



STATE OF WASHINGTON

ENERGY FACILITY SITE EVALUATION COUNCIL

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February 19, 2016

Mr. Kelly Flint  
Sr. Vice President and General Counsel  
Savage Companies  
901 W. Legacy Center Way  
Midvale, UT 84047

Subject: Tesoro Savage Vancouver Energy Distribution Terminal Project (Project) – Revised Industrial National Pollutant Discharge Elimination System (NPDES) Permit Application Review: Application No. 2013-0; Docket: EF-131590.

Dear Mr. Flint:

The purpose of this letter is to provide review comments on the revised draft NPDES Permit Engineering Report dated October 15, 2015 submitted to the Energy Facility Site Evaluation Council (EFSEC). EFSEC coordinated a review of this report with its permit contractor at the Department of Ecology (Ecology). Review comments are provided below.

**City of Vancouver Pretreatment Permit:**

A pretreatment permit issued by the City of Vancouver (City) is required to discharge industrial wastewater, in this case, wastewater from the West boiler area and pump basin, to the City wastewater treatment plant. Appendix M of the revised engineering report dated October 15, 2015 contains two correspondences between the City and the applicant. However, there is no pretreatment permit/approval by the City included in Appendix M. Without information on wastewater characterization and the expected treatment level of the oil/water separator, EFSEC is unable to verify the effluent can meet the city pretreatment standards. The engineering report may be conditionally approved pending the approval of the City to accept discharge from the facility.

**Area 200 Unloading and Office (Subsection 1.4.2.1)**

This section states “Boiler blowdown (process wastewater) from Area 600 will be pumped to this area for on-site oil-water separation and discharge to the sewer.” However in section 1.4.2.5, it states “Boiler blowdown will be temperature treated using a heat exchanger and chemical neutralization if needed... A downstream oil-water separator is also included in the design prior to discharge. Process wastewater from this area is discharged to the gravity sewer described in Area 200 above.” Section 8.3.2 states “Blowdown temperature at the boiler

plant would be lowered to permit allowable levels with a cooling system that uses potable water as the coolant. Coolant water would be mixed along with the boiler blowdown". Please clarify which type of treatment will be employed to treat boiler blowdown prior to discharging to the city sanitary sewer system.

**Administration and Support Building (Subsection 5.2.2.1)**

The report states there are two double wall containment tanks located to the southeast of the easternmost administration/support building. The report also states those tanks will be operated such that 825 bbl of capacity is reserved to contain an entire railcar (plus 10 percent). However, there is no discussion on the impact to the tank capacity caused by the additional rail car wash water since the rail car washing water flow was not addressed in the previous report. Without the information, Ecology is unable to verify the tanks have sufficient capacity to store wastewater from the unloading building and contain spills in the building as required.

**Rail car washing (Subsection 6.1.6.1):**

The revised report (Page 44) states frequency of railcar exterior washing is one railcar per month based on the experience of the applicant at facilities receiving one unit train per day. Assuming each unit train contains 120 railcars, the terminal will receive oil from 3,600 railcars per month and only one out of 3600 railcars requires pressure washing. Please provide the source of the operational data and how much water is required to pressure wash each railcar.

The report states process wastewater including railcar wash water and other wastewater sources in the unloading facility is discharged to two containment tanks located at the admin/support area of Area 200. Content of those tanks will be hauled off site and disposed of by a licensed hauling and disposal company at an appropriate location. Please identify the receiving facility, treatment process employed and the ultimate disposal point(s) of all wastewater generated at the facility that is disposed of offsite.

**Northern pipeline, Terminal 4 stormwater system (Subsection 1.4.1.1):**

The report states that the northern pipeline currently discharging stormwater to the Terminal 4 water quality pond will be re-routed to bypass the water quality pond and reconnect to the Port existing stormwater outfall to the Columbia River. The project is ongoing and will occur prior to the construction of the facility. Will the pipeline re-routing project proceed as planned since Farwest Steel is closed at this point?

**Anti-degradation Policy:**

Tier II is used to ensure that receiving waters of a higher quality than the criteria assigned in the standards are not degraded unless such lowering of water quality is necessary and in the overriding public interest. Tier II applies only to new or expanded sources of pollution from specific types of activities directly regulated by Ecology (e.g., NPDES, 401, 404, Forest Practices). Any new or expanding dischargers that would cause a measurable degradation of water quality:

- a. Must go through a technology review to identify and apply any feasible alternatives to that degradation.
- b. Must show that overriding public benefits would occur from allowing the lowering of water quality.

A Tier II analysis should be included in the NPDES engineering report. For reference, please see WAC 173-201A-320 and Ecology guidance: (<https://fortress.wa.gov/ecy/publications/SummaryPages/1110073.html>) for more information.

**Area 200 Miscellaneous Part/Equipment Wash (Subsection 8.3.1):**

This section describes wastewater sources in Area 200 including rail car and part/equipment washing, rainwater either dripping from the rail cars or blown in from the side, and accidental release of oil or fire retardant during oil transfers or system maintenance. Wash water will be collected and conveyed to the containment tanks for hauling off site by trucks to an approved facility for recycling or disposal. Wastewater collected at collection/containment tranches will be pumped to the unloading facility containment tanks and hauled off site by truck to a licensed and approved disposal facility. Please provide wastewater characterization, the treatment process employed and the ultimate point(s) for all wastewater generated at Area 200.

**Area 600 Boiler Effluent (Subsection 8.3.2):**

The boiler effluent discharges listed includes condensate discharge of 12,425 gpd to haul off. Please include characterization of the condensate and identify the receiving facility, treatment process employed and the ultimate disposal point of the wastewater. West Boiler (Subsection 17.2) states process wastewater including condensate, blowdown and cooling water will be treated on site and discharged to the sanitary sewer. Please specify how the condensate will be disposed of (offsite disposal or to the sanitary sewer). **Please ensure that the treatment process employed for each wastewater stream is consistent throughout the engineering report.**

**Fire pump cooling water (Subsection 8.3.4):**

States that fire pump cooling water from different Areas 200, 300 and 400 is being discharged to the containment tank, sanitary sewer and stormwater system. However, there is no information regarding the characteristics of fire pump cooling water. Please provide the information for review.

**C.2 Process Schematic for Wastewater Discharges:**

The diagram shows there is a boiler building in Area 300 and two product tanks are heated with steam. However, it does not match with the wastewater collection/treatment system for Area 300 as provided in the engineering report. Please revise the diagram as appropriate.

The requested information is necessary for EFSEC to continue in its development of the NPDES permit and review of the Application for Site Certification (ASC). Additional information may be requested in the future if it is determined more information is needed to continue permit development and processing of the ASC. Any alterations or changes to the proposed Project during EFSEC's ASC review could warrant additional review by EFSEC and may affect the processing of other Project permit applications.

If you have any questions or would like to discuss any of these issues further, please contact Sonia E. Bumpus at (360) 664-1363, or at [sbumpus@utc.wa.gov](mailto:sbumpus@utc.wa.gov).

Sincerely,



Stephen Posner  
EFSEC Manager

cc: Irina Makarow, BergerABAM  
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