

**WASHINGTON STATE DEPARTMENT OF ECOLOGY
RESPONSE TO PUBLIC COMMENTS**

**Northwest Alloys
1560A Marble Valley Road
Addy, Washington 99101**

**State Waste Discharge Permit No. ST 8088
June 9, 2011**

Ecology published notice of an opportunity to comment on the renewal of State Waste Discharge Permit No. ST 8088 in the Colville Statesman Examiner and the Spokane Spokesman Review on April 13, 2011. The proposed permit will allow Northwest Alloys (NWA) to use commingled wastewater to irrigate forage fields on their property. In the notice, Ecology invited public review of the proposed order and provided a 42-day public comment period. The deadline for submittal of written comments was May 25, 2011. A public meeting and hearing was held for this action on May 18, 2011. Two people provided comments at the hearing. Ecology received written comments from another individual.

Comments were received from: Lois Greenman
 Scott Simmons
 Steve Shaw, NW Alloys

We included all of the comments received in this document. We summarized the comments, where appropriate, to save time and space. The original comments comprise part of the legal record for this permit. The record is available for public review at Ecology's Industrial Section office in Lacey, WA. Anyone interested in reading the full text of the comments or in obtaining a copy of a particular comment should call or e-mail Kim Wigfield in Lacey at (360) 407-6931 or kim.wigfield@ecy.wa.gov.

Comments appear in regular text, followed by Ecology's response in italicized text. Ecology will send a copy of this response to comments to each individual who provided comments and those people attending the public meeting/hearing.

Comments from Lois Greenman (1-3)

1. I am concerned about the commingled wastewater running off of NWA's fields and impacting my property or the tributary to Stranger Creek.

The proposed permit includes setback requirements to protect surface waters and private property. NWA cannot land apply wastewater within 25 feet of their property boundary

wnd within 100 feet of surface water. They cannot allow spray irrigation practices to result in runoff of wastewater to any surface waters of the state or to any lands not owned or controlled by NWA.

To further address this concern, NWA inspected the area of concern with Charlie Kessler from the Stevens County Conservation District (SCCD). They determined that there is a defined channel through Field 4 with enough seasonal flow to collect up and downstream samples. NWA has arranged with SCCD to collect one set of samples prior to the start of this season's irrigation and two more sets of samples in June and July after irrigation has begun. Each sample will be analyzed for NH₃, chloride, pH, and conductivity. The results will be reported to Ecology.

2. My history with the NWA property goes back to 1917. My grandparents bought the original 160 acres. I now own 20 acres. My parents and I sold the rest to NW Alloys. I love that property and care what happens to it. It is difficult to watch the dead plant just sitting there. We need jobs. Let's get some industry in here. We've got the work force.

NWA is actively pursuing opportunities to redevelop the facility for magnesium production or other uses. One of the hardest parts of this redevelopment is securing a favorable electric power rate to restart and operate the facility.

3. Why is Ecology going to approve a permit for 5 more years if the plant is shut down?

NWA accumulates rainwater falling on the plant site over the winter months. Several other wastewaters are commingled with the stormwater. When the plant was operating, NWA was able to use the commingled wastewater as make up water in the magnesium production process. With the plant closed, NWA needs to manage this wastewater in another way. The proposed permit allows NWA to use the commingled wastewater to irrigate forage fields on their property. If the plant does restart, Ecology will work with NWA to evaluate whether a wastewater discharge permit is still necessary.

Comment from Scott Simmons (4)

4. What percentage of the chloride in the commingled wastewater is derived from ferric chloride?

Ferric chloride is toxic, highly corrosive, and acidic. However, when it is mixed with water under atmospheric conditions, it undergoes a chemical reaction. The ferric chloride separates into iron and chloride. The iron settles out as a solid leaving chloride

from the compound in the stormwater. Any residual acidity from the chemical reaction is neutralized by the natural alkalinity of the surrounding soils or water.

There are multiple sources of chloride at the smelter that can dissolve in the plant's stormwater. It is not possible to determine the percentage of chloride in the commingled wastewater that is derived from ferric chloride.

Comments from Steve Shaw (5-6)

5. The table in Condition S2.E., Groundwater Monitoring (Land Application Wells), requires the parameter bicarbonate to be reported in mg/L as N. NWA believes that "as N" should be removed.

The table was corrected.

6. The table in Condition S2.G., Crop Monitoring, requires NH₃ Nitrogen to be analyzed and reported. NWA believes that Total Kjeldahl Nitrogen (TKN) should be monitored instead. TKN is the form of nitrogen typically analyzed for in crop tissue. This change is consistent with Ecology's boilerplate parameter list for crop tissue sampling.

The table was corrected.