



City of Stevenson

Phone (509)427-5970

FAX (509) 427-8202

7121 E Loop Road, PO Box 371

Stevenson, Washington 98648

February 4, 2019

Patricia Bailey, Department of Ecology
Southwest Regional Office, Water Quality Program
PO Box 47775
Olympia, WA 98504-7775

Dear Mrs. Bailey,

On April 25, 2017 the City of Stevenson provided you with an aggressive compliance schedule to address the deficiencies noted in the April 7, 2017 Notice of Violation #14032. That compliance schedule was incorporated into the Administrative Order #14221. The city has accomplished the directives outlined in the Order and is continuing to work on ensuring the City's treatment plant operates effectively while we move forward on design and construction of the necessary upgrades.

The city has:

- Instituted a self-imposed moratorium on new commercial connections discharging more than residential BOD loading
- Worked with commercial kitchens and Significant Industrial Users (SIUs) to promote source control and reduce BOD
- Applied for and received notification of funding for the design of wastewater treatment facility and wastewater collection system improvements through the Department of Ecology
- Updated the city ordinance on industrial pretreatment
- Modified Wastewater Treatment Plant (WWTP) operations to improve treatment
- Updated and implemented increased wastewater rates to include a high-strength category
- Completed the General Sewer Plan and Wastewater Facilities Plan Update
- Engaged the community in a Value Planning process to identify alternatives to improve BOD treatment and capacity at a lower cost with greater community value
- Analyzed the alternatives from the Value Planning process
- Solicited Requests for Qualifications for engineering services for the design of wastewater treatment facility and wastewater collection system improvements.
- Hired a full time WWTP Operator to assist with contract operations at the plant and collections system.

The initial compliance schedule has the city beginning the design phase of the WWTP in June of 2018. That schedule assumed the funding for the design would take place at or near that date. While the city received notification that its application for funding of the design phase will be funded, a contract is not signed. The city does not have enough funds to begin the design phase without the contract for funding which would enable payment. The city anticipates signing a contract for funding in February and has begun the RFQ process.

The initial compliance schedule also shows the city applying for funding in October, 2019 for the construction phase. In order to meet the original schedule, the city would need to shorten the design phase from 12 months to 7. While it can be done, the city does not feel that rushing the design phase of a

project of this size and scope is beneficial for the community. In order to allow for the minimum of 12 months for design, the city requests a modification of the compliance schedule as outlined below.

- February-April 2019 – Negotiate individual contracts with SIUs on Best Management Practices and BOD reduction requirements
- February-June 2019 – Review and strengthen the city’s Fats Oils and Grease program
- March 2019-April 2020 – Design WWTP improvements
- October 2020 - Apply for DOE Funding
- October-November 2021 – Solicit Construction Bids
- December 2021-January 2022 – Review bids and select contractor
- February 2022-March 2023 – Construction
- April 2023 – Startup of upgraded WWTP

The above schedule represents a year and four-month extension of the timeline for construction and outlines additional steps the city will be taking to meet the intent of the Administrative Order. The city feels that this will create the best long-term outcome for the community in terms of building an affordable and efficient WWTP with increased capacity.

To ensure that the WWTP stays in compliance with our NPDES Permit, the City will be taking these additional steps:

1. Replacement of brush aerators that are worn out.
2. Continue to haul additional solids to enable increased wasting.
3. Sewer collections inspection and CIP repair to reduce I&I.
4. Inspection and smoke testing to ensure downspouts are not connected to sanitary sewer.
5. Pursue classification of Class “B” solids for land application to reduce outside hauling costs.
6. Increased preventative maintenance at the WWTP to minimize equipment malfunctions/downtime.
7. Increased training/communication with members of ecology to ensure city staff has the knowledge to operate the plant at peak efficiency.
8. Information gathering, such as DO readings throughout the day and hourly peak flow measurements, to assist with proper sizing/design of the WWTP improvements.

Feel free to direct any questions regarding this matter to Eric Hansen, Public Works Director.

Sincerely,



Scott Anderson
Mayor



Leana Kinley
City Administrator



Eric Hansen
Public Works Director