

Response to Comments

Yakima Training Center
NPDES Permit Number: WA0021962
September 3, 2021

On June 15, 2021, the U.S. Environmental Protection Agency Region 10 (EPA) issued a public notice for the proposed reissuance of the Yakima Training Facility draft National Pollutant Discharge Elimination System (NPDES) Permit No. WA0021962. The public comment period closed on July 15, 2021.

During the public comment period, EPA received comments from:

- Brian Lawrence, Environmental Compliance Manager, Yakima Training Center
- Angela Zeigenfuse, Senior Water Quality Rule Writer and 401 Certification Coordinator, Washington Department of Ecology (Ecology)

This document presents the comments received and provides corresponding response to those comments. As a result of comments received, the following revisions were made to the permit:

- Surface water monitoring start date delayed to begin six months from the effective date of the permit (to July 1, 2022).
- Footnote 9 in Permit Table 2 was removed.
- Discharge Monitoring Report (DMR) link in Permit Section III.B was updated.
- In Table 1. Effluent Limits and Monitoring Requirements - Clarified the monitoring requirements associated with the permit renewal application Form 2A.

Permit

Comment 1.

Page 2, Schedule of Submissions Table (Ecology)

Ecology has requested that Yakima Training Center provide notice that it has developed and implemented the QAP.

Response.

EPA confirms Section II.B of the permit requires that the permittee must notify EPA and Ecology once the QAP is finalized. No changes to the permit were made.

Comment 2.

Page 2, Schedule of Submissions Table (Ecology)

Ecology has requested that Yakima Training Center provide notice that it has developed and implemented the O&M plan.

Response.

EPA confirms Section II.A of the permit requires that the permittee must notify EPA and Ecology once the O&M Plan is finalized. No changes to the permit were made.

Comment 3.

Page 6, Section 1.B, Table 1 - Sampling in accordance with Application Form 2A (Yakima Training Center)

“Please clarify analysis required in more detail. Fact sheet for this refers to Form 2A sampling, but this only note only refers to Table B. Does YTC WWTP need to sample for metals, VOCs, etc? as outlined in the other Tables for Form 2A?”

Response.

Only the parameters in Tables A and B are required. With the exception of total dissolved solids and oil and grease, the permit requires all of the other parameters to be sampled quarterly or monthly because they are pollutants of concern. For total dissolved solids and oil and grease, the permit requires yearly sampling. To clarify this requirement, EPA has revised the permit to remove reference to the application and refer directly to sampling of total dissolved solids and oil and grease.

Comment 4.

Page 8, Section 1.C, Surface Water Monitoring Report - Location concern (Ecology)

Ecology noted that the Yakima Training Center must seek approval of the surface water monitoring locations from Ecology and implementation of the locations will have to be coordinated with Ecology once the QAP is in place.

Response.

EPA confirms that the permit already contains a condition that requires the Yakima Training Center to seek approval of the surface water monitoring stations from Ecology. In addition, EPA has revised the permit to delay surface water monitoring to begin on July 1, 2022, six months after the effective date of the permit. This will allow the Permittee time to work with Ecology on identifying specific surface water monitoring locations.

Comment 5.

Page 8, Section 1.C, Surface Water Monitoring Report - Location concern (Yakima Training Center)

“Access to these identified sites may be an issue. Concerns with access to the Yakima River in areas upstream and downstream of the effluent discharge. Has site visit been conducted to identify potential sites?”

Response.

To ensure that the Permittee has sufficient time to address access issues and identify appropriate surface water monitoring locations with Ecology, EPA has delayed the surface water monitoring effective date to begin July 1, 2022, six months after the effective date of the permit.

Comment 6.

Page 9, Section 1.C, Table 2 – Sampling in accordance with Application Form 2A (Yakima Training Center)

“Metals, dissolved organic carbon, conductivity, and hardness are not identified on Table 1 or 2 above. This statement implies need for Table C sampling under Form 2A for permit application testing data. Need clarification on this sampling or suggest removal this requirement.”

Response.

This footnote was an error and has been removed from the permit.

Comment 7.

