

# **Response to Comments on the Draft NPDES Permit for the Elwha Water Treatment Plant**

**EPA Region 10  
April 2007  
NPDES Permit #WA-002666-2**

## **Background**

On January 26, 2007, EPA issued a public notice of the availability of a draft NPDES permit for the Elwha Water Treatment Plant. The permit would authorize discharges from the Elwha Water Treatment Plant to the Elwha River.

## **Response to Public Comments on the Draft NPDES Permit**

EPA received comments on the draft NPDES Permit from Shirley Nixon of Port Angeles, Washington.

Ms. Nixon asked EPA to consider holding a public hearing on the draft permit for the purpose of explaining certain aspects of the permit and the treatment plant's operation. The federal regulation 40 CFR 124.12(a) states that the Regional Administrator shall hold a public hearing whenever he or she finds, on the basis of requests, a significant degree of public interest in the draft permit. Because EPA received comments on the draft permit from only one individual, and because this response to comments addresses all issues raised by those comments, EPA does not believe that the "significant degree of public interest" which would require a public hearing exists in this case.

### ***Comment #1***

How much water is expected to be diverted from the river and through the treatment plant on a daily basis, and for what purposes?

### ***Response #1***

The influent flow to the Elwha Water Treatment Plant (EWTP) will range between 21 and 92 CFS. Elwha River water will be treated by the Elwha water treatment plant for use by the Washington Department of Fish and Wildlife salmon-rearing channel, the Diashowa paper mill, and the Port Angeles water system, with supplemental treatment provided by the Port Angeles Water Treatment Plant (PAWTP) (URS, 2003).

### ***Revisions to Permit***

None.

### ***Comment #2***

What will be the likely peak seasonal demand for diversions through the treatment plant, and when will these peaks likely occur?

***Response #2***

According to URS (2003), the peak water demand months are likely to be April and May, due to increased water demand from the Washington Department of Fish and Wildlife rearing channel and the Lower Elwha Klallam Tribal hatchery. Demand for municipal use and for the Diashowa paper mill is expected to be relatively consistent throughout the year.

***Revisions to Permit***

None.

***Comment #3***

What are the current and estimated average daily summer and fall flows of the Elwha River in the reach near the proposed treatment plant?

***Response #3***

For the purposes of responding to this comment, EPA will consider “summer” to be the season between June 22 and September 21, and “fall” to be the season between September 22 and December 21, based on the dates of the summer solstice, fall equinox, and winter solstice, which mark the first days of summer, fall, and winter, respectively.

The Elwha River gauge with the longest period of record is USGS Station #12045500, Elwha River at McDonald Bridge near Port Angeles, Washington. At that station, the average summer flow rate (June 22 through September 21) from 1997 through 2006 is 1,071 CFS and the average fall flow rate (September 22 through December 21) for the same period of record is 1,594 CFS.

The dams are operated in “run-of-the-river” mode (USBR, 2007), meaning that the amount of water flowing through the dams is the same as the amount of water flowing into the impoundment. As such, seasonal average flow rates will not be significantly different during and after dam removal than they have been in recent years.

***Revisions to Permit***

None.

***Comment #4***

Where exactly will river flow be measured for purposes of the Discharge Monitoring Reports?

***Response #4***

Gauging stations are currently located upstream of Lake Mills, McDonald Bridge below Lake Mills, and a station at the Elwha Surface Water Intake. The permit does not specify which gauging station must be used. The permit does specify that the flows used to determine compliance with certain effluent limits must be those either immediately upstream or downstream of the discharge, however, the permit allows for the existing gauges to be used by calculating the flow rate at the location of interest from known inflows and diversions (e.g. the surface water intake to and discharge from the treatment plant).

***Revisions to Permit***

None.

***Comment #5***

What other water treatment processes, such as fluoridation or chlorination, if any, will be performed in the water treatment plant? If other treatment processes will be performed in this treatment plant, what other governmental agencies, if any, will be responsible for regulating or overseeing this activity?

***Response #5***

The Elwha Water Treatment Plant is strictly a sedimentation and clarification plant. Chemical treatment will occur elsewhere in the City's water system.

***Revisions to Permit***

None.

***Comment #6***

The Federal Bureau of Reclamation has applied for this NPDES permit; however, it is generally thought that the plant is being built to accommodate the needs of the City of Port Angeles municipal water supply. What entity will own the treatment plant and be responsible for operating it through the life of the NPDES permit?

***Response #6***

The treatment plant will be a federal facility until the river has stabilized and additional treatment is no longer need. At that time the plant will be "mothballed" and ownership transferred to the City of Port Angeles.

***Revisions to Permit***

None.

***Comment #7***

Discharge Monitoring Reports should be submitted more frequently than once a month. More frequent reporting is especially important in periods (such as the summer and autumn months) when river flows are likely to be at their lowest.

***Response #7***

EPA does not agree with the commenter that DMRs should be submitted more frequently than once per month. Note that many pollutant parameters are to be monitored more much frequently than once per month and that certain permit violations, including violations of the maximum daily limits for total suspended solids, are to be reported to EPA within 24 hours from the time the permittee becomes aware of the violation (see Part III.G. of the permit). EPA believes that monthly reporting for routine monitoring, coupled with required 24-hour telephone reporting of certain violations provides adequate notice of noncompliance.

***Revisions to Permit***

None.

### ***Comment #8***

It is unclear to me from reading Table 3 on Page 11 how often the permittee must calculate and report minimum and average effluent dilution ratios. Some of the samples on the chart – such as total aluminum and total dissolved solids show a sample frequency of only once a month. Such sampling (and reporting/monitoring) should occur much more frequently --- on a schedule similar to Total Suspended Solids or pH. This would allow more prompt modification of operations to respond to changes in river flows, water temperatures, and to protect environmental values – especially during low flow periods.

### ***Response #8***

The permit does not require the permittee to calculate dilution ratios. The footnote in Table 3 on Page 11 of the Fact Sheet was erroneous. However, the permittee must use effluent and receiving water flow rates and TSS concentrations when reporting TSS loads and determining compliance with TSS effluent limitations. TSS sampling and loading calculations must occur daily.

The pollutant parameters with a monitoring frequency of once per month (biochemical oxygen demand, alkalinity, total dissolved solids, total aluminum, and dissolved oxygen) have no effluent limits associated with them. These data are being gathered for the purpose of determining whether the discharge has the reasonable potential to cause or contribute to excursions above water quality standards for any of these pollutants. Over the five-year life of the permit, a sampling frequency of once per month would result in a total of 60 data points, which is adequate to perform the statistical analysis necessary to perform a reasonable potential analysis, per the procedures of the *Technical Support Document for Water Quality-based Toxics Control* (EPA, 1991). Therefore, a sampling frequency of once per month is adequate for the pollutants for which it has been used.

### ***Revisions to Permit***

None.

### **References**

EPA. 1991. *Technical Support Document for Water Quality-based Toxics Control*. US Environmental Protection Agency, Office of Water, EPA/505/2-90-001.

URS. 2003. *Final Report: Elwha Water Treatment Plant Predesign Clallam County, Washington*. Prepared for U.S. Bureau of Reclamation. August 4, 2003.

USBR. 2007. “Elwha and Glines Canyon Dams, Elwha River near Port Angeles, Washington.” <http://www.usbr.gov/pmts/sediment/projects/ElwhaRiver/ElwhaGlinesCanyon.htm>. Accessed 3/6/07.