance with the terms and limits in the permit.

F. Oil, Grease, and Lubricant Management

Permit Condition S.10 details requirements for Oil, Grease and Lubricant management. It requires submission of an EAL Evaluation Report, Oil and Grease Accountability Plan, and Oil and Grease Annual Report.

Wicket gates, in-line equipment, lubricated wire ropes, and Kaplan runners all use lubricants which may come into contact with water. This may result in release of lubricants into water. Currently, oil and grease are the primary lubricants used for equipment. However, EALs are an alternative lubricant that are biodegradable and less

harmful to aquatic life species. EALs also offer a reasonable alternative to longer-term, but costly solutions such as oil-less turbines. EALs prevent or minimize the generation and potential release of pollutants from the facility to the waters of the United States.

The permit requires the use of EALs for all equipment with oil to water grease interfaces, unless technically infeasible. EPA's 2011 Environmentally Acceptable Lubricants report defines EALs as "lubricants that have been demonstrated to meet standards for biodegradability, toxicity, and bioaccumulation potential that minimize their likely adverse consequences in the aquatic environment, compared to conventional lubricants." The permit requires that EALs used are consistent with the definition of EALs in EPA's 2011 Environmentally Acceptable Lubricants report. Whether or not the use of EALs is "technically infeasible" will be based on consideration of applicable legal requirements; facility operational requirements; costs of conversion; risk of potential damage to equipment; and maintenance and outage schedules.

G. Compliance Schedule

Continuous Monitoring and Temperature TMDL WLA

A Total Maximum Daily Load (TMDL) specifies the maximum amount of a pollutant that a waterbody can receive and still meet applicable Water Quality Standards. The USEPA issued for public review and comment a Temperature TMDL for the Columbia and Snake Rivers in May 2020.

The proposed permit includes a Compliance Schedule for the facility to install continuous temperature monitoring equipment. The facility will be required to meet the Wasteload Allocation set by the Final EPA Columbia River Temperature TMDL.

Ecology understands implementing and installing monitoring technology sufficient to demonstrate compliance with the proposed permit limits will take both detailed planning and possibly significant expenditures. Therefore, a Compliance Schedule is both reasonable and necessary.

The Compliance Schedule requires:

1. Submission of a Monitoring Plan. The facility must adequately sample and analyze influent and effluent for flow, temperature, pH and Oil and Grease. The monitoring plan presented to Ecology must be sufficiently robust so as to determine compliance with the WLA. The monitoring plan must be presented to Ecology [insert date, 1 year after permit effective date]. The critical season months when the WLA limit will be effective are July, August, September, and October.

2. Installation of necessary monitoring equipment. Continuous temperature monitoring is required for cooling water influent and effluent. Monthly temperature monitoring may be applied where a similar discharge requires continuous temperature monitoring. The facility will have to determine if continuous flow monitoring at all appurtenances is feasible.
 3. The facility must evaluate whether or not existing QAPP data for ambient river temperatures are representative of ambient background conditions upstream of Wanapum Dam. Suitable ambient temperature studies and data quality should conform to the most current QAPP standards. Conduct all sampling and analysis in accordance with the guidelines given in [Guidelines for Preparing Quality Assurance Project Plans for Environmental Studies, Ecology Publication 04-03-030](https://fortress.wa.gov/ecy/publications/documents/04-03-030) (<https://fortress.wa.gov/ecy/publications/documents/0403030.pdf>).
- A model [Quality Assurance Plan specific for temperature](https://fortress.wa.gov/ecy/publications/documents/0503202.pdf) is available at (<https://fortress.wa.gov/ecy/publications/documents/0503202.pdf>).
4. Compliance with the TMDL WLA. The facility must be in compliance with the TMDL WLA by [insert the date that is two-years after permit effective date, or 30 days after EPA issues the final Temperature TMDL, whichever is later].

H. PCB Management

The permits do not allow for the addition of toxic materials or chemicals and prohibit the discharge of PCBs. PCBs may be present in transformers and other equipment at hydroelectric generating facilities. Grant PUD attests the facility does not use PCB's.

