



STATE OF WASHINGTON  
DEPARTMENT OF HEALTH  
OFFICE OF DRINKING WATER  
*P.O. Box 47822 | Olympia, WA 98504*  
Tel: 360-236-3100 | Fax: 360-236-2253 | 711 Washington Relay Service

February 12, 2026

SUNNY AULAKH  
PUBLIC WORKS DIRECTOR  
SUMAS WATER DEPARTMENT  
saulakh@cityofsumas.com

Subject: Sumas Water Department Water System (ID #84870)  
Whatcom County  
**CT6 Chlorine Project Report and Construction Document APPROVAL**  
Submittal #25-0502

Dear Sunny Aulakh:

The submittal we received on May 5, 2025, with additional information received on October 14, 2025, and January 20, 2026, is **APPROVED** in accordance with the provisions of WAC 246-290. Future changes in the rules may be more stringent and require facility modification or corrective action.

There are some limitations to this design that are expected to be addressed in Sumas' next Water System Plan. To construct this design, the following must be included in Sumas' upcoming Water System Plan:

- **This design requires S09 (May Rd Well 1 to Sumas & SRWA) to be inactivated permanently. This will reduce Sumas' source capacity. The new source capacity analysis (without S09 May Rd) must be included in Sumas' Water System. The capacity analysis must show that Sumas can serve projected growth throughout the planning period without S09 May Rd.**
- **This project must be included in the upcoming WSP's capital improvement plan and budget. There is a possibility that the City won't need to construct it. However, we need to see that there is a plan to pay for it if it is required.**

#### **SUMMARY OF PROJECT SCOPE**

If constructed, this project will allow Sumas to meet a CT of 6 chlorination in response to distribution coliform contamination from November 2023 to September 2024. It includes 460.4 ft of 30" C900 piping in a serpentine configuration, with some 10" transmission mains, provides 15,150 gallons of CT volume. The system is designed for a maximum flow of 1500 GPM. This results in 10.1 minutes of contact time. 12.5% liquid hypochlorite will be diluted

to 2.5% (1:4) and injected with a flow-paced LMI EXCEL XR metering feed pump. The 360-gallon chlorine feed tank is designed to last 8 to 16 days, depending on demand. The minimum required chlorine concentration is 0.2 mg/L in distribution. Should CT6 be required, the minimum chlorine residual at entry point would be 0.6 mg/L, with a target dose of 1.35 mg/L to account for chlorine demand and a 1.5 safety factor. Sumas' 2030 ADD is 371,958 GPD, and MDD is 943,916 GPD, based on their 2011 WSP capacity analysis.

This project doesn't increase the capacity of the system

## **CHLORINATION TREATMENT, CT6 INACTIVATION REQUIREMENT**

This project report and construction documents are required because coliform hits from November 2023 to September 2024 triggered the requirement for distribution chlorine treatment under WAC 246-290-451. Sumas agreed to get their chlorine design approved, take additional coliform samples, and to install chlorine treatment if DOH requires it in the future.

While distribution disinfection is the requirement, based on the information provided in this project report, CT6 treatment can be achieved by maintaining a minimum free chlorine residual value of 0.6 milligrams per liter (mg/L) and a contact time of **10.1** minutes at a maximum flow rate of **1,500 gallons/minute** in a 15,150-gallon contact pipe. The compliance point for monitoring the minimum free chlorine residual of 0.6 mg/L is at the sample line that connects to the outlet of the contact pipe, routed approximately 50 feet to the chemical building. Compliance samples must be taken using a digital colorimeter or other approved EPA method.

In addition, when/if Sumas meets the chlorine compliance trigger, the system will be required to maintain a detectable residual disinfectant concentration (0.2 mg/L) in all active parts of the distribution system.

Once the disinfection treatment is online, this system is required to:

- Measure and record on ODW forms (example included in O&M manual) residual disinfectant concentration at representative locations in the distribution system five days per week.
- Measure the residual disinfectant concentration at the same time and location as routine and repeat coliform sample collection.
- Submit the chlorination report forms to ODW every month, by the 10th of the following month.

## **DISINFECTION BYPRODUCT MONITORING REQUIREMENTS**

Community and non-transient non-community systems with chlorination treatment are required to sample for disinfection byproducts. After the treatment system is online you will be notified of this sampling requirement. For more information, please contact our source water protection program lead, Jeff Roeser, at 253-395-6775 or [Jeff.Roeser@doh.wa.gov](mailto:Jeff.Roeser@doh.wa.gov).

## **LEAD AND COPPER MONITORING**

The project report adequately addresses the impacts on the corrosivity of the water. The proposed treatment is not reasonably expected to increase the corrosiveness of the water. This project does not change the lead and copper tap sampling or water quality parameter monitoring frequency for this water system.

## **PROJECT COMPLETION**

This approval is valid for two years unless we determine a need to withdraw the approval, WAC 246-290-120. If you need an extension, please send us a written schedule for completion. Extensions may be subject to additional terms and conditions.

## **WATER RIGHTS**

ODW approval of your water system design does not grant or guarantee any right to a specific quantity of water. The approved number of service connections is based on your representation of available water quantity. If the Department of Ecology, a local planning agency, or other authority responsible for determining water rights and water system adequacy, determines you have use of less water than you represented, the number of approved connections may be reduced to equal the actual amount of water and your legal right to use it.

If you have any questions, please contact me 564-669-0753 or by email at [laura.mclaughlin@doh.wa.gov](mailto:laura.mclaughlin@doh.wa.gov).

Sincerely,



Laura McLaughlin, PE  
ODW Engineer  
(564) 669-0753

Enclosures: construction completion report

cc: Curt Schoenfelder, PE, [cschoenfelder@wilsonengineering.com](mailto:cschoenfelder@wilsonengineering.com)  
Jason Clawson, City of Sumas Operator, [jmclawson@cityofsumas.com](mailto:jmclawson@cityofsumas.com)  
Eric Hull, PE, Eric Hull [ehull@wilsonengineering.com](mailto:ehull@wilsonengineering.com)  
Patrick Hull – Whatcom County Health [phull@co.whatcom.wa.us](mailto:phull@co.whatcom.wa.us)  
Aniela Sidorska – DOH, Compliance Manager  
Krista Chavez – DOH, Regional Planner  
Joyful Bell – DOH, Coliform Manager