

## **FACT SHEET FOR NPDES PERMIT WA0022365**

### **Okanogan POTW**

Date of Public Notice: **03/26/2025**

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 Okanogan 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 Okanogan POTW, NPDES permit WA0022365, are available for public review and comment from **March 26, 2025**. For more details on preparing and filing comments about these documents, please see Appendix A - Public Involvement Information.

The City of Okanogan 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 City of Okanogan POTW was originally constructed in 1948. Between the years of 1983 and 1984 the City of Okanogan constructed upgrades at the POTW, replacing the aging trickling filter with a two-stage rotating biological contactor (RBC) system. This increased the facility's design flow to 0.54 MGD. During this same time period, the city's collection system was upgraded. A second round of upgrades were initiated in 2002 that included the construction of a new influent lift station, installation of two additional RBC units (for a post-upgrade total of four), enhanced ancillary blower capacity, and installation of a UV disinfection system. A capital improvement project began in 2004 that focused on outfall updates, manhole repairs, pump replacements, fine screen

installation, and grit classifier replacement. The most recent upgrades at the facility were concluded in 2017 and involved replacing the fine screen, removing the existing comminutor grinders, constructing a canopy over the new fine screen, and improving the grit removal building by replacing the grit pumps, hydro-cyclone, and classifier.

Ecology published a DDT/PCB total maximum daily load (TMDL) assessment for the Lower Okanogan River in July 2003. During the technical analysis phase of the TMDL, analyses of the wastewater from the Okanogan POTW determined the average level of total-DDT (t-DDT) in the effluent at 1.6ng /L. At the maximum design flow rate of 0.54 MGD and a concentration of 1.6ng /L, the Okanogan POTW would discharge 3.3 mg/day of t-DDT. The given wasteload allocation (WLA) for the facility is 2 mg/day of t-DDT. However, the 95th percentile of the actual flow from 2015 to 2024 is only 0.221 MGD, which results in an estimated discharge of 1.3 mg/day. Given the rate of growth occurring in Okanogan, Ecology is not concerned with the mass loading of t-DDT based on flow alone for years to come. Ecology conducted a reasonable potential analysis for t-DDT and no reasonable potential exist. Therefore, no t-DDT limit is contained in the proposed permit except for those associated with the TMDL wasteload allocations.

The limits contained in the proposed permit are unchanged from the 2015 permit, except for limits associated with wasteload allocations set in the 2004 Lower Okanogan River Basin DDT and PCBs TMDL. Ecology requires the City to monitor its effluent for t-DDT and PCBs at least once during the duration of the proposed permit term. Ecology may require additional DDT monitoring and source detection investigation through permit modifications or during the next permit cycle.

The City of Okanogan has complied substantially with the effluent limits and permit conditions throughout the duration of the permit issued on January 27, 2015. 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. 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**

<b>Applicant:</b>	
Facility name and address	Okanogan POTW 1610 South 1st Avenue Okanogan, WA 98840
Contact at facility	Name: Clint Little Title: Operator Telephone #: (509) 422-0000 Email: okwwtp@okanogancity.com
Responsible official	Name: Wayne Turner Title: Mayor Address: PO Box 752, Okanogan, WA 98840 Telephone #: (509) 422-3600 Email: Okanoganmayor@okanogancity.com
Type of treatment	Rotating Biological Contactor (RBC) with Ultraviolet Disinfection
Facility location (NAD83/WGS84 reference datum)	Latitude: 48.3532 Longitude: -119.5967
Discharge waterbody name and location (NAD83/WGS84 reference datum)	Okanogan River Latitude: 48.3516 Longitude: -119.5955

### Permit status

Issuance date of previous permit: 1/27/2015

Application for permit renewal submittal date: 2/21/2019

Date of Ecology acceptance of application: 3/4/2019

### Inspection status

Date of last sampling inspection: N/A

Date of last non-sampling inspection: 7/31/2024

**Figure 1 - Facility location map**



## **II.A. Facility description**

### **1. History**

The Okanogan POTW and collection system is owned by the City of Okanogan. The original treatment works and initial collection system was constructed in the late 1940's and had a capacity of approximately 0.25 MGD. The original treatment works consisted of a headworks with a comminutor and bar screen, a primary clarifier, trickling filter for secondary treatment, a chlorine contact chamber, and an outfall into the Okanogan River. Solids were handled via a sludge digestion system and drying beds. By the mid 1970s, failures in the collection system resulted in increases in infiltration which in turn caused the facility to operate above design capacity.

An engineering report was commissioned in 1977 and identified necessary capital improvements at the Okanogan POTW and the city's collection system. The aging main influent line was replaced in 1984 and the existing collection system was overhauled. The POTW was upgraded in 1985 by replacing the

trickling filter with a two-stage RBC system. This increased the facility's design flow to 0.54 MGD.

The POTW was again upgraded from 2002-2003. A new influent lift station was installed along with two additional RBC units (bringing the total to four discrete units), enhanced blower capacity, and the replacement of the existing chlorine contact system with a UV disinfection system. Another round of upgrades to the headworks occurred in 2017. At this time a new vertical finescreen with vertical screw conveyor, screening compactor, grit pump, hydrocyclone and classifier were installed.

Washington State Department of Ecology first issued the City of Okanogan a National Pollution Discharge Elimination System (NPDES) permit in 1980. The most recent permit renewal occurred in January 2015.

## **2. Collection system status**

The current City of Okanogan's collection system consists of approximately 16.5 miles of sewer pipes. These sewer pipes range in size from 6" to 18" in diameter. The original pipes were made from concrete, but collection system upgrades have replaced much of the concrete with PVC. These upgrades have decreased the amount of I&I in the collection system. The City maintains three lift stations, 304 manholes, and six collection area drainage basins.

## **3. Treatment process**

The Okanogan POTW uses a rotating biological contactor (RBC) process for secondary treatment before discharging treated wastewater to the Okanogan River.

Raw influent wastewater flows into the POTW at the influent lift station through a vertical fine screen. The influent goes through a manually cleaned bar screen into an aerated grit chamber. The hydrocyclone degritter and grit classifier installed in 2016 collects solids which are gathered and disposed of at the local landfill. From the headworks, wastewater moves to the primary clarifier where suspended solids settle out before being moved to the RBC system. Okanogan POTW has two RBC trains that run in parallel with each system made up of two RBC modules. After this secondary treatment, remaining sludge is collected in two secondary clarifiers and pumped back through primary clarifier. Solids are moved to the primary aerobic digester and then moved to the drying beds for testing and disposal. After clarification, the wastewater is disinfected through an ultraviolet system before discharging through the facilities outfall at the Okanogan River.

## **4. 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. Okanogan 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 by aerobic digestion and land applied at Boulder Park Farms. This facility has met the solid waste requirements for screening, as required by WAC 173-308-205.

### 5. Discharge outfall

The treated and disinfected effluent flows into the Okanogan River at approximately River Mile 24.8. Effluent is discharged through an 18" open ended pipe that is anchored to the river bottom with concrete blocks. The outfall is located 20' offshore and submerged approximately 15' beneath the surface of the river. The outfall was last inspected in 2017.

### II.B. Description of the receiving water

Okanogan POTW discharges to the Okanogan River. Other nearby point source outfalls include the Omak POTW. Significant nearby non-point sources of pollutants include stormwater runoff from urban areas and nearby agricultural lands. Section IIIE of this fact sheet describes any receiving waterbody impairments.

The ambient background data used for this permit includes the following from USGS station 12447200 and Ecology Environmental Information Management System (EIM) station 49A070 at Malott, WA:

**Table 2 - Ambient background data**

Parameter	Value
Temperature (highest annual 1-DMax)	25.1 °C
Temperature (highest annual 7-DADMax)	23.7 °C
pH (Maximum / Minimum)	7.7/8.4 standard units
Dissolved Oxygen	13.4 mg/L
Total Ammonia-N	0.04 mg/L
Fecal Coliform	72.6/100 mL dry weather
Turbidity	16.2 NTU
Hardness	140 mg/L as CaCO <sub>3</sub>
Alkalinity or Salinity	120 mg/L as CaCO <sub>3</sub>
Copper	2.77 µg/L
Lead	0.337 µg/L
Zinc	5 µg/L

### II.C. Wastewater influent characterization

Okanogan 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 3/1/2015 to 5/1/2024.

**Table 3 - Wastewater influent characterization**

Parameter	Units	# of Samples	Average value	Maximum value
Biochemical Oxygen Demand (BOD <sub>5</sub> )	mg/L	478	183.23	362
Biochemical Oxygen Demand (BOD <sub>5</sub> )	lbs/day	478	292.25	661
Total Suspended Solids (TSS)	mg/L	478	112.17	350
Total Suspended Solids (TSS)	lbs/day	478	181.8	642

**II.D. Wastewater effluent characterization**

Okanogan 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 3/1/2015 to 5/1/2024.