J. General conditions

Ecology bases the standardized General Conditions on state and federal law and regulations. They are included in all individual industrial NPDES permits issued by Ecology.

VII. Permit Issuance Procedures

A. Permit modifications

Ecology may modify this permit to impose numerical limits, if necessary to comply with water quality standards for surface waters, with sediment quality standards, or with water quality standards for groundwaters, after obtaining new information from sources such as inspections, effluent monitoring, outfall studies, and effluent mixing studies.

Ecology may also modify this permit to comply with new or amended state or federal regulations.

B. Proposed permit Issuance

This proposed permit includes all statutory requirements for Ecology to authorize a wastewater discharge. The permit includes limits and conditions to protect human health and aquatic life, and the beneficial uses of waters of the state of Washington. Ecology proposes to issue this permit for a term of 5 years.

VIII. References for Text and Appendices

Environmental Protection Agency (EPA)

- 2020. Total Maximum Daily Load (TMDL) for Temperature in the Columbia and Lower Snake Rivers; Region 10
- 2011. Environmentally Acceptable Lubricants, EPA 800-R-11-002
- 1992. National Toxics Rule. Federal Register, V. 57, No. 246, Tuesday, December 22, 1992.
- 1991. *Technical Support Document for Water Quality-based Toxics Control*. EPA/505/2-90-001.
- 1988. *Technical Guidance on Supplementary Stream Design Conditions for Steady State Modeling*. USEPA Office of Water, Washington, D.C.
- 1985. *Water Quality Assessment: A Screening Procedure for Toxic and Conventional Pollutants in Surface and Ground Water*. EPA/600/6-85/002a.
- 1983. *Water Quality Standards Handbook*. USEPA Office of Water, Washington, D.C. Tsivoglou, E.C., and J.R. Wallace.
- 1972. *Characterization of Stream Reaeration Capacity*. EPA-R3-72-012. (Cited in EPA 1985 op.cit.)
- 1979. *In-stream Deoxygenation Rate Prediction*. Journal Environmental Engineering Division, ASCE. 105(EE2). (Cited in EPA 1985 op.cit.)

Washington State Department of Ecology

- July 2018. [Permit Writer's Manual. Publication Number 92-109](https://fortress.wa.gov/ecy/publications/documents/92109.pdf)
(<https://fortress.wa.gov/ecy/publications/documents/92109.pdf>)
- September 2011. [Water Quality Program Guidance Manual – Supplemental Guidance on Implementing Tier II Antidegradation. Publication Number 11-10-073](https://fortress.wa.gov/ecy/publications/summarypages/1110073.html)
(<https://fortress.wa.gov/ecy/publications/summarypages/1110073.html>)

October 2010 (revised). [Water Quality Program Guidance Manual – Procedures to Implement the State's Temperature Standards through NPDES Permits](#). Publication Number 06-10-100

(<https://fortress.wa.gov/ecy/publications/summarypages/0610100.html>)

February 2007. [Focus Sheet on Solid Waste Control Plan, Developing a Solid Waste Control Plan for Industrial Wastewater Discharge Permittees](#), Publication Number 07-10-024. (<https://fortress.wa.gov/ecy/publications/documents/0710024.pdf>) Wright, R.M., and A.J. McDonnell.

[Laws and Regulations](#) (<http://leg.wa.gov/LawsAndAgencyRules/Pages/default.aspx>)

[Permit and Wastewater Related Information](#) (<https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Water-quality-permits-guidance>)

Permit Literature Resources

April 2004. Hanford Reach Fall Chinook Protection Plan.

June 2004. Total Maximum Daily Load for Total Dissolved Gas in the Mid-Columbia River and Lake Roosevelt Submittal Report. Ecology Publication Number 04-03-002. USEPA, WADOE, Spokane Tribe of Indians.

April 2008. 123 FERC 61049 United States of America Federal Energy Regulatory Commission Project No. 2114-116. Order Issuing New License.

