

# Paul Pickett

1. The NPDES permit is not in compliance with WAC 193-201A. The discharges of cooling water as described in the fact sheet are over criteria 20 degrees C in some cases (Ice Harbor and Bonneville). The Snake and Columbia Rivers at points of discharge are impaired for temperature, but they compare the discharge to the impaired waters of the River. This approach is incorrect. The permit assumes full mixing and does not provide a mixing zone. The cooling water should be meeting the criterion of 20 deg daily maximum at the point of discharge, and not be increasing temperatures by more than 0.3 at any time.
2. Ecology should ask EPA to delay issuing this permit. The timing is poor, given that a temperature TMDL is being developed for the Snake and Columbia Rivers and a DEIS developed for Columbia River System Operations. The NPDES permit should be issued after the TMDL and DEIS are completed.