FACT SHEET FOR NPDES PERMIT WA0050474

Vantage POTW

Date of Public Notice: 12/05/2024

Permit Effective Date: xx/xx/xxxx

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 Vantage Publicly-Owned Treatment Works (POTW).

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 Vantage POTW, NPDES permit WA0050474, are available for public review and comment from **December 5, 2024 through January 5, 2025**. For more details on preparing and filing comments about these documents, please see Appendix A - Public Involvement Information.

Vantage POTW 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

The Vantage POTW consists of a small complete mix activated sludge wastewater treatment plant capable of treating a maximum monthly average flow of 0.087 Million Gallons a Day The treatment plant is located at 120 Holiday Avenue in Vantage, Washington. The collection system provides service to residential customers within the Community of Vantage, as well as Gingko and Wanapum State Parks.

The Vantage POTW has complied substantially with the effluent limits and permit conditions throughout the duration of the permit issued on July 25, 2017. Ecology assessed compliance based on its review of the facility's discharge monitoring reports

(DMR's) and on inspections conducted by Ecology. Limits contained in the proposed permit remain unchanged from the current permit except for a new temperature heat load limit introduced by the 2021 Columbia and Lower Snake Rivers Temperature Total Maximum Daily Load (TMDL) written by the EPA. The permit includes new monitoring requirements for *E.coli* in order to develop site-specific correlation between *E.coli* and fecal coliform.

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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 in the Washington Administrative Code (WAC) apply to domestic wastewater NPDES permits:

- Procedures Ecology follows for issuing NPDES permits (chapter 173-220 WAC)
- Discharge standards for domestic wastewater facilities (chapter 173-221 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 treatment 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:	**Kittitas County Water District #6**
Facility name and address	Vantage POTW 120 Holiday Avenue

Applicant:	**Kittitas County Water District #6**
	Vantage, WA 98950
Contact at facility	Name: Ron Roduner Title: Operator/Plant Manager Telephone #: 509-398-0525
Responsible official	Name: Michelle Stockdale Title: Utility District Chairperson Address: PO Box 71, Vantage WA, 98950 Telephone #: 509-859-1627 Email: vantagesewer6@gmail.com
Type of treatment	Class II: Complete mix activated sludge, chlorine disinfection
Facility location (NAD83/WGS84 reference datum)	Latitude: 46.9419 Longitude: -119.9858
Discharge waterbody name and location (NAD83/WGS84 reference datum)	Columbia River Latitude: 46.9419 Longitude: -119.9819

Permit status

Renewal date of previous permit: July 25, 2017

Application for permit renewal submittal date: August 25, 2021

Date of Ecology acceptance of application: September 1, 2021

Inspection status

Date of last non-sampling inspection: March 13, 2023

Figure 1 - Facility location map

II.A. Facility description

1. History

The Community of Vantage is located approximately 26 miles east of Ellensburg next to Interstate 90, immediately west of the Columbia River (see location map in Appendix C). The Community installed the original wastewater treatment plant in 1966. This original extended aeration package plant was rated at 0.005 MGD and was privately owned by Stockdale, Inc. After approximately five years of operation, the Community determined the facility was undersized due to the flourishing tourist industry associated with the Ginko and Wanapum State Parks, as well as the projected flows from failing residential septic systems in the area.

In 1972, an engineering report was prepared, proposing regionalization of the wastewater treatment facility. In 1973, the Kittitas County Water District (KCWD) #6 was formed to obtain grants from the United States Environmental Protection Agency and Washington Department of Ecology to upgrade the wastewater treatment facility. The KCWD #6 assumed ownership of the facility in 1975. In 1978, the KCWD #6 completely replaced the existing treatment system with as small complete mix activated sludge wastewater treatment plant capable of treating a maximum monthly average flow of 0.087 MGD.

The last major overhaul of the facility occurred in 2012 when a lift station and a solids augur were installed at the facility's headworks. An amendment to the Wastewater Facility Plan was completed in May 2012 by Varela & Associates, Inc. and was revised in August 2012. This amendment projected influent flows, influent BOD, and influent TSS out to 2032. A wasteload assessment was conducted in 2020 to determine trends in wastewater influent. This assessment concluded that during the 2010-2020 period, influent flow and TSS concentration were decreasing slightly and influent BOD concentration was increasing slightly. At these projected rates, the Vantage POTW would not reach the projected influent rates proposed in the updated Wastewater Facility Plan. Results of the 2020 wasteload assessment have been included in Appendix G.

2. Collection system status

Wastewater is conveyed by both gravity and lift station. The present sanitary collection system is composed of approximately 2.0 miles of pipe. The influent of the POTW enters through an 8-inch sewer collection pipe. An Infiltration/Inflow (I/I) study conducted from 2015 through 2020 reported a base I/I of 0.015 MGD a year. Five of years of the study had a variance of only 0.005 MGD from this baseline. Despite the age of the collection system, low levels of regional precipitation result in little variance in I/I in the Vantage collection system. Results of the I/I study have been included in Appendix F.

3. Treatment process

The POTW uses a complete-mix activated sludge process, with diffuse aeration, which provides secondary treatment for the wastewater. The present treatment

facilities consist of a headworks with a solids augur, manually-fine screen, two aeration basins, secondary clarification, aerobic sludge digester, sludge drying beds, chlorine contact basin, flow meter, outfall line, and process control building with a laboratory.

The POTW is a Class II facility according to Washington Administrative Code (WAC) 173-230-330, based on the flow, plant type, and complexity of the system.

The principal treatment plant operator of this system must be, at least, Group II certified by the State of Washington.

4. Contract operations

Kittitas County Water District #6 contracts the operation and maintenance of the wastewater treatment plant with Ron Roduner by the terms and conditions contained in a mutually agreed upon service agreement. The agreement identifies the responsibilities of the contractor and the owner.

The Water Quality Program's standard procedure is to identify contract operators as co-permittees on individual municipal NPDES permits, to address both state and federal requirements for permittees. However, this is not required in every case. Ecology may issue the permit only to the owner; Ecology staff and managers based their decision on the facts, Ecology guidance, and the responsibilities defined in the entities' service agreement.

Ecology did not include the contractor as co-permittee. When a domestic wastewater facility does not comply with permit conditions, Ecology considers the roles identified in the contract between the owner and operator when it develops formal or informal enforcement actions.

5. Solid wastes and residual solids

The treatment facilities remove solids during the treatment of the wastewater at the headworks (grit and screenings), and at the primary and secondary clarifiers, in addition to incidental solids (rags, scum, and other debris) removed as part of the routine maintenance of the equipment. Vantage POTW drains grit, rags, scum, and screenings and disposes this solid waste at the local landfill. Solids removed from the primary and secondary clarifiers are treated in drying beds and land applied under the statewide general permit for biosolids management. This facility has met the solid waste requirements for screening, as required by WAC 173-308-205, by use of a solids screening augur.

6. Discharge outfall

The treated and disinfected effluent discharges from the facility via an 8-inch concrete pipe into the Columbia River at River Mile 420.4. The outfall discharges into the river approximately 1,000 feet off shore and 80 feet below the surface of the water. The position of the outfall, in conjunction with the volume of the receiving water, allows for significant mixing of the POTW effluent.

II.B. Description of the receiving water

Vantage POTW discharges to the Columbia river. There are no other nearby point source outfalls. There are no known significant non-point sources of pollutants nearby.

The ambient background data used for this permit includes the following from the Washington State Department of Ecology Environmental Information Management System station 36A070 located on the Columbia River at Vernita Bridge (46.641519 -119.7317054):

Table 2 - Ambient background data

Parameter	Value
Temperature (highest annual 1-DMax)	23.6 °C
Temperature (highest annual 7-DADMax)	22.4 °C
pH (Maximum / Minimum)	8.8/6.5 standard units
Dissolved Oxygen (Average)	11.8 mg/L
Total Ammonia-N (Maximum)	0.02 mg/L
Fecal Coliform (Average)	5.1 CFU / 100mL
Turbidity (Average)	2.6 NTU
Hardness	68.1 mg/L as CaCO3

II.C. Wastewater influent characterization

Vantage POTW reported the concentration of pollutants in the wastewater influent in the permit application and in discharge monitoring reports. The tabulated data represents the quality of the wastewater influent from January 1, 2019 to March 31, 2024.

Table 3 - Wastewater influent characterization

Parameter	Units	# of Samples	Minimum value	Maximum value
pH	N/A	833	4.62	8.5

Parameter	Units	# of Samples	Average value	Maximum value
Biochemical Oxygen Demand (BOD_5)	mg/L	278	120.35	315
Biochemical Oxygen Demand (BOD_5)	lbs/day	278	8.46	36
Total Suspended Solids (TSS)	mg/L	278	145.58	692
Total Suspended Solids (TSS)	lbs/day	278	10.4	53
Temperature	°C	834	16.73	25.4
Flow	MGD	1947	0.0098	0.08

II.D. Wastewater effluent characterization

Vantage POTW reported the concentration of pollutants in the discharge in the permit application and in discharge monitoring reports. The tabulated data represents the quality of the wastewater effluent discharged from January 1, 2019 to March 31, 2024.

Table 4 - Wastewater effluent characterization

Parameter	Units	# of Samples	Average value	Maximum value
Biochemical Oxygen Demand (BOD5)	mg/L	278	6.95	16.2
Biochemical Oxygen Demand (BOD5)	lbs/day	278	0.38	1.3
Total Suspended Solids (TSS)	mg/L	277	9.91	32
Total Suspended Solids (TSS)	lbs/day	277	0.56	2.5
Temperature	°C	831	15.66	26.1
Flow	MGD	1947	0.008	0.12
Total Residual Chlorine	mg/L	832	0.37	0.52
Ammonia	mg/L	65	1.4	8.6
Dissolved Oxygen	mg/L	833	6.45	11.01
Total Kjeldahl Nitrogen	mg/L as N	34	0.161	2.4
Nitrate plus Nitrite	mg/L as N	15	10.13	24
Oil and Grease	mg/L	15	9.1	11.9
Total Dissolved Solids	mg/L	7	181.7	360
Total Hardness	mg/L	7	57	130

Parameter	Units	# of Samples	Maximum Monthly Geometric Mean	Maximum Weekly Geometric Mean
Fecal Coliform	#/100 ml	277	100	100

Parameter	Units	# of Samples	Minimum value	Maximum value
pH	N/A	833	6	8

II.E. Summary of compliance with previous permit issued July 25, 2017

The previous permit placed effluent limits on Biochemical Oxygen Demand, Total Suspended Solids, Total Residual Chlorine, pH, Ammonia, and Fecal Coliform Bacteria.