April 2008. 401 Certification Priest Rapids Hydropower Project. Order No. 4219 Relicensing of the Priest Rapids Hydroelectric Project (FERC No. 2114).

2011. Clean Water Act_Federal Water Pollution Control Act_Title 33-Navigation_Navigable Waters_Chap. 26-Water Pollution Prevention_Control

February 2018. DRAFT Temperature Water Quality Standards for the Columbia, Lower Columbia, and Lower Snake Rivers.

December 2018. Quality Assurance Project Plan for Monitoring Selected Water Quality Parameters within the Priest Rapids Hydroelectric Project: 2018 Update. Public Utility District No. 2 of Grant County.

January 2019. 2019-2023 (5-Year) Total Dissolved Gas Abatement Plan. Public Utility District No. 2 of Grant County.

February 2019. Spill Prevention, Control and Countermeasures Plan (SPCC). Wanapum Development. Priest Rapids Hydroelectric Project. Public Utility District No. 2 of Grant County.

May 2019. Sampling Plan for a National Pollutant Discharge Elimination System Permit Application. Public Utility District No. 2 of Grant County.

March 2019. 2018 Summary Results of the Water Quality Fixed-Site Monitoring Program Within the Priest Rapids Hydroelectric Project. Keeler, Carson.

November 2019. RE: Public Comment on Grant County Public Utility District's National Pollution Discharge Elimination System Permit Application for the Wanapum Dam. Anter, Simone.

Alkalinity Budget of the Columbia River. Park, P. Kilho. Webster, George. Yamamoto, Roy.

U.S. Army Corps of Engineers. 2015. Memorandum for Walla Walla District Projects, Subject: Oil Accountability Program. CENWW-OD-T, SOP 200-1-1. April 21, 2015.

Appendix A — Public Involvement Information

Ecology proposes to issue a permit to Grant PUD – Wanapum Dam. The permit includes wastewater discharge limits and other conditions. This fact sheet describes the facility and Ecology's reasons for requiring permit conditions.

Ecology placed a Public Notice of Application on October 25, 2019 in the Columbia Basin Herald to inform the public about the submitted application and to invite comment on the issuance of this permit.

Ecology will place a Public Notice of Draft on December 8, 2020 in the Columbia Basin Herald 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.
- Urges people to submit their comments, in writing, before the end of the Comment Period
- Tells how to request a public hearing of comments about the proposed NPDES permit.
- Explains the next step(s) in the permitting process.

NOTICE: ANNOUNCEMENT OF AVAILABILITY OF DRAFT PERMIT

PERMIT NO.: WA0991028

APPLICANT: Public Utility District No. 2 of Grant County

FACILITY: Wanapum Dam

Public Utility District No. 2 of Grant County has applied for a National Pollutant Discharge Elimination System (NPDES) permit in accordance with the provisions of Chapter 90.48 Revised Code of Washington (RCW) and Chapter 173-220 Washington Administrative Code (WAC), and the Federal Clean Water Act.

Following evaluation of the application and other available information, a draft permit has been developed which would allow the discharge of non-contact cooling water from Wanapum Dam, 14353 Hwy 243 S, Beverly, WA to the Columbia River. 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 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:

<https://apps.ecology.wa.gov/paris/DocumentSearch.aspx?PermitNumber=WA0991028&FacilityName=&City=&County=&Region=0&PermitType=0&DocumentType=0>. The application, fact sheet, proposed permit, and other related documents are also available at the Department's Central Regional Office for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m., weekdays. To obtain a copy or to arrange to view copies at the Central Regional Office, please e-mail publicrecordsofficer@ecy.wa.gov or write to Public Records Officer, Department of Ecology, PO Box 47600, Olympia, WA 98504.

Interested persons are invited to submit written comments regarding the proposed permit. All comments must be submitted within 30 days after publication of this notice to be considered for the final determination.

Submit comments online at: <http://wq.ecology.commentinput.com/?id=V3YfW> . Email and written comments should be sent to: cynthia.huwe@ecy.wa.gov or Cynthia Huwe, WQ 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. The Department 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.

