

Joel Harrington

I have reviewed the draft NPDES permit for the Fire Training Academy. My questions are below:

- 1) Why are there no discharge limits established for PFAS, despite required quarterly sampling?
- 2) Why are there no discharge limits established for PAHs when sampling is still required?
- 3) If there are no discharge limits for PFAS or PAHs, does that mean no action will be taken regardless of the PFAS or PAHs concentrations detected?
- 4) Why are several rounds of sampling required to establish discharge limits for PFAS or PAHs? Why should the data influence the limits?
- 5) Since PFAS has already been detected at unacceptable levels in groundwater and drinking water at the Fire Training Academy, doesn't that indicate that PFAS concentrations discharging from the Fire Training Academy have been at unacceptable levels?
- 6) If the PFAS Sampling and Analysis Plan is not due until "no later than one year after the permit effective date" does that mean that PFAS sampling will be delayed and may not occur in the first year of this permit?
- 7) How does the permit prevent, monitor or address unauthorized discharges associated with heavy rainfall, like what occurred in December 2025?
- 8) In January 2019, Ecology received a 2017 lab report from the Fire Training Academy indicating there were concentrations of PFAS in samples collected at all three ponds (and drinking water). Why has it taken until 2026 to require more sampling and when will discharge limits be established?