Vantage POTW has complied with the effluent limits and permit conditions throughout the duration of the permit issued on July 25, 2017 with the exceptions listed below. Ecology assessed compliance based on its review of the facility's discharge monitoring reports (DMRs) and on inspections.

The following table summarizes the violations that occurred during the permit term.

Table 5 - Violations July 25, 2017 - March 31, 2024

Violation date	Parameter type	Unit type	Max limit	Measurement value quantity	Statistical base type	Violation
1/1/2018	N/A	N/A	N/A	N/A	N/A	Late DMR
1/1/2018	Hardness	mg/L	N/A	N/A	Single Sample	Analysis not Conducted
1/1/2020	N/A	N/A	N/A	N/A	N/A	Late DMR
1/1/2022	N/A	N/A	N/A	N/A	N/A	Late DMR
10/1/2023	Ammonia	mg/L	8.2	8.6	Maximum	Effluent Violation

The following table summarizes compliance with report submittal requirements over the permit term.

Table 6 - Permit submittals

Submittal name	Submittal status	Due date	Received date
Application for Permit Renewal	Received	8/31/2021	8/25/2021
Wasteload Assessment	Received	8/31/2021	6/17/2021
Infiltration and Inflow Evaluation	Received	8/31/2021	6/17/2021

II.F. State environmental policy act (SEPA) compliance

State law exempts the issuance, reissuance or modification of any wastewater discharge permit from the SEPA process as long as the permit contains conditions that are no less stringent than federal and state rules and regulations (RCW 43.21C.0383). The exemption applies only to existing discharges, not to new discharges.

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).
- 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 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.

III.A. Design criteria

Under WAC 173-220-150 (1)(g), flows and waste loadings must not exceed approved design criteria. Ecology approved design criteria for this facility's treatment plant in the May 1978 Operation and Maintenance (O&M) manual prepared by Giaudrone & Associates Engineering. Design criteria information was updated in the May 2012 Amendment to Wastewater Facility Plan prepared by Varela & Associates, Inc. The table below includes design criteria from the referenced reports.

Table 7 - Design criteria for Vantage POTW

Parameter	Design quantity
Max Month Design Flow (MMDF)	0.087 MGD
BOD_5 Loading for Maximum Month	175 lb/day
TSS Loading for Maximum Month	175 lb/day
Design Population Equivalent	615 People

III.B. Technology-based effluent limits

Federal and state regulations define some technology-based effluent limits for domestic wastewater treatment plants. These effluent limits are given in 40 CFR

Part 133 (federal) and in chapter 173-221 WAC (state). Chapter 173-220-130 WAC requires that "effluent limitations shall not be less stringent than those based upon the treatment facility design efficiency contained in approved engineering plans and reports." The proposed permit includes technology-based limits based on the approved treatment facility design.

Table 8 - Technology-based limits

Parameter	Average Monthly	Average Weekly
BOD_5	30 mg/L	45 mg/L
BOD_5	The BOD_5 effluent concentration must not exceed fifteen percent (15%) of the average influent concentration	
TSS	30 mg/L	45 mg/L
TSS	The TSS effluent concentration must not exceed fifteen percent (15%) of the average influent concentration	

Parameter	Average Monthly	Average Weekly
Chlorine	0.5 mg/L	0.75 mg/L

Parameter	Monthly Geometric Mean	Weekly Geometric Mean
Fecal coliform bacteria	200 organisms/100 mL	400 organisms/100 mL

Parameter	Daily Minimum	Daily Maximum
pH	6.0 standard units	9.0 standard units

Ecology derived the technology-based monthly average limit for chlorine from standard operating practices. ***Chlorination of Wastewater*** (Water Pollution Control Federation, 1976) states that a properly designed and maintained wastewater treatment plant can achieve adequate disinfection if a 0.5 mg/L chlorine residual is maintained after fifteen minutes of contact time. See also ***Wastewater Engineering, Treatment, Disposal and Reuse***, (Metcalf & Eddy, Inc., 1991). A treatment plant that provides adequate chlorination contact time can meet the 0.5 mg/L chlorine limit on a monthly average basis. According to WAC 173-221-030(11)(b), the corresponding weekly average is 0.75 mg/L.

Technology-based mass limits for BOD5 and TSS are based on WAC 173-220-130(3)(b) and WAC 173 221-030(11)(b). Ecology calculated the monthly and weekly average mass limits for BOD5 and TSS as follows:

Mass limit = CL x DF x CF, where:

CL = Technology-based concentration limit (mg/L)

DF = Maximum monthly average design flow (MGD)

CF = Conversion factor = 8.34

Table 9 - Technology-based mass limits

Parameter	Concentration limit (mg/L)	Mass limit (lbs/day)
BOD5 Monthly Average	30	21.8
BOD5 Weekly Average	45	32.7
TSS Monthly Average	30	21.8
TSS Weekly Average	45	32.7

III.C. Surface water quality-based effluent limits

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). Water quality-based effluent limits may be based on an individual waste load allocation or on a waste load allocation developed during a basin wide total maximum daily load study (TMDL).

1. Numeric criteria for the protection of aquatic life and recreation

Numeric 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 numeric 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.

2. Numeric criteria for the protection of human health

Numeric criteria for the protection of human health are promulgated in Chapter 173-201A WAC and 40 CFR 131.45. These criteria are designed to protect human health 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.

3. Narrative criteria

Narrative water quality criteria (e.g., WAC 173-201A-240(1)) 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) and of all marine waters (WAC 173-201A-210) in the state of Washington.

4. Antidegradation

The purpose of Washington's Antidegradation Policy (WAC 173-201A-300-330) 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.
- Ecology's analysis described in this section of the fact sheet demonstrates that the proposed permit conditions will protect existing and designated uses of the receiving water.

5. 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)).

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. 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 authorizes a small acute mixing zone, surrounded by a chronic mixing zone around the point of discharge (WAC 173-201A-400). The water quality standards impose certain conditions before allowing the discharger a mixing zone:

a. Ecology must specify both the allowed size and location in a permit.

The proposed permit specifies the size and location of the allowed mixing zone (as specified below).

b. The facility must fully apply “all known, available, and reasonable methods of prevention, control and treatment” (AKART) to its discharge.

Ecology has determined that the treatment provided at Vantage POTW meets the requirements of AKART (see “Technology-based Limits”).

c. Ecology must consider critical discharge conditions.

Surface water quality-based limits are derived for the water body’s critical condition (the receiving water and waste discharge condition with the highest potential for adverse impact on the aquatic biota, human health, and existing or designated waterbody uses). The critical discharge condition is often pollutant-specific or waterbody-specific.

Critical discharge conditions are those conditions that result in reduced dilution or increased effect of the pollutant. Factors affecting dilution include the depth of water, the density stratification in the water column, the currents, and the rate of discharge. Density stratification is determined by the salinity and temperature of the receiving water. Temperatures are warmer in the surface waters in summer. Therefore, density stratification is generally greatest during the summer months. Density stratification affects how far up in the water column a freshwater plume may rise. The rate of mixing is greatest when an effluent is rising. The effluent stops rising when the mixed effluent is the same density as the surrounding water. After the effluent stops rising, the rate of mixing is much more gradual. Water depth can affect dilution when a plume might rise to the surface when there is little or no stratification. Ecology's ***Permit Writer's Manual*** (Ecology, 2018) describes additional guidance on criteria/design conditions for determining dilution factors.

Table 10 - Critical conditions used to model the discharge

Critical condition	Value
Seven-day-average low river flow with a recurrence interval of ten years (7Q10)	46984.04 m^3/s
River depth at the 7Q10 period	90 ft
River velocity	0.1024 ft/s
Manning roughness coefficient	0.025
Channel width	5100 ft
Maximum average monthly effluent flow for chronic and human health non-carcinogen	0.0219 cfs
Annual average flow for human health carcinogen	3.67 MGD
Maximum daily flow for acute mixing zone	0.08 MGD
1-DAD-MAX Effluent temperature	77.72 °F

Ecology obtained ambient data from the Washington State Department of Ecology Environmental Information Management System station 36A070 located on the Columbia River at Vernita Bridge (46.641519 -119.7317054).

d. Supporting information must clearly indicate the mixing zone would not:

- Have a reasonable potential to cause the loss of sensitive or important habitat.
- Substantially interfere with the existing or characteristic uses.
- Result in damage to the ecosystem.
- Adversely affect public health.

Ecology established Washington State water quality criteria for toxic chemicals using EPA criteria. EPA developed the criteria using toxicity tests with numerous organisms and set the criteria to generally protect the species tested and to fully protect all commercially and recreationally important species.

EPA sets acute criteria for toxic chemicals assuming organisms are exposed to the pollutant at the criteria concentration for one hour. They set chronic standards assuming organisms are exposed to the pollutant at the criteria concentration for four days. Dilution modeling under critical conditions generally shows that both acute and chronic criteria concentrations are reached within minutes of discharge.

The discharge plume does not impact drifting and non-strong swimming organisms because they cannot stay in the plume close to the outfall long enough to be affected. Strong swimming fish could maintain a position within the plume, but they can also avoid the discharge by swimming away. Mixing zones generally do not affect benthic organisms (bottom dwellers) because the buoyant plume rises in the water column. Ecology has additionally determined that the effluent will not exceed 33 degrees C for more than two seconds after discharge; and that the temperature of the water will not create lethal conditions or blockages to fish migration.

Ecology evaluates the cumulative toxicity of an effluent by testing the discharge with whole effluent toxicity (WET) testing.