Please bring this public notice to the attention of persons who you know would be interested in this matter. The Department is an equal opportunity agency. If you need this publication in an alternate format, please contact us at (509) 575-2490 or TTY (for the speech and hearing impaired) at 711 or 1-800-833-6388.

Ecology has published a document entitled [*Frequently Asked Questions about Effective Public Commenting*](#) which is available on our website at <https://fortress.wa.gov/ecy/publications/SummaryPages/0307023.html> .

Fact Sheet for NPDES Permit WA0991028

XX/XX/XXXX ([Permit effective date](#))

Wanapum Dam

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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 West Alder Street
Union Gap, WA 98903

The primary author of this permit and fact sheet is Keith Primm.

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](#).

Table 13 - 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 — Glossary

- 1-DMax or 1-day maximum temperature** – The highest water temperature reached on any given day. This measure can be obtained using calibrated maximum/minimum thermometers or continuous monitoring probes having sampling intervals of thirty minutes or less.
- 7-DADMax or 7-day average of the daily maximum temperatures** – The arithmetic average of seven consecutive measures of daily maximum temperatures. The 7-DADMax for any individual day is calculated by averaging that day's daily maximum temperature with the daily maximum temperatures of the three days prior and the three days after that date.
- Acute toxicity** – The lethal effect of a compound on an organism that occurs in a short time period, usually 48 to 96 hours.
- AKART** – The acronym for “all known, available, and reasonable methods of prevention, control and treatment.” AKART is a technology-based approach to limiting pollutants from wastewater discharges, which requires an engineering judgment and an economic judgment. AKART must be applied to all wastes and contaminants prior to entry into waters of the state in accordance with [RCW 90.48.010](#) and [RCW 90.48.520](#), [WAC 173-200-030\(2\)\(c\)\(ii\)](#), and [WAC 173-216-110\(1\)\(a\)](#).
- Alternate point of compliance** – An alternative location in the groundwater from the point of compliance where compliance with the groundwater standards is measured. It may be established in the groundwater at locations some distance from the discharge source, up to, but not exceeding the property boundary and is determined on a site specific basis following an AKART analysis. An “early warning value” must be used when an alternate point is established. An alternate point of compliance must be determined and approved in accordance with [WAC 173-200-060\(2\)](#).
- Ambient water quality** – The existing environmental condition of the water in a receiving water body.
- Ammonia** – Ammonia is produced by the breakdown of nitrogenous materials in wastewater. Ammonia is toxic to aquatic organisms, exerts an oxygen demand, and contributes to eutrophication. It also increases the amount of chlorine needed to disinfect wastewater.
- Annual average design flow (AADF)** – average of the daily flow volumes anticipated to occur over a calendar year.
- Average monthly (intermittent) discharge limit** – The average of the measured values obtained over a calendar months' time taking into account zero discharge days.
- Average monthly discharge limit** – The average of the measured values obtained over a calendar months' time.
- Background water quality** – The concentrations of chemical, physical, biological or radiological constituents or other characteristics in or of groundwater at a particular point in

time upgradient of an activity that has not been affected by that activity, [\[WAC 173-200-020\(3\)\]](#). Background water quality for any parameter is statistically defined as the 95% upper tolerance interval with a 95% confidence based on at least eight hydraulically upgradient water quality samples. The eight samples are collected over a period of at least one year, with no more than one sample collected during any month in a single calendar year.

Best management practices (BMPs) – Schedules of activities, prohibitions of practices, maintenance procedures, and other physical, structural and/or managerial practices to prevent or reduce the pollution of waters of the state. BMPs include treatment systems, operating procedures, and practices to control: plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage. BMPs may be further categorized as operational, source control, erosion and sediment control, and treatment BMPs.

BOD₅ – Determining the five-day Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of organic material present in an effluent that is utilized by bacteria. The BOD₅ is used in modeling to measure the reduction of dissolved oxygen in receiving waters after effluent is discharged. Stress caused by reduced dissolved oxygen levels makes organisms less competitive and less able to sustain their species in the aquatic environment. Although BOD₅ is not a specific compound, it is defined as a conventional pollutant under the federal Clean Water Act.