**Table 4 - Wastewater effluent characterization**

Parameter	Units	# of Samples	Average value	Maximum value
Flow	MGD	3347	0.192	0.661
Biochemical Oxygen Demand (BOD <sub>5</sub> )	mg/L	478	4.45	14
Biochemical Oxygen Demand (BOD <sub>5</sub> )	lbs/day	478	7.22	27
Total Suspended Solids (TSS)	mg/L	478	6.2	33
Total Suspended Solids (TSS)	lbs/day	478	9.99	55
Temperature	C°	4256	20.4	26.9
Ammonia	mg/L	478	1.128	16.2
Ammonia	lbs/day	478	1.892	25.2
Dissolved Oxygen	mg/L	1043	6.299	17.5

Parameter	Units	# of Samples	Maximum Monthly Geometric Mean	Maximum Weekly Geometric Mean
Fecal Coliform	#CFU/100ml	955	13.9	64.8

Parameter	Units	# of Samples	Minimum value	Maximum value
pH	S.U.	2307	7.02	8.41

**II.E. Summary of compliance with previous permit issued 1/27/2015**

The previous permit placed effluent limits on BOD, TSS, pH, Fecal Coliform Bacteria, and t-DDT.

Okanogan POTW has complied with the effluent limits and permit conditions throughout the duration of the permit issued on January 27, 2015, 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 January 2015 to June 2024**

Violation date	Parameter type	Unit type	Limit	Measurement value quantity	Violation
10/2021	Ammonia	mg/L	N/A	N/A	Analysis not conducted
10/2021	Ammonia	lbs/day	N/A	N/A	Analysis not conducted
9/2023	TSS	% removal	>85%	83%	Numeric Effluent Violation
6/2024	INF BOD	mg/L	N/A	N/A	Frequency of Sampling
6/2024	INF BOD	lbs/day	N/A	N/A	Frequency of Sampling
6/2024	EFF BOD	mg/L	N/A	N/A	Frequency of Sampling
6/2024	EFF BOD	lbs/day	N/A	N/A	Frequency of Sampling
6/2024	INF TSS	mg/L	N/A	N/A	Frequency of Sampling
6/2024	INF TSS	lbs/day	N/A	N/A	Frequency of Sampling
6/2024	EFF TSS	mg/L	N/A	N/A	Frequency of Sampling
6/2024	EFF TSS	lbs/day	N/A	N/A	Frequency of Sampling

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

**Table 6 - Permit submittals**

Submittal name	Submittal status	Last Due date	Last Received date
Wasteload Assessment	Received	12/15/2016	12/12/2016
Outfall Evaluation	Received	8/15/2017	7/31/2017
Infiltration and Inflow Evaluation	Received	12/15/2016	12/12/2016
Annual Effluent Study of Temperature (2015-2023)	Received	12/31/2023	10/9/2023
Application for Permit Renewal	Received	2/28/2019	2/21/2019

#### **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. The table below includes design criteria from the referenced report.

**Table 7 - Design criteria for Okanogan POTW**

Parameter	Design quantity
Maximum Month Design Flow (MMDF)	0.54 MGD
Peak Instantaneous Design Flow (PIDF)	1.35 MGD
BOD <sub>5</sub> Loading for Maximum Month	1,007 lb/day
TSS Loading for Maximum Month	1,056 lb/day

### **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 <sub>5</sub>	30 mg/L	45 mg/L
BOD <sub>5</sub>	The BOD <sub>5</sub> 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	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

Technology-based mass limits for BOD<sub>5</sub> 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 BOD<sub>5</sub> 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)	Influent design load (lbs/day)	Mass limit (lbs/day)
BOD <sub>5</sub> Monthly Average	30	1,007	135.1
BOD <sub>5</sub> Weekly Average	45	1,007	202.7
TSS Monthly Average	30	1,057	135.1
TSS Weekly Average	45	1,057	202.7

### 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.
- For waters that do not meet assigned criteria, or protect existing or designated uses, Ecology will take appropriate and definitive steps to bring the water quality back into compliance with the water quality standards.
- 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 Okanogan 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)	458 CFS
River depth at the 7Q10 period	10.4ft
River velocity	0.276 ft/s
Manning roughness coefficient	0.025
Channel width	160ft
River depth at discharge	8ft
Wind velocity	2m/s
7-DAD MAX/1-DAD-MAX Effluent temperature	77.2 °F

Ecology obtained ambient data at critical conditions in the vicinity of the outfall from ambient station USGS station 12447200 and Ecology EIM station 49A070 at Malott, WA.

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.

### **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 11 - Salmonid spawning, rearing, and migration**

Criteria	Value
Temperature – Highest 7-DAD MAX	17.5°C (63.5°F)
Dissolved oxygen – Lowest 1-Day minimum	10.0 mg/L

Criteria	Value
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 Okanogan River is listed on the current 303(d) and is impaired for DDT/PCB. Ecology completed a Total Maximum Daily Load (TMDL) Analysis and published their results in October 2004. The TMDL report states that the Okanogan River and several tributaries were listed by the State for non-attainment of the EPA human health criteria for DDT and PCB's in edible fish tissue and for non-attainment of chronic criteria for DDT in the water. These contaminants are considered legacy chemicals and are not currently in use as they have been banned in both the United States and Canada for 40 years.

The TMDL includes waste load allocations (WLA) for the Okanogan POTW as follows:

**Table 12 - DDT and PCB Waste Load Allocations for Okanogan POTW (mg/day)**

POTW	Design Flow (l/s)	4,4'-DDE	4,4'-DDD	4,4'-DDT	t-DDT	t-PCB
Okanogan POTW	23.7	1.2	1.7	1.2	2.0	0.3

Three other POTW's were included in the TMDL: Oroville, Tonasket, and Omak. WLA's of these facilities were also based on the design flow of the facility. In previous permit iterations, Okanogan POTW has been required to sample for PCB and DDT at least once per permit cycle, but may also be required to sample more

frequently if 85% of the facility's design capacity is reached for three consecutive months. Except in the case of major flooding of the Okanogan River, Okanogan POTW has maintained adequate capacity well below the 85% design limit during the previous permit term.

### **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.

### **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.

Outfall 001 is not fitted with a diffuser.

**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 downstream distance of 318 feet.

**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 downstream distance of 31.8 feet.

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

**Table 13 - Dilution factors**

Criteria	Acute	Chronic
Aquatic Life	9.0	122.1
Human Health, Carcinogen		122.1
Human Health, Non-carcinogen		122.1

Ecology determined the impacts of dissolved oxygen deficiency, 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<sub>5</sub> 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<sub>5</sub>) 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.

Ecology modeled the impact of BOD<sub>5</sub> on the receiving water at critical condition and with the technology-based effluent limit for BOD<sub>5</sub> described under "Technology-Based Effluent Limits" above. The calculations to determine dissolved oxygen impacts are shown in Appendix D.

Ecology predicted no violation of the surface water quality standards for dissolved oxygen due to the impacts of biochemical oxygen demand (BOD<sub>5</sub>) under critical conditions. Therefore, the proposed permit contains the technology-

based effluent limit for BOD<sub>5</sub>. The permit also does not contain a limit on ammonia based on dissolved oxygen impacts (ammonia toxicity is examined elsewhere in this fact sheet).

### **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 coliforms by simple mixing analysis using the technology-based limit of 400 organisms per 100 mL. 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: 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 USGS station 12447200 and Ecology EIM station 49A070 at Malott, WA and Ecology spreadsheet tools.

Ecology determined that 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. 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 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.

## **8. DDT, PCB, and their Metabolites**

This fact sheet and the proposed permit address DDT/PCB and their metabolites together because Ecology's multi-parameter TMDL Study addressed them jointly. The TMDL addresses the problem of bioaccumulation of DDT/PCB in edible fish tissue. Since sources of the DDT/PCB are ubiquitous, the TMDL is basin wide in scope. These toxic substances are bioaccumulative and could pose a health hazard to humans who ingest large quantities of fish containing high levels of DDT/PCB. DDT/PCB is stored in the fatty tissues and oils of living organisms and in river sediments.

Bioaccumulation occurs when single cell organisms ingest or absorb DDT/PCBs present in the environment. These organisms are then consumed by larger organisms and absorb the DDT/PCBs, who in turn become prey to even larger organisms and so on. In this way, low concentrations in the ambient waters are concentrated in the tissues of the organisms higher in the food chain. Edible fish represent the apex of the aquatic food chain, which in the case of the Lower Okanogan River contain DDT/PCB levels potentially dangerous to humans. In addition to a biologic pathway through the food web, fish can absorb DDT/PCB from the water column and suspended sediments as they pass through the gills during respiration.