Ecology reviewed the above information, the specific information on the characteristics of the discharge, the receiving water characteristics and the discharge location. Based on this review, Ecology concluded that the discharge does not have a reasonable potential to cause the loss of sensitive or important habitat, substantially interfere with existing or characteristics uses, result in damage to the ecosystem, or adversely affect public health if the permit limits are met.

e. The discharge/receiving water mixture must not exceed water quality criteria outside the boundary of a mixing zone.

Ecology conducted a reasonable potential analysis, using procedures established by the EPA and by Ecology, for each pollutant and concluded the discharge/receiving water mixture will not violate water quality criteria outside the boundary of the mixing zone if permit limits are met.

f. The size of the mixing zone and the concentrations of the pollutants must be minimized.

At any given time, the effluent plume uses only a portion of the acute and chronic mixing zone, which minimizes the volume of water involved in mixing. The plume mixes as it rises through the water column therefore much of the receiving water volume at lower depths in the mixing zone is not mixed with discharge. Similarly, because the discharge may stop rising at some depth due to density stratification, waters above that depth will not mix with the discharge. Ecology determined it is impractical to specify in the permit the actual, much more limited

volume in which the dilution occurs as the plume rises and moves with the current.

Ecology minimizes the size of mixing zones by requiring dischargers to install diffusers when they are appropriate to the discharge and the specific receiving waterbody. When a diffuser is installed, the discharge is more completely mixed with the receiving water in a shorter time. Ecology also minimizes the size of the mixing zone (in the form of the dilution factor) using design criteria with a low probability of occurrence. For example, Ecology uses the expected 95th percentile pollutant concentration, the 90th percentile background concentration, the centerline dilution factor, and the lowest flow occurring once in every ten years to perform the reasonable potential analysis.

Because of the above reasons, Ecology has effectively minimized the size of the mixing zone authorized in the proposed permit.

g. Maximum size of mixing zone.

The authorized mixing zone does not exceed the maximum size restriction.

h. Acute mixing zone.

- The discharge/receiving water mixture must comply with acute criteria as near to the point of discharge as practicably attainable.

Ecology determined the acute criteria will be met at 10% of the distance (or volume fraction) of the chronic mixing zone at the ten-year low flow.

- The pollutant concentration, duration, and frequency of exposure to the discharge will not create a barrier to migration or translocation of indigenous organisms to a degree that has the potential to cause damage to the ecosystem.

As described above, the toxicity of any pollutant depends upon the exposure, the pollutant concentration, and the time the organism is exposed to that concentration. Authorizing a limited acute mixing zone for this discharge assures that it will not create a barrier to migration. The effluent from this discharge will rise as it enters the receiving water, assuring that the rising effluent will not cause translocation of indigenous organisms near the point of discharge (below the rising effluent).

- Comply with size restrictions.

The mixing zone authorized for this discharge complies with the size restrictions published in chapter 173-201A WAC.

i. Overlap of Mixing Zones.

This mixing zone does not overlap another mixing zone.

6. Surface water quality-based effluent limits

Water quality-based effluent limits for Vantage POTW include Temperature (Heat Load)

Table 11 – Water quality-based limits

Parameter	Average Monthly
Temperature (Heat Load)	8.57E+06 kcal/day

III.D. Designated uses and surface water quality criteria

Applicable designated uses and surface water quality criteria are defined in chapter 173-201A WAC. The table included below summarizes the criteria applicable to this facility's receiving water and its designated uses.

1. Freshwater aquatic life uses and associated criteria

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.

Table 12 - Salmonid spawning, rearing, and migration

Criteria	Value
Temperature – Highest 7-DAD MAX	17.5°C (63.5°F)
Dissolved oxygen – Lowest 1-Day minimum	8.0 mg/L
Turbidity	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	Total dissolved gas must not exceed 110 percent of saturation at any point of sample collection.
pH	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.

2. Recreational use and criteria

The recreational use for this receiving water is primary contact recreation. *E.coli* organism levels must not exceed a geometric mean value of 100 CFU or MPN per 100 mL, with no more than 10 percent of all samples (or any single sample when less than ten sample points exist) obtained within the averaging period exceeding 320 CFU or MPN per 100 mL.

3. Water supply uses

The water supply uses are domestic, agricultural, industrial, and stock watering.

4. Miscellaneous freshwater uses

The miscellaneous freshwater uses are wildlife habitat, harvesting, commerce and navigation, boating, and aesthetics.

III.E. Water quality impairments

The Columbia and Lower Snake Rivers are listed on the state's polluted waters list for high water temperatures that are above Washington water quality standards and can harm salmon. Because the Columbia and Snake Rivers cross multiple state boundaries and span almost 900 miles, the federal Environmental Protection Agency (EPA) established the Columbia and Lower Snake Rivers Temperature Total Maximum Daily Load (TMDL)[1] on May 20, 2020 (USEPA Region 10, 2021). The TMDL was finalized on August 13, 2021. The TMDL assigns a Wasteload Allocation (WLA) expressed as a Heat Load in kcal/day to all point source discharges to the Columbia River, including this facility. Vantage POTW has been assigned a heat load of 8.57E+06 kcal/day based on design criteria and past effluent monitoring data. The heat load is included in the permit as a limit, applying facility-wide from the months of June to October. The heat load is calculated as the product of the monthly average temperature and the monthly average flow, multiplied by a conversion factor of 3.78E+06 kcals/day/(°C x MGD).

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

Ecology must consider the narrative criteria described in WAC 173-201A-260 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.

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.

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.

[1] https://www.epa.gov/columbiariver/tmdl-temperature-columbia-and-lower-snake-rivers

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

1. Mixing zones and dilution factors

Pollutants in an effluent may affect the aquatic environment near the point of discharge (near field) or at a considerable distance from the point of discharge (far field). Toxic pollutants, for example, are near-field pollutants; their adverse effects diminish rapidly with mixing in the receiving water. Conversely, a pollutant such as biological oxygen demand (BOD) is a far-field pollutant whose adverse effect occurs away from the discharge even after dilution has occurred. Thus, the method of calculating surface water quality-based effluent limits varies with the point at which the pollutant has its maximum effect.

With technology-based controls (AKART), predicted pollutant concentrations in the discharge exceed water quality criteria. Ecology therefore authorizes a mixing zone in accordance with the geometric configuration, flow restriction, and other restrictions imposed on mixing zones by chapter 173-201A WAC.

The diffuser at Outfall 001 has a diameter of 8 inches. The diffuser depth is 80 feet.

Chronic mixing zone – WAC 173-201A-400(7)(a) specifies that mixing zones must not extend in a downstream direction from the discharge ports for a distance greater than 300 feet plus the depth of water over the discharge ports or extend upstream for a distance of over 100 feet, not utilize greater than 25% of the flow, and not occupy greater than 25% of the width of the water body. The mixing zone extends from the bottom to the top of the water column.

The chronic dilution factor below is based on a width restriction of 24.4 meters.

Acute mixing zone – WAC 173-201A-400(8)(a) specifies that in rivers and streams a zone where acute toxics criteria may be exceeded must not extend beyond 10% of the distance towards the upstream and downstream boundaries of the chronic zone, not use greater than 2.5% of the flow and not occupy greater than 25% of the width of the water body. The mixing zone extends from the bottom to the top of the water column.

The acute dilution factor below is based on a width restriction of 11.9 meters.

Ecology determined the dilution factors that occur within these zones at the critical condition using Cormix1 v.12.0. The dilution factors are listed below.

Table 13 - Dilution factors

Criteria	Acute	Chronic
Aquatic Life	283	6660
Human Health, Carcinogen		6660
Human Health, Non-carcinogen		6660

Ecology determined the impacts of dissolved oxygen, pH, fecal coliform, ammonia, and temperature as described below, using the dilution factors in the above table. 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.

2. Dissolved Oxygen: BOD_5 and Ammonia Effects

Natural decomposition of organic material in wastewater effluent impacts dissolved oxygen in the receiving water at distances far outside of the regulated mixing zone. The 5-day Biochemical Oxygen Demand (BOD_5) of an effluent sample indicates the amount of biodegradable material in the wastewater and estimates the magnitude of oxygen consumption the wastewater will generate in the receiving water. The amount of ammonia-based nitrogen in the wastewater also provides an indication of oxygen demand in the receiving water.

With technology-based limits, this discharge results in a small amount of BOD_5 loading relative to the large amount of dilution in the receiving water at critical conditions. Technology based limits for BOD_5 will ensure that dissolved oxygen criteria are met in the receiving water.

3. pH

Ecology modeled the impact to receiving waters under critical conditions using technology-based limits for pH (6.0 – 9.0) and the *pH-mix-fresh* worksheet in Ecology's PermitCalc spreadsheet. Appendix D includes the model results. Model calculations predict no violation of the pH criteria under critical conditions. The proposed permit includes technology-based limits for pH.

4. Bacteria

In the previous permit cycle, Ecology modeled the number of fecal coliform by simple mixing analysis using the technology-based limit of 400 organisms per 100 mL and a dilution factor of 6660. That analysis showed no violation of the fecal coliform recreational use criterion under critical conditions. The domestic technology-based limits for fecal coliform in WAC 173-221 are still in effect. Without effluent data for *E.coli*, Ecology cannot determine whether the discharge will violate the recreational use criterion for *E.coli*. Given that the characteristics of the receiving water and the discharge have not changed substantially since the analysis conducted in the previous permit cycle, and the transition is a change in bacterial indicator not more or less stringent than the previous criterion, the proposed permit will maintain the technology-based effluent limit for fecal coliform. In addition, the permittee will be required to monitor for both fecal coliform and E. coli. Ecology will then use this data to assess the reasonable potential to exceed the applicable recreational use criterion in the next iteration of this permit.

5. Turbidity

Ecology evaluated the impact of turbidity based on the range of turbidity in the effluent and turbidity of the receiving water. Ecology expects no violations of the turbidity criteria outside the designated mixing zone provided the facility meets its technology-based total suspended solids permit limits.

