

S P O K A N E C O U N T Y



UTILITIES DIVISION  
N. Bruce Rawls, PE, Utilities Director

A DIVISION OF THE PUBLIC WORKS DEPARTMENT

November 9, 2007

Permit Coordinator  
Department of Ecology  
N. 4601 Monroe Street  
Spokane, WA 99205

RECEIVED

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DEPARTMENT OF ECOLOGY  
EASTERN REGIONAL OFFICE

SUBJECT: DRAFT NPDES PERMITS

Dear Permit Coordinator:

This letter is to provide Spokane County's comments on the following draft NPDES permits:

- WA-000082-5---Inland Empire Paper Company
- WA-000089-2---Kaiser Aluminum Fabricated Products, LLC
- WA-002447-3---City of Spokane/Spokane County (Pretreatment Program)
- WA-004514-4---Liberty Lake Sewer and Water District

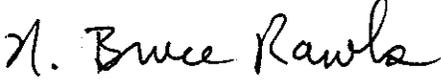
Spokane County requests that the Department of Ecology revise the draft permit of each discharger by adding a compliance schedule for implementation of treatment technology consistent with the WLA Targets and schedule that is provided in the Draft Spokane River and Lake Spokane Dissolved Oxygen Total Maximum Daily Load, issued September 2007 (Draft TMDL). These compliance schedules are consistent with the Foundational Concepts for the TMDL and provide additional assurance that the actions, goals, and targets required during the first 10 years of the TMDL will be achieved.

Spokane County notes that the draft permits for the City of Spokane and Liberty Lake Sewer District provide for an increase in flows beyond that authorized in the draft TMDL's waste load allocation targets. Spokane County requests that the Department of Ecology revise the flows in the draft permits so that the permitted flows and nutrient loading to the Spokane River is consistent with the WLA Targets provided in the Draft TMDL.

Thank you for this opportunity to comment on the draft NPDES permits. Spokane County urges the Department of Ecology to make the County's requested

revisions to these permits, which will cover the first 5 years of the 20-year TMDL period, so that the permits are consistent with the goals and targets provided in the Draft TMDL.

Sincerely,

A handwritten signature in cursive script that reads "N. Bruce Rawls".

N. Bruce Rawls, P.E.  
Spokane County Director of Utilities