Message

From: Ott, Ellie (ECY) [EKEY461@ECY.WA.GOV]
Sent: 11/28/2018 11:03:46 PM
To: Wu, Jennifer [Wu.Jennifer@epa.gov]
Subject: Grand Coulee
Attachments: ATT00001.txt

Jenny – here are my comments on the fact sheet for Grand Coulee. Most parallel comments that I've provided you on the other fact sheets.

Ellie

- Cover sheet does not mention the name of the receiving water (this is just a picky thing on my part)

- Please include when the individual application was approved/accepted by the EPA.

- Section II.C – Some toxics have been discussed throughout the fact sheet as pollutants associated with the discharges from these facilities. Please address these in the first paragraph.

- Section II.E - The fact sheet contains no descriptive information regarding the size, age, and/or condition of the outfalls at each individual dam. Over all, very little descriptive facility information is provided in the fact sheet. Please revise outfall descriptions to indicate whether the each outfall has a continuous or intermittent discharge.

- Section II.F. – This section references data proved by ODEQ. This facility does not abut Oregon waters. Did you mean Ecology or the Colville Tribe?

- Effluent characterization is extremely limited and several reported parameters fall below DL/QLs for analytical methods. How were these data analyzed? How many samples exist for each parameter. What is the statistical nature of the temperatures provided in the effluent characterization section? Are they daily maximum or 7-DADM? Providing the concentration range for each pollutant is misleading as not all pollutants are present in all discharges.

- In general, the fact sheet contains no discussion of upstream receiving water quality for any of the dams. Upstream data is necessary for evaluating compliance with surface water quality standards such as temperature and pH. Given the numerous studies conducted on this waterbody, QA/QC'd data is available from multiple sources. Please indicate why it wasn't used in the reasonable potential determination.

- Section II.B - Receiving water designated uses for WA only references spawning and rearing. Please revise to reflect either char spawning and rearing or salmonid spawning, rearing and migration. This affects the application of different water quality criteria.

- Section III.D. Ecology primarily agrees with the summary of impairments on the Columbia (Note: there is no discussion regarding the DO impairment on the Columbia and COD/BOD concentrations in the outfalls, please revise) . However, there are concerns regarding the language used that substantiates the approach taken by the EPA to prohibit the discharge of toxic substances. See comments in individual permit in relation to use of BMPs. Ecology supports the requirement for continuous temperature monitoring to inform the TMDL and the next permit cycle; however, any evaluation of temperature impacts in the Columbia cannot incorporate mixing as state water quality standards preclude a mixing zone for impaired waterbodies. The fact sheet later states

that no mixing zone is allowed; please differentiate between mixing zone and available dilution. Please also provide discussion regarding how these permits will incorporate temperature TMDL WLAs once approved and the evaluation made regarding thermal impacts. See individual permit comments for additional discussion regarding receiving water temperature monitoring.

- Effluent limits and Monitoring, Section IV, overall, Ecology disagrees with the monitoring frequencies listed in the effluent limit and monitoring tables. A frequency of 1/month for continuous a discharge does not provide adequate information in which to characterize the water quality. In addition, monitoring for flow 1/month is not appropriate for a continuous discharge. It would be helpful to indicate which outfalls are continuous and which are intermittent. See individual permit comments.

- pH limits do not include the analysis to look at the 0.2/0.5 s.u. allowable change, based on the designated use. Rather, they only include the water quality based range of 6.5 – 8.5 s.u. See comments provided on the individual permits.

- Ecology disagrees with EPA regarding the statement that there is no information on whether discharges from hydroelectric projects contain toxic or hazardous pollutants other than oil and grease. We do support the narrative effluent limits for toxics; however, given listings on the snake for PCBs, quantitative information should be collected on the discharges as part of the BMP plan. This will assist in preferred product purchasing, identification of sources and driving the adaptive management process. See the EPA's 2015 recommendations for Permitting in the Spokane River as it relates to toxics. The general recommendations should be applicable to all the facilities discharging to the Snake River

- Section IV, BOD/COD discussion: Information regarding Little Goose Lock and Dam is different than what was discussed earlier within the fact sheet. Revise as necessary.

- Section IV, Oil and Grease: There are concerns over the one data point @ Outfall 010 indicating an oil and grease concentration of 531 mg/L and the ability for the facility to meet this limit. Please revise monitoring frequency for this parameter to more than once per month for a portion of the permit cycle. Compliance with the limit provides a basis for the permittee to request a monitoring frequency reduction during the permit term.

- Section IV, Toxics: Consider including BMP plan discussion in this section. "PCB free" needs a definition.

- Section IV, Temperature: See permit comments regarding lack of information related to location of influent temperature monitoring and needs for downstream receiving water monitoring.

- Minimum levels: please revise to indicate that all samples for effluent limit compliance must use EPA approved analytical methods in addition to meeting the sufficiently sufficient methods requirement. Please also include a statement that characterization or effectiveness monitoring (e.g., for PCBs as part of the BMP plan) may use non Part 136 methods to return usable information.

- Section V.B – Monitoring Locations: It would be helpful to include a discussion related to locations of influent monitoring for each of the facilities.

- Section V.C – Monitoring frequencies: see individual permit comments regarding required monitoring frequencies. Ecology does not agree that the frequencies will provide representative discharge data.

- Section VI.A. – What is the process for monitoring prior to the QAP approval? Is this data usable in RP determinations in the next permit cycle? There are at least 6 DMR submittals required prior to the due date of the draft QAP.

- Section VI.B: Monitoring is necessary to support the use of BMPs, aid in source control efforts, and to drive the adaptive management process. Please address in this section. Also, the annual BMP plan review is discussed; however, there is no discussion of the annual report requirement. Please revise and include.

- Section VI, D: This section details the CWIS requirements and compliance schedule milestones. Ecology agrees that an evaluation report is necessary to ensure compliance with the 316(b) regulations. Task 1 should include a comparison to NMFS' screening requirements and an entrainment/impingement study as necessary. Please include a mechanism that prevents Tasks 3-5 from being required provided finding that the existing CWIS meets existing regulations after completion of tasks 1 and 2.

- Section VII: please include the list of enhanced outreach activities.

- Section VIII, D; please provide information related to the original NEPA determination and the date that it was approved for each of the dams.

M. Eleanor Ott, P.E.
Water Quality Program | Dept of Ecology
eleanor.ott@ecy.wa.gov | **360.407.6433**

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