DDT, PCBs, or metabolites were detected in the Okanogan's effluent in samples taken in April and May of 2001. Later sampling in 2005 detected DDT compounds just at the detection level. The 2005 set of analyses are suspect

however in that DDT and its decay products were found all at the same level, which in the environment is highly unlikely as these compounds decay at different rates and originate from the primary compound DDT. In addition, the resolution of the 2005 analysis was considerably less than the 2001 suite of analyses. DDT, PCB, and their metabolites were found in low concentrations in the treatment plant sludge.

Since PCBs are difficult to detect in water, investigators estimated daily loads of PCBs discharged from the facility based on the concentrations of suspended solids in the effluent. They assumed the suspended solids in the effluent were composed primarily of sludge (TMDL Draft Report, pp. 34-35), and concentrations of pollutants in the effluent solids matched those found in the sampled sludge. However, other studies found little correlation between TSS levels and DDT/PCB levels.

Estimated DDT and PCB daily loads discharged from the Okanogan treatment plant to the Okanogan River, based on effluent samples (DDT) and sludge samples (PCBs) are presented in Table 10.

**Table 14 - Estimated Daily Loads of DDT and PCB from the Okanogan POTW**

<b>4,4'- DDE,  in mg/day</b>	<b>4,4'- DDD,  in mg/day</b>	<b>4,4'- DDT,  in mg/day</b>	<b>t-DDT,  in mg/day</b>	<b>t-PCB <sup>a</sup>,  in mg/day</b>
0.8	0.3	1.1	2.2	1.3

a-Results shown are for PCB Aroclors 1260, 1254, 1248, 1242, 1232, 1221 and 1016.

The assumed combined t-PCB loads from the Omak and Okanogan STPs (2.6 mg t-PCB/day) was about 0.3% of the loading capacity of the Okanogan River at Malott.

Aside from the costly removal of highly contaminated sediments sources and removal of obvious land-based sources, if they can be identified, a programmatic reduction of new contaminants to the aquatic environment and natural attenuation through decay (half-life) of DDT/PCB present in the environment is the only practical strategy available for lowering DDT/PCB in fish tissue.

The literature contains many estimates of the half-life of DDT. A half-life is that length of time for DDT to decay to half its original concentration. DDT's half-life is estimated to be from 56 days in surface water to 5 to 16 years in sediments. One estimate placed the half-life of DDT at 150 years. DDE, the daughter product of DDT decay, has a similar suite of half-life estimates ranging from a fraction of a day to 7 years. The half-life of PCB aroclors in the environment is estimated from 1 to 28 years with an average rate of 8 years. Therefore, it is reasonable to

conclude that an interval of 5 to 10 years between sampling events is an effective determiner of DDT, DDT metabolic bi-products and PCB concentration trends in the environment.

Since the DDT ban in the 1970's, no new sources of DDT are theoretically entering the system, a sampling frequency that considers the decay rate of the analyte is likely the most cost-effective method.

The bioaccumulative effect allows very low concentrations of DDT/PCB in the environment to become concentrated in fish tissue at levels where the results of analysis have a high level of statistical certitude. Frequent sampling of POTW effluent, since it is subject to the vagaries of analysis associated with background noise at low concentrations and natural variation associated with environmental sampling, is not justifiable given the cost of sampling and analysis when measured against the half-life.

The concentration of DDT/PCB, displayed in table 11, is extremely low in the Okanogan POTW effluent. Interference and methodology significantly affect the detection level and reliability of the results of an analysis in these extremely low ranges. Wastewater is particularly susceptible to interference due to the many substances (chloride, TDS, phosphate, etc.) contained in a wastewater sample.

**Table 15 - Okanogan Effluent DDT and PCB Characterization**

Date	4,4'-DDE, in ng/L	4,4'- DDD, in ng/L	4,4'- DDT, in ng/L	t-DDT, in ng/L	PCBs, in ng/L
4/16/01	0.7	u(0.8)	0.6	1.3	nd
5/17/01	0.4	0.4	1.0	1.8	nd
5/14/02	na	na	na	na	0.39 <sup>a</sup> (0.65)
12/5/2005	ud 4.0(10)	ud 4.0(10)	ud 4.0(10)	ud 4.0(10)	na

u-undetected at practical quantitation limit in parenthesis.

ud-undetected at practical quantitation limit in parenthesis but detected at the MDL of 3.0 ng/L.

nd-not detected, no practical quantitation limit determined.

na-not analyzed.

<sup>a</sup> Concentration of PCB 1248, formerly used in hydraulic fluids, vacuum pumps, rubber plasticizers, synthetic resins, and adhesives, other aroclors were undetected at the practical quantification level of 0.65 ng/L.

The TMDL study report notes that daily effluent loads of DDT and PCBs are low at all three treatment plants included in the TMDL study (Omak, Omak and Okanogan). Tonasket began discharging to the Okanogan River after the TMDL study sampled. Table 12 contains the WLA's for the four sewage treatment

plants impacted by the approved 2004 Lower Okanogan River Basin DDT and PCBs Total Maximum Daily Load.

**Table 16 - Wasteload Allocation for Okanogan River STPs (mg/Day)**

STP	River Mile	Design Flow (l/s)	4,4'-DDE	4,4'-DDD	4,4'-DDT	t-DDT	t-PCB
Oroville <sup>a</sup>	e	21.6	1.1	1.6	1.1	1.9	0.3
Tonasket <sup>b</sup>	56.4	17.5	0.9	1.3	0.9	1.5	0.5
Omak <sup>c</sup>	29.9	82.8	4.2	6.0	4.2	7.2	1.2
<b>Okanogan <sup>d</sup></b>	<b>24.8</b>	<b>24.8</b>	<b>1.2</b>	<b>1.7</b>	<b>1.2</b>	<b>2.0</b>	<b>0.3</b>
Chronic Water Quality Criteria in ng/L			1.0	1.0	1.0	1.0	0.17

<sup>a</sup> NPDES permit WA-002239-0

<sup>b</sup> NPDES permit WA-005233-7

<sup>c</sup> NPDES permit WA-002094-0

<sup>d</sup> NPDES permit WA-002236-5

e Similkameen River mile 4.0. The Similkameen River enters the at Okanogan River mile 74.1

The 2001 set of analyses of the wastewater determined the average level of t-DDT at 1.6ng/L. At the maximum design flow rate of 0.54 MGD and a concentration of 1.6 ng/L, the Okanogan POTW would discharge 3.3 mg t-DDT/Day, 1.3 milligrams above its given wasteload allocation (WLA) of 2 mg t-DDT/Day. The 95<sup>th</sup> percentile of average monthly flow from 2004 to 2008 is 0.303 MGD. At this flow and estimated concentration of t-DDT, the POTW is potentially delivering 1.3 mg/Day of t-DDT, well below the WLA. Please note this does not take into account any DDT decay over the 7-year period from the first analysis to today (2008). Given the rate of growth occurring in Okanogan, mass loading of t-DDT based on flow alone should not be a concern for several years to come. Reasonable potential analyses were conducted determine if the effluent has the potential to violate either the human health criteria or the water quality criteria. The analyses demonstrated that no reasonable potential exists. Therefore, only the wasteload allocations associated with the 2004 Lower Okanogan River Basin DDT and PCBs Total Maximum Daily Load (TMDL) are contained as limits in the permit.

The analysis conducted by Gary Struthers Associates (GSA) in 2005 fulfilled the current permit requirement contained in Special Condition S8.C., Source Reduction and Identification. Analysis for t-DDT and the DDT decay products are all reported at the same concentration, at a method detection level (MDL) of 3.0 ng/L. The practical quantification level (PQL) was 10 ng/L. In addition to questionable reporting levels, it is highly unlikely that DDT and its decay products would all be at

the same concentration. The sensitivity of the test was considerably less than the 2001 series, and considering the problems stated above, the results have been discarded.

The Okanogan collection system was sampled at selected sites by GSA with five sites found positive for DDT. The definitive test found low concentrations in a fatty solid (OKA-1) and three other sites (OKA-1, OKA-2, OKA-3, OKA-4) were found positive via immunoassay testing. PCB was detected via immunoassay at (OKA-4, OKA-5, OKA-6, OKA-7), but were not analyzed via the definitive test. The report, however, goes on to state that for DDT false positives were significant in the case of oily solids. In the case of PCB false positives could not be directly addressed. The report stated the tools used were appropriate for screening purposes only.

The estimated PCB daily load to the Okanogan River is 1.3 mg/Day, which is based on the assumption that solids in the effluent are largely PCB containing sludge particles and the PCB will partition at some rate to the water column. PCB was not detected in the wastewater at the PQL, except in the GSA study where PCB aroclor 1248 is reported at 0.39 ng/L even though it is below the PQL of 0.65 ng/L.