Bypass – The intentional diversion of waste streams from any portion of a treatment facility.

Categorical pretreatment standards – National pretreatment standards specifying quantities or concentrations of pollutants or pollutant properties, which may be discharged to a POTW by existing or new industrial users in specific industrial subcategories.

Chlorine – A chemical used to disinfect wastewaters of pathogens harmful to human health. It is also extremely toxic to aquatic life.

Chronic toxicity – The effect of a compound on an organism over a relatively long time, often 1/10 of an organism's lifespan or more. Chronic toxicity can measure survival, reproduction or growth rates, or other parameters to measure the toxic effects of a compound or combination of compounds.

Clean water act (CWA) – The federal Water Pollution Control Act enacted by Public Law 92-500, as amended by Public Laws 95-217, 95-576, 96-483, 97-117; USC 1251 et seq.

Compliance inspection-without sampling – A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations.

Compliance inspection-with sampling – A site visit for the purpose of determining the compliance of a facility with the terms and conditions of its permit or with applicable statutes and regulations. In addition it includes as a minimum, sampling and analysis for all

parameters with limits in the permit to ascertain compliance with those limits; and, for municipal facilities, sampling of influent to ascertain compliance with the 85 percent removal requirement. Ecology may conduct additional sampling.

Composite sample – A mixture of grab samples collected at the same sampling point at different times, formed either by continuous sampling or by mixing discrete samples. May be "time-composite" (collected at constant time intervals) or "flow-proportional" (collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increased while maintaining a constant time interval between the aliquots).

Construction activity – Clearing, grading, excavation, and any other activity, which disturbs the surface of the land. Such activities may include road building; construction of residential houses, office buildings, or industrial buildings; and demolition activity.

Continuous monitoring – Uninterrupted, unless otherwise noted in the permit.

Critical condition – The time during which the combination of receiving water and waste discharge conditions have the highest potential for causing toxicity in the receiving water environment. This situation usually occurs when the flow within a water body is low, thus, its ability to dilute effluent is reduced.

Date of receipt – This is defined in [RCW 43.21B.001\(2\)](#) as five business days after the date of mailing; or the date of actual receipt, when the actual receipt date can be proven by a preponderance of the evidence. The recipient's sworn affidavit or declaration indicating the date of receipt, which is unchallenged by the agency, constitutes sufficient evidence of actual receipt. The date of actual receipt, however, may not exceed forty-five days from the date of mailing.

Detection limit – The minimum concentration of a substance that can be measured and reported with 99 percent confidence that the pollutant concentration is above zero and is determined from analysis of a sample in a given matrix containing the pollutant.

Dilution factor (DF) – A measure of the amount of mixing of effluent and receiving water that occurs at the boundary of the mixing zone. Expressed as the inverse of the percent effluent fraction, for example, a dilution factor of 10 means the effluent comprises 10% by volume and the receiving water 90%.

Distribution uniformity – The uniformity of infiltration (or application in the case of sprinkle or trickle irrigation) throughout the field expressed as a percent relating to the average depth infiltrated in the lowest one-quarter of the area to the average depth of water infiltrated.

Early warning value – The concentration of a pollutant set in accordance with [WAC 173-200-070](#) that is a percentage of an enforcement limit. It may be established in the effluent, groundwater, surface water, the vadose zone or within the treatment process. This value acts as a trigger to detect and respond to increasing contaminant concentrations prior to the degradation of a beneficial use.

Enforcement limit – The concentration assigned to a contaminant in the groundwater at the point of compliance for the purpose of regulation, [\[WAC 173-200-020\(11\)\]](#). This limit assures that a groundwater criterion will not be exceeded and that background water quality will be protected.

Engineering report – A document that thoroughly examines the engineering and administrative aspects of a particular domestic or industrial wastewater facility. The report must contain the appropriate information required in [WAC 173-240-060](#) or [WAC 173-240-130](#).

