



State of Washington
DEPARTMENT OF FISH AND WILDLIFE

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Main Office Location: Natural Resources Building, 1111 Washington Street SE, Olympia, WA

May 26, 2021

Laurie Niewolny
Washington Department of Ecology
PO Box 47775
Olympia, WA 98504-7775

RE: Comments on Draft Upland Finfish Hatching and Rearing National Pollution Discharge Elimination System (NPDES) General Permit

Dear Ms. Niewolny,

Thank you for the opportunity to comment on the draft Upland Finfish Hatching and Rearing National Pollution Discharge Elimination System (NPDES) General Permit. On this seventh anniversary of the General Permit, we express our appreciation that the process and administration has always been fair, cooperative, and mutually respectful.

Washington Department of Fish and Wildlife (WDFW) applied for coverage for sixty-four facilities. This letter provides comments regarding production and discharges to waterbodies impaired for temperature, dissolved oxygen, and polychlorinated biphenyls (PCBs). WDFW seeks clarification for use of aquaculture chemicals and drugs, water quality monitoring protocols, and reporting on DMRs.

Production

WDFW shall provide updated production to DOE and requests production be revised in the permit for the following eleven facilities: Eells Springs, Chambers Creek, Similkameen, Ringold Springs, Hoodspport, Goldendale, Bellingham, Fallert Creek, Satsop Springs, George Adams and Marblemount.

Production at eight facilities has increased more than 20% since the permit issued on Dec 16, 2015. WDFW will publish twice in a local newspaper of general circulation a notice for coverage has been made pursuant to Section 173-226-130(5) WAC. These eight facilities include: Bingham Creek, Eells Springs, Elwha, Chambers Creek, Similkameen, Ringold Springs, Hoodspport, and Goldendale.

Discharges to Impaired Waters

This issuance does contain substantial increased water quality monitoring at some facilities, and we seek clarification to ensure consistent administrative and operational fulfillment of permitted activities and reporting.

In Appendix D of the draft General Permit – there are 303(d) listing parameters for facilities that may discharge within one-half mile downstream of an impaired waterbody. WDFW facilities in the appendix include thirteen for temperature and nine for dissolved oxygen.

On page 56 and in Appendix E – Monitoring for Effluent Discharges, the sampling protocol for the dissolved oxygen parameters calls for six representative grab samples to be collected throughout the normal workday to create flow proportional composite samples. WDFW requests nutrient monitoring of effluent discharges be guided by the discharge monitoring requirements set forth in Administrative Orders #17969 and #17971. This request is based on the difficulty sampling throughout the day and meeting the 48-hour holding time for samples shipped overnight to laboratories. Also, many facilities have limited overnight shipping options nearby.

Hatcheries that discharge to impaired waters do not need to collect an influent sample if they assume the influent concentration is zero. The source water for many facilities is an impaired waterbody based on the State of Washington’s 303(d) list. Adding optional influent samples may be cost prohibitive for many facilities because the full nutrient suite costs \$200 per sample event for each site. First, WDFW asks DOE to consider using applicable water quality data from the water quality assessment to characterize the facility’s influent water source rather than assuming concentration is zero. Second, WDFW requests DOE consider an adaptive sampling protocol to balance the data required to assess effluent discharge with the actual pounds of fish feed used each month and the cost per parameter in the nutrient suite. For example, when feed use is under 1000 pounds per month, nutrient sample frequency could be reduced to once per month. Also, when feed use is low, the number of parameters in the nutrient suite could be reduced to those essential for evaluation of the effluent discharge to save costs.

WDFW respectfully requests that Vancouver Hatchery, which discharges into the Columbia River, be considered for exemption from additional monitoring. This request is based on the volume of discharge from the hatchery being insignificant compared to the receiving waterbody.

Aquaculture Drugs

The maximum holding time for Standard Methods 4500-CI G is 0.25 hour, requiring proximity to a laboratory or in-house accreditation. The short holding-time for this method essentially makes Chloramine-T, an effective aquaculture drug, unusable at hatcheries and few replacement aquaculture drugs are available. In Appendix A, WDFW would appreciate recommendations for chlorine screening methods that are practical in a hatchery setting and training for hatchery staff.

Does Section 6. B.– Disease Control Chemicals include drugs used under the direction of a licensed veterinarian?

On page 27. B. – Veterinarian, by extra label, may use any FDA labeled product not necessarily approved in fish or hatchery use as a treatment for fish.

Permittees must use disease control chemicals in conformance with product label instructions or approved INAD protocols. WDFW suggests changing the second half of this sentence to “or extra label use by a licensed veterinarian.”