### **Reasonable potential analysis**

Annual summer maximum, supplementary spawning criterion, and incremental warming criteria: Ecology evaluated the reasonable potential for the discharge to exceed the annual summer maximum, the supplementary spawning criterion, and the incremental warming criteria at the edge of the chronic mixing zone during critical condition(s). No reasonable potential exists to exceed the temperature criterion where:

$$(T_{\text{effluent}_{95}} - \text{Criterion}) / \text{DF} < 0.3.$$

$T_{\text{effluent}_{95}}$  = 95th percentile 7-DADMax or 1DMax temperature of the effluent

DF = chronic dilution factor

A temperature difference of less than 0.3°C at the edge of the mixing zone is lower than the definition of a “measurable change” as defined in WAC 173-201A-320(3).

### **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 effluent may contain chemicals of concern for human health, based on a 303(d) listing (quality impairment) of the receiving waterbody for a regulated chemical that Ecology knows or expects is present in the discharge.

Ecology evaluated the discharge's potential to violate the water quality standards as required by 40 CFR 122.44(d) by following the procedures published in the

***Technical Support Document for Water Quality-Based Toxics Control***

(EPA/505/2-90-001) (USEPA, 1991) and Ecology's Permit Writer's Manual (Ecology, 2018) to make a reasonable potential determination. The evaluation showed that the discharge has no reasonable potential to cause a violation of water quality standards, and an effluent limit is not needed.

**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](#)<sup>1</sup>.

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.

**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).

Okanogan 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.

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<sup>1</sup> <https://ecology.wa.gov/Spills-Cleanup/Contamination-cleanup/Sediment-cleanups>

### III.L. Comparison of effluent limits with the previous permit issued January 27, 2015

**Table 17 - 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 CFUs/100ml	200 CFUs/100ml
Fecal Coliform Bacteria – Weekly Geometric Mean	Technology	400 CFUs/100ml	400 CFUs/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.
4,4'-DDE – Daily Maximum	Water Quality	1.2 mg/Day	1.2 mg/Day
4,4'-DDD – Daily Maximum	Water Quality	1.7 mg/Day	1.7 mg/Day
4,4'-DDT – Daily Maximum	Water Quality	1.2 mg/Day	1.2 mg/Day
t-DDT – Daily Maximum	Water Quality	2.0 mg/Day	2.0 mg/Day
t-PCBs – Daily Maximum	Water Quality	0.30 mg/Day	0.30 mg/Day

## 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 rotating biological contactors.

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.

Ecology has required monitoring of both fecal coliform and *E. coli* in the permit application. This dual monitoring will help inform both Ecology and Okanogan POTW of the correlation between the two indicators. Dual monitoring requirements consist of annual sampling for *E. coli*, with this sampling occurring on the same day a required fecal coliform sample is taken.

#### **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 for: list parameters OR use table below

**Table 18 - Accredited parameters**

Parameter name	Category	Method name	Matrix description
TSS	General Chemistry	SM 2540 D-2011	Non-Potable Water
pH	General Chemistry	SM 4500-H+ B2011	Non-Potable Water
BOD-5	General Chemistry	SM 5210 B-2011	Non-Potable Water
Fecal Coliform	Microbiology	SM 9222 D (mFC)-06	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. Prevention of facility overloading**

Overloading of the treatment plant is a violation of the terms and conditions of the permit. To prevent this from occurring, RCW 90.48.110 and WAC 173-220-150 require Okanogan POTW to:

- Take the actions detailed in proposed permit Special Condition S.4.
- Design and construct expansions or modifications before the treatment plant reaches existing capacity.
- Report and correct conditions that could result in new or increased discharges of pollutants.

Special Condition S.4 restricts the amount of flow.

The municipality should contact Ecology's regional office as early as practical before planning a project that may include Ecology-administered funding.

### **V.C. Operation and maintenance**

The proposed permit contains Special Condition S.5 as authorized under RCW 90.48.110, WAC 173-220-150, chapter 173-230 WAC, and WAC 173-240-080. Ecology included it to ensure proper operation and regular maintenance of equipment, and to ensure that Okanogan POTW takes adequate safeguards so that it uses constructed facilities to their optimum potential in terms of pollutant capture and treatment.

Special Condition S.5 requires facility name to review and update as needed an operation and maintenance manual as required by state regulation for the construction of wastewater treatment facilities (WAC 173-240-080). Implementation of the procedures in the operation and maintenance manual ensures the facility's compliance with the terms and limits in the permit.

The City of Okanogan has documented or suspects inflow, infiltration, overflows, failures in its collection system. Portions of the collection system are at least 40 years old, were constructed using techniques such as concrete pipes with oakum packing and/or have numerous manholes, which were not installed using modern materials. Ecology expects leaks are present in the collection system due to its age, materials used, and construction methods for its installation. Therefore, the proposed permit requires the City of Okanogan to characterize the collection system for the presence of leaks by providing the following information:

- Infiltration & Inflow Report once per permit cycle

Three good references to aid in these tasks include:

- ***Existing Sewer Evaluation and Rehabilitation: Manual of Practice FD 6*** (Water Environment Federation, American Society of Civil Engineers, 2020)
- ***Handbook for Sewer System Infrastructure Analysis and Rehabilitation***, EPA/625/6-91/030 (USEPA, 1991)
- ***Standard Specifications for Road, Bridge, and Municipal Construction***, M 41-10 (Washington State Department of Transportation, 2023)

If significant leaks in the collection system are discovered, Ecology may require corrective actions by issuing an administrative order following review of the assessment.

### **V.D. Pretreatment**

Ecology administers the National Pretreatment Program under the terms of the "National Pollutant Discharge Elimination System (NPDES) Memorandum of Agreement Between the State of Washington and the United States Environmental Protection Agency Region 10" (1986), including any revisions, modifications, or amendments to the Memorandum of Agreement, and 40 CFR Part 403.

Under this delegation of authority, Ecology will serve as either: a) the Control Authority for those industrial users who introduce pollutants into a POTW which has not been approved to have a Pretreatment Program or b) the Approval Authority for an approved Pretreatment Program.

The City of Okanogan does not have an approved pretreatment program. Therefore, Ecology acts as the Control Authority pursuant to 40 CFR Part 403.10(e). In the City of Okanogan sewer service area, in accordance with WAC 173-216, Ecology issues permits for the wastewater discharges from the nondomestic users.

### **1. Duty to enforce discharge prohibitions**

This provision prohibits the publicly owned treatment works (POTW) from authorizing, permitting, or allowing an industrial discharger to discharge certain types of waste into the sanitary sewer.

- The first section prohibits the POTW from accepting pollutants which causes “pass through” or “interference”. This general prohibition is from 40 CFR §403.5(a). Appendix C of this fact sheet defines these terms.
- The second section reinforces specific state and federal pretreatment prohibitions found in 40 CFR §403.5(b) and WAC 173-216-060. The POTW may not accept wastes which violate the specific state and federal discharge prohibitions. Wastewaters with the following characteristics are prohibited:
  - Wastewaters prohibited to be discharged by the Dangerous Waste Regulations in chapter 173-303 WAC.
  - Explosive or flammable.
  - Have too high or low of a pH (too corrosive, acidic or basic).
  - May cause a blockage such as grease, sand, rocks, or viscous materials.
  - Heat in amounts that will inhibit biological activity at the POTW.
  - Are of sufficient strength or volume to interfere with treatment.
  - Contain too much petroleum-based oils, mineral oil, or cutting fluid.
  - Create noxious or toxic gases at any point.
- The third section reflects state prohibitions [WAC 173-216-060(2)(b)(vii)] on the POTW accepting certain types of discharges unless the discharge has received prior written authorization from Ecology. These discharges include:
  - Cooling water in significant volumes.
  - Stormwater and other direct inflow sources.
  - Wastewaters significantly affecting system hydraulic loading, which do not require treatment.

## **2. Requirements for performing an industrial user survey**

The Okanogan POTW serves many other industrial and commercial users, some of which have the potential to be or become, with changed processes, significant industrial users [40 CFR §403.3(v)]. A significant industrial user is a nondomestic indirect discharger (user) subject to categorical pretreatment standards under 40 CFR §403.6 and 40 CFR Chapter I, Subchapter N or any other nondomestic indirect discharger that meets any of the following:

- Discharges an average of 25,000 gallons per day or more of process wastewater to the POTW (excluding sanitary, noncontact cooling, and boiler blowdown wastewater).
- Contributes a process wastestream that makes up 5% or more of the average dry weather hydraulic or organic capacity of the POTW.
- Is designated as such by the Permittee or Ecology on the basis that the nondomestic indirect discharger has a reasonable potential to adversely affect the POTW's operation.

