

SUPPLEMENTAL FACT SHEET FOR NPDES PERMIT WA 0002984
PHILLIPS 66 FERNDAL REFINERY
PERMIT MODIFICATION PUBLIC NOTICE
JULY 1, 2016

The Department of Ecology issued NPDES Permit No. WA0002984 to the Phillips 66 Ferndale Refinery on March 11, 2014. The permit became effective on April 1, 2014. On April 21, 2015, Phillips 66 sent a letter to Ecology requesting to modify the NPDES Permit. The letter included an engineering analysis report for the American Petroleum Institute (API) separators and a completed EPA Form 2F to add two new stormwater discharge locations.

After reviewing the engineering report and Form 2F, Ecology requested additional data to support the engineering report and changes to Form 2F. Ecology reviewed the additional data and changes to the form and determined that the information was complete. Ecology has made modifications to the permit in response to the refinery's request. Other revisions were also made to correct typos in the current permit. The proposed changes are discussed in this fact sheet.

PROPOSED PERMIT CHANGES

1. Process Wastewater Discharges

The reference to Appendix A in the last sentence in foot note "h" of Permit Condition S1.A. was changed to Appendix B. This change was made to correct a typo in the current permit.

2. Stormwater Benchmarks, Prohibitions, and Monitoring Requirements Outfalls

Permit Condition S1.C. was revised to include two new stormwater discharge locations, Outfalls 006 and 007. The refinery completed the construction of the Railcar Unloading Facility (RUF) and began operating the facility in November 2014. On April 21, 2015, the refinery submitted a completed EPA Form 2F to add two new discharge locations, MP 001 and MP 002. Ecology renamed MP 001 as Outfall 006 and MP 002 as Outfall 007 for consistency with other outfall identifiers.

The facility routes non-contact stormwater runoff from the rail areas, gravel roadways, and parking areas of the RUF to three retention ponds called the East Pond, West Pond, and Mid Pond. These ponds allow the sediments from the stormwater runoff to settle in the ponds. Each pond has an outlet structure that controls the discharged flow rate. Additionally, the Mid and East Ponds have isolation valves.

The stormwater discharged from the East Pond flows through a wooded area and is discharged through existing Outfall 002. The stormwater discharged from the Mid Pond and the West Pond are discharged through Outfalls 006 and 007, respectively. The discharges from these outfalls flow through a wooded area to feed onsite wetlands before leaving the refinery property at the Slater Road ditch.

The refinery has been discharging the stormwater from these locations under Ecology's Construction Stormwater General Permit.

The permit was modified to include the same requirements for Outfalls 006 and 007 as the other stormwater outfalls listed in Condition S1.C.

3. *Design Criteria*

The wording in Permit Condition S5.A., regarding the design criteria for the Induced Gas Floatation (IGF) unit, was changed to apply to the API oil/water separators as measured at the influent to the IGF. This change was made to clarify the intent of the requirement. The API separator effluent flow is equivalent to the influent flow to the IGF.

In addition, the design criteria for the maximum influent flow through the API separators was changed from 1850 gpm to 2380 gpm. This change was made to reflect the current design flow for the API separators.

At the end of 2014, the refinery had more than three consecutive months exceeding 85% of the maximum influent flow to the IGF unit (1850 gpm). The exceedances triggered the requirement in Permit Condition S5.B. to submit to Ecology a plan for maintaining design capacity. Phillips 66 requested that instead they be allowed to re-evaluate the design flow for the API separators since changes had been made to the unit in recent years.

The maximum design flow rate for the API separators (1850 gpm) was based on the 2006 flow test through the API separator effluent weir. Later in 2006, the refinery modified the weir to improve the API separator flow. In February 2015, the refinery contracted with ERM-West, Inc. (ERM) to conduct a process wastewater design basis review for the purpose of re-evaluating the API separator and IGF design flow rates. The review established a maximum effective flow rate of 2380 gpm for the API separators and 2500 gpm for the IGF.

Ecology reviewed the data from ERM's analysis to determine if there is any impact to the secondary wastewater treatment system when the maximum flow through the API separators and the influent flow to the IGF unit is increased. The upgrades to the secondary wastewater treatment system in 2007 provided sufficient capacity to handle the increased flow and additional organic loadings.

The refinery has been taking steps to improve the primary wastewater treatment system which includes the API separators and IGF. They are evaluating different treatment technologies that could augment or replace portions of the system. Ecology continues to monitor the final effluent data for Outfall 001 to ensure compliance with the water quality standards.

4. *Plan for Maintaining Adequate Capacity*

The reference to WAC 173-240-060 in the last paragraph of Permit Condition S5.B. was revised to WAC 173-240-130. This change was made to correct a typo in the current permit.

PUBLIC INVOLVEMENT INFORMATION

The Department of Ecology has tentatively determined to modify the NPDES permit for the Phillips 66 Ferndale Refinery. The Department will publish a Public Notice of Modification (PNOM) on July 6, 2016 in the *Ferndale Record-Journal* to inform the public that a draft permit modification and fact sheet are available for review. A notice will also run in Spanish on July 8, 2016 in the newsletter *tú Decides*.

Interested persons are invited to submit written comments regarding the draft permit modification. The draft permit modification, fact sheet, and related documents are available for inspection and copying between the hours of 8:00 a.m. and 5:00 p.m. weekdays, by appointment, at the Ecology offices listed below.

Department of Ecology
Industrial Section
300 Desmond Drive
Lacey, WA 98503

Call (360) 407-6916 to make an appointment. Documents are also available online at <https://fortress.wa.gov/ecy/industrial/UIPermit/DraftPermits.aspx>.

Send written comments to:

Liem Nguyen
Department of Ecology
Industrial Section
P.O. Box 47600
Olympia, WA 98504-7600
Liem.nguyen@ecy.wa.gov
Fax: (360) 407-6102

Comments should reference specific text followed by the requested change or concern when possible. **Ecology will only consider comments that pertain to the permit conditions we are proposing to modify.**

The Department will consider all comments received between July 6, 2016 and August 8, 2016, in formulating a final determination to modify the permit. The Department's

response to all significant comments is available upon request and will be mailed directly to people expressing an interest in this permit.

Further information may be obtained from the Department by telephone at (360) 407-6955 or by writing to the address listed above.

**Second Permit Modification – Response to Comments
September 7, 2016**

Public Review

Ecology placed a Public Notice of Modification in the *Ferndale Record-Journal* on July 6, 2016 and the Spanish newsletter *tú Decides* on July 8, 2016 to invite comment on the proposed permit modification and supplemental fact sheet. The public comment period ran from July 6, 2016 through August 8, 2016.

Ecology received no comments during the public comment period.