6. Toxic pollutants – aquatic life criteria

Federal regulations at 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.

The following toxic pollutants are present in the discharge: chlorine and ammonia Ecology conducted a reasonable potential analysis (See Appendix D) on these parameters to determine whether it would require effluent limits in this permit.

Ammonia's toxicity depends on that portion which is available in the unionized form. The amount of unionized ammonia depends on the temperature and pH in the receiving freshwater. To evaluate ammonia toxicity, Ecology used the available receiving water information for Washington State Department of Ecology Environmental Information Management System station 36A070 located on the Columbia River at Vernita Bridge (46.641519 -119.7317054) and Ecology spreadsheet tools.

Valid ambient background data were available for ammonia. Ecology used all applicable data to evaluate reasonable potential for this discharge to cause a violation of water quality standards.

No valid ambient background data were available for chlorine. Ecology used zero for background.

Ecology determined that chlorine and ammonia pose no reasonable potential to cause or contribute to exceedances of the water quality criteria at the critical conditions using procedures given in the ***Technical Support Document for Water Quality-Based Toxics Control*** (EPA/505/2-90-001) (USEPA, 1991) (Appendix D) and as described above. The previous version of this permit included a maximum daily limit for ammonia at 8.2 mg/L. This limit has been maintained in the current permit due to Ecology's practice on anti-backsliding as laid out in 40 CFR 122.44. Ecology’s determination assumes that this facility meets the other effluent limits of this permit.

7. Temperature

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

a. Annual summer maximum threshold criteria (June 15 to September 15)

b. Supplemental spawning and rearing season criteria (September 15 to June 15)
c. Incremental warming restrictions
d. Guidelines on preventing acute lethality and barriers to migration of salmonids

Ecology evaluates each criterion independently to determine reasonable potential and derive permit limits.

a. Annual summer maximum and supplementary spawning/rearing criteria

Each water body has an annual maximum temperature criterion [WAC 173-201A-200(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 some fresh waters are expressed as the highest 1-Day annual maximum temperature (1-DMax).

b. 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)]. 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.

c. Guidelines to prevent acute lethality or barriers to migration of salmonids. These site-level considerations do not override the temperature criteria listed above.
    i. 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.
    ii. General lethality and migration blockage: The temperature at the edge of a chronic mixing zone must not exceed either a 1DMax of 23°C or a

7DADMax of 22°C. When adjacent downstream temperatures are 3°C or more cooler, the 1DMax at the edge of the chronic mixing zone must not exceed 22°C.

iii. Lethality to incubating fish: The temperature must not exceed 17.5°C at locations where eggs are incubating.

Reasonable potential analysis

Annual summer maximum and incremental warming criteria: Ecology calculated the reasonable potential for the discharge to exceed the annual summer maximum and the incremental warming criteria (See temperature calculations in Appendix D).

The discharge is allowed to warm the water by a defined increment only when the background (ambient) temperature is cooler than the assigned threshold criterion. Ecology allows warming increments only when they do not cause temperatures to exceed either the annual maximum or supplemental spawning criteria.

The incremental increase for this discharge is within the allowable amount. Therefore, the proposed permit does not include a temperature limit.

III.H. Evaluation of human health-based water quality criteria

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

Ecology determined the applicant's discharge is unlikely to contain chemicals regulated to protect human health, and does not contain chemicals of concern based on existing effluent data or knowledge of discharges to the system. Ecology will reevaluate this discharge for impacts to human health at the next permit reissuance.

III.I. 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 website[2]..

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.

[2] https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Sediment-cleanups

III.J. 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).

Vantage POTW does not discharge wastewater to the ground. No permit limits are required to protect groundwater.

III.K. 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.

III.L. Comparison of effluent limits with the previous permit effective 9/1/2017

Table 14 - Comparison of previous and proposed effluent limits – Outfall 001

Limit	Basis of Limit	Existing permit limit	Proposed permit limit
Biochemical Oxygen Demand (5-day) – Average Monthly	Technology	30 mg/L	30 mg/L
Biochemical Oxygen Demand (5-day) – Average Monthly – Average Weekly	Technology	45 mg/L	45 mg/L
Total Suspended Solids – Average Monthly	Technology	30 mg/L	30 mg/L
Total Suspended Solids – Average Weekly	Technology	45 mg/L	45 mg/L
Fecal Coliform Bacteria – Monthly Geometric Mean	Technology	200 CFU/100mL	200 CFU/100mL
Fecal Coliform Bacteria – Weekly Geometric Mean	Technology	400 CFU/100mL	400 CFU/100mL
pH – Daily Minimum	Technology	6.0 S.U.	6.0 S.U.
pH – Daily Maximum	Technology	9.0 S.U.	9.0 S.U.
Total Residual Chlorine - Average Monthly	Technology	0.5 mg/L	0.5 mg/L
Total Residual Chlorine - Average Weekly	Technology	0.75 mg/L	0.75 mg/L
Total Ammonia - Maximum Daily	Water-Quality	8.2 mg/L	8.2 mg/L

IV. 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.

IV.A. Wastewater monitoring

The monitoring schedule is detailed in the proposed permit under Special Condition S.2. Specified monitoring frequencies consider the quantity and variability of the discharge, the treatment method, past compliance, significance of pollutants, and cost of monitoring. The required monitoring frequency is consistent with agency guidance given in the current version of Ecology's ***Permit Writer's Manual,*** Publication 92-109 (Ecology, 2018) for a complete mix activated sludge facility.

Monitoring of sludge quantity and quality is necessary to determine the appropriate uses of the sludge. Biosolids monitoring is required by the current state and local solid waste management program and by EPA under 40 CFR 503.

IV.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). Ecology accredited the laboratory at this facility.

Table 15 - Accredited parameters

Parameter name	Category	Method name	Matrix description
Solids, Total Suspended	General Chemistry	SM 2540 D-2011	Non-Potable Water
Chlorine (Residual), Total	General Chemistry	SM 4500-Cl G-2011	Non-Potable Water
pH	General Chemistry	SM 4500-H+ B-2011	Non-Potable Water
Dissolved Oxygen	General Chemistry	SM 4500-O G-2011	Non-Potable Water
Biochemical Oxygen Demand (BOD)	General Chemistry	SM 5210 B-2011	Non-Potable Water

V. Other permit conditions

V.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).

V.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.

V.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].

The proposed permit requires this facility to develop and implement a plan for preventing the accidental release of pollutants to state waters and for minimizing damages if such a spill occurs

V.D. Outfall Evaluation

The proposed permit requires Vantage POTW to conduct an outfall inspection and submit a report detailing the findings of that inspection (Special Condition S.10). The inspection must evaluate the physical condition of the discharge pipe and diffusers, and evaluate the extent of sediment accumulations in the vicinity of the outfall.

V.E. Operation and Maintenance Manual

Ecology requires industries to take all reasonable steps to properly operate and maintain their wastewater treatment system in accordance with state and federal regulations [40 CFR 122.41(e) and WAC 173-220-150 (1)(g)]. The facility has prepared and submitted an operation and maintenance manual as required by state regulation for the construction of 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.

V.F. Best management practices

Best management practices (BMPs) are the actions identified to manage, prevent contamination of, and treat stormwater. BMPs include 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 also include treatment systems, operating procedures, and practices used to control plant site runoff, spillage or leaks, sludge or waste disposal, and drainage from raw material storage.

V.G. General conditions

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

VI. Permit issuance procedures

VI.A. Permit modifications

Ecology may modify this permit to impose numeric 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.

VI.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 five years.

VII. References for text and appendices

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Water Pollution Control Federation. (1976). *Chlorination of Wastewater.*

Washington State and Ecology website general reference links:

State laws and rules[3]

Permit and Wastewater Related Information[4]

[3] https://leg.wa.gov/state-laws-and-rules/
[4] https://ecology.wa.gov/Regulations-Permits/Guidance-technical-assistance/Water-quality-permits-guidance

Appendix A – Public Involvement Information

Ecology proposes to reissue a permit to Vantage POTW. The permit includes wastewater discharge limits and other conditions. This fact sheet describes the facility and Ecology's reasons for requiring permit conditions.

Ecology will place a Public Notice of Draft on **Ellensburg Daily Record** 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.

Frequently Asked Questions about Effective Public Commenting[5]

You may obtain further information from Ecology by telephone 509-426-0679 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 Caleb Bos.

[5] https://apps.ecology.wa.gov/publications/SummaryPages/0307023.html

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 as defined in WAC 371-08-305 and -335. "Notice of appeal" is defined in WAC 371-08-340.
- Serve a copy of your appeal and this permit on Ecology on the Department of Ecology mail, in person, or by email (see addresses below).
- You must also comply with other applicable requirements in chapter 43.21B RCW and chapter 371-08 WAC.

Filing with the PCHB

For the most current information regarding filing with the PCHB:
visit https://eluho.wa.gov/[6] or call 360-664-9160.

Service on Ecology

Street Address:

Department of Ecology
Attn: Appeals Processing Desk
300 Desmond Drive SE
Lacey, WA 98503

Mailing Address:

Department of Ecology
Attn: Appeals Processing Desk
PO Box 47608
Olympia, WA 98504-7608

E-Mail Address:

ecologyappeals@ecy.wa.gov

[6] https://eluho.wa.gov/

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.

BOD_5 – 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 BOD_5 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 BOD_5 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.

Days (compliance period interval) – When the compliance period is stated in days: (A) exclude the day of the event that triggers the period; (B) count every day, including intermediate Saturdays, Sundays, and legal holidays; and (C) include the last day of the period, but if the last day is a Saturday, Sunday, or legal holiday, the period continues to run until the end of the next day that is not a Saturday, Sunday, or legal holiday.

Detection level – or method detection limit means the minimum concentration of an analyte (substance) that can be reported with 99% confidence that the measured concentration is distinguishable from method blank results as determined by the procedure given in 40 CFR part 136, Appendix B.

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.

Enterococci – A subgroup of fecal streptococci that includes *S. faecalis*, *S. faecium*, *S. gallinarum*, and *S. avium*. The enterococci are differentiated from other streptococci by their ability to grow in 6.5% sodium chloride, at pH 9.6, and at 10°C and 45°C.

