ADDENDUM TO THE FACT SHEET
FOR NATIONAL POLLUTANT DISCHARGE
ELIMINATION SYSTEM (NPDES)
PERMIT NO. WA0038695

I. GENERAL INFORMATION

Facility: Cowlitz County Department of Public Works
Ryderwood Wastewater Treatment Plant
207 Fourth Avenue North
Kelso, WA 98626

II. APPLICATION REVIEW

An application for permit reissuance was submitted to the Department of Ecology (Department) on August 10, 2000, and accepted by the Department on February 16, 2001. The scope and manner of any review of an application for replacement of permit by the Department shall be sufficiently detailed as to insure the following:

- That the permittee is in substantial compliance with all of the terms, conditions, requirements and schedules of compliance of the expired permit;
- That the Department has up-to date information on the permittee's production levels; permittee's waste treatment practices; 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 the Department by the permittee; and
- That the discharge is consistent with applicable effluent standards and limitations, water quality standards, and other legally applicable requirements listed in WAC 173-220-130.

The application for Cowlitz County Department of Public Works Ryderwood Wastewater Treatment Plant was reviewed and indicates that no changes in the treatment characteristics of the effluent process or volume of wastewater has occurred.

III. PERMIT REAUTHORIZATION

This fact sheet addendum accompanies the draft permit, which is to be reauthorized to Cowlitz County Department of Public Works Ryderwood Wastewater Treatment Plant for the discharge of wastewater to Becker Creek. 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 addressed conditions and issues at the facility at the time when the previous permit was issued, and statements made reflected the status in 1998. Since the issuance of the current permit, the Department has not received any information which indicates that environmental impacts from the discharge are

persuasive enough to undertake a complete renewal of the permit. The reauthorized permit is virtually identical to the previous permit issued on March 11, 1998.

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. The Department 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 cycle.

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 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 the Department'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.

The only changes to the previous permit are the submittal date requirements. Submittal requirements from the previous permit that were completed and submitted and do not require additional or continued assessment were left unchanged. The submittal dates for the other standard compliance and submittal requirements that have been carried over from the past permit into this reauthorized permit have been adjusted to 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 the submittal requirement.

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, the Department 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 the Department's response. Comments and the resultant changes to the permit will be summarized in the fact sheet addendum, Appendix D—Response to Comments.

IV. PREVIOUS PERMIT COMPLIANCE/CONDITIONS

For the permit issued March 11, 1998, the following conditions have been met:

S1.C. Compliance Schedule For Installation of an Influent Flow Meter

The Permittee shall install an influent flow meter by June 30, 2001.

The Permittee has installed an Influent Flow Meter.

S10.B. Reporting Requirements

If the Permittee has information on the background physical conditions or background concentration of chemical substances (for which there are criteria in Chapter 173-201A WAC) in the receiving water, this information shall be submitted to the Department as part of the Effluent Mixing Report.

The Permittee has submitted this report.

On page 4 of the fact sheet, *Compliance*:

Since January 1995, the Cowlitz County Ryderwood WWTP has occasionally violated average monthly and weekly mass load limits for suspended solids. However, monthly average flow and BOD_5 mass loading limits and the BOD_5 85 percent removal requirement are chronically violated during wet months.

The last inspection of this facility was on August 19, 1997. The report noted the chronic BOD_5 violations were attributed to high flows due to I/I and that the facility needed an influent flow meter.

Since the plant does not discharge during the critical low flow months of the year, water quality may not be an issue. The large facultative lagoons are unlined, which could cause exfiltration during low groundwater periods. This coupled with a relatively low flow and large lagoons could explain the lack of discharge during the dry season.

The County needs to submit an I/I report outlining the steps, which will be taken to minimize I/I flow. The report is due in June 1999. The permit also requires the County to install an influent flow meter by June 1998.

The Permittee has submitted the report and installed the flow meter.

V. RECOMMENDATION FOR PERMIT ISSUANCE

The Department proposes that this permit be issued for five years.

APPENDIX A – PUBLIC INVOLVEMENT INFORMATION

The Department 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 October 11, 2000, and October 18, 2000, in *Longview Daily News* to inform the public that an application had been submitted and to invite comment on the reauthorization of this permit.

The Department will publish a Public Notice of Draft (PNOD) on April 19, 2001, in *Longview Daily News* to inform the public that a draft permit and fact sheet are available for review. Interested persons are invited to submit written comments regarding the draft permit. The draft permit, fact sheet addendum, and fact sheet 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
Southwest Regional Office
P.O. Box 47775
Olympia, WA 98504-7775

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. The Department 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.

The Department 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. The Department'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 the Department by telephone at (360) 407-6279, or by writing to the address listed above.