



STATE OF WASHINGTON  
**DEPARTMENT OF ECOLOGY**

Eastern Region Office

4601 North Monroe St., Spokane, WA 99205-1295 • 509-329-3400

August 25, 2022

Marlene Feist  
Public Works Director  
City of Spokane  
808 West Spokane Falls Boulevard  
Spokane, Washington 99201

RE: Clarification and Correction to National Pollutant Discharge Elimination System (NPDES)  
Permit WA0024473 and Fact Sheet– Riverside Park Water Reclamation Facility (RPWRF)

Dear Marlene Feist:

The Department of Ecology (Ecology) received an email request from the City of Spokane on August 10, 2022 to correct typos/errors in the City of Spokane RPWRF NPDES permit WA0024473 and fact sheet. In addition to the errors listed in the request, a few additional errors were also corrected by Ecology. The corrections made are listed below.

Permit:

1. On Page 18, under Pretreatment Monitoring Requirements, Table 9, paragraph 3, reads 'Additionally, the Permittee must sample for the parameters identified in EPA Local Limits Development Guide Appendices Appendix G at the outfall for the primary clarifier and submit the results with the Pretreatment Annual Report Section S6.A (5)'.

**Correction:** As indicated in the response to comment, primary clarifier monitoring will not be required during the permit cycle. This paragraph was deleted.

2. On Page 39 and 40, under Section S6.A, paragraph 5: reads 'The report should include a summary of the inhibition identified through the sampling of the primary clarifier effluent in the second and fourth year of the permit. The Primary Clarifier effluent must be sampled for the list of parameters identified in EPA Local Limits Development Guidance Appendices, Publication EPA 833-R-04-002B July 2004, Appendix G in the 2<sup>nd</sup> and 4<sup>th</sup> year of the permit'.

**Correction:** Primary clarifier monitoring will not be required during the permit cycle. This paragraph was deleted.

3. Page 19, under Table 133a: 'Wet Weather Operations Monitoring'

**Correction:** The table number in the heading has a typo. The Table number should be Table 13. The heading was corrected.

4. Page 22, under Section S2.B, paragraph No. 2, it reads 'The Permittee must add parameters in Table 13 to the parameters identified in the post construction monitoring plan'.

**Correction:** The reference to Table 13 is an error. It should be Table 14. The reference was corrected.

5. Page 22, under Table 14: 'Combined Sewer Overflow (CSO) Monitoring Schedule'. The caption at the bottom of the table is an error.

**Correction:** The caption was changed from Table 13 Footnotes to Table 14 Footnotes.

6. Page 16, under Table 7: 'Final Wastewater Effluent', HEM (FOG) and HEM-SGT (TPH) both have the unit of ug/L, this unit is a typo.

**Correction:** HEM (FOG) and HEM-SGT (TPH) units were corrected to mg/L.

7. Page 19, under Table 13a: 'Wet Weather Operations Monitoring', Total Precipitation and Calculated Membrane Flow Capacity sampling frequencies are incorrect. These two frequencies were accidentally switched.

**Correction:** Total Precipitation sampling frequency was corrected from Continuous to 1/event and Calculated Membrane Flow was corrected from 1/event to Continuous.

#### Fact Sheet:

1. Page 67, Outfall evaluation, 'The proposed permit requires City of Spokane to conduct an outfall inspection for each CSO and submit findings of that inspection (Special Condition 16) in the CSO Annual Report'.

**Correction:** Social Condition S16 was not the correct reference, it was changed to Special Condition S14.

Because text was removed as a result of the corrections, page numbers in the corrected copy may not match the page numbers listed in this letter. The corrections above reference page numbers in the original unedited version.

Marlene Feist  
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A corrected permit and fact sheet are enclosed. Please replace the current documents with the corrected versions. Since it is not a major change, we are correcting the permit and no public comment period is necessary.

Please contact Diana Washington at (509) 385-5529 or by email at [dwas461@ecy.wa.gov](mailto:dwas461@ecy.wa.gov) if you have questions about this permit correction.

Sincerely,

A handwritten signature in cursive script that reads "Shara Joy".

Shara Joy  
Water Quality Program  
Eastern Regional Office

SJ:sj

Enclosure (Corrected permit and fact sheet)

cc: Michael Cannon, City of Spokane RPWRF  
Jon Eckhart, City of Spokane RPWRF  
Raylene Gennett, City of Spokane  
Jeff Donovan, City of Spokane  
Diana Washington, PE, WQP Permit Manager, Ecology Eastern Region  
Art Jenkins, PE, WQP Permit Unit Supervisor, Ecology Eastern Region

Hi Diana,

Thank you for the clarification on the O&M Manual date and corrected permit. In reviewing the new permit we did notice a few additional items that I thought I'd bring to your attention:

- In the response to comments document (page 52, Comment PA-1-30), it states "...the permit will not require testing of the primary clarifier effluent." However, I'm still seeing it listed in a couple different sections in the permit. Is it possible to get these sections corrected/removed?
- In the permit, under Table 9 (page 18):

Additionally, the Permittee must sample for the parameters identified in EPA Local Limits Development Guide Appendices Appendix G at the outfall for the primary clarifier and submit the results with the Pretreatment Annual Report Section S6.A(5).

- And, under S6.A(5):

5. Pretreatment Report

The Permittee must provide to Ecology an annual report that briefly describes its program activities during the previous calendar year. The report should include a summary of the inhibition identified through sampling of the primary clarifier effluent in the second and fourth year of the permit.

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Permit Number WA0024473  
Effective Date: 09/01/2022

The Primary Clarifier effluent must be sampled for the list of parameters identified in EPA Local Limits Development Guidance Appendices, Publication EPA 833-R-04-002B July 2004, Appendix G in the 2<sup>nd</sup> and 4<sup>th</sup> year of the permit.

- The fact sheet talks about CSO Outfall evaluation on page 67, referencing S16 in permit. S16 has to do with Chronic toxicity testing. I'm not seeing anything in the permit itself on outfall evaluations, besides what's in S14.B(1) on conducting regular sewer inspections. Is there any requirements here that we're missing? Not sure this necessitates any correction, but the CSO team wanted to make sure we're covering what we need to do vs. how we've done the outfall inspections historically.
- The rest below are more just typos I saw, that I don't think are super critical, but might be worth changing if you're able to update the primary clarifier sampling piece:
  - Table 133a should be table 13
  - S2.B paragraph references Table 13 (should be Table 14).
  - Footnotes under Table 14 reference "Table 13 Footnotes"

Hopefully those all make sense. Let me know if you have any follow-up questions. Appreciate it,

Jeff