E. coli – A bacterium in the family Enterobacteriaceae named Escherichia coli and is a common inhabitant of the intestinal tract of warm-blooded animals, and its presence in water samples is an indication of fecal pollution and the possible presence of enteric pathogens.

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.

Immediate reporting – Report permit violations immediately without delay of any interval of time from the moment the permittee becomes aware of the violation. Priority should first be given to stopping an active noncompliance.

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 limit (MDL) – See Detection level.

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) – Section 402 of the Clean Water Act, 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 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:

- Exceeds 0.5 % of treatment plant design capacity criteria and discharges <25,000 gallons per day or;
- 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 (ML) – The term ‘‘minimum level’’ refers to either the sample concentration equivalent to the lowest calibration point in a method or a multiple of the method detection limit (DL), whichever is higher. Minimum levels may be obtained in several ways: They may be published in a method; they may be based on the lowest acceptable calibration point used by a laboratory; or they may be calculated by multiplying the DL in a method, or the DL determined by a laboratory, by a factor of 3. For the purposes of NPDES compliance monitoring, EPA considers the following terms to be synonymous: ‘‘quantitation limit,’’ ‘‘reporting limit,’’ and ‘‘minimum level’’.

Reasonable potential – A reasonable potential to cause or contribute to 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) –

- All industrial users subject to Categorical Pretreatment Standards under 40 CFR Chapter I, Subchapter N and 40 CFR 403.6 and;
- 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 the second paragraph 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 BOD_5 – 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 BOD_5 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 BOD_5 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.

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.

Appendix D — Technical Calculations

Reasonable Potential Analysis:

Ecology uses spreadsheet tools to determine reasonable potential (to cause or contribute to violations of the aquatic life and human health water quality numeric standards) and to calculate effluent limits. The process and formulas for determining reasonable potential and effluent limits in these spreadsheets come from the Technical Support Document for Water Quality-based Toxics Control, (EPA 505/2-90-001) (USEPA, 1991).

Reasonable Potential Analysis - Ammonia (Total NH3)

Pollutant, CAS No. & NPDES Application Ref. No.			AMMONIA, Criteria as Total NH3
Effluent Data	# of Samples (n)		65
	Coeff of Variation (Cv)		1.7
	Effluent Concentration, ug/L (Max. or 95th Percentile)		7,860
	Calculated 50th percentile Effluent Conc. (when n>10)		
Receiving Water Data	90th Percentile Conc., ug/L		36
	Geo Mean, ug/L		
Water Quality Criteria	Aquatic Life Criteria, ug/L	Acute	13,283
		Chronic	1,114
	WQ Criteria for Protection of Human Health, ug/L		-
	Metal Criteria Translator, decimal	Acute	-
		Chronic	-
	Carcinogen?		N

Aquatic Life Reasonable Potential

Effluent percentile value			0.950
s	$s^2=\ln(CV^2+1)$		1.166
Pn	$Pn=(1\text{-confidence level})^{1/n}$		0.955
Multiplier			1.00
Max concentration (ug/L) at edge of...		Acute	63
		Chronic	37
Reasonable Potential? Limit Required?			**NO**

Reasonable Potential Analysis - Fecal Coliform

Calculation of Fecal Coliform at Chronic Mixing Zone

INPUT	
Chronic Dilution Factor	6660.5
Receiving Water Fecal Coliform, #/100 ml	13
Effluent Fecal Coliform - worst case, #/100 ml	400
Surface Water Criterion, #/100 ml	*14*
OUTPUT	
Fecal Coliform at Mixing Zone Boundary, #/100 ml	**13**
Difference between mixed and ambient, #/100 ml	0

Conclusion: At design flow, the discharge has no reasonable potential to violate water quality standards for fecal coliform.

Reasonable Potential Analysis - Dissolved Oxygen

Calculation of Dissolved Oxygen at Chronic Mixing Zone

INPUT	
Chronic Dilution Factor	6660.5
Receiving Water DO Concentration, mg/L	13.8
Effluent DO Concentration, mg/L	9.5
Effluent Immediate DO Demand (IDOD), mg/L	
Surface Water Criteria, mg/L	*10*
OUTPUT	
DO at Mixing Zone Boundary, mg/L	**13.80**
DO decrease caused by effluent at chronic boundary, mg/L	**0.00**

Conclusion: At design flow, the discharge has no reasonable potential to violate water quality standards for dissolved oxygen.

References: EPA/600/6-85/002b and EPA/430/9-82-011

Reasonable Potential Analysis - Freshwater Temperature

Freshwater Temperature Reasonable Potential and Limit Calculation

Based on WAC 173-201A-200(1)(c)(i)--(ii) and the Water Quality Program Guidance. All data inputs must meet WQ guidelines.

	Core Summer Critera	Supplemental Criteria
INPUT	July 1-Sept 14	Sept 15-July 1
1. Chronic Dilution Factor at Mixing Zone Boundary	6660.5	6660.5
2. 7DADMax Ambient Temperature (T) (Upstream Background 90th percentile)	21.7 °C	18.7 °C
3. 7DADMax Effluent Temperature (95th percentile)	24.3 °C	21.3 °C
4. Aquatic Life Temperature WQ Criterion in Fresh Water	16.0 °C	13.0 °C
OUTPUT		
5. Temperature at Chronic Mixing Zone Boundary:	21.7 °C	18.7 °C
6. Incremental Temperature Increase or decrease:	0.0 °C	0.0 °C
7. Maximum Allowable Incremental Temperature Increase:	1.0 °C	1.1 °C
8. Maximum Allowable Temperature at Mixing Zone Boundary:	16.0 °C	13.0 °C
A. If ambient temp is warmer than WQ criterion		
9. Does temp fall within this warmer temp range?	YES	YES
10. **If YES - Use TMDL-based or performance-based limit - Do Not use this spreadsheet**		
B. If ambient temp is cooler than WQ criterion but within $28/(T_{amb}+7)$ of the criterion		
11. Does temp fall within this Incremental temp. range?	---	---
12. Temp increase allowed at mixing zone boundary, if required:	---	---
C. If ambient temp is cooler than (WQ criterion - $28/(T_{amb}+7)$)		
13. Does temp fall within this Incremental temp. range?	---	---
14. Temp increase allowed at mixing zone boundary, if required:	---	---
RESULTS		
15. Do any of the above cells show a temp increase?	**NO**	**NO**
16. Temperature Limit if Required?	**NO LIMIT**	**NO LIMIT**

Reasonable Potential Analysis - Freshwater pH

Calculation of pH of a Mixture of Two Flows

Based on the procedure in EPA's DESCON program (EPA, 1988. Technical Guidance on Supplementary Stream Design Conditions for Steady State Modeling. USEPA Office of Water, Washington D.C.)

INPUT		
	@ Acute Boundary	@ Chronic Boundary
1. Dilution Factor at Mixing Zone Boundary	283.9	6660.5
2. Ambient/Upstream/Background Conditions		
Temperature (deg C):	21.70	21.70
pH:	8.40	8.40
Alkalinity (mg CaCO3/L):	50.00	50.00
3. Effluent Characteristics		
Temperature (deg C):	24.30	24.30
pH:	7.40	7.40
Alkalinity (mg CaCO3/L):	130.00	130.00
4. Aquatic Life Use Designation	Char spawning & rearing and/or core summer habitat	
OUTPUT		
1. Ionization Constants		
Upstream/Background pKa:	6.37	6.37
Effluent pKa:	6.35	6.35
2. Ionization Fractions		
Upstream/Background Ionization Fraction:	0.99	0.99
Effluent Ionization Fraction:	0.92	0.92
3. Total Inorganic Carbon		
Upstream/Background Total Inorganic Carbon (mg CaCO3/L):	50	50
Effluent Total Inorganic Carbon (mg CaCO3/L):	142	142
4. Condtions at Mixing Zone Boundary		
Temperature (deg C):	21.71	21.70
Alkalinity (mg CaCO3/L):	50.28	50.01
Total Inorganic Carbon (mg CaCO3/L):	50.79	50.48
pKa:	6.37	6.37
5. Allowable pH change	NA	0.20
RESULTS		
pH at Mixing Zone Boundary:	**8.37**	**8.40**
pH change at Mixing Zone Boundary:	0.03	0.00
Is permit limit needed?	NO	NO

CORMIX v.12.0 CORMIX1 Chronic Mixing Zone Calculation Session Report

CORMIX SESSION REPORT:

XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX XXXXXXXXXXXXXXXXXXX

CORMIX MIXING ZONE EXPERT SYSTEM

CORMIX Version 12.0GTD

HYDRO1:Version-12.0.0.0 December,2020

SITE NAME/LABEL:

DESIGN CASE:

FILE NAME: C:\Users\cbos461\OneDrive - Washington State Executive Branch Agencies\Desktop\Vantage Cormix.prd

Using subsystem CORMIX1: Single Port Discharges

Start of session: 05/23/2024--12:38:21

****

SUMMARY OF INPUT DATA:

AMBIENT PARAMETERS:

Cross-section = bounded

Width BS = 1554.48 m

Channel regularity ICHREG = 1

Ambient flowrate QA = 1330.44 m^3/s

Average depth HA = 27.43 m

Depth at discharge HD = 24.38 m

Ambient velocity UA = 0.0312 m/s

Darcy-Weisbach friction factor F = 0.0163

Calculated from Manning's n = 0.025

Wind velocity UW = 4.47 m/s

Stratification Type STRCND = U

Surface temperature = 19.70 degC

Bottom temperature = 19.70 degC

Calculated FRESH-WATER DENSITY values:

Surface density RHOAS = 998.2666 kg/m^3

Bottom density RHOAB = 998.2666 kg/m^3

DISCHARGE PARAMETERS: Single Port Discharge

Nearest bank = right

Distance to bank DISTB = 304.80 m

Port diameter D0 = 0.2042 m

Port cross-sectional area A0 = 0.0328 m^2

Discharge velocity U0 = 0.02 m/s

Discharge flowrate Q0 = 0.000570 m^3/s

Discharge port height H0 = 3.05 m

Vertical discharge angle THETA = -12.5 deg

Horizontal discharge angle SIGMA = 270 deg

Discharge temperature (freshwater) = 24.34 degC

Corresponding density RHO0 = 997.2128 kg/m^3

Density difference DRHO = 1.0538 kg/m^3

Buoyant acceleration GP0 = 0.0104 m/s^2

Discharge concentration C0 = 100 %

Surface heat exchange coeff. KS = 0 m/s

Coefficient of decay KD = 0 /s

DISCHARGE/ENVIRONMENT LENGTH SCALES:

LQ = 0.18 m Lm = 0.10 m Lb = 0.19 m

LM = 0.07 m Lm' = 99999 m Lb' = 99999 m

NON-DIMENSIONAL PARAMETERS:

Port densimetric Froude number FR0 = 0.38

Velocity ratio R = 0.56

MIXING ZONE / TOXIC DILUTION ZONE / AREA OF INTEREST PARAMETERS:

Toxic discharge = no

Water quality standard specified = no

Regulatory mixing zone = yes

Regulatory mixing zone specification = distance

Regulatory mixing zone value = 118.87 m (m^2 if area)

Region of interest = 15544.80 m

****

HYDRODYNAMIC CLASSIFICATION:

| FLOW CLASS = H1 |

This flow configuration applies to a layer corresponding to the full water depth at the discharge site.