The purpose of the IU Survey is to identify all facilities that may be subject to pretreatment standards or requirements so that Ecology can take appropriate measures to control these discharges. The steps the POTW must document in their IU Survey submittal include:

- d. The POTW must develop a master list of nondomestic users (commercial and industrial). This list must be based on several sources of information including business licenses, and water and sewer billing records.
- e. The POTW must canvas all the potential sources. The POTW must identify categories of nondomestic users and have potentially significant users complete a survey form.
- f. The POTW must identify SIUs in all areas served by the POTW.

Ecology uses the industrial user survey as a major mechanism to determine which nondomestic users merit further controls, such as a state waste discharge permit. Ecology describes the information needed in the survey submittal to allow Ecology to make permitting decision in the manual "Performing an Industrial User Survey". Where surveys are incomplete, Ecology may take such enforcement as appropriate and/or require the POTW to develop a fully delegated pretreatment program.

The proposed permit requires Okanogan POTW to conduct an industrial user survey to determine the extent of compliance of all industrial users of the sanitary sewer and wastewater treatment facility with federal pretreatment regulations [40 CFR Part 403 and CWA Sections 307(b) and CWA Section 308)], with state regulations (chapter 90.48 RCW and chapter 173-216 WAC), and with local ordinances.

### **3. Identification of new nondomestic wastewater sources and notification of permit requirements**

The permit requires non-delegated POTWs to take “continuous, routine measures to identify and authorize nondomestic wastewater discharges. Examples of such routine measures include regular review of business license and building permit applications, advertisements, and personal reconnaissance. Collection system operators should be trained on what to look for so they can identify and report new industrial dischargers. The City of Okanogan may not allow SIUs to discharge prior to receiving a permit from Ecology and must notify all industrial users of their responsibility to apply for a State Waste Discharge Permit. The POTW must also notify Ecology.

#### **V.E. 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.F. Solid waste**

To prevent water quality problems the facility is required in permit Special Condition S7 to store and handle all residual solids (grit, screenings, scum, sludge, and other solid waste) in accordance with the requirements of RCW 90.48.080 and state water quality standards.

The final use and disposal of sewage sludge from this facility is regulated by U.S. EPA under 40 CFR 503, and by Ecology under chapter 70.95J RCW, chapter 173-308 WAC “Biosolids Management,” and chapter 173-350 WAC “Solid Waste Handling Standards.” The disposal of other solid waste is under the jurisdiction of the Okanogan County Health Department.

Requirements for monitoring sewage sludge and record keeping are included in this permit. Ecology will use this information, required under 40 CFR 503, to develop or update local limits.

#### **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

- Ecology. (2011). *Waters Requiring Supplemental Spawning and Incubation Protection for Salmonid Species*. Publication 06-10-038. Retrieved from <https://apps.ecology.wa.gov/publications/documents/0610038.pdf>
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- USEPA. (1987). *Enhanced Stream Water Quality Models QUAL2E and QUAL2E-UNCAS: Documentation and User Manual, EPA/600/3-87/007*.

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- Water Environment Federation, American Society of Civil Engineers. (2020). *Existing Sewer Evaluation and Rehabilitation: Manual of Practice FD 6*.
- Water Pollution Control Federation. (1976). *Chlorination of Wastewater*.

**Washington State and Ecology website general reference links:**

[Laws and Regulations](#)<sup>2</sup>

[Permit and Wastewater Related Information](#)<sup>3</sup>

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<sup>2</sup><https://leg.wa.gov/state-laws-and-rules/>

<sup>3</sup> <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 Okanogan 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 **March 26, 2025 in Omak-Okanogan Co Chronicle** 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.

[\[Attach printed copy of the Public Notice mail-out\]](#)

[Frequently Asked Questions about Effective Public Commenting<sup>4</sup>](#)

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.

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<sup>4</sup> <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/><sup>5</sup> 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

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<sup>5</sup> <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<sub>5</sub>** – 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<sub>5</sub> 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<sub>5</sub> 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<sub>5</sub>** – 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<sub>5</sub> 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<sub>5</sub> 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

### Simple Mixing:

Ecology uses simple mixing calculations to assess the impacts of certain conservative pollutants, such as the expected increase in fecal coliform bacteria at the edge of the chronic mixing zone boundary. Simple mixing uses a mass balance approach to proportionally distribute a pollutant load from a discharge into the authorized mixing zone. The approach assumes no decay or generation of the pollutant of concern within the mixing zone. The predicted concentration at the edge of a mixing zone ( $C_{mz}$ ) is based on the following calculation:

$$C_{mz} = C_a + [(C_e - C_a)/DF]$$

$C_a$  = ambient concentration

$C_e$  = effluent concentration

DF = dilution factor

### 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 Calculation

Facility	Okanogan POTW
Water Body Type	Freshwater
Rec. Water Hardness	** Enter Hardness on DFCalc Tab **

Dilution Factors:	Acute	Chronic
Aquatic Life	9.0	122.1
Human Health Carcinogenic		#DIV/0!
Human Health Non-Carcinogenic		#DIV/0!

Pollutant, CAS No. & NPDES Application Ref. No.		AMMONIA, Criteria as Total NH3											
Effluent Data	# of Samples (n)	478											
	Coeff of Variation (Cv)	1.897	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6	0.6
	Effluent Concentration, ug/L (Max. or 95th Percentile)	590											
	Calculated 50th percentile Effluent Conc. (when n>10)												
Receiving Water Data	90th Percentile Conc., ug/L	40											
	Geo Mean, ug/L												
Water Quality Criteria	Aquatic Life Criteria, Acute ug/L	2,593											
	Chronic	277											
	WQ Criteria for Protection of Human Health, ug/L	-			#N/A	#N/A							
	Metal Criteria Acute	-											
	Translator, decimal Chronic	-											
	Carcinogen?	N			#N/A	#N/A							

### Aquatic Life Reasonable Potential

[illegible]

### Calculation of Fecal Coliform at Chronic Mixing Zone

INPUT	
Chronic Dilution Factor	122.1
Receiving Water Fecal Coliform, #/100 ml	73
Effluent Fecal Coliform - worst case, #/100 ml	22
Surface Water Criterion, #/100 ml	14
OUTPUT	
Fecal Coliform at Mixing Zone Boundary, #/100 ml	72
Difference between mixed and ambient, #/100 ml	0

**Conclusion:** At design flow, the discharge has a reasonable potential to violate water quality standards for fecal coliform.

### Calculation of Dissolved Oxygen at Chronic Mixing Zone

INPUT	
Chronic Dilution Factor	122.1
Receiving Water DO Concentration, mg/L	13.4
Effluent DO Concentration, mg/L	8.4
Effluent Immediate DO Demand (IDOD), mg/L	
Surface Water Criteria, mg/L	
OUTPUT	
<b>DO at Mixing Zone Boundary, mg/L</b>	<b>13.36</b>
<b>DO decrease caused by effluent at chronic boundary, mg/L</b>	<b>0.04</b>

**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

INPUT	
1. Receiving Water Temperature (deg C):	25.1
2. Receiving Water pH:	8.4
3. Is salmonid habitat an existing or designated use?	Yes
4. Are non-salmonid early life stages present or absent?	Present
OUTPUT	
Using mixed temp and pH at mixing zone boundaries?	no
Ratio	13.500
FT	1.400
FPH	1.000
pKa	9.243
Unionized Fraction	0.125

Unionized ammonia NH3 criteria (mg/L as NH <sub>3</sub> )	
Acute:	0.396
Chronic:	0.042
<b>RESULTS</b>	
Total ammonia nitrogen criteria (mg/L as N):	
Acute:	2.593
Chronic:	0.277

	Core Summer Criteria	Supplemental Criteria
INPUT	July 1-Sept 14	Sept 15-July 1
1. Chronic Dilution Factor at Mixing Zone Boundary	122.1	9.0
2. 7DADMax Ambient Temperature (T) (Upstream Background 90th percentile)	25.1 °C	15.0 °C
3. 7DADMax Effluent Temperature (95th percentile)	25.9 °C	20.0 °C
4. Aquatic Life Temperature WQ Criterion in Fresh Water	16.0 °C	13.0 °C
OUTPUT		
5. Temperature at Chronic Mixing Zone Boundary:	25.1 °C	15.6 °C
6. Incremental Temperature Increase or decrease:	0.0 °C	0.6 °C
7. Maximum Allowable Incremental Temperature Increase:	0.9 °C	1.3 °C
8. Maximum Allowable Temperature at Mixing Zone Boundary:	16.0 °C	13.0 °C
<b>A. If ambient temp is warmer than WQ criterion</b>		
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>B. If ambient temp is cooler than WQ criterion but within 28/(T<sub>amb</sub>+7) of the criterion</b>		
11. Does temp fall within this Incremental temp. range?	---	---
12. Temp increase allowed at mixing zone boundary, if required:	---	---
<b>C. If ambient temp is cooler than (WQ criterion - 28/(T<sub>amb</sub>+7))</b>		
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

