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Responded At: Mar 16, 2023 13:20:21 pm

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- Q1. **Are you part of an Agency or Organization?** **Yes (please specify)**
Energy Northwest
-
- Q2. **Share any comment**
See attached.
-
- Q3. **Upload your document (optional)** https://s3-us-west-1.amazonaws.com/ehq-production-us-california/6e9f0aed046f14ba30f604d2228b29d7a888c29f/original/1678998010/3c860ed024a092c4944c91328f2817bf_GO2-23-042%C2%A0-_Letterhead.pdf?1678998010
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- Q4. **Upload a picture (optional)** not answered
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- Q5. **Did you also share a video?** No
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- Q6. **What is the title of your video?** not answered
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March 16, 2023
GO2-23-042
DIC 409

Amy Moon
Siting and Compliance Lead
Energy Facility Site Evaluation Council
PO Box 43172
Olympia WA, 98504-3172

ELECTRONIC SUBMITTAL ONLY

Dear Ms. Moon:

Subject: 2023 DRAFT NPDES PERMIT FACILITY COMMENTS

Reference: Draft 9/7/22 National Pollutant Discharge Elimination System Waste Discharge Permit WA002515-1

Energy Northwest (EN) appreciates the opportunity to submit comments regarding the draft National Pollutant Discharge Elimination System (NPDES) permit renewal (WA002515-1) for the Columbia Generating Station. Regarding the draft permit, EN has the following comments:

1. Page 8, condition S2.A, Table 4 contains an annual monitoring requirement for oil and grease that was not present in the original draft NPDES permit reviewed by EN. EN would like to know the basis for this new monitoring requirement.
2. Page 22, condition S8.B.1 states: "*A list of all oil and petroleum products and other materials used and/or stored on-site...*" The previous permit prefaced the quantities of oil, petroleum products, and other materials as "bulk". This condition, as written, would apply to all materials on-site, even if they don't have the potential to enter the environment (e.g., lab reagents used exclusively indoors). EN recommends modifying the language to read: "*a list of all **bulk** oil and petroleum products and other materials...*". A qualification based on bulk amounts of hazardous material is more practical and manageable. EN's current Spill Prevention, Control, and Counter-Measure Plan focuses on bulk chemicals and their potential to spill to the environment.
3. Page 28, condition S13.B.4 requires visual semiannual intake structure impingement monitoring. These inspections have not been successful in the spring due to high flows in the Columbia River rendering the activity unsafe. EN recommends modifying the

requirement to an annual basis instead of semiannual.

4. There are many instances of hyperlinks to the Code of Federal Regulations, Washington Administrative Code, and other guidance documents. EN is concerned that any changes to the hyperlinked documents, especially guidance documents, could become in effect a change to the NPDES permit without it going through normal permit modification reviews. EN recommends removing the hyperlinks and citing the current (at time of writing) revisions to the regulations and guidance documents or otherwise clarifying the effective dates for any referenced regulations and guidance.

This letter will also be submitted in the online public comment database provided by the Energy Facility Site Evaluation Council (EFSEC).

Respectfully,

Signed By:
Ramos, Mary Joy. - DOMAIN1\mramos
3/16/2023 1:08 PM
Final Approver

Mary Joy C. Ramos
Environmental and Regulatory Programs Manager

MR/sa

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