

April 13, 2020

Angela Zeigenfuse  
Washington State Department of Ecology  
Water Quality Program

RE: Washington Department of Ecology 401 Water Quality Certifications for draft NPDES permits at the four Lower Columbia and four Lower Snake Rivers Dams.

The Public Power Council (PPC) appreciates this opportunity to comment on Washington State Department of Ecology's 401 Water Quality Certifications (401 Certification) for National Pollutant Effluent Discharge System (NPDES) permits at eight federal hydro facilities on the Lower Columbia and Lower Snake Rivers. PPC represents the non-profit, community-owned public utility customers that purchase the output of the Federal Columbia River Power System (FCRPS) from the Bonneville Power Administration (BPA).

BPA's wholesale power customers depend on hydropower from the federal system to serve the residents of the Northwest with affordable, reliable, carbon-free power at cost. The wholesale power rates paid by Northwest public power recover the costs of the FCRPS, including extensive fish and wildlife mitigation programs throughout the region, and costs related to reporting and monitoring of effluent as covered in the NPDES permits and 401 Certifications.

PPC is supportive of monitoring and reporting that measurably maintains or improves the water quality of the Columbia River System due to hydro facility effluent without being overly burdensome or overextending the intended scope and purpose of the related permits or certifications. In this context, the 401 Certifications should be limited to the same scope and purpose as the draft NPDES permits for these federal facilities. The draft NPDES permits cover pollutant effluent, specifically authorizing discharges related to

cooling water, equipment and floor drain-related water, equipment and facility maintenance-related water, lubricants, and backwash strainers.<sup>1</sup>

The NPDES permits are not intended to cover water used for generating purposes, water behind the dams, or water being spilled over dams. These other topics, which include water quality issues such as river temperature and Total Dissolved Gas (TDG), are addressed in forums such as the FCRPS Biological Opinion. The FCRPS Biological Opinion and other regional agreements entail that the federal dams are operated within a tightly prescribed set of boundaries, and if the 401 Certifications include requirements beyond the original scope of the draft NPDES permits, these other obligations may be negatively impacted.

The NPDES permits have also been specifically drafted to align with water quality standards in Washington State. Oil and grease limits, as with other sections of the draft NPDES permits, have been derived from the narrative water quality criteria in the Washington state water quality standards, and are aligned with several other NPDES permits issued in Washington. For these reasons, and consistent with the discussion of scope above, the 401 Certifications should be granted without conditions. Additional conditions that are not directly related to the contents of the draft NPDES permits would step outside the intent of the certification and potentially interfere with adaptive management of the river.

The 401 Certifications should also be drafted in a manner that is practicable and not unduly burdensome. It is possible to include monitoring and reporting requirements that, while well intentioned, add significant cost or operational challenge without providing measurable benefits. For example, the draft NPDES permits include a discussion of water temperature impacts from dam effluents. This discussion acknowledges that the volume of water used for cooling or other operations purposes is de minimis compared to the volume of water that passes through turbines or over spillways and has little to no impact on river temperatures. However, the NPDES still requires continuous monitoring and consistent reporting of effluent temperature. This is an example of a type of monitoring requirement that the WDOE should consider excluding from the 401 Certifications.

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<sup>1</sup> NPDES Permit Fact Sheet of U.S. Army Corp of Engineers Lower Columbia Hydroelectric Facilities, p. 16. March, 2020.

Thank you for your consideration of the comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Scott Simms". The signature is fluid and cursive, with a horizontal line extending from the end.

Scott Simms

Executive Director of the Public Power Council