

# FACT SHEET ADDENDUM FOR NPDES PERMIT WA-000054-0 Columbia Gorge Aluminum

February 2012

## PURPOSE of this Fact Sheet

This fact sheet explains and documents the decisions Ecology made in drafting the proposed modification to the National Pollutant Discharge Elimination System (NPDES) permit for Columbia Gorge Aluminum.

The Environmental Protection Agency (EPA) developed the NPDES permitting program as a tool to “restore and maintain the chemical, physical, and biological integrity of the Nation’s waters.” EPA delegated to Ecology the power and duty to write, issue, and enforce NPDES permits within Washington State. Both state and federal laws require any industrial facility to obtain a permit before discharging waste or chemicals to a water body.

An NPDES permit limits the types and amounts of pollutants the facility may discharge. Those limits are based either on (1) the pollution control or wastewater treatment technology available to the industry, or on (2) the receiving water’s customary beneficial uses. 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 or modifying an NPDES permit.

## PUBLIC ROLE in the Permit

Ecology makes the draft permit modification and fact sheet addendum available for public review and comment at least thirty (30) days before issuing the final modified permit to the facility operator (WAC 173-220-050). Copies of the fact sheet addendum and draft permit modification for Columbia Gorge Aluminum, NPDES permit WA-000054-0, are available for public review at the Department of Ecology in Lacey, Goldendale Community Library, and online at <http://apps.ecy.wa.gov/industrial/proposed.asp>. The comment period will run from February 1, 2012 until the close of business on March 5, 2012. A legal notice of this comment period ran in the Goldendale Sentinel February 1, 2012. Ecology is only accepting public comment on the proposed modifications to the permit.

Before publishing the draft NPDES permit modification, Columbia Gorge Aluminum, reviewed it for factual accuracy.

After the public comment period closes, Ecology will summarize substantive comments and our responses to them. Ecology will include our summary and responses to comments as **Appendix A - Response to Comments**, to the fact sheet addendum and publish it when modifying the NPDES permit. Ecology will not revise the rest of the fact sheet, but the full document will become part of the legal history contained in the facility’s permit file.

## 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 of permits (NPDES permits), 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).

Ecology adopted rules describing how it exercises its authority:

- Procedures Ecology follows for issuing NPDES permits (Chapter 173-220 WAC)
- Water quality criteria for surface waters (Chapter 173-201A WAC) and for ground waters (Chapter 173-200 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 industrial facility 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 when Ecology substantially modifies a permit it must prepare a draft permit modification and accompanying fact sheet addendum, 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).

## II. BACKGROUND INFORMATION

By letter dated November 4, 2011, Columbia Gorge Aluminum (CGA) requested that Ecology modify Condition S1.B1 of its NPDES Permit. CGA requested that Ecology reduce the frequency of monitoring their final effluent for aluminum, Total Suspended Solids (TSS), and fluoride from weekly to once a month.

Columbia Gorge Aluminum's NPDES permit was written for a fully operational aluminum smelter. The smelter temporarily shut down operations in 2003. When the permit was reissued in 2008, it included provisions for reduced monitoring during curtailment. The company decided to permanently close the smelter in 2009. They have since dismantled all potlines and most of the buildings. During demolition, the company has only had a few workers on site. There is no discharge to the Columbia River most days of the month.

There is no process wastewater left from the former smelter. The discharge consists of stormwater and a small amount of sanitary wastewater. Best management practices are being used by the demolition contractors onsite to minimize pollutants in the stormwater. The sanitary wastewater is

treated by a package plant activated sludge system prior to combining with the stormwater. The combined stormwater and treated sanitary wastewater are discharged to the Columbia River through Outfall 001.

CGA's discharge monitoring reports show that the levels of aluminum, TSS, and fluoride are fairly stable and significantly lower than the permit limits. These levels or something lower are expected to be representative of future discharges.

The table below shows a comparison of the daily maximum levels of aluminum, TSS, and fluoride for the last three months to the permit limits:

Parameter	September 2011	October 2011	November 2011	Daily Max Limit
TSS (lbs/day)	0.11	4.3	0	411
Aluminum (lbs/day)	0.002	0	0	40
Fluoride (lbs/day)	0.034	1.9	2.1	350

The proposed changes in monitoring are to reduce the frequency in the permit from that required during curtailment to what is required during and after demolition.

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 calling Angie Fritz at (360) 407-7393 or by writing to the permit writer at the address listed below:

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