Ann Bailey

See uploaded file for my comments

January 26, 2026

Washington State Department of Ecology
Tricia Miller, Permit Coordinator
Water Quality Program
Northwest Region Office
PO Box 330316,
Shoreline, WA 98133-9716

RE: National Pollutant Discharge Elimination System (NPDES) and
State Waste Discharge Permit No. WA0031836
Fire Training Academy
North Bend, Washington

Ms. Miller:

I am a retired environmental scientist that worked for decades on the cleanup of rivers contaminated by environmentally persistent chemicals (e.g. PCBs, DDT). I find it very concerning that the release of PFAS, another suite of “forever chemicals”, is being allowed to continue near the headwaters of the Snoqualmie River. You would think that we would learn. These chemicals move downstream and cause harm to humans and wildlife all along the way. Let alone the additional cost for dealing with the forever chemicals once released.

My comments on the draft **NPDES Permit No. WA0031836** are provided below:

Fact Sheet:

Page 11. 11.B. Description of receiving water

Additional notes: The Fire Training Academy (FTA) is on a ridge between the Middle and South Forks of the Snoqualmie River. It is in a remote area near the headwaters of the river. Groundwater likely extends into both forks of the river. The discharges being regulated by this permit are a discharge point to the groundwater from a stormwater pond (Monitoring point 1), and to a discharge point to a creek (Monitoring Point 2) that drains to the South Fork of the river. It should be noted no sampling has been done to evaluate if PFAS contamination is present on the side of the ridge which drains to the Middle Fork.

The FTA is in what would be expected to be a relatively pristine area, which is a prime recreational area for hiking, fishing and kayaking. People using the area for recreation or consuming fish would not expect that they would be exposed to bioaccumulating, carcinogenic contaminants.

Page 13. 11.C. Wastewater characterization

The summary states wastewater results are tabulated in Tables 2 and 3, which is misleading. PFAS results are not tabulated, but only discussed in the footnotes. These results should not be omitted from the Fact Sheet.

In the third and fifth paragraphs of Footnote 2, the PFAS sampling efforts are described and note that all samples collected exceed the Department of Health State Action Levels. Yet

no actual values are provided or tabulated. Importantly, these results indicate that there is documented residual contamination from past use of fluorinated foams in the groundwater, ponds and effluent. A table of the results should be included. Such tables are useful for comparison purposes as more data is collected.

This contamination needs to be further evaluated as soon as possible as discharge of the contaminants to groundwater and surface water continues at unknown levels. Plus the firefighters are being exposed to unknown quantities of PFAS when using the recycled water.

Permit:

Page 7. Table 3. PFAS sampling should start with the first quarter of the new permit. There is no reason to wait for a sampling and analysis plan as the locations and method for sampling and analysis are known.

Page 27. S10.A. PFAS Sampling and Analysis Plan

As stated above, the grab sampling should start the first quarter of the new permit. Unmonitored discharge should not be allowed to continue. As stated in the Fact Sheet, PFAS has been measured in both the ponds and the discharge to the creek.

Due date for a Sampling and Analysis Plan should be within 1 month of the effective date of the permit, if required at all.

S10.B. PFAS Source Identification

No source identification study need be performed. The source of the PFAS is known to be from the past use of fluorinated firefighting foams. As stated in the Fact Sheet, PFAS is known to be present in both discharges being monitored, plus it is present in the ponds and groundwater. [The extent of PFAS contamination in the soil, water and groundwater at the site should be further evaluated, which is required for clean up under the Model Toxics Control Act (MTCA). This should be happening, as the site was listed as a MTCA site for clean up in 2023. However, no activity has been undertaken or planned regarding PFAS.]

More appropriate under the NPDES permit is that the method for treatment of the discharges to reduce PFAS levels being released to surface and groundwater should be evaluated and implemented ASAP.

Page 29. S12 Prohibition of use of fluorinated Class B foams

This section of the permit explicitly prohibits the facility to discharge fluorinated Class B foams. Technically it is already documented that the discharge of the PFAS from the use of fluorinated foams is ongoing. Thus, the facility is not meeting the permit conditions.

It was stated at the public hearing that since the drinking water well at the site was contaminated with PFAS, a reverse osmosis (RO) unit was installed to treat drinking water. It was not clear if all well water used at the site is treated by RO. That is, is water used for sanitary purposes (showers and toilets) treated as well? If the contaminated well water is still used for site sanitary purposes, then treated by the current technology for “reclaiming”, PFAS from the groundwater well is continually being introduced to the pond system. This not only reintroduces

the PFAS to the surface water, but also exposes the firefighters when using the reclaimed water for fire training purposes (let alone showering). This should be clarified.

As written now it will be years until a few more data points are collected for PFAS at the monitoring points. No guidelines are provided in the permit as to what would be levels of concern for PFAS concentrations in the discharge to the ground and surface water. Other states, e.g. Maine, New York, and Michigan, have instituted PFAS effluent limits. The state of Washington can institute limits, as federal limits may be years away. Ecology should establish discharge limits with the same rationale as the limit for benzene for this permit.

It is concerning that PFAS contamination at this site has been known since 2017 and since then only 10 samples have been collected to assess the contamination. From the limited data collected it is clear that there is a significant amount of residual contamination from past fluorinated firefighting foams. My concern about the FTA property started when I heard about the cleanup being done at the Issaquah Eastside Fire and Rescue. The City of Issaquah had to shut down two drinking water wells for a period due to PFAS in the groundwater from the fluorinated foams used at the site. Now the city is required to treat their well water. But at least now they are also dealing with the source of contamination. Currently, there are no such plans for the FTA.

Respectfully submitted,

Ann Bailey
North Bend, Washington