Discovery Clean Water Alliance

Board of Directors Agenda

Quarterly Meeting

Friday, June 20, 2025, 10:00 a.m.
District Board Meeting Room, 8000 NE 52nd Court, Vancouver, WA 98665

The Board of Directors will be accepting public comment on published agenda items via in-person or virtual attendance during this meeting. *Written comments may be submitted to* lmattos@crwwd.com *by 5:00 PM the day before the meeting. Comments will be compiled and sent to the Board of Directors.*

Please join the meeting from your computer, tablet or smartphone:
https://meet.goto.com/DiscoveryCleanWaterAlliance/allianceboardofdirectorsmeeting

You can also dial in using your phone: **(312) 757-3121**; Access Code: **827-164-141**

Regular Meeting

No	Item	Action/Info	Presenter	Time (minutes)
1.	**Call To Order**			
2.	**Flag Salute**			
3.	**Late Additions to the Agenda**			
4.	**Public Comment** *This item is to provide an opportunity for citizen comment.*	**INFORMATION**		5
5.	**Consent Agenda** a. Board of Directors Meeting Minutes of March 14, 2025 b. Audit of Accounts c. Authorization to Change Location of September Regular Board of Directors Meeting	**ACTION**		5
6.	**Reports**	**INFORMATION**		
	a. Board of Directors Officer Elections		**Peterson**	**5**
	b. Operator Reports – First Quarter 2025		**Jenkins**	**15**
	c. Capital Program Report – First Quarter 2025		**Peterson**	**30**
	d. Treasurer Report – First Quarter 2025		**Logan**	**10**
	e. Regulatory Compliance Program Report		**Thomas**	**30**
	f. Administrative Lead Report		**Peterson**	**20**
7.	**Adjourn Meeting**			

Next Meeting: **Friday, September 19, 2025, 10:00 a.m., Regular Business Meeting**
(Location to be determined at the June meeting)

The Board provides reasonable accommodations to persons with disabilities. Please contact a staff member (by noon Thursday) if we can be of assistance. If you should experience difficulty hearing the proceedings, please bring this to the attention of the Board by raising your hand.

Discovery Clean Water Alliance

Board of Directors Meeting
First Quarter 2025
MINUTES

Friday, March 14, 2025, 10:00 a.m.
In-Person / Remote Meeting via GoToMeeting
District Board Meeting Room, 8000 NE 52nd Court, Vancouver, WA 98665

Present:

City of Battle Ground:	Troy McCoy, alternate for Shane Bowman
Clark County:	Sue Marshall
City of Ridgefield:	Lee Wells, alternate (for vacant position)
Clark Regional Wastewater District:	Norm Harker

Staff: Clark Regional Wastewater District: John Peterson; City of Battle Ground: None; Clark County: None; City of Ridgefield: None.

Attendees: Clark Regional Wastewater District: Neil Kimsey, Denny Kiggins, Robin Krause, David Logan, Matt Jenkins, Leanne Mattos, Kristen Thomas, Britny Carrier, Bob Sanguinetti, Marcella Laasch; City of Vancouver: Frank Dick; Clark County: Joelle Loescher; City of Battle Ground: Mark Herceg; Interested Citizens: Dan Clark, Leah Lothspeich; Foster Garvey Legal Counsel: Lee Marchisio; Guest Speakers: None

Special Business Meeting

Call to order:

In the absence of Chair Bowman and the vacancy of the Vice-Chair position at the March 14, 2025 Alliance Board of Directors Special Meeting, for the purposes of presiding over this meeting of the Board and performing all other duties of the Chair, Lee Wells moved "to appoint Troy McCoy as Chair Pro Tem for the limited period of the Chair's absence." Norm Harker seconded the motion. Motion carried unanimously.

Chair Pro Tem McCoy called the meeting to order at 10:02 a.m.

1. **Late Additions/Deletions to the Agenda**
   None.

2. **Public Comment**
   None.