INPUT		
	@ Acute Boundary	@ Chronic Boundary
1. Dilution Factor at Mixing Zone Boundary	9.0	122.1
2. Ambient/Upstream/Background Conditions		
Temperature (deg C):	25.10	25.10
pH:	8.40	8.40
Alkalinity (mg CaCO3/L):	120.00	120.00
3. Effluent Characteristics		
Temperature (deg C):	25.92	25.92
pH:	7.72	7.72
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:	6.35	6.35
Effluent pKa:	6.34	6.34
2. Ionization Fractions		
Upstream/Background Ionization Fraction:	0.99	0.99
Effluent Ionization Fraction:	0.96	0.96
3. Total Inorganic Carbon		
Upstream/Background Total Inorganic Carbon (mg CaCO3/L):	121	121
Effluent Total Inorganic Carbon (mg CaCO3/L):	135	135
4. Conditions at Mixing Zone Boundary		
Temperature (deg C):	25.19	25.11
Alkalinity (mg CaCO3/L):	121.11	120.08
Total Inorganic Carbon (mg CaCO3/L):	122.67	121.19
pKa:	6.35	6.35
5. Allowable pH change	NA	0.20
RESULTS		
pH at Mixing Zone Boundary:	8.24	8.39
pH change at Mixing Zone Boundary:	0.16	0.01
Is permit limit needed?	NO	NO

### Calculation of Water Quality-Based Effluent Limits:

Ecology calculates water quality-based effluent limits by the two-value wasteload allocation process as described on page 100 of the TSD (USEPA, 1991) and shown below.

1. Calculate the acute wasteload allocation  $WLA_a$  by multiplying the acute criteria by the acute dilution factor and subtracting the background factor. Calculate the chronic wasteload allocation ( $WLA_c$ ) by multiplying the chronic criteria by the chronic dilution factor and subtracting the background factor.

$$WLA_a = (\text{acute criterion} \times DF_a) - (\text{background concentration} \times (DF_a - 1))$$

$$WLA_c = (\text{chronic criterion} \times DF_c) - (\text{background concentration} \times (DF_a - 1))$$

Where:

$DF_a$  = acute dilution factor

$DF_c$  = chronic dilution factor

2. Calculate the long-term averages ( $LTA_a$  and  $LTA_c$ ) which will comply with the wasteload allocations  $WLA_a$  and  $WLA_c$ .

$$LTA_a = WLA_a \times e^{(0.5\sigma^2 - z\sigma)}$$

Where:

$$\sigma^2 = \ln(CV^2 + 1)$$

$$z = 2.326$$

CV = coefficient of variation = standard deviation/mean

$$LTA_c = WLA_c \times e^{(0.5\sigma^2 - z\sigma)}$$

Where:

$$\sigma^2 = \ln(CV^2/4 + 1)$$

$$z = 2.326$$

3. Use the smallest LTA of the  $LTA_a$  or  $LTA_c$  to calculate the maximum daily effluent limit (MDL) and the monthly average effluent limit (AML).

$$MDL = LTA \times e^{(z\sigma - 0.5\sigma^2)}$$

Where:

$$\sigma^2 = \ln(CV^2 + 1)$$

$$z = 2.326 \text{ (99}^{\text{th}} \text{ percentile)}$$

LTA = limiting long-term average

$$AML = LTA \times e^{(z\sigma - 0.5\sigma^2)}$$

Where:

$$\sigma^2 = \ln(CV^2/n + 1)$$

n = number of samples per month

$$z = 1.645 \text{ (95}^{\text{th}} \text{ percentile)}$$

LTA = limiting long-term average

#### CHRONIC CORMIX SESSION REPORT:

XX  
 XXXXXXXXXXXXXXXXXXXXXXX

## 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\OK-Chronic.prd

Using subsystem CORMIX1: Single Port Discharges

Start of session: 07/11/2024--10:08:41

\*\*\*\*\*

## SUMMARY OF INPUT DATA:

-----  
 AMBIENT PARAMETERS:

Cross-section = bounded  
 Width BS = 48.77 m  
 Channel regularity ICHREG = 1  
 Ambient flowrate QA = 12.97 m<sup>3</sup>/s  
 Average depth HA = 3.17 m  
 Depth at discharge HD = 2.44 m  
 Ambient velocity UA = 0.0839 m/s  
 Manning roughness coefficient friction factor N = 0.025  
 Wind velocity UW = 2 m/s  
 Stratification Type STRCND = U  
 Surface temperature = 25.10 degC  
 Bottom temperature = 25.10 degC  
 Calculated FRESH-WATER DENSITY values:  
 Surface density RHOAS = 997.0199 kg/m<sup>3</sup>  
 Bottom density RHOAB = 997.0199 kg/m<sup>3</sup>

-----  
 DISCHARGE PARAMETERS: Single Port Discharge

Nearest bank = right  
 Distance to bank DISTB = 6.10 m  
 Port diameter D0 = 0.4572 m  
 Port cross-sectional area A0 = 0.1642 m<sup>2</sup>  
 Discharge velocity U0 = 0.05 m/s  
 Discharge flowrate Q0 = 0.008368 m<sup>3</sup>/s  
 Discharge port height H0 = 0.30 m  
 Vertical discharge angle THETA = 0 deg  
 Horizontal discharge angle SIGMA = 90 deg  
 Discharge temperature (freshwater) = 26.18 degC  
 Corresponding density RHO0 = 996.7363 kg/m<sup>3</sup>  
 Density difference DRHO = 0.2836 kg/m<sup>3</sup>  
 Buoyant acceleration GP0 = 0.0028 m/s<sup>2</sup>

Discharge concentration  $C0 = 100 \%$   
Surface heat exchange coeff.  $KS = 0 \text{ m/s}$   
Coefficient of decay  $KD = 0 /s$

---

DISCHARGE/ENVIRONMENT LENGTH SCALES:

$LQ = 0.41 \text{ m}$        $Lm = 0.25 \text{ m}$        $Lb = 0.04 \text{ m}$   
 $LM = 0.61 \text{ m}$        $Lm' = 99999 \text{ m}$        $Lb' = 99999 \text{ m}$

---

NON-DIMENSIONAL PARAMETERS:

Port densimetric Froude number  $FR0 = 1.43$   
Velocity ratio  $R = 0.61$

---

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

Toxic discharge = no  
Water quality standard specified = yes  
Water quality standard  $CSTD = 100 \%$   
Regulatory mixing zone = yes  
Regulatory mixing zone specification = distance  
Regulatory mixing zone value = 96.93 m ( $m^2$  if area)  
Region of interest = 609.60 m

---

HYDRODYNAMIC CLASSIFICATION:

\*\_\_\_\_\_\*

| FLOW CLASS = H1A1 |

\*\_\_\_\_\_\*

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

Applicable layer depth = water depth = 2.44 m

Limiting Dilution  $S = (QA/Q0) + 1.0 = 1550.8$

---

MIXING ZONE EVALUATION (hydrodynamic and regulatory summary):

---

X-Y-Z Coordinate system:

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

6.10 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  $c = 2.1723 \%$   
Dilution at edge of NFR  $s = 46.0$   
NFR Location:  $x = 19.78 \text{ m}$   
(centerline coordinates)  $y = 0.25 \text{ m}$   
 $z = 2.44 \text{ m}$   
NFR plume dimensions: half-width (bh) = 1.52 m  
thickness (bv) = 1.52 m  
Cumulative travel time: 222.2189 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.

---

**Benthic attachment:**

For the present combination of discharge and ambient conditions, the discharge plume becomes attached to the channel bottom within the NFR immediately following the efflux. High benthic concentrations may occur.

---

**FAR-FIELD MIXING SUMMARY:**

Plume becomes vertically fully mixed at 461.09 m downstream.

---

**PLUME BANK CONTACT SUMMARY:**

Plume in bounded section contacts one bank only at 114.58 m downstream.

---

\*\*\*\*\* **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  $c = 0.819569 \%$   
Corresponding dilution  $s = 122.1$   
Plume location:  $x = 96.93 \text{ m}$   
(centerline coordinates)  $y = 0.25 \text{ m}$   
 $z = 2.44 \text{ m}$   
Plume dimensions: half-width (bh) = 5.63 m  
thickness (bv) = 1.08 m  
Cumulative travel time: 1141.2441 sec.

**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.

At this position, the plume is CONTACTING the RIGHT bank.

Furthermore, the specified water quality standard has indeed been met within the RMZ. In particular:

The ambient water quality standard was encountered within a control volume describing a portion of the discharge plume.

