

**FACT SHEET ADDENDUM FOR NPDES PERMIT WA-000369-9**

**Agrium U.S., Incorporated – Hedges Facility**

**SUMMARY**

**I. GENERAL INFORMATION**

Facility: Agrium U.S. Inc.  
PO Box 5797  
Hedges Area - East End of Perkins Road  
Kennewick WA 99336

Since the 1998 permit renewal, Unocal sold this fertilizer product terminal facility to Agrium. At that time the facility was used for ammonia storage and transfer, aqua ammonia production, and N-pHuric production. All manufacturing and distribution activities were suspended at the Hedges facility by January 2005. Agrium de-inventoried the tanks and permanently removed the N-pHuric unit from the site. The permittee continues to operate the water system to keep it available as fire protection for buildings.

Before restarting operations, Agrium will give the Department of Ecology at least 30 days prior Notice. Agrium will request a permit modification at that time, if necessary. Under the existing permit the facility may discharge 70,000 gallons of wastewater per day. This discharge originates from water supply system pressure relief activity, including the fire control system. Monitoring for the discharge has been changed from monthly to quarterly during operations curtailment.

**II. APPLICATION REVIEW**

An application for permit reissuance was submitted to the Department of Ecology (Department) on October 22, 2002. The scope and manner of any review of an application for the Department's official action on a permit shall be sufficiently detailed as to insure the following:

- The permittee is in substantial compliance with all of the terms, conditions, requirements and schedules of compliance of the expired permit;
- The Department has up-to date information-on the facility's production levels; on permittee's waste treatment practices; and on the nature, content, and frequencies of permittee's discharge-either pursuant to the submittal of new forms and applications, or pursuant to monitoring records and reports resubmitted to the Department by the permittee; and

- The discharge is consistent with applicable effluent standards and limitations, water quality standards, and other legally applicable requirements listed in WAC 173-216 and WAC 173-200.

Ecology's review of the application for the Hedges Facility indicates **little or no change in the treatment characteristics of the effluent process or in the volume of waste water**. In the past flow was estimated, but current metering shows actual flow is greater than past estimates assumed so a new volume limitation is indicated. The proposed maximum flow limitation is now 70,000 gallons per day. No impacts to receiving water are expected from the more accurate flow measurement.

### III. PERMIT REAUTHORIZATION

This fact sheet addendum accompanies the draft permit, which Ecology proposes to reauthorize to Hedges Facility for the discharge of wastewater to the Columbia River. The previous fact sheet is also part of this administrative record and explains the basis for the discharge limitations and conditions of the reauthorized permit.

The existing permit requirements, including discharge limitations and monitoring, do not need to be changed to protect the receiving water quality. The previous fact sheet and permit addressed conditions and issues at the facility at the time when the facility was operating at full production. Since issuance of the current permit, the Department has received no information about environmental impacts from the discharge that were not evaluated at the time of permit issuance that persuades Ecology to undertake a complete permit renewal process. Because production is curtailed Ecology will merely reauthorize this permit.

The reauthorized permit is virtually identical to the permit issued in June 1998. The discharge limits and conditions in effect at the time the previous permit expired, carry over unchanged, to this reauthorized permit.

Ecology's assessment of the permittee's compliance, combined with inspections of the facility during the previous permit term, indicate that the facility should not be placed on high priority for the permit renewal process. During the interim between expiration of the previous permit and Ecology's issuance of an updated permit, the permittee must operate the facility in compliance with the expired permit.

The permit reauthorization process, in concert with the routine renewal of high priority permits, allows the Department to reissue permits in a timely manner and to minimize the number of facilities operating under permits that have passed their expiration dates.

The only changes Ecology would make to the previous permit are the submittal date requirements, and changing the required monitoring frequency from "monthly" to "quarterly" reporting during operations curtailment. Submittal requirements from the previous permit that were completed and submitted, and that do not require additional or

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continued assessment, were removed from this permit reauthorization. The submittal dates for the other standard compliance reporting and submittal requirements (carried over from the past permit into this reauthorized permit) have been adjusted to fit the proposed permit schedule. The Department considered these submittals necessary in the previous permit and no information has come forward to cause a reconsideration of those submittal requirements.

Public notice of the availability of the draft reauthorized permit is required at least 30 days before Ecology issues the permit reauthorization [Washington Administrative Code (WAC) 173-220-050]. The fact sheet and draft permit are available for review (see Appendix A—Public Involvement for more detail on the Public Notice procedures).

After the public comment period closes, the Department will summarize the substantive comments and our response to them. The summary and response to comments will become part of the legal permitting process file. Anyone who submits comments or so requests one will receive a copy of the Department's response. Comments and any resulting changes to the permit will be summarized in the fact sheet addendum under Appendix D—Response to Comments.

#### IV. RECOMMENDATION FOR PERMIT ISSUANCE

The Department proposes to reauthorize this permit for a term of five years.

### **APPENDIX A – PUBLIC INVOLVEMENT INFORMATION**

The Department proposes to reauthorize a discharge permit to the applicant listed on page 1 of this fact sheet addendum. The permit contains conditions and effluent limitations that are described in the fact sheet.

The Department will publish a Public Notice on June 21, 2006 in *the Tri-City Herald* to inform the public that a draft permit and fact sheet addendum are available for review. Interested persons are invited to submit written comments about the draft permit to the postal address (below, left). The proposed permit reauthorization, fact sheet addendum, and fact sheet are available for inspection and copying during business hours (between the hours of 8:00 a.m. and 5:00 p.m. weekdays) by appointment, at Ecology's Lacey building (listed below center) or at Richland (below right).

Mail written comments to:

Mark Dirx  
Department of Ecology  
Industrial Section  
P.O. Box 47706  
Olympia, WA 98504-7600

Phone 360/407-6916 to visit:  
Department of Ecology  
Industrial Section  
300 Desmond Drive  
Lacey, WA 98503

Phone 509/372-7920 to visit:  
Department of Ecology  
Richland Field Office  
3100 Port of Benton Blvd.  
Richland, WA 99354

Any person may comment on the draft permit reauthorization, or may request a public hearing on this draft permit reauthorization, by writing to the postal address above within the 30-day comment period. The request for a hearing must indicate the interest of the writer and the reasons why a hearing is warranted. The Department will hold a formal hearing if we learn of significant public interest in the draft permit (WAC 173-220-090). Ecology will publish a Public Notice announcing the date, time, and place of any hearing at least 30 days in advance of the event. Anyone who expressed a previous interest in this permit will be mailed an individual notice 30 days before the scheduled hearing (WAC 173-220-100).

Comments should reference specific text in the proposed permit or fact sheet, followed by a proposed modification when possible, or by a related concern. Comments may address technical issues, accuracy and completeness of information, the scope of the facility's proposed coverage, adequacy of environmental protection, permit conditions, or any other concern that would result from reauthorization of this permit.

The Department will consider all comments received within 30 days from June 21, 2006, in formulating a final determination to issue, revise, or deny the permit. After Ecology decides what to do about Agrium's permit application, the Department's formal response to all significant comments will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department. Phone 360/407-6937 in Lacey, or write to Mark Dirx at the postal address (listed above left).