Applicable layer depth = water depth = 24.38 m

Limiting Dilution S = (QA/Q0)+ 1.0 = 2335889.6

****

MIXING ZONE EVALUATION (hydrodynamic and regulatory summary):

X-Y-Z Coordinate system:

Origin is located at the BOTTOM below the port/diffuser center:

304.80 m from the right bank/shore.

Number of display steps NSTEP = 10 per module.

NEAR-FIELD REGION (NFR) CONDITIONS :

Note: The NFR is the zone of strong initial mixing. It has no regulatory implication. However, this information may be useful for the discharge designer because the mixing in the NFR is usually sensitive to the discharge design conditions.

Pollutant concentration at NFR edge c = 0.0112 %

Dilution at edge of NFR s = 8922.5

NFR Location: x = 124.85 m

(centerline coordinates) y = -0.07 m

z = 24.38 m

NFR plume dimensions: half-width (bh) = 9.02 m

thickness (bv) = 9.02 m

Cumulative travel time: 3794.3838 sec.

Buoyancy assessment:

The effluent density is less than the surrounding ambient water density at the discharge level.

Therefore, the effluent is POSITIVELY BUOYANT and will tend to rise towards the surface.

FAR-FIELD MIXING SUMMARY:

Plume becomes vertically fully mixed at 3208.84 m downstream.

PLUME BANK CONTACT SUMMARY:

Plume in bounded section does not contact bank.

********** TOXIC DILUTION ZONE SUMMARY **********

No TDZ was specified for this simulation.

********** REGULATORY MIXING ZONE SUMMARY **********

The plume conditions at the boundary of the specified RMZ are as follows:

Pollutant concentration c = 0.015083 %

Corresponding dilution s = 6660.5

Plume location: x = 118.87 m

(centerline coordinates) y = -0.07 m

z = 24.38 m

Plume dimensions: half-width (bh) = 6.78 m

thickness (bv) = 8.46 m

Cumulative travel time < 3794.3838 sec. (RMZ is within NFR)

Note:

Plume concentration c and dilution s values are reported based on prediction file values - assuming linear interpolation between predicted points just before and just after the RMZ boundary has been detected.

Please ensure a small step size is used in the prediction file to account for this linear interpolation. Step size can be controlled by increasing (reduces the prediction step size) or decreasing (increases the prediction step size) the - Output Steps per Module - in CORMIX input.

Regulatory Mixing Zone Analysis:

The specified RMZ occurs within the near-field region (NFR). This RMZ specification may be highly restrictive.

********** FINAL DESIGN ADVICE AND COMMENTS **********

The discharge port or nozzle points towards the nearest bank.

Since this is an UNUSUAL DESIGN, check whether you have specified correctly the port horizontal angle (SIGMA).

INTRUSION OF AMBIENT WATER into the discharge opening will occur!

For the present discharge/environment conditions the discharge densimetric Froude number is well below unity. This is an UNDESIRABLE operating condition.

To prevent intrusion, change the discharge parameters (e.g. decrease the discharge opening area) in order to increase the discharge Froude number.

In a future iteration, change the discharge parameters (e.g. decrease port diameter) in order to increase the Froude number.

REMINDER: The user must take note that HYDRODYNAMIC MODELING by any known

technique is NOT AN EXACT SCIENCE.

Extensive comparison with field and laboratory data has shown that the

CORMIX predictions on dilutions and concentrations (with associated

plume geometries) are reliable for the majority of cases and are accurate

to within about +-50% (standard deviation).

As a further safeguard, CORMIX will not give predictions whenever it judges

the design configuration as highly complex and uncertain for prediction.

CORMIX v.12.0 CORMIX1 Acute Mixing Zone Calculation Session Report

CORMIX SESSION REPORT:

XXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXXX

CORMIX MIXING ZONE EXPERT SYSTEM

CORMIX Version 12.0GTD

HYDRO1:Version-12.0.0.0 December,2020

SITE NAME/LABEL:

DESIGN CASE:

FILE NAME: C:\Users\cbos461\OneDrive - Washington State Executive Branch Agencies\Desktop\Vantage Cormix.prd

```
 Using subsystem CORMIX1:     Single Port Discharges
 Start of session:           05/23/2024--12:40:16
********************************************************************************

SUMMARY OF INPUT DATA:

--------------------------------------------------------------------------------

AMBIENT PARAMETERS:
 Cross-section                    = bounded
 Width                    BS      = 1554.48 m
 Channel regularity       ICHREG  = 1
 Ambient flowrate         QA      = 1330.44 m^3/s
 Average depth            HA      = 27.43 m
 Depth at discharge       HD      = 24.38 m
 Ambient velocity         UA      = 0.0312 m/s
 Darcy-Weisbach friction factor  F      = 0.0163
  Calculated from Manning's n          = 0.025
 Wind velocity            UW      = 4.47 m/s
 Stratification Type      STRCND  = U
 Surface temperature              = 19.70 degC
 Bottom temperature               = 19.70 degC
 Calculated FRESH-WATER DENSITY values:
 Surface density          RHOAS   = 998.2666 kg/m^3
 Bottom density           RHOAB   = 998.2666 kg/m^3
--------------------------------------------------------------------------------

DISCHARGE PARAMETERS:          Single Port Discharge
 Nearest bank                     = right
 Distance to bank         DISTB   = 304.80 m
 Port diameter            D0      = 0.2042 m
 Port cross-sectional area  A0    = 0.0328 m^2
```

Discharge velocity U0 = 0.01 m/s

Discharge flowrate Q0 = 0.000438 m^3/s

Discharge port height H0 = 3.05 m

Vertical discharge angle THETA = -12.5 deg

Horizontal discharge angle SIGMA = 270 deg

Discharge temperature (freshwater) = 24.34 degC

Corresponding density RHO0 = 997.2128 kg/m^3

Density difference DRHO = 1.0538 kg/m^3

Buoyant acceleration GP0 = 0.0104 m/s^2

Discharge concentration C0 = 100 %

Surface heat exchange coeff. KS = 0 m/s

Coefficient of decay KD = 0 /s

DISCHARGE/ENVIRONMENT LENGTH SCALES:

LQ = 0.18 m Lm = 0.08 m Lb = 0.15 m

LM = 0.06 m Lm' = 99999 m Lb' = 99999 m

NON-DIMENSIONAL PARAMETERS:

Port densimetric Froude number FR0 = 0.29

Velocity ratio R = 0.43

MIXING ZONE / TOXIC DILUTION ZONE / AREA OF INTEREST PARAMETERS:

Toxic discharge = no

Water quality standard specified = no

Regulatory mixing zone = yes

Regulatory mixing zone specification = distance

Regulatory mixing zone value = 11.89 m (m^2 if area)

Region of interest = 15544.80 m

****

HYDRODYNAMIC CLASSIFICATION:

| FLOW CLASS = H1 |

This flow configuration applies to a layer corresponding to the full water depth at the discharge site.

Applicable layer depth = water depth = 24.38 m

Limiting Dilution S = (QA/Q0)+ 1.0 = 3036656.2

****

MIXING ZONE EVALUATION (hydrodynamic and regulatory summary):

X-Y-Z Coordinate system:

Origin is located at the BOTTOM below the port/diffuser center:

304.80 m from the right bank/shore.

Number of display steps NSTEP = 10 per module.

NEAR-FIELD REGION (NFR) CONDITIONS :

Note: The NFR is the zone of strong initial mixing. It has no regulatory implication. However, this information may be useful for the discharge designer because the mixing in the NFR is usually sensitive to the discharge design conditions.

Pollutant concentration at NFR edge c = 0.0087 %

Dilution at edge of NFR s = 11502.9

NFR Location: x = 140.67 m

(centerline coordinates) y = -0.04 m

z = 24.38 m

NFR plume dimensions: half-width (bh) = 8.99 m

thickness (bv) = 8.99 m

Cumulative travel time: 4319.3652 sec.

Buoyancy assessment:

The effluent density is less than the surrounding ambient water density at the discharge level.

Therefore, the effluent is POSITIVELY BUOYANT and will tend to rise towards the surface.

FAR-FIELD MIXING SUMMARY:

Plume becomes vertically fully mixed at 3221.49 m downstream.

PLUME BANK CONTACT SUMMARY:

Plume in bounded section does not contact bank.

********** TOXIC DILUTION ZONE SUMMARY **********

No TDZ was specified for this simulation.