3. **Consent Agenda**
   Action:
   Norm Harker moved, seconded by Lee Wells, to approve the Consent Agenda, approving the December 20, 2024 meeting minutes; ratifying claim warrants #10714-10716 & ACH transactions in the amount of $1,217,869.52 for December 2024, claim warrants #10717-10720 & ACH transactions in the amount of $1,414,258.92 for January 2025, and claim warrants #10721-10722 & ACH transactions in the amount of $1,761,057.35 for February 2025; approving Authorization to Cancel the March 21 Regular Board Meeting; and adopting Resolution 2025-01, adopting the Alliance Language Access Policy. Motion carried unanimously.

4. Operator Report – Fourth Quarter 2024

Matt Jenkins presented the Operator Report covering the Salmon Creek Treatment Plant (SCTP), Ridgefield Treatment Plant (RTP), and the Alliance Transmission System operations and treatment performance through December 31, 2024. He noted that SCTP and RTP treatment performance was stable throughout the fourth quarter of the year, and that all NPDES permit limits were met.

Mr. Jenkins provided an update outlining the ongoing maintenance accomplishments and priorities at the SCTP and RTP, as well as the operations and maintenance of the Alliance Transmission System. Mr. Jenkins explained that staff completed the backlog of high priority maintenance repairs in December of 2024.

5. Capital Program Report – Fourth Quarter 2024

Robin Krause presented updates on the capital program and capital project activities. He presented a Capital Program Summary status report for the District-led capital projects included in the 2025-2026 budget period. He provided updates on projects in construction, projects in design, and projects in planning, including a review of alternatives for the HVAC system replacement for the SCTP administration building. The Board concurred with moving forward with the low cost VRF system option.

6. Treasurer Report – Fourth Quarter 2024

David Logan presented the Fourth Quarter 2024 Financial Report reflecting the results from operations for all funds, as well as cash and investment balances as of December 31, 2024

Mr. Logan concluded with an update on the 2024 Annual Comprehensive Financial Report (ACFR) preparation, to be followed by the SAO audit beginning in April.

7. Regulatory Compliance Program Report

Kristen Thomas presented an update on the Industrial Pretreatment program, the Washington Wastewater-Based Epidemiology project, PFAS legislation and regulation, and the status of various permit updates for the SCTP.

8. Administrative Lead Report

John Peterson presented the Administrative Lead report, highlighting the following items, which were included in the agenda packet:

1) 2024 Capacity Management Update – Mr. Peterson provided a capacity management update. The Phase 5 capacity summary shows that the plant should not exceed regional system capacity.
2) Federal & State Advocacy Update – Mr. Peterson reported on the status of the bills being tracked that did not pass last congress (WIPPES Act, the CERCLA Liability Protection, and the Special District Grant Accessibility Act), and introduced the Biosolids Substitute Senate Bill. Mr. Peterson also provided an update on the Federal and State funding request efforts underway.
3) Communications Program Update – Mr. Peterson shared information about the ongoing efforts to keep the public, state and federal elected officials and offices, and Member agencies, updated on the work of the Alliance.

The meeting was adjourned at 11:34 a.m.

Prepared and edited by Alliance Administrative Lead staff. Approved by the Discovery Clean Water Alliance Board of Directors on:

June 20, 2025

_____

Secretary

Accounts Payable

Blanket Voucher Approval Document

Discovery Clean Water Alliance

We, the undersigned Board of Directors of Discovery Clean Water Alliance, Clark County, Washington, do hereby certify that the merchandise and / or services hereinafter specified have been received and approved for payment in the amount of $1,300,419.21 this 21st day of March 2025.

