

*Response to Comments on Permit Modifications of the Lower Columbia River and Lower Snake River
Federal Dam NPDES Permits, 2024*

Response to Comments

Lower Columbia River

Bonneville Project, WA0026778
The Dalles Lock and Dam, WA0026701
John Day Project, WA0026832
McNary Lock and Dam, WA0026824

Lower Snake River

Ice Harbor Lock and Dam, WA0026816
Lower Monumental Lock and Dam, WA0026808
Little Goose Lock and Dam, WA0026786
Lower Granite Lock and Dam, WA0026794

January 8, 2024

Summary

On July 1, 2023, the National Pollutant Discharge Elimination System (NPDES) permits for the Lower Columbia River federal dams became effective. The NPDES permits for the Lower Snake River federal dams became effective prior to this on April 1, 2022. All of these dam permits had previous public notices and comment periods that are summarized at <https://www.epa.gov/npdes-permits/discharge-permits-federal-hydroelectric-projects-lower-columbia-river> and <https://www.epa.gov/npdes-permits/discharge-permits-federal-hydroelectric-projects-lower-snake-river>.

On August 10, 2023, the U.S Army Corps of Engineers (USACE) sent a letter to the U.S Environmental Protection Agency Region 10 (EPA) requesting a modification to the pH monitoring frequency in all 8 of the federal dam permits listed above. On December 6, 2023, the EPA issued a public notice for the proposed modification to the pH monitoring frequency in the NPDES permits as requested. The public comment period ended on January 4, 2024. The EPA only accepted comments on the proposed change in pH monitoring frequency.

During the public comment period the EPA received two comments from USACE. This document presents the comments received and provides corresponding responses to those comments.

Changes in Response to Public Comments

As a result of comments received, the following revision was made to the final permits:

- The EPA erroneously uploaded the wrong version of the Dalles Lock and Dam permit on the public notice website. EPA notes that the correct modified version of the permit was sent to the USACE. The final permit modification issued for the Dalles Lock and Dam is consistent with the other federal dam permit modifications. No language has been updated in the final permit modifications in response to this comment.

Response to Comments

Comment 1. In EPA’s NPDES Permit Fact Sheet, Federal Hydroelectric Projects in the Lower Columbia River, and Lower Snake Rivers, Section III Cause for Modification, EPA states the proposed pH monitoring limit be 6.5 to 8.5 standard units, but in the Tables in the draft NPDES permit modifications for Bonneville Lock and Dam, The Dalles Lock and Dam, McNary and John Day Lock and Dam state pH effluent limitation between 7 to 8.5 standard units. The Corps would like to request that the effluent limitation be changed to 6.5 to 8.5 standard units, consistent with the Fact Sheet.

Response. The EPA erroneously summarized the pH limits in the permit modification fact sheet. The pH limit presented in the permit modification fact sheet of 6.5-8.5 s.u. only applies to the Lower Snake River facilities and not the Lower Columbia River facilities. See the original fact sheets for the basis of these different pH limits. As explained in detail in the fact sheet for the permit modification, the modification is only for pH monitoring frequency. EPA did not propose to modify the pH limits and the basis for the pH limits in the permits is described in the original fact sheets for these permits.

EPA Region 10 does not revise fact sheets issued with draft permits after the public comment period. Instead, EPA Region 10 corrects information and provides any additional explanation in the response to comments document. No changes were made to the permit as a result of this comment.

Comment 2. In EPA’s December 06, 2023 email notification to The Dalles Lock and Dam Operations Project Manager was an attached copy of the Draft Permit Modification for The Dalles Lock and Dam, which correctly stated in Tables 1 and 2 the newly modified pH monitoring Note 3 stating: “During the first year of the permit, the required monitoring frequency is 1/week. In subsequent years, the required monitoring frequency is 1/month.”

However, on EPA’s Public Notification webpage located at: <https://www.epa.gov/npdes-permits/modification-discharge-permits-federal-hydroelectric-projects-lower-columbia-and> the Draft NPDES Permit Modification, The Dalles Lock and Dam, Columbia River, #WA0026701 does not appear to have been modified and still contains the previous pH monitoring requirements in Tables 1 and 2, Note 2, which states “In the first year of the permit, if there are no exceedances of the pH limit or detection of oil and grease in an outfall, the required monitoring frequency for that pollutant and for that outfall is reduced to 1/month. If there are exceedances in an outfall in the first year of the permit, the frequency will remain 1/week for the pollutant in the outfall for the remainder of the permit term.”

The Corps would like to ensure that the Final NPDES Permit Modification for The Dalles Lock and Dam will state “Note 3 stating: “During the first year of the permit, the required monitoring frequency is 1/week. In subsequent years, the required monitoring frequency is 1/month”, similar to the language in the proposed Bonneville and John Day permits.

Response. As described in the fact sheet, the EPA is modifying the pH monitoring frequency for each of the eight permits to state that “During the first year of the permit, the required monitoring frequency is 1/week, in subsequent years, the required monitoring frequency is 1/month”. This language was correctly included in the fact sheet and all the draft modified permits that were sent to the USACE for review. However, when EPA posted the Dalles Lock and Dam permit modification on its website, EPA erroneously uploaded an older version of the Dalles Lock and Dam permit. The rest of the draft permit modifications that were posted on the website contained the modified language. In addition, the description of the proposed permit modification was contained in the fact sheet and explicitly stated that the modification would apply to all eight permits. EPA is clarifying that the language in the final permit modification for the Dalles Lock and Dam reflects what EPA intended on proposing and what was in the other 7 permits.