Page 9, Section 2.A. – Operation and Maintenance Plan (Yakima Training Center)

“Does YTC have an existing O&M plan that can be updated to reflect any changes? Does YTC have resources available to write/update the O&M Plan?”

Response.

This appears to be an internal comment among Facility personnel. Section II.A of the permit requires that an O&M Plan must be developed within 180 days of permit issuance, and the permittee must submit written notice to EPA and Ecology that the O&M Plan has been developed and implemented.

Comment 8.

Page 9, Section 2.B. – Quality Assurance Plan (Yakima Training Center)

“Does YTC have a QAP developed for monitoring? Does YTC have resources available to write/update QAP?”

Response.

This appears to be an internal comment among Facility personnel. Section II.B of the permit requires that a QAP must be developed within 90 days of permit issuance, and the permittee

must submit written notice to EPA and Ecology that the O&M Plan has been developed and implemented.

Comment 9.

Page 11, Section III.B, Reporting monitoring results (Yakima Training Center)

“What is the electronic submittal requirement for Ecology? Is there an email address or website for Ecology electronic submissions?”

Response.

The permittee only needs to submit DMR data to NetDMR. Ecology does not require direct submissions of DMRs.

Comment 10.

Page 11, Section III.B, Reporting monitoring results (Ecology)

“DMR’s: YTC must submit DMR’s to Ecology. This could be a bit of a sticky issue. The permittee is already submitting electronic DMR’s via NetDMR; does Ecology wish for YTC to submit DMR’s through the Web Portal as well? I would argue that since EPA is the primary agency here and all the data is getting into their ISIS data via NetDMR, a paper copy of the DMR should be sufficient for Ecology’s purpose. Recipient of this paper copy should probably be CRO –WQ Tech unit. – This is addressed in the Fact Sheet and the permittee is given 3 options.”

Response.

EPA confirmed with Ecology that Ecology will access the DMR data through NetDMR and will not require a separate submission.

Comment 11.

Page 11, Section III.B, Reporting of Monitoring Results (Ecology)

“Link ‘<https://netdmr.epa.gov/netdmr/public/home.htm>’ did not work for me, resulted in an error message”

Response.

The link has been corrected to: <https://npdes-ereporting.epa.gov/net-netdmr>

Comment 12.

Page 19, Section IV.J, Anticipated Noncompliance (Ecology)

Ecology requests that Yakima Training Center must notify Ecology when they have an anticipated noncompliance.

Response.

Permit Section IV.J states the permittee must provide written advance notice to the Director of the Enforcement and Compliance Assurance Division and Ecology of any planned changes in the permitted facility or activity that may result in noncompliance with this permit. No change was made to the permit.

Fact Sheet

Comment 1.

Page 2 (Ecology)

“Link ‘<https://www.epa.gov/npdes-permits/Washington-npdes-permits>’ doesn’t seem to work.”

Response.

EPA has verified that the link is correct and is accessible.

Comment 2.

Page 13, Section IV, Effluent Limitation Changes (Ecology)

“There is an ‘Error! Reference source not found’ in the Effluent Limitation Changes section”

Response.

Thank you for the comment, EPA has corrected the error message.

Comment 3. Page 20, Section III. D, Electronic Submission of DMRs (Ecology)

“There might be an issue in section D on page 20, the fact sheet is discussing sending copies of the monthly DMR to ECY, but ‘EPA’ may be substituted for ECY in a number of places.

‘Part III.B of the Permit requires that the Permittee submit a copy of the DMR to Ecology. Currently, the permittee may submit a copy to EPA by one of three ways: 1. a paper copy may be mailed. 2. The email address for EPA may be added to the electronic submittal through NetDMR, or 3. The permittee may provide EPA viewing rights through NetDMR.’”

Response.

This language in the Fact Sheet is incorrect. It is referring to submittal of the copy and has been corrected to refer to Ecology, not EPA. As explained in the Response to Comment 10, the

permittee only needs to submit DMRs through NetDMR.

Comment 4. Page 20, Section IV.A, Quality Assurance Plan (Ecology)

“QAP section: IDEQ is listed instead of WA ECY”

Response.

EPA notes this typographical error and has corrected it.