



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 155
Seattle, WA 98101

WATER DIVISION

April 22, 2022

Mr. Pat Hallinan
Washington Department of Ecology
Water Quality Program
4601 N. Monroe Street
Spokane, Washington 99205

(Sent via email to: phal461@ecy.wa.gov)

Re: U.S. Environmental Protection Agency Comments
Draft National Pollutant Discharge Elimination System (NPDES) Permit and Fact Sheet
Inland Empire Paper Company (Permit #WA0000825)

Dear Mr. Hallinan:

Thank you for the opportunity to comment on the Washington Department of Ecology (Ecology) draft permit for Inland Empire Paper Company. EPA conducted this review in accordance with the procedures outlined in the National Pollutant Discharge Elimination System (NPDES) Memorandum of Agreement Between Ecology and EPA Region 10. EPA is providing the following comments on the draft permit and fact sheet.

Fact Sheet

PCB Analytical Methods

The discussion of total PCB analytical methods beginning on Pages 51 and 52 of the fact sheet should include EPA Method 1628. This is a PCB congener method which was published in July 2021, and which has undergone multi-laboratory validation, although it has not yet been approved under 40 CFR Part 136 for use in NPDES permit compliance monitoring.¹

Technical Calculations

EPA published updated Clean Water Act Section 304(a) recommended criteria for aluminum in 2018.² These updated criteria superseded the recommended criteria from 1988, which are used in the reasonable potential analysis for aluminum on Page 71 of the fact sheet. Ecology should repeat the reasonable potential analysis for aluminum using the updated recommended aluminum criteria. The 2018 aluminum criteria are dependent upon receiving water pH, hardness and dissolved organic carbon. Dissolved organic carbon data are available in Ecology's Environmental Information Management System for the Spokane River near Upriver Dam, downstream from the discharge.

Draft Permit

Monitoring Requirements

The fact sheet states on Page 52 that PCB monitoring using method EPA Method 1668 is required for the purpose of BMP effectiveness monitoring. The permit states, on Page 30, that the Quality Assurance/Quality Control plan for PCB source control and effluent characterization must include

¹ <https://www.epa.gov/cwa-methods/pcb-congeners-low-resolution-gc-ms-method-1628-not-yet-approved>

² <https://www.epa.gov/wqc/aquatic-life-criteria-aluminum>

testing frequencies for routine monitoring of PCBs in the final effluent using EPA method 1668, but it does not specify a monitoring frequency.

In the Permitting Recommendations for the Spokane River Watershed submitted to Ecology on July 13, 2015, EPA recommended that Ecology require monitoring of the final effluent for Inland Empire Paper Company for PCB congeners using EPA Method 1668C at least quarterly. EPA continues to recommend this effluent monitoring to evaluate the effectiveness of both source control BMPs and treatment and to quantify PCB loadings from point sources.

For any questions or concerns with EPA's comments on Ecology's draft permit for Inland Empire Paper, feel free to contact Brian Nickel of my staff at (206) 553-6251 or by email at Nickel.Brian@epa.gov.

Sincerely,

Susan Poulsom, Manager
NPDES Permitting Section

cc: Adriane Borgias, Ecology ERO (via e-mail)
Karl Rains, Ecology ERO (via e-mail)