

**Appendix E**  
**Ecology Response to Comments**  
**for the Montesano Wastewater Treatment Plant**  
**Draft Permit WA0024660 and Fact Sheet**

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The legal notice that informed the public that a draft permit and fact sheet were available for review was published in The Daily World on September 10, 2024. Ecology received comments on the draft documents during the 30-day public comment period. Below are the comments and Ecology's responses. Copies of the original comment letters received by Ecology during the public comment period are available upon request.

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Ecology received one comment from the City of Montesano on September 19, 2024, via email. No other parties provided feedback. The comment below is followed by Ecology's response indicating corresponding changes to the permit and fact sheet.

**Comment 1:**

Thank you for the opportunity to submit public comments on the draft NPDES Permit for the City of Montesano WWTP. The City has given serious consideration to the proposed changes to the permit and we are concerned about the reduction in discharge limits and requirements for the groundwater study and facility plan, but we understand and accept the premise for those changes. However, we are strongly opposed to the imposition of a Receiving Water Study on the City.

We believe the information from the Fact Sheet supports our position that a Receiving Water Study is not needed to determine if there is no reasonable potential to exceed water quality standards at the outfall. On page 22 of the fact sheet, it is stated that the 1993 study remains conservative enough to calculate limits from it. On page 23 of the fact sheet, it is stated that the 7Q10 low flow in the 1993 study is very conservative (by a factor of 2 of the expected actual 7Q10 at the outfall). The fact sheet also acknowledges that the 1993 study results are even more conservative when looking at actual wet weather flow over the past five years (0.272 MGD) versus the 1993 study average wet weather flow assumption of 0.64 MGD. There is also no current Total Maximum Daily Load (TMDL) or other documented temperature concerns for this stretch of the river. The reasonable potential analysis and modeling results in the fact sheet is very clear that there is no reasonable potential to exceed water quality standards.

The proposed Receiving Water Study will place an undue burden on the City compared to any expected benefit. The City is not in a position to take on the additional work of a Receiving Water Study. We are a very small community and have very limited staffing. Our staff is already operating at full capacity to meet the current requirements to successfully operate the WWTP. We are also generally at capacity for managing consultants for the various City-wide projects that we typically have underway each year.

In summary, we believe there is very limited potential benefit of conducting a Receiving Water Study compared to the burden that would be placed on the City to conduct such a study. We are not opposed to the concept of conducting a study to update information, but the City does not have the resources to do it. We respectfully request removal of the Receiving Water Study requirement from the proposed NPDES Permit for the City.

**Response 1:**

This comment uses Ecology's justification for using the City's 1993 Mixing Zone Study to also argue that updated receiving water data is not needed. However, even with a sufficiently conservative mixing zone study, receiving water data need to be updated periodically to accurately assess a discharge's reasonable potential to exceed water quality standards.

With this in mind, Ecology finds that the City of Montesano's request to remove the receiving water study from the final permit and fact sheet is reasonable. Although the available receiving water data should be updated, they were sufficient to assess reasonable potential to exceed water quality standards for this permit. There are also several new compliance requirements in this permit renewal. Ecology acknowledges that this will impact the City of Montesano's staffing and resources. To reduce the burden on the City, Ecology removed the receiving water study from the final permit and fact sheet. Ecology also removed text that referenced the receiving water study. Ecology may look into other ways to update the receiving water data or include this requirement in the next permit issuance.