

## Response to Comments

Moclips River Estates Wastewater Treatment Plant

NPDES Permit Number: WA0026603

March 31, 2026

---

On January 8, 2026, the U.S. Environmental Protection Agency Region 10 (EPA) issued a public notice for the proposed reissuance of the Moclips River Estates Wastewater Treatment Plant (WWTP) draft National Pollutant Discharge Elimination System (NPDES) Permit No. WA0026603. The public comment period closed February 6, 2026.

During the public comment period, the EPA received one comment from the Washington State Department of Health (DOH).

This document presents the comment received and provides the corresponding response to that comment. As a result of this comment, Permit Part III.G.1. was revised to require the Permittee to report occurrences of noncompliance to both the EPA and the DOH Shellfish Program.

---

### **Comment 1. Shellfish Harvesting**

The DOH Shellfish Program classifies areas for commercial shellfish harvest. Along the Pacific Coast of Washington, downstream of the Quinault Indian Nation Moclips River Estates Wastewater Treatment Plant discharge point, DOH has set a shellfish harvesting prohibited area due to the discharge from the Moclips River Estates WWTP as shown in Figure 1, below.

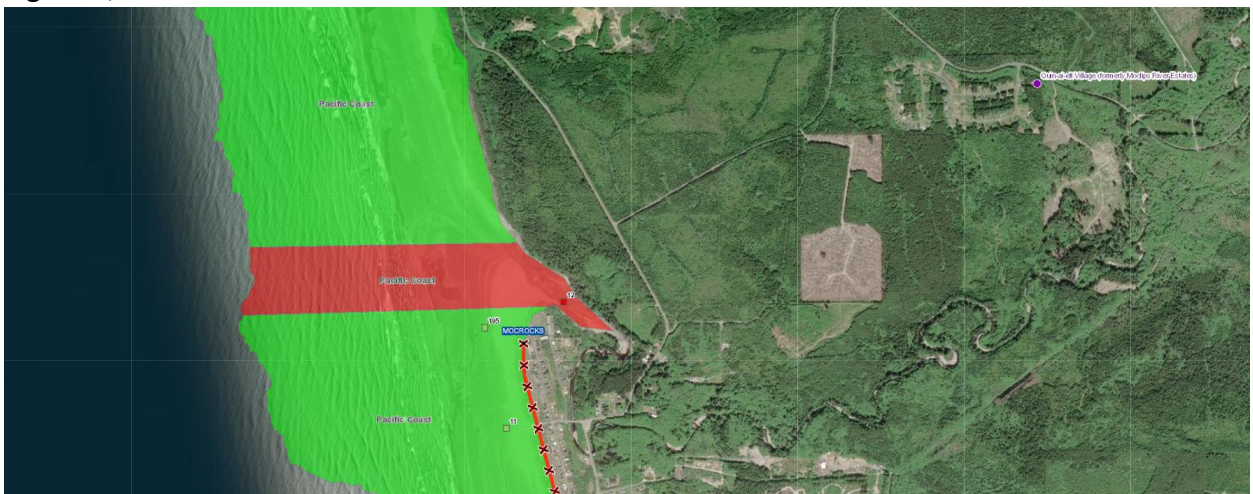


Figure 1. Shellfish harvesting prohibited area shown in red  
In the event of a WWTP upset, additional action by DOH may be required to ensure health and safety of nearby shellfish harvesting. It is important that DOH be notified promptly of any of the conditions outlined in NPDES Permit Section III.G.

DOH requests the following modification of the permit section, as shown in red.

**G. Twenty-four Hour Notice of Noncompliance Reporting**

1. The permittee must report the following occurrences of noncompliance to the NPDES Compliance Hotline in Seattle, Washington, (206) 553-1846 and to the Washington State Department of Health Shellfish Program, (360)-789-8962, within 24 hours from the time the permittee becomes aware of the circumstances:

**Response.** The EPA had discussions with DOH Shellfish Program personnel during the development of the permit. During those discussions, both agencies concluded that the WWTP is likely not the source of downstream bacteria issues. The DOH, in an email (dated September 22, 2025), listed potential sources ranging from wildlife (deer, racoons, etc.), to septic systems that are in the lower river, to rotting wood or wetlands that could be a source of fecal coliform mimicking bacteria.

However, timely notification of potential noncompliance occurrences subject to Permit Part III.G.1. will help inform DOH's management of nearby shellfish harvesting activities. Therefore, the EPA has revised Permit Part III.G.1. to require the Permittee to report occurrences of noncompliance to both the EPA and the DOH Shellfish Program. The revised permit provisions read as follows:

1. The permittee must report the following occurrences of noncompliance to the NPDES Compliance Hotline in Seattle, Washington, (206) 553-1846 and to the Washington State Department of Health Shellfish Program, (360) 789-8962, within 24 hours from the time the permittee becomes aware of the circumstances:
  - a. any noncompliance that may endanger health or the environment;
  - b. any unanticipated bypass that exceeds any effluent limitation in the permit (See Permit Part IV.F., *Bypass of Treatment Facilities*);
  - c. any upset that exceeds any effluent limitation in the permit (See Permit Part IV.G., *Upset Conditions*);
  - d. any violation of a maximum daily discharge limitation for applicable pollutants identified by footnote 1 of Table 1 of Permit Part I.B;
  - e. any overflow prior to the treatment works over which the permittee has ownership or has operational control. An overflow is any spill, release or diversion of municipal sewage including:
    - i. an overflow that results in a discharge to waters of the United States; and
    - ii. an overflow of wastewater, including a wastewater backup into a building (other than a backup caused solely by a blockage or other malfunction in a privately-owned sewer or building lateral) that does not reach waters of the United States.