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General Manager:
GARY R. IVORY

FEB 15 2024

Public Utility District

No. 1 of Douglas County

DEPARTMENT OF ECOLOGY
CENTRAL REGIONAL OFFICE

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Via Electronic Filing – keith.primm@ecy.wa.gov

February 12, 2024

Keith Primm
Permit Writer/Facility Manager
Water Quality Program
Ecology at Central Regional Office
Union Gap, WA
(509) 575-2490

**Subject: Wells Dam's National NPDES Wastewater Discharge Permit No. WA0991031
Notification of Change to Outfall Locations**

Dear Mr. Primm,

The Public Utility District No. 1 of Douglas County (Douglas PUD) respectfully submits to Washington State Department of Ecology (Ecology) a notification of a change in the outfall discharge locations listed in our Wells Dam National Pollutant Discharge Elimination System (NPDES) Wastewater Discharge Permit No. WA0991031, per Section G4 (Page 27) of the permit.

G4. Reporting planned changes

The Permittee must, as soon as possible, but no later than one hundred eighty (180) days prior to the proposed changes, give notice to Ecology of planned physical alterations or additions to the permitted facility, production increases, or process modification which will result in:

- 1. The permitted facility being determined to be a new source pursuant to 40 CFR 122.29(b).*
- 2. A significant change in the nature or an increase in quantity of pollutants discharged.*
- 3. A significant change in the Permittee's sludge use or disposal practices. Following such notice, and the submittal of a new application or supplement to the existing application, along with required engineering plans and reports, this permit may be modified, or revoked and reissued pursuant to 40 CFR 122.62(a) to specify and limit any pollutants not previously limited. Until such modification is effective, any new or increased discharge in excess of permit limits or not specifically authorized by this permit constitutes a violation.*

Pursuant to Section G4 and beginning 180 days after submission of this letter, Outfalls 14 – 23 will be plumbed directly into the Wells Dam drainage sump rather than directly discharging into the Columbia River. The wastewater discharge from these systems will enter the drainage sump system and be tested for Hexane Extractable Materials (HEM) and temperature as part of the routine testing for Outfall No. 1: Sump System Discharge. There will be no change to the maximum volume of wastewater discharged from the Wells Project. The proposed modification would simply change the number of outfalls tested on a regular basis since point source discharge locations would be combined as shown in Attachment A. Douglas PUD is proposing to report “no discharge” for these outfalls following replumbing and would continue as such until the permit renewal process when these point source outfall locations would be removed from the new permit application.

Combining discharge locations have a number of benefits. Outfalls 14-23 are non-contact cooling HVAC systems with limited opportunities for additive HEM products. By combining these outfalls, the number of samples taken monthly would be reduced substantially and reduce the sample burden for Douglas PUD. Additionally, any process water that travels the sump system is exposed to wastewater monitoring and process capabilities that other direct discharge does not receive. These systems include an oil alarm (detection) and oil skimmer. As such, Douglas PUD believes that the discharge location change will have either a neutral or improved environmental outcome for state surface waters.

Plumbing these HVAC systems to the sump system discharge was part of the original Wells Dam drainage water system, however, it was never instituted. Further, the change in process flow is similar to how drainage water is handled at other hydroelectric facilities, such as those managed by Public Utility District No. 2 of Grant County.

Douglas PUD is not proposing a production or point source increase, adding new sources, or changing the quantity of pollutants discharged and, therefore, Douglas PUD believes that, pursuant to Section G4 of the permit, only a notification is required to stay compliant with our permit terms. Since there are no meaningful changes to the wastewater system, instead a minor change to plumbing, we also believe we are exempt from submitting an engineering report and detailed plans for review (NPDES Permit No. WA0991031, Section G5, Page 27):

G5. Plan review required

Prior to constructing or modifying any wastewater control facilities, an engineering report and detailed plans and specifications must be submitted to Ecology for approval in accordance with chapter 173-240 WAC. Engineering reports, plans, and specifications must be submitted at least one hundred eighty (180) days prior to the planned start of construction unless a shorter time is approved by Ecology. Facilities must be constructed and operated in accordance with the approved plans.

