



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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DATE: July 10, 2018

TO: Buck Ryan, Snake River Waterkeeper

THROUGH: Jerrod Pfaff, Garfield Mayor
Cande Hasenoehrl, Garfield Council Member
Eric Hansen, Attorney for Town of Garfield
Cynthia Wall, Ecology Water Quality Grants and Loans

FROM: Diana Washington, Senior Water Quality Engineer

SUBJECT: June 28, 2018, Follow-up Meeting with Garfield and Snake River Waterkeeper

Introduction:

The Town of Garfield (Town) received a 60-Day Notice of Violations and Intent to Sue under Section 505 of the Clean Water Act from the Snake River Waterkeeper (Waterkeeper) on March 10, 2017. The Town of Garfield, Ecology staff, and the Waterkeeper, along with legal representation met to discuss the issues at Ecology's Spokane Office on June 7, 2017. University Legal Assistance sent a summary of the meeting on July 14, 2017.

The Town and the Waterkeeper met again on January 23, 2018, to discuss progress and actions being taken in 2018 by the Town to gain compliance with NPDES Permit WA0044822. Ecology provided a summary of that meeting on February 14, 2018. Next steps included an update meeting and an inspection in six months. The following summarizes the June 28, 2018, conference call. The inspection is tentatively scheduled for July 16, 2018.

Compliance Update provided by Ecology:

The following is a table for the violations reported since February 15, 2018. These values are taken from the compliance report in PARIS of DMRs submitted from February 15, 2018, through June 15, 2018. Table 1 shows five numeric effluent limit exceedances over the last six months. The remaining exceedances are for influent design criteria and are a result of excess infiltration and inflow.

Table 1 DMR Limit and Design Exceedances

Monitoring Period Begin Date	Limit	Reported Value	Units	Monitoring Point	Parameter Type	Violation	Statistical Base Type
3/1/2018	12	17	lbs./day	1	Solids	Numeric exceedance	Average Monthly
3/1/2018	18	21.4	lbs./day	1	Solids	Numeric exceedance	Weekly Average
5/1/2018	3	3.1	mg/L	1	Ammonia	Numeric exceedance	Single Sample
5/1/2018	1.8	2.85	mg/L	1	Ammonia	Numeric exceedance	Average Monthly
5/1/2018	100	110	cfu/100ml	1	Fecal Coliform	Numeric exceedance	Weekly Average
2/1/2018		0	gpd	IN1	Flow	Analysis not Conducted*	Single Sample
2/1/2018		0	gpd	IN1	Flow	Analysis not Conducted*	Single Sample
1/1/2018	70,000 (59,500)	234,039	gpd	IN1	Flow	Design exceedance	Average
2/1/2018	70,000 (59,500)	175,723	gpd	IN1	Flow	Design exceedance	Average
2/1/2018	105(89.25)	149.5	lbs./day	IN1	Solids	Design exceedance	Average
3/1/2018	70,000 (59,500)	253,648	gpd	IN1	Flow	Design exceedance	Average
3/1/2018	105 (89.25)	229.5	lbs./day	IN1	Solids	Design exceedance	Average
4/1/2018	130 (110.5)	126	lbs./day	IN1	BOD ₅	Design exceedance	Average
4/1/2018	70,000 (59,500)	216,336	gpd	IN1	Flow	Design exceedance	Average
4/1/2018	105 (89.25)	162.5	lbs./day	IN1	Solids	Design exceedance	Average
5/1/2018	130 (110.5)	202.5	lbs./day	IN1	BOD ₅	Design exceedance	Average
5/1/2018	70,000 (59,500)	126,953	gpd	IN1	Flow	Design exceedance	Average
5/1/2018	105 (89.25)	337.5	lbs./day	IN1	Solids	Design exceedance	Average
* The analysis was not conducted due to an issue with the pump and flow meter. They responded quickly to the problem and only missed two days of flow reading. They estimated the pump run time to enable them to estimate the monthly average daily flow.							

Town of Garfield Actions Update:

The Town committed greater than 32 percent of operator/maintenance staff time to correcting infiltration and inflow issues, approximately 130 hours. Additionally, the Town committed 297 hours to operations and maintenance of the wastewater treatment facility and collection system. The hours were used to complete the actions in Table 2.

Table 2 Town of Garfield I & I Corrective Actions

Action	Expected Results
650 feet of 6-inch main smoke tested and replaced	Eliminated infiltration and exfiltration to and from the collection system. This action should show a significant flow reduction.
27 manhole inspections	Identified issues and prioritized work.
7 manhole repairs (Sealguard)	Reduced inflow into the collection system.
4 manhole covers re-centered or raised to grade	Prevents inflow due to ponding over the manhole during precipitation and rain on snow events.
2 manhole cover replaced	Eliminate inflow.
Pipe under the creek tested for infiltration.	The Town plugged off the flow above the creek to evaluate for creek water entering the system. No infiltration from the creek noted.
Culvert connected to the collection system plugged.	The Town is not sure how much flow was entering the collection system from this culvert or where the water was coming from. It may have been a spring that was originally connected to the collection system and forgotten. The Town is investigating the source of the water from the culvert. It is plugged and they have not received word from anyone of a backup of water. They will continue to investigate.

Next Steps:

- Ecology will schedule and conduct a site technical assistance visit on July 16, 2018.
- Garfield will work with Cynthia Wall to identify infiltration and inflow actions, equipment, materials, and staff time covered by the planning funds.
- Garfield will submit a plan explaining how they will conduct maintenance on the polishing wetland.
- Garfield will identify future actions to be taken to address I & I issues
- Garfield will identify how they will assess success for I & I actions taken.