

**Addendum to the Fact Sheet for
State Waste Discharge Permit
Permit No. ST0007353**

Modification Date: July 27, 2021

1. General Information

Facility name and address:

Naval Undersea Warfare Center Division, Keyport
610 Dowell St, Building 206
Keyport, WA 98345

2. Permit Modification

On May 27, 2021, the Naval Undersea Warfare Center Division, Keyport (NUWC Keyport) submitted a permit modification application requesting several changes to their existing permit.

1. Modification to the Otto Fuel II reclamation system discharge location and sample point to Building 514

As propositioned in the fact sheet to the permit issued on June 26, 2018, NUWC Keyport has requested to discharge the treated wastewater from the reclamation of Otto Fuel II directly to the sanitary sewer, from Building 514, instead of transferring the wastewater for further treatment at Building 825 Industrial Waste Treatment Plant (IWTP). NUWC Keyport is currently in the process of installing a new Otto Fuel II reclamation unit, substantially similar in design as the existing unit, and is proposing to install a direct discharge line to the sanitary sewer. The primary component of Otto Fuel II is propylene glycol dinitrate (PGDN). Uncombusted Otto Fuel II removed from components is in a mixture with seawater. The reclamation unit separates out the Otto Fuel II from the seawater.

As part of the request to modify the discharge location of the Otto Fuel II reclamation system, NUWC Keyport provided results from three sampling events to confirm that the treated wastewater meets Kitsap County local limits for discharge to the sanitary sewer. The results are summarized in Table 1.

Ecology is proposing to modify the permit to allow discharge of treated wastewater from the Otto Fuel II reclamation system directly to the sanitary sewer. Ecology is proposing to allow monitoring of PGDN on a per batch basis from the new SP003 once NUWC Keyport has completed installation of the new discharge port and notified Ecology of the change. The PGDN permit limit currently applied to SP001 will be applicable to SP003 when it is in use. In addition, all monitoring results, as summarized in Table 1, show this discharge will comply with local limits. The level of copper in one of the samples was very close to the local limit of 0.75 mg/L. Ecology is not proposing any additional monitoring at SP003 since NUWC Keyport ultimately

measures compliance to local limits at SP002, the final discharge of all combined industrial and domestic wastewater to the Kitsap County sewer system.

Table 1 Otto Fuel II reclamation system discharge sampling

Parameter	Maximum Value (mg/L)	Average Value (mg/L)	Local Limit (mg/L)
Total suspended solids	85	49	350
Arsenic	0.01	0.01	0.15
Cadmium	0.03	0.02	0.1
Chromium	0.008	0.004	1.0
Copper	0.72	0.43	0.75
Lead	0.005	0.005	0.25
Mercury	0.00003	0.00003	0.01
Molybdenum	0.005	0.005	2.0
Nickel	0.01	0.008	0.6
Selenium	Non-detect	Non-detect	0.8
Silver	Non-detect	Non-detect	0.5
Zinc	0.13	0.06	2.0

2. Addition of modified language for notification of nonroutine discharges

NUWC Keyport requested the addition of the following statement under permit condition S9:

“Temporary discharges with a volume of less than 1,000 gallons, and which are evaluated, and found not to be a dangerous waste, hazardous waste, or a categorical discharge as defined under 40 CFR Parts 403-699, and are determined not to contain pollutants in concentrations greater than the local limitations, may be made without prior notice to Ecology and Central Kitsap Waste Water Treatment Plant (WWTP). The evaluations and characterizations of the discharges, must be made available to Ecology and Central Kitsap WWTP if requested.”

Ecology has considered this request and is proposing to add this language in S9. To determine compliance with the evaluations under this authorization, Ecology is proposing to require NUWC Keyport to submit a list of all discharges made under this provision with the permit renewal application. Ecology has included this proposed requirement in S3.L.

3. Addition of authorizations to discharge minor and intermittent industrial wastewater

Upon the request of NUWC Keyport, and with approval from Kitsap County Public Works, Ecology is proposing to modify the minor and intermittent industrial discharges to include updated information. The authorized minor and intermittent discharges are listed in permit condition S11. Ecology does not believe the proposed changes will cause a substantial increase in daily flow or contribute any new pollutants.

In addition to updating the authorized minor and industrial discharges list, which gives approximate maximum daily discharge rates and not explicit flow limits, Ecology is proposing that NUWC Keyport notify Ecology and Kitsap County if flows from these authorized sources are expected to be substantially greater than the stated approximate flow.

In addition to the requested modifications, Ecology took this opportunity to update the Ecology Northwest Regional Office address and phone numbers.

All proposed modifications to the permit are highlighted in gray for ease of locating.

3. Public Process

In accordance with WAC 173-216-090, public notification requirements do not apply for state waste discharge permits if there are no increases in volume or changes in characteristics of discharge beyond those previously authorized.

The requested additional authorized discharge locations will not considerably increase the total volume of wastewater discharged from this site nor should contribute any new pollutants to the sanitary sewer system. Therefore, Ecology is not conducting a public notice of this modification.

4. Permit Appeal Process

Appendix A describes the permit appeal process.

5. Recommendation for Permit Issuance

Ecology proposes to retain the existing permit expiration date of June 30, 2023. The proposed modification is effective immediately.

The primary author of this permit and fact sheet is Maia Hoffman.

Appendix A --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).

To appeal you must do the following within 30 days of the date of receipt of this permit:

- File your appeal and a copy of this permit with the PCHB (see addresses below). Filing means actual receipt by the PCHB during regular business hours.
- Serve a copy of your appeal and this permit on Ecology in paper form - by mail or in person. (See addresses below.) E-mail is not accepted.

You must also comply with other applicable requirements in chapter 43.21B RCW and chapter 371-08 WAC.

ADDRESS AND LOCATION INFORMATION

Street Addresses	Mailing Addresses
Department of Ecology Attn: Appeals Processing Desk 300 Desmond Drive SE Lacey, WA 98503	Department of Ecology Attn: Appeals Processing Desk PO Box 47608 Olympia, WA 98504-7608
Pollution Control Hearings Board 1111 Israel RD SW STE 301 Tumwater, WA 98501	Pollution Control Hearings Board PO Box 40903 Olympia, WA 98504-0903