An update process flow line diagram is attached to this letter and should replace the process water flow and drainage system schematics issued in the Permit (Attachment A).

Should you have additional questions, please contact Mariah Mayfield, Aquatic Resource Biologist at (mariah.mayfield@dcpud.org, 509-881-2326) or Andrew Gingerich Natural Resources Supervisor (andrew.gingerich@dcpud.org, 509-881-2323).

Sincerely,



Gary R. Ivory
General Manager

Cc: Erik Van Doren – Ecology
Caleb Bos - Ecology
Tyler Evans – Douglas PUD
Matt Mullins – Douglas PUD
Shane Bickford – Douglas PUD
Andrew Gingerich – Douglas PUD

Attachment A. Updated Water Flow and Drainage System Schematic

**WELLS HYDROELECTRIC PROJECT NO. 2149
NPDES PERMIT NO. WA0991031**

ATTACHMENT A

UPDATED WATER FLOW AND DRAINAGE SYSTEM SCHEMATICS

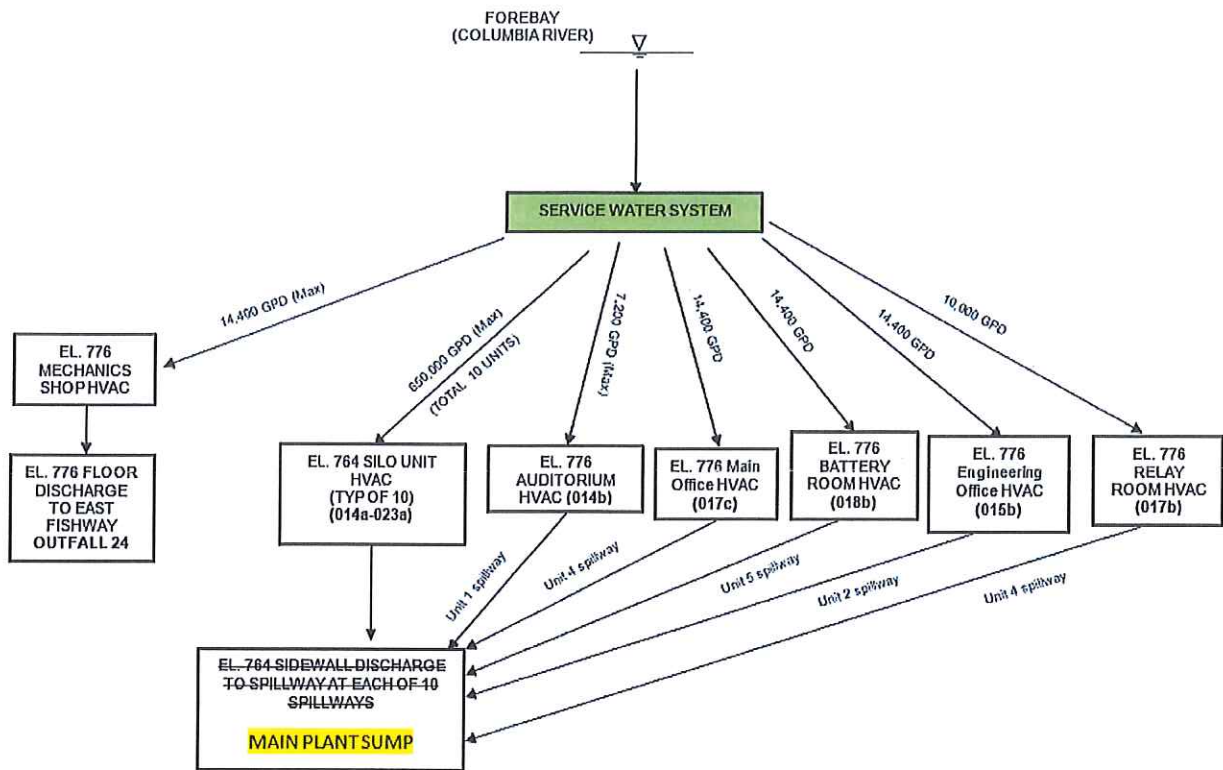


Figure 1: Service Water System Schematic for Temperature Point Source Discharges with Discharge Changes Planned for 2024 (highlighted in yellow).