Therefore, the following plume conditions are a conservative estimate (with lower concentrations or with larger dimensions) for the region at whose boundary the standard is met:

Local boundary concentration = 100 %

Corresponding dilution = 1

Water quality standard = 100 %

Corresponding dilution  $s = 1$

Plume location:  $x = 0$  m

(centerline coordinates)  $y = 0$  m

$z = 0$  m

Plume dimensions: half-width (bh) = 0.45 m

thickness (bv) = 0.45 m

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

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  $\pm 50\%$  (standard deviation).

As a further safeguard, CORMIX will not give predictions whenever it judges the design configuration as highly complex and uncertain for prediction.

#### ACUTE CORMIX SESSION REPORT:

XX  
XXXXXXXXXXXXXXXXXXXX

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\OK-Chronic.prd

Using subsystem CORMIX1: Single Port Discharges

Start of session: 07/12/2024--09:48:28

\*\*\*\*\*

SUMMARY OF INPUT DATA:

**AMBIENT PARAMETERS:**

Cross-section = bounded  
 Width BS = 48.77 m  
 Channel regularity ICHREG = 1  
 Ambient flowrate QA = 12.97 m<sup>3</sup>/s  
 Average depth HA = 3.17 m  
 Depth at discharge HD = 2.44 m  
 Ambient velocity UA = 0.0839 m/s  
 Manning roughness coefficient friction factor N = 0.025  
 Wind velocity UW = 2 m/s  
 Stratification Type STRCND = U  
 Surface temperature = 25.10 degC  
 Bottom temperature = 25.10 degC  
 Calculated FRESH-WATER DENSITY values:  
 Surface density RHOAS = 997.0199 kg/m<sup>3</sup>  
 Bottom density RHOAB = 997.0199 kg/m<sup>3</sup>

**DISCHARGE PARAMETERS:** Single Port Discharge

Nearest bank = right  
 Distance to bank DISTB = 6.10 m  
 Port diameter D0 = 0.4572 m  
 Port cross-sectional area A0 = 0.1642 m<sup>2</sup>  
 Discharge velocity U0 = 0.08 m/s  
 Discharge flowrate Q0 = 0.012706 m<sup>3</sup>/s  
 Discharge port height H0 = 0.30 m  
 Vertical discharge angle THETA = 0 deg  
 Horizontal discharge angle SIGMA = 90 deg  
 Discharge temperature (freshwater) = 26.18 degC  
 Corresponding density RHO0 = 996.7363 kg/m<sup>3</sup>  
 Density difference DRHO = 0.2836 kg/m<sup>3</sup>  
 Buoyant acceleration GP0 = 0.0028 m/s<sup>2</sup>  
 Discharge concentration C0 = 100 %  
 Surface heat exchange coeff. KS = 0 m/s  
 Coefficient of decay KD = 0 /s

**DISCHARGE/ENVIRONMENT LENGTH SCALES:**

LQ = 0.41 m      Lm = 0.37 m      Lb = 0.06 m  
 LM = 0.93 m      Lm' = 99999 m      Lb' = 99999 m

**NON-DIMENSIONAL PARAMETERS:**

Port densimetric Froude number FR0 = 2.17  
 Velocity ratio R = 0.92

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

Toxic discharge = no

Water quality standard specified = yes  
Water quality standard CSTD = 100 %  
Regulatory mixing zone = yes  
Regulatory mixing zone specification = distance  
Regulatory mixing zone value = 9.69 m (m<sup>2</sup> if area)  
Region of interest = 609.60 m

\*\*\*\*\*

#### HYDRODYNAMIC CLASSIFICATION:

\* \_\_\_\_\_ \*  
| FLOW CLASS = H2A1 |  
\* \_\_\_\_\_ \*

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

Applicable layer depth = water depth = 2.44 m

Limiting Dilution  $S = (QA/Q0) + 1.0 = 1021.7$

\*\*\*\*\*

#### MIXING ZONE EVALUATION (hydrodynamic and regulatory summary):

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##### X-Y-Z Coordinate system:

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

6.10 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  $c = 3.1405$  %

Dilution at edge of NFR  $s = 31.8$

NFR Location:  $x = 17.57$  m

(centerline coordinates)  $y = 0.37$  m

$z = 2.44$  m

NFR plume dimensions: half-width (bh) = 1.55 m

thickness (bv) = 1.55 m

Cumulative travel time: 191.0019 sec.

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##### 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.

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Benthic attachment:

For the present combination of discharge and ambient conditions, the discharge plume becomes attached to the channel bottom within the NFR immediately following the efflux. High benthic concentrations may occur.

-----  
FAR-FIELD MIXING SUMMARY:

Plume becomes vertically fully mixed at 387.04 m downstream.

-----  
PLUME BANK CONTACT SUMMARY:

Plume in bounded section contacts one bank only at 96.83 m downstream.

\*\*\*\*\* 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  $c = 11.064447 \%$

Corresponding dilution  $s = 9.0$

Plume location:  $x = 9.69 \text{ m}$

(centerline coordinates)  $y = 0.37 \text{ m}$

$z = 0.80 \text{ m}$

Plume dimensions: half-width (bh) = 0.54 m

thickness (bv) = 1.08 m

Cumulative travel time < 191.0019 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.

At RMZ, plume centerline distance to right bank = 6.47 m

Discharge location distance to right bank (DISTB) = 6.10 m

At RMZ, plume half-width (BHLMZ) = 0.54 m

Furthermore, the specified water quality standard has indeed been met within the RMZ. In particular:

The ambient water quality standard was encountered within a control volume describing a portion of the discharge plume.

Therefore, the following plume conditions are a conservative estimate (with lower concentrations or with larger dimensions) for the region at whose boundary the standard is met:

Local boundary concentration = 100 %  
 Corresponding dilution = 1  
 Water quality standard = 100 %  
 Corresponding dilution  $s = 1$   
 Plume location:  $x = 0$  m  
 (centerline coordinates)  $y = 0$  m  
 $z = 0$  m  
 Plume dimensions: half-width (bh) = 0.55 m  
 thickness (bv) = 0.55 m

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 \*\*\*\*\*

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  $\pm 50\%$  (standard deviation).

As a further safeguard, CORMIX will not give predictions whenever it judges the design configuration as highly complex and uncertain for prediction.

Summary Stats

Variables	7Q10	30Q5
Length (x)	7 days	30 days
Recurrence (y)	10 years	5 years
Mean_Logs (u)	6.4859	6.6115
SD_Logs (s.d.)	0.27348	0.30668
Skew_Logs (g)	-0.36395	-0.29975
K	-1.3131	-0.82112
z	-1.2811	-0.83953
Result	458.0 cfs	578.0 cfs
Har_Mean	1,441.3 cfs	

## Appendix E — Response to Comments

City of Okanogan comments generated during Facility Review

### **CITY OF OKANOGAN**

Mayor Wayne L. Turner



Ms. Joy Espinoza  
Water Quality Program  
Department of Ecology  
1250 West Alder Street  
Union Gap, WA 98903-0009

Dear Ms. Espinoza:

In accordance with the letter received on January 27, 2025, we are submitting comments on the NPDES Permit Number WA0022365 and the related Fact Sheet.

#### **NPDES Permit Number WA0022365**

1. S2.B., clarify the first sentence in the second paragraph. The City does not understand what is required. Is the implication that a more accurate (lower detection) test is being developed?
2. The City would like to request that the DDT/PCB analysis be removed from the permit. The testing is expensive and the City does not understand the benefit in performing these tests. If the current analytical methods are not accurate enough (reference comment 1) is there a purpose in testing that doesn't provide enough accuracy?
3. S1.B, the draft permit significantly changes the mixing zone and the dilution factors. Please provide a clarification as to how the mixing zone and dilution factors were obtained. The dilution factors are significantly different than the previous permit while the discharge and river have remained the same.
4. S2. Table 5, the Total Ammonia mass calculation should be changed to 1/month to match the concentration requirements (immediately above in the table).
5. S2. Table 7, The City would like to request that the DDT/PCB analysis be removed from the permit. The testing is expensive and the City does not understand the benefit in performing these tests. If the current analytical methods are not accurate enough (reference comment 1) is there a purpose in testing that doesn't provide enough accuracy?

**Fact Sheet Permit Number WA0022365**

1. Page 18, Table 10: The critical conditions used to model the discharge are significantly different than the previous permit. Explain how the River velocity, Manning roughness coefficient and channel width were determined.
2. Page 21, Table 12: DDT and PCB Waste Load Allocations design flow should be 24.8 l/s, not 23.7 l/s.
6. Page 23, Table 13 the draft permit significantly changes the mixing zone and the dilution factors. Please provide a clarification as to how the mixing zone and dilution factors were obtained.
3. Page 34: A discussion on inflow/infiltration/overflow failures in the collection system is included, and requests characterization of the collection system. This requirement does not appear in the permit. In addition, the City recently completed a General Sewer/WWTF Plan. The City is embarking on significant capital improvements and requests and study of the collection system be delayed until the current CIP is completed and the City can evaluate the success of those efforts.