Fecal coliform bacteria – Fecal coliform bacteria are used as indicators of pathogenic bacteria in the effluent that are harmful to humans. Pathogenic bacteria in wastewater discharges are controlled by disinfecting the wastewater. The presence of high numbers of fecal coliform bacteria in a water body can indicate the recent release of untreated wastewater and/or the presence of animal feces.

Grab sample – A single sample or measurement taken at a specific time or over as short a period of time as is feasible.

Groundwater – Water in a saturated zone or stratum beneath the surface of land or below a surface water body.

Industrial user – A discharger of wastewater to the sanitary sewer that is not sanitary wastewater or is not equivalent to sanitary wastewater in character.

Industrial wastewater – Water or liquid-carried waste from industrial or commercial processes, as distinct from domestic wastewater. These wastes may result from any process or activity of industry, manufacture, trade or business; from the development of any natural resource; or from animal operations such as feed lots, poultry houses, or dairies. The term includes contaminated stormwater and, also, leachate from solid waste facilities.

Interference – A discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

- Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal; and
- Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to subtitle D of the SWDA), sludge regulations appearing in [40 CFR Part 507](#), the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.

Local limits – Specific prohibitions or limits on pollutants or pollutant parameters developed by a POTW.

Major facility – A facility discharging to surface water with an EPA rating score of > 80 points based on such factors as flow volume, toxic pollutant potential, and public health impact.

Maximum daily discharge limit – The highest allowable daily discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. The daily discharge is calculated as the average measurement of the pollutant over the day.

Maximum day design flow (MDDF) – The largest volume of flow anticipated to occur during a one-day period, expressed as a daily average.

Maximum month design flow (MMDF) – The largest volume of flow anticipated to occur during a continuous 30-day period, expressed as a daily average.

Maximum week design flow (MWDF) – The largest volume of flow anticipated to occur during a continuous 7-day period, expressed as a daily average.

Method detection level (MDL) – See Detection Limit.

Minor facility – A facility discharging to surface water with an EPA rating score of < 80 points based on such factors as flow volume, toxic pollutant potential, and public health impact.

Mixing zone – An area that surrounds an effluent discharge within which water quality criteria may be exceeded. The permit specifies the area of the authorized mixing zone that Ecology defines following procedures outlined in state regulations ([chapter 173-201A WAC](#)).

National pollutant discharge elimination system (NPDES) – The NPDES ([Section 402 of the Clean Water Act](#)) is the federal wastewater permitting system for discharges to navigable waters of the United States. Many states, including the state of Washington, have been delegated the authority to issue these permits. NPDES permits issued by Washington State permit writers are joint NPDES/State permits issued under both state and federal laws.

pH – The pH of a liquid measures its acidity or alkalinity. It is the negative logarithm of the hydrogen ion concentration. A pH of 7 is defined as neutral and large variations above or below this value are considered harmful to most aquatic life.

Pass-through – A discharge which exits the POTW into waters of the State in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation), or which is a cause of a violation of State water quality standards.

Peak hour design flow (PHDF) – The largest volume of flow anticipated to occur during a one-hour period, expressed as a daily or hourly average.

Peak instantaneous design flow (PIDF) – The maximum anticipated instantaneous flow.

Point of compliance – The location in the groundwater where the enforcement limit must not be exceeded and a facility must comply with the Ground Water Quality Standards. Ecology determines this limit on a site-specific basis. Ecology locates the point of compliance in the groundwater as near and directly downgradient from the pollutant source as technically, hydrogeologically, and geographically feasible, unless it approves an alternative point of compliance.

Potential significant industrial user (PSIU) – A potential significant industrial user is defined as an Industrial User that does not meet the criteria for a Significant Industrial User, but which discharges wastewater meeting one or more of the following criteria:

- a. Exceeds 0.5 % of treatment plant design capacity criteria and discharges <25,000 gallons per day or;
- b. Is a member of a group of similar industrial users which, taken together, have the potential to cause pass through or interference at the POTW (e.g. facilities which develop photographic film or paper, and car washes).

