

ADDENDUM TO THE FACT SHEET FOR THE
NATIONAL POLLUTANT DISCHARGE
ELIMINATION SYSTEM (NPDES)
WATER TREATMENT PLANT
WASTEWATER DISCHARGE GENERAL PERMIT

I. GENERAL INFORMATION

This fact sheet addendum is a companion document to the National Pollutant Discharge Elimination System (NPDES) General Permit for Water Treatment Plants.

The state of Washington Department of Ecology (Ecology) has tentatively decided to reauthorize a general permit for water treatment plant discharges. Ecology developed the general permit to regulate discharges from filter backwash operations and sedimentation basins to surface waters. The general permit does not apply to facilities using ion exchange or reverse osmosis processes or to facilities with a maximum production capacity of less than 50,000 gallons a day.

The general permit includes technology-based effluent limits for pH and settleable solids and a water quality-based effluent limit for chlorine. The permit requires facilities to monitor effluent for pH, settleable solids, chlorine, and turbidity. All facilities under this general permit must be in compliance with the permit's technology and water quality-based limits.

II. PERMIT REAUTHORIZATION

When Ecology *reauthorizes* a discharge permit it essentially reissues the permit with the existing limits, terms and conditions. Alternatively, when Ecology *renews* a permit it re-evaluates the impact of the discharge on the receiving water and may change the limits, terms and conditions of the permit.

Ecology assigns a high priority for permit *renewal* when permit changes are needed to protect water quality. The permit *reauthorization* process, along with the renewal of high priority permits, allows Ecology to reissue permits in a timely manner.

Since the issuance of the permit in 2004, Ecology not received any information that indicates that environmental impacts from these discharges warrant a complete renewal of the permit.

As a result, Ecology proposes to *reauthorize* this general permit for the discharge of filter backwash and sedimentation basin wastewater from water treatment plants. The reauthorized permit is virtually identical to the permit issued on June 16, 2004. The fact sheet developed in 2004 and this fact sheet addendum explain the basis for the permit conditions and discharge limitations and are part of the permit administrative record.

In this re-authorized permit, Ecology carried over the discharge limits and conditions from the 2004 permit. Ecology also:

- removed the compliance schedule for chlorine as all facilities are now in compliance with the chlorine effluent limit; and
- updated the due dates for reports and compliance submittals

Ecology must publish a public notice of the availability of the draft reauthorized permit at least 30 days before re-issuing the permit [Washington Administrative Code (WAC) 173-220-050]. Ecology invites you to review and comment on its decision to reauthorize the permit. See Appendix A-Public Involvement for more detail on the Public Notice procedures.

After the public comment period has closed, Ecology will prepare a “Response to Comments.” The Response to Comments will address each comment individually or in groups of related comments. Ecology sends a copy of the Response to Comments to all parties who submit comments.

III. SMALL BUSINESS ECONOMIC IMPACT

Under chapter 173-226 WAC, Ecology must “prepare an economic impact analysis on all draft general permits which are intended to directly cover small business.” Water treatment plants are owned and operated primarily by municipal governments, not small businesses.

Nonetheless, Ecology prepared an environmental impact analysis when it first issued this general permit. The reauthorized permit retains the elements of previous permits designed to lessen impacts on small businesses:

- Facilities with a maximum production capacity of less than 50,000 gallons a day are excluded from the proposed general permit.
- Discharges to land and to Publicly Owned Treatment Works (POTWs) will not typically require a permit. Currently, a larger percentage of small facilities discharge to land or POTW than large facilities. These discharge options are also generally more realistic and easier to implement by small facilities than by large facilities.
- Monitoring frequency are reduced from weekly to monthly for facilities with a maximum production capacity of less than 4,000,000 gallons a day.

IV. RECOMMENDATION FOR PERMIT ISSUANCE

Ecology proposes to reauthorize this permit for five years.

APPENDIX A--PUBLIC INVOLVEMENT INFORMATION

Ecology proposes to reauthorize the general NPDES Water Treatment Plant Wastewater Discharge permit. The permit includes wastewater discharge limits and other conditions. The fact sheet and fact sheet addendum describe the industry and Ecology's reasons for reauthorizing the permit conditions.

Ecology will place a Public Notice of Draft on May 6, 2009, in the *State Register* to inform the public and to invite comment on the proposed draft National Pollutant Discharge Elimination System permit, fact sheet and fact sheet addendum.

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.

Ecology has published a document entitled **Frequently Asked Questions about Effective Public Commenting** which is available on our website at <http://www.ecy.wa.gov/biblio/0307023.html>.

You may obtain further information from Ecology by telephone at 360-407-6279, by e-mail at cgru461@ecy.wa.gov, or by writing to the permit writer at the address listed below.

Water Quality Permit Coordinator
Department of Ecology
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

The primary author of this permit and fact sheet is Carey Cholski.