



Fact Sheet Addendum for Proposal of Additional Conditions

The U.S. Environmental Protection Agency (EPA)
Proposes to Reissue a National Pollutant Discharge Elimination System (NPDES)
Permit to Discharge Pollutants Pursuant to the Provisions of the Clean Water Act
(CWA) to:

Suquamish Wastewater Treatment Plant
Kitsap County Public Works
18000 Suquamish Way NE
Suquamish, Washington 98392

Public Notice Start Date: May 14, 2024
Public Notice Expiration Date: June 13, 2024

Technical Contact: Sally Goodman
206-553-0782
800-424-4372, ext. 0782 (within Alaska, Idaho, Oregon, and Washington)
goodman.sally@epa.gov

EPA Re-Proposes to Reissue NPDES Permit

EPA proposes to reissue the NPDES permit for the facility referenced above. This is the second public comment period on the draft permit. EPA is seeking comment on the new conditions that have been added to the draft permit since the previous comment period. Accordingly, EPA is only seeking comment on the following proposed changes:

- Addition of per- and polyfluoroalkyl substances (PFAS) monitoring requirements
- Reduction in frequency of enterococci bacteria monitoring

This Fact Sheet includes:

- Information on public comment, public hearing, and appeal procedures
- Information supporting the addition of permit conditions related to PFAS monitoring and reduction of enterococci bacteria monitoring.

State Certification

The EPA requested final 401 certification from the Washington Department of Ecology (Ecology) on September 17, 2019. Ecology provided certification with conditions on December 16, 2019, and subsequently provided amendments to the certification conditions

on November 12, 2020 and May 13, 2022. The re-proposed draft permit includes and notes these certification conditions. The EPA is not accepting comments on these conditions because they are required to be incorporated into the permit pursuant to CWA section 401(d).

Public Comment

Pursuant to 40 CFR 124.14(c), the EPA is only accepting comments on aspects of the draft permit, listed above, that are different from those in the draft permit that was issued for public comment on September 19, 2019, and excluding those conditions added as a result of 401 certification. Comments submitted previously on the first public comment period need not be resubmitted.

The EPA requests that all comments or requests for a public hearing be submitted via email to Sally Goodman (goodman.sally@epa.gov). If you are unable to submit comments via email, please call 206-553-0782. Persons wishing to comment on, or request a public hearing for, the re-proposed draft permit for this facility may do so by the expiration date of the public comment period. A request for a public hearing must state the nature of the issues to be raised as well as the requester's name, address, and telephone number. All comments and requests for public hearings must be submitted to the EPA as described above.

After the Public Notice expires, the EPA will make a final decision regarding permit issuance based on all comments received during both comment periods. The permit will become effective no less than 30 days after the issuance date unless an appeal is submitted to the Environmental Appeals Board within 30 days pursuant to 40 CFR § 124.19.

Documents are Available for Review

The draft and re-proposed permits, the fact sheets, and other information can be found online at: <https://www.epa.gov/npdes-permits/npdes-permit-suquamish-wastewater-treatment-plant-washington>.

I. Description of EPA's Re-Proposal

A. Background

On September 19, 2019, the EPA issued a draft permit for the Suquamish Wastewater Treatment Plant (WWTP) for public review, with a comment deadline of October 21, 2019. Since the initial comment period, the EPA has determined that certain changes are necessary.

B. Facility & Receiving Water Information

The initial Fact Sheet, published on September 19, 2019, contains information about the WWTP and the receiving waters to which the WWTP discharges. No changes have been made since that time.

C. Permit Changes Subject to the Re-Proposal

The following sections describe the changes made to the draft permit that are subject to the re-proposal.

1. *PFAS Monitoring Requirement*

PFAS are a group of synthetic chemicals that have been in use since the 1940s. PFAS are found in a wide array of consumer and industrial products. Due to their widespread use and persistence in the environment, most people in the United States have been exposed to PFAS. Discharges of PFAS above certain levels may cause adverse effects to human health and/or aquatic life. Since the initial public notice of this draft permit, the EPA has developed its strategy to protect communities and the environment from PFAS in the nation's waters, including issuing guidelines for monitoring provisions in NPDES Permits¹ and issuing the first ever national drinking water standard for PFAS.

Given the new guidelines and since PFAS chemicals are persistent in the environment and may lead to adverse human health and environmental effects, the EPA is adding PFAS monitoring requirements to the draft permit. Section I.B of the draft permit requires that the permittee conduct quarterly influent, effluent, and sludge sampling for PFAS chemicals for two years. The monitoring requirements for PFAS chemicals are deferred until the third and fourth years of the permit term (beginning during the first complete quarter of the third year). This will give the permittee time to plan for this new monitoring requirement (e.g., to obtain funding, train employees, and find a suitable contract laboratory).

The purpose of these monitoring and reporting requirements is to better understand potential discharges of PFAS from this facility and to inform future permitting decisions, including the potential development of water quality-based effluent limits. The EPA is authorized to require this monitoring and reporting pursuant to CWA section 308(a).

The EPA notes that there is currently not an analytical method approved in 40 CFR Part 136 for PFAS. As stated in 40 CFR 122.44(i)(1)(iv)(B), in the case of pollutants or

¹ https://www.epa.gov/system/files/documents/2022-12/NPDES_PFAState%20Memo_December_2022.pdf

pollutant parameters for which there are no approved methods under 40 CFR Part 136 or methods are not otherwise required under 40 CFR chapter I, subchapter N or O, monitoring shall be conducted according to a test procedure specified in the permit for such pollutants or pollutant parameters. Therefore, the permit specifies that until there is an analytical method approved in 40 CFR Part 136 for PFAS, monitoring shall be conducted using Final EPA Method 1633.

2. Enterococci Bacteria Monitoring Frequency

The EPA included monitoring for enterococci bacteria in the original draft permit because of the update to Washington's WQS for the protection of water contact recreational uses, which replaced fecal coliform criteria with criteria for enterococci bacteria in marine waters. Since it is a new standard, there are no enterococci monitoring data for the facility and the EPA could not assess reasonable potential or develop an effluent limit. The goal of monitoring is to build a data set so that reasonable potential can be evaluated at the next permit issuance. EPA has determined that the requirement of 3/week monitoring for enterococci is unnecessary to simply collect a baseline dataset and has reduced the monitoring requirement in Table 1 of the permit to 1/month.