Ecology may determine that a discharger initially classified as a potential significant industrial user should be managed as a significant industrial user.

Quantitation level (QL) – Also known as **Minimum Level of Quantitation (ML)** – The lowest level at which the entire analytical system must give a recognizable signal and acceptable calibration point for the analyte. It is equivalent to the concentration of the lowest calibration standard, assuming that the lab has used all method-specified sample weights, volumes, and cleanup procedures. The QL is calculated by multiplying the MDL by 3.18 and rounding the result to the number nearest to $(1, 2, \text{ or } 5) \times 10^n$, where n is an integer. ([64 FR 30417](#)).
ALSO GIVEN AS:

The smallest detectable concentration of analyte greater than the Detection Limit (DL) where the accuracy (precision & bias) achieves the objectives of the intended purpose. (Report of the Federal Advisory Committee on Detection and Quantitation Approaches and Uses in Clean Water Act Programs Submitted to the US Environmental Protection Agency December 2007).

Reasonable potential – A reasonable potential to cause a water quality violation, or loss of sensitive and/or important habitat.

Responsible corporate officer – A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation, or the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures ([40 CFR 122.22](#)).

Sample Maximum – No sample may exceed this value.

Significant industrial user (SIU) –

- 1) All industrial users subject to Categorical Pretreatment Standards under [40 CFR 403.6](#) and [40 CFR Chapter I, Subchapter N](#) and;
- 2) Any other industrial user that: discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, noncontact cooling, and boiler blow-down wastewater); contributes a process wastestream that makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the Control Authority* on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement [in accordance with [40 CFR 403.8\(f\)\(6\)](#)].

Upon finding that the industrial user meeting the criteria in paragraph 2, above, has no reasonable potential for adversely affecting the POTW's operation or for violating any pretreatment standard or requirement, the Control Authority* may at any time, on its own initiative or in response to a petition received from an industrial user or POTW, and in accordance with [40 CFR 403.8\(f\)\(6\)](#), determine that such industrial user is not a significant industrial user.

*The term "Control Authority" refers to the Washington State Department of Ecology in the case of non-delegated POTWs or to the POTW in the case of delegated POTWs.

Slug discharge – Any discharge of a non-routine, episodic nature, including but not limited to an accidental spill or a non-customary batch discharge to the POTW. This may include any pollutant released at a flow rate that may cause interference or pass through with the POTW or in any way violate the permit conditions or the POTW's regulations and local limits.

Soil scientist – An individual who is registered as a Certified or Registered Professional Soil Scientist or as a Certified Professional Soil Specialist by the American Registry of Certified Professionals in Agronomy, Crops, and Soils or by the National Society of Consulting Scientists or who has the credentials for membership. Minimum requirements for eligibility are: possession of a baccalaureate, masters, or doctorate degree from a U.S. or Canadian institution with a minimum of 30 semester hours or 45 quarter hours professional core courses in agronomy, crops or soils, and have 5, 3, or 1 years, respectively, of professional experience working in the area of agronomy, crops, or soils.

Solid waste – All putrescible and non-putrescible solid and semisolid wastes including, but not limited to, garbage, rubbish, ashes, industrial wastes, swill, sewage sludge, demolition and construction wastes, abandoned vehicles or parts thereof, contaminated soils and contaminated dredged material, and recyclable materials.

Soluble BOD₅ – Determining the soluble fraction of Biochemical Oxygen Demand of an effluent is an indirect way of measuring the quantity of soluble organic material present in an effluent that is utilized by bacteria. Although the soluble BOD₅ test is not specifically described in Standard Methods, filtering the raw sample through at least a 1.2 um filter prior to running the standard BOD₅ test is sufficient to remove the particulate organic fraction.

State waters – Lakes, rivers, ponds, streams, inland waters, underground waters, salt waters, and all other surface waters and watercourses within the jurisdiction of the state of Washington.

Stormwater – That portion of precipitation that does not naturally percolate into the ground or evaporate, but flows via overland flow, interflow, pipes, and other features of a stormwater drainage system into a defined surface water body, or a constructed infiltration facility.

