CGS NPDES
Comment
#008

ENERGY NORTHWEST

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ENERGY FACILITY SITE
EVALUATION COUNCIL

Energy Facility Site Evaluation Council
Attention: Jim La Spina
P.O. Box 43172
Olympia, WA 98504-3172

Subject: **COLUMBIA GENERATING STATION**
PUBLIC NOTICE REVIEW OF PROPOSED NPDES PERMIT

Reference: Letter, GI2-14-019, dated February 3, 2014, J La Spina (EFSEC) to M Reddemann, "Columbia Generating Station NPDES Permit Renewal"

The Energy Facility Site Evaluation Council (EFSEC) has made a tentative determination to reissue the National Pollutant Discharge Elimination System (NPDES) Permit No. WA-002515-1 for Energy Northwest's Columbia Generating Station and is seeking public comment (Reference). Energy Northwest has completed a review of the proposed NPDES permit and supporting fact sheet for factual accuracy and completeness and provides the following written comments for EFSEC Council consideration.

- Factsheet Page 40 – the reference to the footnote to Table 11 should be "Table 10"
- Permit Page 8, Section S2.A(4) – The new evaporation pond flow monitoring requirement was written into the draft permit before the new evaporation ponds were fully designed or constructed. Energy Northwest recommends that footnote 1 be revised to authorize daily measurements or calculated estimates of flow when continuous monitoring is not possible.
- Permit Page 8, Section S2.A footnote 5 – Energy Northwest would like to retain the temperature monitor at the Circulating Water (CW) pumphouse as a back-up instrument for blowdown temperature monitoring. Energy Northwest recommends that footnote 5 be revised to allow use of the CW pumphouse temperature instrument as an alternative sampling location during maintenance or outages of the proposed temperature instrument at the river pumphouse.

- Permit Page 21, Section S9.B.1 – The spill control plan components calls for "a list of all oil and petroleum products and other materials used and/or stored on-site, which when spilled, or otherwise released into the environment, designate as dangerous waste or extremely hazardous waste." Columbia's spill control plan includes a list of hazardous substances likely to be used at CGS and applicable reportable quantities. Energy Northwest believes the existing spill control plan meets the intent of Section S9 and recommends that this condition be limited to "bulk" rather than "all" products and materials.

If you have any questions concerning this information, please contact BC Barfuss at (509) 377-4541

Respectfully,

DK Atkinson
Vice President, Employee Development/Corporate Services

cc: J Ayres, Ecology
V McGowan, Ecology