

15 October 2015

Mr. Stephen Posner
Energy Facility Site Evaluation Council
Washington Utilities and Transportation Commission
P.O. Box 43172
Olympia, WA 98504-3172

Subject: Vancouver Energy
EFSEC Application No. 2013-01, Docket No. EF131590
Response to 6 August 2015 Letter Regarding Industrial National Pollutant Discharge
Elimination System Permit Application Review

Dear Mr. Posner:

The purpose of this letter is to respond in part to your letter, dated 6 August 2015, regarding Washington State Department of Ecology (Ecology) comments on Vancouver Energy's industrial stormwater National Pollutant Discharge Elimination System (NPDES) permit application.

The agency review comments were limited to three topics of concern: rail car exterior washing, process wastewater production at the West Boiler building, and discharges from the pump basin located in the Storage Area. Further, Energy Facility Site Evaluation Council (EFSEC) staff later clarified that the Engineering Report should be updated to include comprehensively all water and wastewaters generated from the site (stormwater, process wastewater, and domestic wastewater). Please find below responses to the comments of the 6 August 2015 letter. As requested by Ecology, updates to the NPDES Engineering Report and Operations Stormwater Pollution Prevention Plan have been completed and these reports are resubmitted for additional EFSEC review with this letter.

Railcar Exterior Washing

A separate letter, dated 31 August 2015, was provided to EFSEC detailing our response to the reviewer's comments regarding railcar exterior washing. For completeness, a copy of that letter is attached for reference.

Process Water and Wastewater

Also, the engineering report states the West Boiler is not included in the first phase of development and there is no process wastewater information provided. The revised air permit application shows water use at Area 600 - Boiler Building can be as high as



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69,600 gallon[s] per day. What may be the amount of wastewater generated at the building with such high water usage rate? Boiler blowdown and cooling water discharge may be considered to be process wastewater and may be regulated under the NPDES permit for the facility. The information on wastewater characterization, collection, conveyance, treatment and the ultimate disposal point should be included in the revised engineering report.

The Engineering Report has been revised to include descriptions of water supply for both domestic and process water uses as well as wastewaters generated from the site. Existing utility descriptions and mapping were added as well as descriptions of the water use and wastewater generated. Descriptions of on-site pretreatment prior to discharge has also been described in the updated Engineering Report. The bulk of the new information provided is in sections 8 and 9 of the Engineering Report.

Specifically, the West Boiler Building and its associated process water and wastewater have been preliminarily designed and anticipated constituents estimated, based upon the use of the City's water, materials used in construction, anticipated conditions, and chemicals needed to maintain operations. A complete water balance, including the amount of blowdown, loss to atmosphere, make-up water, and discharged condensate, have been detailed in the Engineering Report.

Pump Basin Discharges

The submitted report also indicates stormwater from the 3,300 square feet pump basin in the tank farm containment area will be discharged to the City of Vancouver Treatment Plant. However, the submitted Application for Site Certification (ASC) dated August 2013 and February 2014 for discharging treated wastewater from the pump basin to the City of Vancouver sanitary sewer system does not include information to show the receiving treatment plant has approved and agreed to receive the proposed discharge. Please provide the information in the revised engineering report.

The source of waste flows generated by the pump basin are dominantly composed of stormwater. Stormwater contribution during the maximum expected storm—the 100-year, 24-hour event—is approximately 7,000 gallons per day, or approximately 5 gallons per minute. An oil-water separator designed for a treatment flow rate of 47 gallons per minute is provided downstream of the pump basin for treatment of residual oils/lubricants and solids. The contribution of flow from the pump basin has been identified in the State Waste Discharge Permits submitted with the ASC and was included in the estimated flow rate provided to the City during early agency coordination. Utility capacity letters obtained by the Applicant from the City are attached in Appendix M of the Engineering Report for reference.

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Please feel free to contact me at 206/431-2373, or irina.makarow@abam.com, if you have any questions about this submittal. We look forward to further coordination with you, your staff, and EFSEC's consultants.

Sincerely,

A handwritten signature in blue ink, appearing to read 'I. Makarow', with a long horizontal flourish extending to the right.

Irina Makarow

Senior Environmental Project Manager

IM:llt

cc: Kelly Flint, Savage Companies
Jay Derr, Van Ness Feldman