ADDENDUM TO THE FACT SHEET FOR STATE WASTE DISCHARGE PERMIT NO. ST-9158

I. GENERAL INFORMATION

COLUMBIA COLSTOR

MAILING ADDRESS: **2730 W. MARINA DRIVE**
MOSES LAKE, WA 98837

FACILITY LOCATION: **224905 E. BOWLES RD**
KENNEWICK, WA 99337

II. APPLICATION REVIEW

An application for permit reissuance was submitted to the Department of Ecology (Ecology) on April 9, 2007 and accepted April 16, 2007. The facility was last inspected on September 20, 2007. Prior to making a determination whether to reauthorize an existing permit or conduct a full renewal, a thorough review of the permit and compliance history of the facility is conducted. This review shall be sufficiently detailed as to insure the following:

- Although the Permittee's compliance with the pH and total dissolved solids limits of the permit have been poor with pH compliance at 54% and TDS compliance at 67%, the actual severity of each individual violation is modest. Ecology considered the location of the facility and the quality of the discharge in the decision to reauthorize the permit. The facility is located in an industrial park subject to the influence of the Columbia River and groundwater flow upgradient of the facility, poses no risk to any domestic well sources. No toxics are involved and it is the opinion of Ecology's hydrogeologist that soil chemistry would soon negate the slightly elevated pH and TDS, which is in the form of bicarbonate. The Permittee and Ecology are working together to bring the discharges into compliance. It is very likely the Permittee will either decommission the lagoon or line it in the near future. The Permittee will conduct analysis of the TDS fraction of the discharge and review the subsequent data collected with Ecology. During the course of the proposed permit, the Permittee will be working closely under the direction of Ecology's facility manager to achieve compliance with the permit limits.

- Ecology has up-to date information on the nature, content, and frequencies of Permittee's discharge, either pursuant to the submission of new forms and

applications or pursuant to monitoring records and reports resubmitted to Ecology by the Permittee.

The application for Columbia Colstor-Kennewick (Colstor) and discharge monitoring reports (DMRs) were reviewed and they indicate no substantial change in the treatment characteristics of the effluent process or volume of wastewater.

III. PERMIT REAUTHORIZATION

This fact sheet addendum accompanies the draft permit, which is to be reauthorized to Colstor for the discharge of non-contact cooling water to ground. 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 adequately addressed conditions and issues at the facility at the time the previous permit was issued. Ecology has not received any information during the previous permit term indicating environmental impacts from the discharge were overlooked. Nor have incidents severe enough to undertake a complete renewal of the permit occurred during that time period.

Table 1 compares the results of four years of monthly discharge reports gathered during the previous permit cycle and the current permit cycle.

Table 1: Wastewater Characterization from Discharge Monitoring Reports 1998 to 2002 and 2003 to 2007

Parameter	1998 to 2002	2003 to 2007
pH, in standard units	10.2 max 6.5 min	8.9 max 7.9 min [1]
Total Dissolved Solids [2]	379.4 mg/L	483.7 mg/L [3]
Total Suspended Solids[2]	39.1 mg/L	2.4 mg/L
Total Volatile Suspended Solids [2]	5.4 mg/L	1.0 mg/L

[1] pH maximum and minimum as reported on the DMRs from July 2003 through June 2007. Colstor reported 22 violations of exceedance of pH 8.5.
[2] Values represent averages over the reporting period indicated in the top row.
[3] Maximum month November 2004 at 784 mg/L TDS, Colstor reported 16 violations during the time period indicated.

The discharge limits and conditions in effect at the time of expiration of the previous permit are carried over unchanged to this reauthorized permit. Assessment of compliance and inspections of the facility during the previous permit term indicate that the facility should not be placed on a high priority for permit renewal. Ecology assigns a high priority for permit renewals in situations where water quality would materially benefit from a more stringent permit during the next five-year permit.

The permit reauthorization process, in concert with the routine renewal of high priority permits, allows Ecology to reissue permits in a timely manner and minimize the number of active permits that have passed expiration dates. A system of ranking the relative significance of the environmental benefit to be gained by renewing a permit rather than reauthorizing a permit is followed during Ecology's annual permit planning process. Each permit that is due for reissuance is assessed and compared with other permits that are also due for reissuance. The public is notified and input is sought after the initial draft ranking has tentatively established which permits are likely to be completely renewed and which are likely to be reauthorized. All relevant comments and suggestions are considered before a final decision is made regarding the type of reissuance for each permit.

Public notice of the availability of the draft reauthorized permit is required at least 30 days before the permit is issued 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 has closed, Ecology will summarize the substantive comments and the response to each comment. The summary and response to comments will become part of the file for the permit and parties submitting comments will receive a copy of Ecology's response. Comments and the resultant changes to the permit will be summarized in the fact sheet addendum, Appendix B - Response to Comments.

IV. RECOMMENDATION FOR PERMIT ISSUANCE

Ecology proposes that this permit be reauthorized for five years.

APPENDIX A -- PUBLIC INVOLVEMENT INFORMATION

Ecology has determined 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.

Public notice of application was published on June 21, 2007 in the Tri City Herald to inform the public that an application had been submitted and to invite comment on the reauthorization of this permit.

Ecology published a Public Notice of Draft Reauthorization (PNOD) on January 10, 2008 in the Tri City Herald to inform the public that a draft reauthorization permit and fact sheet were available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft reauthorization permit, fact sheet addendum, fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the regional office listed below. Written comments should be mailed to:

Water Quality Permit Coordinator
Department of Ecology
Central Regional Office
15 West Yakima Avenue, Suite 200
Yakima, Washington 98902

Any interested party may comment on the draft permit or request a public hearing on this draft permit within the 30-day comment period to the address above. The request for a hearing shall indicate the interest of the party and the reasons why the hearing is warranted. Ecology will hold a hearing if it determines there is a significant public interest in the draft permit (WAC 173-220-090). Public notice regarding any hearing will be circulated at least 30 days in advance of the hearing. People expressing an interest in this permit will be mailed an individual notice of hearing (WAC 173-220-100).

Comments should reference specific test followed by proposed modification or concern when possible. 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. Ecology will consider all comments received within 30 days from the date of the PNOD indicated above, in formulating a final determination to issue, revise, or deny the permit. Ecology's response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from Ecology by telephone at (509) 457-7105, or by writing to the address listed above.

This fact sheet addendum was written by Richard Marcley.

APPENDIX B -- RESPONSE TO COMMENTS

No comments were received by the Department of Ecology.