On page 28, under Formalin Use, the Permittee must follow label directions. WDFW requests the exception for extra label use under the direction of a licensed veterinarian be included.

On page 31. C. – WDFW requests the permit add that any carcasses treated with drugs or chemicals under the direction of a licensed veterinarian need to be released by prescribing veterinarian for withdrawal purposes.

Appendix G. does not include Chloramine-T as an aquaculture drug. H₂O₂ is no longer a low regulatory priority drug as it is a labeled product. WDFW veterinarian provided this list of FDA approved drugs to update Appendix G.

- Chorionic Gonadotropin (Chorulon®)
- Formalin (Parasite-S, Formalin-FTM, Formacide-B)
- Hydrogen Peroxide (35% Perox Aid®)
- Chloramine-T (Halamid® Aqua)
- Oxytetracycline Hydrochloride (several products available)
- Tricaine Methanesulfonate (Tricaine-S)
- Florfenicol (Aquaflor®)
- Oxytetracycline dihydrate (Terramycin® 200 for Fish)
- Sulfadimethoxine & Ormetoprim (Romet® 30 & Romet® TC)

Water Quality

In the table on the top of page 18 and on page 56, please provide additional information to explain flow sample frequency, specifically for sample and non-sample days.

WDFW questions why discharges to Municipal Sewer Systems (POTW) require TSS and BOD₅ monitoring, when the POTW treats wastewater before discharging it to receiving waters?

PCB Mitigation

On page 55. B. – Despite the fact that Spokane Hatchery’s contribution to the PCB load in the river basin is small compared to other sources and past contamination, WDFW is prepared to follow DOE’s guidance to address contaminated building materials at the Spokane Hatchery. In addition, WDFW will work to decrease phosphorus loads to improve dissolved oxygen conditions in Lake Spokane. WDFW has worked on cooperative projects to improve water quality in the past. For example, WDFW has partnered with Avista Utilities to reduced bioturbation and loading of phosphorus and organic sediments to Lake Spokane by removing carp. Removal of carp has been shown to decrease algal blooms and improve dissolved oxygen, water transparency, and lake ecology.

For PCB Mitigation, the Spokane Hatchery’s renovation will require removal, source control and reduction, and treatment for PCBs. Please define the difference between removal and treatment of PCBs.

Please clarify the statement regarding the use of reduced PCB fish feed. WDFW intends to use reduced PCB fish feed whenever sufficient quantity/quality is available and is fiscally possible.

Reporting and DMRs

WDFW requests that DMRs allow a value and the code M, monitoring is conditional, to be entered on the same day. Please provide additional information to define and clarify the code “monitoring is conditional” and also “conditional,” as it applies to net values.

WDFW requests new DMRs facilitate calculations of heat loads and have instructions for how to report laboratory results not received before quarterly deadlines.

WDFW requests the ability to report and document flood conditions on the DMR, when stormwater impacts the water quality, outside of the facility's control.

Again, thanks for the opportunity to comment on the draft permit. If you have any questions regarding these comments, please contact me at (360) 601-1301 or by email at Eric.Kinne@dfw.wa.gov.

Sincerely,

A handwritten signature in blue ink, appearing to read "Eric Kinne", is displayed within a light gray rectangular box.

Eric Kinne
Hatchery Division Manager

cc: Kelly Cunningham, Fish Program Director
Renee Fields
Ann Laroux

From: [Kinne, Eric B \(DFW\)](#)
To: [Niewolny, Laurie \(ECY\)](#)
Cc: [Fields, Jacqueline R \(DFW\)](#); [Leroux, Ann C \(DFW\)](#); [Cunningham, Kelly J \(DFW\)](#)
Subject: WDFW Comments on Draft Upland Finfish General Permit
Date: Wednesday, May 26, 2021 6:07:13 PM
Attachments: [Final Comment Letter DOE Re NPDES Permit 5 26 2021 \(003\).pdf](#)

Laurie, attached are WDFW's comments on the draft Upland Finfish General Permit.

Please feel free to contact me or my staff if you have any questions on our comments or suggested edits.

Thanks

EK

From: [Kinne, Eric B \(DFW\)](#)
To: [Niewolny, Laurie \(ECY\)](#)
Cc: [Fields, Jacqueline R \(DFW\)](#)
Subject: NPDES Permit Requirements
Date: Friday, June 4, 2021 1:20:04 PM

Hi Laurie, WDFW is concerned with the amount of Nutrient monitoring that is in the draft permit. The current draft requires monitoring anytime fish is being fed which will be year around at 5 of the 9 facilities listed for WDFW. The permit also requires twice a month sampling.

We would like to understand the rational for year around sampling and sampling twice a month. This will be very costly and time consuming and want to better understand the need.

Thanks

EK