We thank Ecology for the opportunity to comment on the permit and fact sheet. Please let us know in advance when the permit and fact sheet will be released for public comment. Should you have any additional questions with regard to our plant operations please feel free to contact the City.

Sincerely,



Shawn Davisson, Public Works Director

Cc: Wayne L. Turner, Mayor

Nancy J. Wetch, P.E., Gray & Osborne, Inc.



Department of Ecology, Central Regional Office (CRO) Response to Facility Comments	
<b>Facility:</b>	Okanogan POTW, WA0022365
<b>Name of Document Reviewed</b>	City of Okanogan's Response to Facility Review of Draft Permit and Fact Sheet
<b>Date of Review</b>	03/04/2025
<b>Reviewer Name and Title</b>	Caleb Bos, Lead Permit Writer

Draft NPDES Permit Facility Comments and Ecology Responses		
Comment Number	Section Reference/ Page No.	Comment
1	S2.B	<b>Clarify the first sentence in the second paragraph. The City does not understand what is required. Is the implication that a more accurate (lower detection) test is being developed?</b>
<i>Ecology Response</i>		<p><i>Language has been updated. It now reads: Should an analytical method capable of detecting extremely low concentrations of DDT and DDT products contained in wastewater treatment effluent <b>not be available</b>, Ecology may require additional testing of effluent for DDT and DDT daughter products.</i></p> <p><i>The reasoning behind this statement is to ensure that an adequate amount of DDT testing be accomplished in accordance with the TMDL. EPA Method 608.3 was updated in December of 2016 and is an adequate testing method for detecting DDT and DDT products. However, Ecology generally does not dictate which test method be utilized in effluent characterization, as long as the test method is from an accredited lab and the test method is able to achieve the required detection and quantification level.</i></p>
2	S2.B	<b>The City would like to request that the DDT/PCB analysis be removed from the permit. The testing is expensive and the City does not understand the benefit in performing these</b>

		<p><b>tests. If the current analytical methods are not accurate enough (reference comment 1) is there a purpose in testing that doesn't provide enough accuracy?</b></p>
Ecology Response		<p><i>The City of Okanogan is required to perform testing of DDT/PCB due to a waste load allocation (WLA) assigned in the Lower Okanogan River Basin DDT and PCB Total Maximum Daily Load (TMDL). TMDL's in the state of Washington are mandated by section 303(d) of the federal Clean Water Act and are enacted in order to protect, restore, and preserve water quality. This TMDL remains in effect, as such it is imperative that effluent discharge from the Okanogan POTW does not exceed the WLA assigned to it. As for testing methods, the City of Okanogan's previous DDT/PCB sample was analyzed using EPA Method 608.3: Organochlorine Pesticides and PCBs by GC/HSD. This method was updated in December of 2016 and is an example of a testing method that has a minimum detection limit and quantification level that is adequate to calculate the waste load of DDT/PCB generated by the Okanogan POTW.</i></p>
3	S 1.B	<p><b>The draft permit significantly changes the mixing zone and the dilution factors. Please provide a clarification as to how the mixing zone and dilution factors were obtained. The dilution factors are significantly different than the previous permit while the discharge and river have remained the same.</b></p>
Ecology Response		<p><i>The way that Ecology determines mixing zones and calculates dilutions factors has changed due to improved technology and better understanding of hydrology. The last time these calculations were done was in 2009 using the modeling software CORMIX 5.0. Ecology currently is using CORMIX 11.0, which is a more advanced version of the software.</i></p> <p><i>The proposed dilution factors in the new permit are Chronic:122.1 and Acute: 9.0. The previous permit's dilution factors were Chronic: 115 and Acute: 14. Ecology does not believe that these represent significant changes to the dilution factors and when these dilution factors were used to calculate reasonable potential analysis for a variety of potential pollutants, no new limits were deemed necessary based on ambient river values, plant effluent values, and the dilution factors.</i></p>

		<p><i>Dilution factors can change due to ambient river conditions as well as plant effluent conditions. In the years since the last analysis was conducted, the volume of water discharged by the Okanogan POTW has decreased. The volume of flow in the Okanogan River has likely also changed due to recent drought conditions. The dilution factor modeling is done using ambient condition low flow values over the span of many years, this low flow volume does change based on winter snowpack conditions resulting in a change in dilution available when the modeling software is run. It should also be noted that when the previous permit writer modeled the dilution factors in 2009, they used the 'unbounded' calculations of CORMIX rather than the 'bounded'. Unbounded modeling is used in discharges to lakes, seas, and ocean bodies. Bounded modeling is used in discharges to rivers and streams. The use of 'unbounded' versus 'bounded' may have caused a change in the determined dilution factors.</i></p> <p><i>Ecology currently calculates the downstream length of a mixing zone by adding the depth of the water body at discharge to 300'. This is in line with guidance provided by Ecology's Permit Writers Workgroup. This resulted in the permit draft's mixing zone value of 318 ft Chronic / 31.8 ft Acute compared to the previous permit's 200 ft Chronic/ 30.3 ft Acute.</i></p>
4	S2, Table 5	<p><b>Table 5, the Total Ammonia mass calculation should be changed to 1/month to match the concentration requirements (immediately above in the table).</b></p>
Ecology Response		<p><i>Change has been made</i></p>
5	S2, Table 7	<p><b>The City would like to request that the DDT/PCB analysis be removed from the permit. The testing is expensive and the City does not understand the benefit in performing these tests. If the current analytical methods are not accurate enough (reference comment 1) is there a purpose in testing that doesn't provide enough accuracy?</b></p>

Ecology Response		Please see comment number 2
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Draft Fact Sheet Facility Comments and Ecology Responses		
Comment Number	Section Reference/ Page No.	Comment
1	Page 18, Table 10	<b>The critical conditions used to model the discharge are significantly different than the previous permit. Explain how the River velocity, Manning roughness coefficient and channel width were determined.</b>
Ecology Response		<p><i>River Velocity is calculated by CORMIX 11.0 based on the parameters that are entered into the model. When entering information into the model, the permit writer can use either the flow rate of the receiving water or the river velocity. Generally, the flow rate is utilized. The flow rate is determined as the 7Q10 value of river low flow values in the critical season over a length of at least 10 years. This 7Q10 value is calculated used USGS gage station data in a model used by Ecology called the D-Flow (or Shiny) App.</i></p> <p><i>Mannings Roughness is a value to calculate bottom friction in a waterway channel. CORMIX 11.0 provides examples of various types of channel types and corresponding Manning's numbers. The value used for Okanogan POTW's calculations was 0.025. The fact sheet provided to you stated the value used was 0.25, this was an error and has been corrected to 0.025. A value of 0.025 corresponds to a 'Clean and straight natural river'. The previous permit calculation used the number 0.035 which corresponds to a 'Winding channel, with pools and shoals.' The permit writer visually surveyed the area around the POTW's outfall and made the judgement call that 0.025 was the appropriate value to use for this measure.</i></p>

		<i>The channel width was calculated using Google Maps. The approximate location of the outfall was determined and the measuring tool was used to calculate the width of the Okanogan River at that point.</i>
2	Page 21 , Table 12	<b>DDT and PCB Waste Load Allocations design flow should be 24.8 1/s, not 23.7 1/s.</b>
Ecology Response		<i>Table 17 of Lower Okanogan River Basin DDT and PCBs TMDL: Submittal Report states the design flow used in Wasteload Allocations at Okanogan is 23.7 (l/s). The value 24.8 in this table is for the River Mile where the Okanogan POTW discharges to the Okanogan River.</i>
3	Page 23 , Table 13	<b>The draft permit significantly changes the mixing zone and the dilution factors. Please provide a clarification as to how the mixing zone and dilution factors were obtained.</b>
Ecology Response		<i>Please see comment 3 in the Permit section above</i>
4	Page 34	<b>A discussion on inflow/infiltration/overflow failures in the collection system is included, and requests characterization of the collection system. This requirement does not appear in the permit. In addition, the City recently completed a General Sewer/WWTF Plan. The City is embarking on significant capital improvements and requests and study of the collection system be delayed until the current CIP is completed and the City can evaluate the success of those efforts.</b>
Ecology Response		<i>The section of the fact sheet has been re-written by the permit author. The statement requiring further characterization has been removed. The bullet points asking for characterization has been removed and only a single action item remains. This single action item is a once per permit cycle Infiltration &amp; Inflow report. This report is standard for Ecology's permits and the form for the report may be obtained from the Okanogan POTW's permit manager or at <a href="https://apps.ecology.wa.gov/publications/summarypages/ECY07083.html">https://apps.ecology.wa.gov/publications/summarypages/ECY07083.html</a></i>