

**ADDENDUM**  
**FACT SHEET FOR NPDES PERMIT WA-002025-7**  
**ANACORTES WASTEWATER TREATMENT PLANT**

On April 3, 2006, the Department received a request from the City of Anacortes to modify their permit to allow reporting of Carbonaceous Biochemical Oxygen Demand (CBOD) in lieu of 5-day Biochemical Oxygen Demand (BOD<sub>5</sub>). The request is the result of an investigation by the facility that indicated ammonia in the plant's effluent was causing abnormally high BOD<sub>5</sub> test results due to the conversion of ammonia to nitrate/nitrite. The city has proposed to use CBOD effluent monitoring to more accurately evaluate effluent oxygen demand.

In accordance with WAC 173-221-050(6), the Department has the option to allow municipal wastewater treatment facilities to substitute CBOD testing for BOD<sub>5</sub> testing as an effluent monitoring parameter. Facilities approved to monitor CBOD shall conform to the following requirements, which are considered to be comparable to requirements of facilities reporting BOD<sub>5</sub>:

- Thirty-day average discharge limit shall not exceed 25 mg/L.
- Seven-day average discharge limit shall not exceed 40 mg/L.
- Percent removal of CBOD shall be no less than 85 percent.
- Parallel monitoring of influent BOD<sub>5</sub> is required to ensure compliance with design loading parameters.

Per request of the Permittee and as allowed by WAC 173-221-050(6), the NPDES permit for the City of Anacortes will be modified to allow substitution of CBOD testing under the provisions listed above. As this modification is a minor change in reporting parameters that do not result in changes in discharge limitations, the permit was not reopened for public comment. The modified permit contains the following changes.

*Section S1.A, Effluent Limitations Table for Outfall #001:*

Original	Biochemical Oxygen Demand (5-day)	30 mg/L, 1126 lbs/day 85% removal of influent BOD	45 mg/L, 1689 lbs/day
<b>New</b>	<b>Carbonaceous Biochemical Oxygen Demand</b>	<b>25 mg/L, 938 lbs/day</b> <b>85% removal of influent BOD</b>	<b>40 mg/L,</b> <b>1501 lbs/day</b>

\*monthly and weekly mass limits are calculated as concentration limit (25 or 40 mg/L) times maximum monthly design flow (4.5 MGD) times 8.34 (conversion factor).

Section S2.A, Monitoring Schedule:

Category	Parameter	Units	Sample Point	Minimum Sampling Frequency	Sample Type
Wastewater Influent (Original)	BOD <sub>5</sub>	mg/l		3/7	24 HC
<b>Wastewater Influent (New)</b>	<b>BOD<sub>5</sub></b>	<b>mg/l</b>		<b>2/30</b>	<b>24 HC</b>

<b>Wastewater Influent (New)</b>	<b>CBOD</b>	<b>mg/l</b>		<b>3/7</b>	<b>24 HC</b>
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Wastewater Effluent (Original)	BOD <sub>5</sub>	mg/l		3/7	24 HC
<b>Wastewater Effluent (New)</b>	<b>CBOD</b>	<b>mg/l</b>		<b>3/7</b>	<b>24 HC</b>