Technically Infeasible – No EAL products are approved for use in a given application that meet manufacturer specifications for that equipment; products which come pre-lubricated (e.g., wire ropes) and have no available alternatives manufactured with EALs; or products meeting a manufacturer's specifications are not available.

Technology-based effluent limit – A permit limit based on the ability of a treatment method to reduce the pollutant.

Total coliform bacteria – A microbiological test, which detects and enumerates the total coliform group of bacteria in water samples.

Total dissolved solids – That portion of total solids in water or wastewater that passes through a specific filter.

Total maximum daily load (TMDL) – A determination of the amount of pollutant that a water body can receive and still meet water quality standards.

Total suspended solids (TSS) – Total suspended solids is the particulate material in an effluent. Large quantities of TSS discharged to a receiving water may result in solids accumulation. Apart from any toxic effects attributable to substances leached out by water, suspended solids may kill fish, shellfish, and other aquatic organisms by causing abrasive injuries and by clogging the gills and respiratory passages of various aquatic fauna. Indirectly, suspended solids can screen out light and can promote and maintain the development of noxious conditions through oxygen depletion.

Upset – An exceptional incident in which there is unintentional and temporary noncompliance with technology-based permit effluent limits because of factors beyond the reasonable control of the Permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, lack of preventative maintenance, or careless or improper operation.

Water quality-based effluent limit – A limit imposed on the concentration of an effluent parameter to prevent the concentration of that parameter from exceeding its water quality criterion after discharge into receiving waters.

DRAFT

Appendix D — Technical Calculations

D-Flow 7Q10

COLUMBIA RIVER BELOW PRIEST RAPIDS DAM, WA

| D-Flow App | developed by Steve Hummel and Pat Hallinan

Station ID Input Method:

☒ Type/Paste ID

☐ Select from Map

Type/Paste_Station_ID:

12472800

Water Year Start Month:

Apr

Number of Months:

12

Date Range:

1999-04-01 to 2019-04-01

Map

List of Stations

All Flow Data

Min 7 Day Flows

7Q10 Calculation

Min 7 Day Plot

Daily Flow Plot

Four Stats Plot

Summary Stats

variables	values
Length (x)	7 days
Recurrence (y)	10 years
Mean_Logs (u)	10.951
SD_Logs (s.d.)	0.14689
Skew_Logs (g)	0.59106
K	-1.2006
Z	-1.2811
7Q10	47,786.8 cfs
Har_Mean	99,514.8 cfs

Period of Record

variable	values
Start_Date	1917-10-01
End_Date	2019-05-14
Dataset Low Flow Years	102

Period of Analysis

variable	values
Start_Date	1999-04-01
End_Date	2019-04-01
Dataset Low Flow Years	21
Analysis Low Flow Years	20

These data are updated in real time as date range and months are filtered

- How does DFLOW determine xQy?
 - DFLOW uses the following formula:
$$xQy = \exp(u + \sigma K(g, y))$$
where u = mean of logarithms of annual low flows
 σ = standard deviation of above
 g = skewness coefficient of above
 - K is calculated using:
$$K = \frac{2}{g} \left[\left(1 + \frac{g^2}{6} - \frac{g^3}{54} \right)^{3/2} - 1 \right] ; z = 4.91 \left[\left(\frac{y}{y'} \right)^{14} - \left(1 - \frac{y}{y'} \right)^{14} \right]$$

Reasonable Potential Analysis:

The spreadsheets Input 2 – Reasonable Potential, and LimitCalc in Ecology's PermitCalc Workbook determine reasonable potential (to violate the aquatic life and human health water quality standards) and calculate effluent limits. The process and formulas for determining reasonable potential and effluent limits in these spreadsheets are taken directly from the [*Technical Support Document for Water Quality-based Toxics Control, \(EPA 505/2-90-001\)*](#). The adjustment for autocorrelation is from EPA (1996a), and EPA (1996b).

Appendix E — Response to Comments

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

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