********** REGULATORY MIXING ZONE SUMMARY **********

The plume conditions at the boundary of the specified RMZ are as follows:

Pollutant concentration c = 0.352234 %

Corresponding dilution s = 283.9

Plume location: x = 11.89 m

(centerline coordinates) y = -0.04 m

z = 6.32 m

Plume dimensions: half-width (bh) = 0.92 m

thickness (bv) = 1.84 m

Cumulative travel time < 4319.3652 sec. (RMZ is within NFR)

Note:

Plume concentration c and dilution s values are reported based on prediction file values - assuming linear interpolation between predicted points just before and just after the RMZ boundary has been detected.

Please ensure a small step size is used in the prediction file to account for this linear interpolation. Step size can be controlled by increasing (reduces the prediction step size) or decreasing (increases the prediction step size) the - Output Steps per Module - in CORMIX input.

Regulatory Mixing Zone Analysis:

The specified RMZ occurs within the near-field region (NFR). This RMZ specification may be highly restrictive.

********** FINAL DESIGN ADVICE AND COMMENTS **********

The discharge port or nozzle points towards the nearest bank.

Since this is an UNUSUAL DESIGN, check whether you have specified correctly the port horizontal angle (SIGMA).

INTRUSION OF AMBIENT WATER into the discharge opening will occur!

For the present discharge/environment conditions the discharge densimetric Froude number is well below unity. This is an UNDESIRABLE operating condition.

To prevent intrusion, change the discharge parameters (e.g. decrease the discharge opening area) in order to increase the discharge Froude number.

In a future iteration, change the discharge parameters (e.g. decrease port diameter) in order to increase the Froude number.

REMINDER: The user must take note that HYDRODYNAMIC MODELING by any known

technique is NOT AN EXACT SCIENCE.

Extensive comparison with field and laboratory data has shown that the

CORMIX predictions on dilutions and concentrations (with associated

plume geometries) are reliable for the majority of cases and are accurate

to within about +-50% (standard deviation).

As a further safeguard, CORMIX will not give predictions whenever it judges

the design configuration as highly complex and uncertain for prediction.

Vantage POTW Effluent data may be found at:
apps.ecology.wa.gov/paris/PermitLookup.aspx

Columbia River ambient data was determined from: Washington State Department of Ecology Environmental Information Management System station 36A070 located on the Columbia River at Vernita Bridge (46.641519 -119.7317054)

Appendix E — Response to Comments

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

Appendix F — 2020 Infiltration and Inflow Report

Vantage POTW **Wastewater Treatment Plant**

Annual Infiltration/Inflow (I/I) Report

Reporting Year: From: January 1, 2015 To: December 31, 2020

Max month design flow: 0.087 MGD
Peak daily design flow: 0.087 MGD
Design Population Equivalent: 615

	Average Monthly Flow (MGD) Year						Total Monthly Rainfall (inches) Year						Population Served Year						Additional Sewer Lines Added (feet) Year					
Month	2015	2016	2017	2018	2019	2020	2015	2016	2017	2018	2019	2020	2015	2016	2017	2018	2019	2020	2015	2016	2017	2018	2019	2020
January	0.010	0.007	0.011	0.007	0.006	0.007	0.400	1.460	0.790	1.250	1.090	0.820	200	200	200	200	200	200	0	0	0	0	0	0
February	0.008	0.006	0.037	0.009	0.009	0.007	0.270	0.150	1.390	0.220	0.500	0.210	200	200	200	200	200	200	0	0	0	0	0	0
March	0.010	0.007	0.008	0.008	0.007	0.008	0.650	1.210	0.800	0.150	0.470	0.610	200	200	200	200	200	200	0	0	0	0	0	0
April	0.011	0.009	0.009	0.020	0.007	0.010	0.030	0.300	1.280	0.880	0.430	0.040	200	200	200	200	200	200	0	0	0	0	0	0
May	0.015	0.011	0.012	0.013	0.009	0.010	1.040	0.270	0.450	0.300	0.310	0.510	200	200	200	200	200	200	0	0	0	0	0	0
June	0.019	0.021	0.014	0.010	0.016	0.013	0.000	0.760	0.200	0.090	0.100	0.490	200	200	200	200	200	200	0	0	0	0	0	0
July	0.021	0.018	0.016	0.013	0.016	0.014	0.000	0.420	0.000	0.000	0.120	0.000	200	200	200	200	200	200	0	0	0	0	0	0
August	0.023	0.014	0.026	0.014	0.015	0.017	0.000	0.000	0.020	0.000	0.310	0.000	200	200	200	200	200	200	0	0	0	0	0	0
September	0.015	0.014	0.015	0.012	0.014	0.011	0.070	0.040	0.090	0.010	0.230	0.110	200	200	200	200	200	200	0	0	0	0	0	0
October	0.010	0.010	0.013	0.011	0.011	0.012	0.230	1.790	0.690	1.110	0.290	0.180	200	200	200	200	200	200	0	0	0	0	0	0
November	0.008	0.009	0.011	0.009	0.008	0.008	0.580	0.350	1.090	0.490	0.020	0.420	200	200	200	200	200	200	0	0	0	0	0	0
December	0.008	0.009	0.009	0.008	0.008	0.006	2.360	0.260	0.220	0.790	0.500	0.400	200	200	200	200	200	200	0	0	0	0	0	0
TOTAL	**0.158**	**0.136**	**0.180**	**0.133**	**0.126**	**0.123**	**5.6**	**7.0**	**7.0**	**5.3**	**4.4**	**3.8**							**Total (feet)**	**0**	**0**	**0**	**0**	**0**	**0**
High	**0.023**	**0.021**	**0.037**	**0.020**	**0.016**	**0.017**													**Total (miles)**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**
Low	**0.008**	**0.006**	**0.008**	**0.007**	**0.006**	**0.006**																		
Average	**0.013**	**0.011**	**0.015**	**0.011**	**0.011**	**0.010**																		
I/I	**0.015**	**0.015**	**0.029**	**0.013**	**0.010**	**0.010**																		

Base Year: 2015 Base Year I/I: 0.015 MGD

Infiltration/Inflow Summary

Year	I/I	% increase from base I/I	% of avg. design flow
2015	0.015	0.0	17.2
2016	0.015	-1.0	17.0
2017	0.029	96.0	33.7
2018	0.013	-10.7	15.4
2019	0.010	-31.8	11.7
2020	0.010	-30.9	11.9

Appendix G — 2020 Wasteload Assessment

Vantage POTW	Wastewater Treatment Plant	Permit No.	WA0050474

Annual Treatment Facility Review Report (Wasteload Assessment)

Reporting Year: From: January 1, 2020 To: December 31, 2020

Design Parameters:

Max monthly design flow (dry):	0.087	mgd		Design Population Equivalent:	615
Max monthly design flow (wet):	0.087	mgd		Present Population Served:	200
Peak daily design flow:	0.087	mgd		Projected Population growth:	0
Design Influent BOD loading:	175	lbs/day	Compliance with effluent permit limitation?		
Design Influent TSS loading:	175	lbs/day	X Yes		No

Table 1, Influent Monthly Average Loading & Peak Daily Flow (From Monthly DMR)

Month	Avg flow (mgd)	Peak flow (mgd)	BOD (lbs/day)	TSS (lbs/day)
January	0.00742	0.01200	5.6	6.2
February	0.00714	0.01300	5	5.75
March	0.00794	0.01000	5.5	6
April	0.01043	0.02900	11.4	19.4
May	0.00955	0.02000	12.5	8.5
June	0.01316	0.02500	13	10.25
July	0.01403	0.02400	9.6	16.4
August	0.01677	0.04000	7.5	10.25
September	0.01077	0.02000	10.0	9.8
October	0.01175	0.01900	9.0	6.3
November	0.00800	0.01500	7.5	6.5
December	0.00644	0.01000	7.6	9.4

Table 2, Maximum Influent Monthly Average Loading (Highest Month)

	2019 Month	2020 Max Monthly Average Value	Design Capacity	% Design Capacity	Previous year Max Monthly Avg value	% Increase / Decrease	
Dry Weather Flow MGD	August	0.0168	0.0870	19.28%	0.0153	9.47%	DRY = May - October of the same year
Wet Weather Flow MGD	April	0.0104	0.0870	11.99%	0.0070	49.05%	
Peak Flow MGD	August	0.0400	0.0870	45.98%	0.0153	161.05%	WET = Jan, Feb, March, April, Nov, Dec of the same year
BOD (lbs/day)	June	13.0	175.0000	7.43%	8.8	48.57%	
TSS (lbs/day)	April	19.4	175.0000	11.09%	9.0	115.56%	

* Flow or wasteload reached 85% of design capacity; ** Flow or wasteload reached or exceeded its design capacity

If actual flow or wasteload reaches 85% of design capacity for three consecutive months, the permittee shall submit a plan and schedule in accordance with their permit.

Table 3, Maximum Monthly Average Data for the Last Three Years (For Plotting)

Year	Flow (mgd)	BOD (lbs/day)	TSS (lbs/day)
2020	0.0167742	12.5	16.4
2019	0.00919355	11.75	15.85
2018	0.0138387	88	17.6

Estimated year when the design capacity is projected to be reached: >>>	Flow	Downward trend
Comments:	BOD	Downward trend
	TSS	Downward trend

Signature and Title

Design Capacity Graphs

Table 4: Max month Flow Data

Year	max month av	design
	Flow , mgd	cap, mgd
2010	0.016000	0.0875
2011	0.026900	0.0875
2012	0.015000	0.0875
2013	0.015516	0.0875
2014	0.029935	0.0875
2015	0.022645	0.0875
2016	0.021233	0.0875
2017	0.037179	0.0875
2018	0.013839	0.0875
2019	0.009194	0.0875
2020	0.016774	0.0875
2021		0.0875

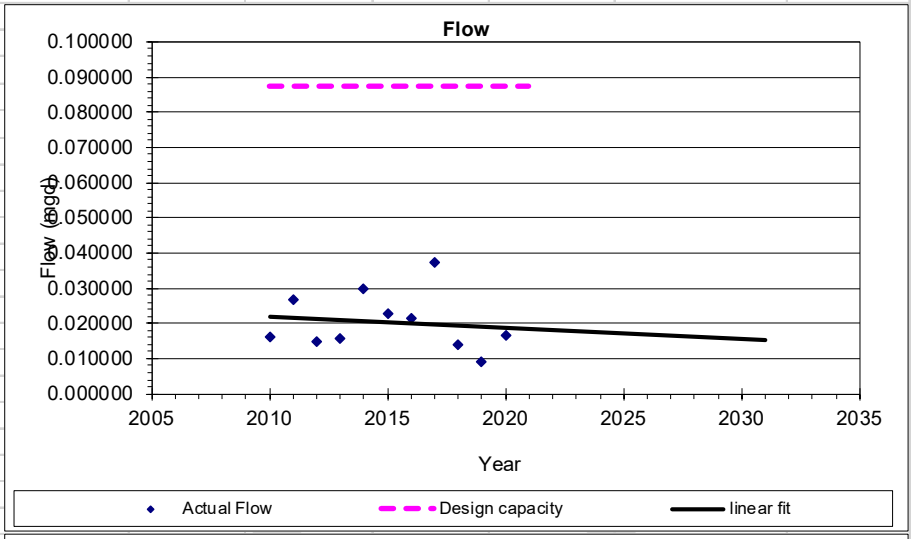
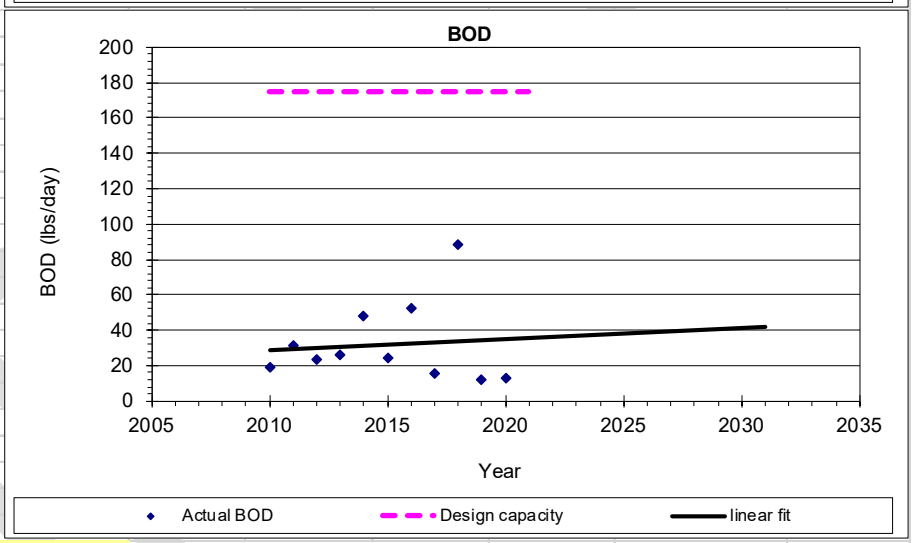


Table 5: Max month BOD Data

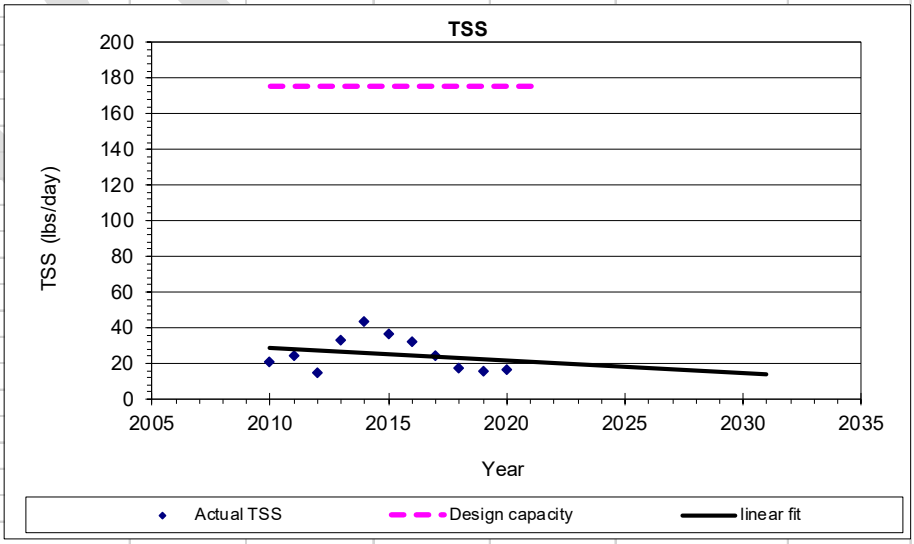
Year	max month av	design cap
	BOD, lbs/day	lbs/day
2010	19.4	175
2011	31.3	175
2012	23	175
2013	26	175
2014	48	175
2015	24.25	175
2016	52.8	175
2017	15.75	175
2018	88	175
2019	11.75	175
2020	12.5	175
2021		175



Vantage POTW **Wastewater Treatment Plant**

Table 6: Max month TSS Data

Year	max month av	design cap
	TSS, lbs/day	lbs/day
2010	21.3	175
2011	24	175
2012	14.4	175
2013	33.25	175
2014	43.75	175
2015	36.5	175
2016	32.4	175
2017	24.25	175
2018	17.6	175
2019	15.85	175
2020	16.4	175
2021		175



When loadings reach design capacity?

1. Fill in Table 4,5,and 6 with at least 3 years of data. The more data you enter the better is your projection.
2. Print on a paper.
3. Extend the dotted design capacity line (separately for flow/BOD/TSS) to intersect the linear fit line (solid).
4. Draw a vertical line from the point of intersection downwards to find the estimated year.
5. Report the earliest year among flow, BOD, and TSS in the first page.

EFFLUENT QUALITY SECTION--Permit Limits

Parameter	Monthly Avg. Units	Monthly Avg. Limit Lb.	Weekly Avg. Units	Weekly Avg. Limit Lb.
*Flow (mgd)	0.0870			
BOD	30	22	45	33
TSS	30	22	45	33
Fecal Coliform (no./100 mL)	200		400	
pH max	9			
pH min	6			
Temperature °C Max				
NH_3-N	8.2		8.2	
Chlorine mg/L	0.5		7.5	

Table 7: Effluent monthly **AVERAGES** (max/min for pH) for subject year

Month	Avg flow	Effluent BOD		Effluent TSS		Fecal Coliform	Min pH	Max pH	Temperature	NH3-N	CL2
	mgd	mg/L	Lb.	mg/L	Lb.	no./100 mL	Std. Units	Std. Units	°C Avg.	mg/L	mg/L
January	0.00532	7.18	0.3	6.16	0.28	1.8	6.25	7.44	8.70714	0.07	0.405714
February	0.00493	6.475	0.225	9.425	0.35	1.8	6.15	6.74	9.3	0.07	0.403333
March	0.00623	10.225	0.475	7.7	0.35	1.8	6.27	6.9	11.2077	0.07	0.387692
April	0.00777	8.04	0.52	6.64	0.44	1.8	6.64	7.13	14.9769	0.07	0.388462
May	0.00648	9.975	0.4	16.075	0.625	1.8	6.29	7.63	18.4538	0.07	0.4
June	0.01037	3.3	0.275	5.4	0.45	1.8	6.39	7.12	20.4538	0.07	0.357692
July	0.01013	4.36	0.24	6.34	0.36	1.8	6.43	7.31	22.8786	0.07	0.410714
August	0.01129	3.125	0.175	3.75	0.25	1.8	6.59	7.22	24.7	0.07	0.363077
September	0.00847	3.7	0.2	4.3	0.3	2	6.5	7.0	21.8	0.2	0.4
October	0.20155	4.5	0.3	6.6	0.4	7	6.6	7.5	17.9	0.1	0.4
November	0.00623	5.5	0.3	7.5	0.4	100	6.9	7.4	13.1	0.1	0.4
December	0.00471	5.8	0.2	8.4	0.3	2	7.0	7.2	10.1	0.1	0.2

Table 8: Effluent monthly **MAXIMUMS** for subject year

Month	Max flow	Effluent BOD		Effluent TSS		Fecal Coliform	Min pH	Max pH	Temperature	NH3-N	CL2
	mgd	mg/L	Lb.	mg/L	Lb.	no./100 mL	Std. Units	Std. Units	°C Max	mg/L	mg/L
January	0.00900	11.9	0.4	13.9	0.6	1.8	6.3	7.4	10.1	0.070	0.5
February	0.01000	8.5	0.2	17.6	0.6	1.8	6.2	6.7	10.2	0.070	0.5
March	0.00800	12.5	0.6	12.3	0.5	1.8	6.3	6.9	13.5	0.070	0.48
April	0.02400	11.3	0.8	8.5	0.6	1.8	6.6	7.1	17.7	0.070	0.5
May	0.01600	10.9	0.5	21.7	0.9	1.8	6.3	7.6	20.8	0.070	0.5
June	0.02000	3.8	0.3	8.5	0.7	1.8	6.4	7.1	23	0.070	0.5
July	0.02000	10.5	0.4	10.0	0.7	1.8	6.4	7.3	25.5	0.070	0.5
August	0.03200	3.7	0.3	6.4	0.5	1.8	6.6	7.2	24.7	0.070	0.5
September	0.04000	6.6	0.3	14.3	1.0	2	6.5	7.0	23.7	0.160	0.5
October	0.00000	6.6	0.3	9.3	0.6	7	6.6	7.5	21.0	0.070	0.5
November	0.01200	6.9	0.4	10.8	0.8	100	6.9	7.4	15.0	0.070	0.5
December	0.00800	6.9	0.3	12.9	0.5	2	7.0	7.2	11.4	0.070	0.5

Table 9: Effluent monthly **VIOLATIONS** calculated for subject year (violations are designated by an "X")

Month	Max flow	Effluent BOD		Effluent TSS		Fecal Coliform	pH MIN	pH MAX	Temperature	NH3-N	CL2
	mgd	mg/L	Lb.	mg/L	Lb.	no./100 mL	S.U	S.U.	°C Max	mg/L	mg/L
January											
February											
March											
April											
May											
June											
July											
August											
September											
October											
November											
December											