David Logan Digitally signed by David Logan Date: 2025.03.25 15:43:57 -07'00'

Treasurer

Director

Director

Director

Director

Line	Claimant	Check No.	Amount
1	CFM STRATEGIC COMMUNICATIONS, INC	10722	5,000.00
2	CLARK COUNTY TREASURER	10723	9,036.11
3	CLARK REGIONAL WASTEWATER DISTRICT	ACH	1,284,613.90
4	FOSTER GARVEY PC	10724	1,049.00
5	GOVERNMENT PORTFOLIO ADVISORS	ACH	720.20
		Page Total:	$1,300,419.21

Accounts Payable

Blanket Voucher Approval Document

Discovery Clean Water Alliance

We, the undersigned Board of Directors of Discovery Clean Water Alliance, Clark County, Washington, do hereby certify that the merchandise and / or services hereinafter specified have been received and approved for payment in the amount of $1,167,501.58 this 25th day of April 2025.

David Logan Digitally signed by David Logan Date: 2025.05.06 13:52:02 -07'00'

Treasurer

Director

Director

Director

Director

Line	Claimant	Check No.	Amount
1	CFM STRATEGIC COMMUNICATIONS, INC	10725	10,000.00
2	CLARK REGIONAL WASTEWATER DISTRICT	ACH	1,147,904.58
3	FOSTER GARVEY PC	10726	6,119.50
4	STATE AUDITOR'S OFFICE	10727	3,477.50
		Page Total:	$1,167,501.58

Accounts Payable

Blanket Voucher Approval Document

Discovery Clean Water Alliance

We, the undersigned Board of Directors of Discovery Clean Water Alliance, Clark County, Washington, do hereby certify that the merchandise and / or services hereinafter specified have been received and approved for payment in the amount of $3,838,942.72 this 23th day of May 2025.

APPROVED
By dlogan at 9:35 am, Jun 13, 2025

Treasurer

Director

Director

Director

Director

Line	Claimant	Check No.	Amount
1	CFM STRATEGIC COMMUNICATIONS, INC	10728	5,000.00
2	CLARK REGIONAL WASTEWATER DISTRICT	ACH	1,960,905.96
3	DEPARTMENT OF COMMERCE	10729	1,871,950.21
4	FOSTER GARVEY PC	10730	669.50
5	RAILROAD MANAGEMENT COMPANY III, LLC	10731	417.05
		Page Total:	$3,838,942.72

Discovery Clean Water Alliance

Consent Staff Report

Board Meeting of June 20, 2025

5c. Authorization to Change Location of September Regular Board of Directors Meeting

STAFF CONTACTS	PHONE	EMAIL
Leanne Mattos, Administrative Supervisor	360-993-8823	lmattos@crwwd.com

PURPOSE: The Salmon Creek Treatment Plant Phase 5 Expansion Program is planned to be completed this summer, representing an investment in the regional system valued at approximately $72 million. Administrative Lead staff recommend changing the location for the September Board meeting to the Salmon Creek Treatment Plant site so that the Board can acknowledge the regional accomplishment and take a tour of the facility to view the finished improvements. There would be no change to the date or time of the regular meeting. Administrative Lead staff would provide notice of the change of location consistent with typical notices of special meeting provided under the Washington Open Public Meetings Act.

CONSENT ACTION REQUESTED: Motion to change the location of the regular September 19, 2025 Board of Directors meeting to the Salmon Creek Wastewater Treatment Plant site, 15100 NW McCann Road, Vancouver WA 98685.

Discovery Clean Water Alliance

Staff Report

Board Meeting of June 20, 2025

6a. Board of Directors Officer Elections

STAFF CONTACTS	PHONE	EMAIL
John M. Peterson, P.E., Alliance Executive Director	360-993-8819	jpeterson@crwwd.com
Leanne Mattos, Board Clerk / Administrative Supervisor	360-993-8823	lmattos@crwwd.com

PURPOSE: The Alliance Interlocal Formation Agreement (IFA) and the adopted Board Rules and Operating Procedures (BROP) resolution provides for Directors to serve as Officers of the Alliance under the following framework:

1. The Alliance Board of Directors shall have a Chair, a Vice-Chair and a Secretary, each of whom shall be elected by the Board (per IFA Section IV.C and BROP Section 3.01).
2. The Board Officers are to be elected at the first regular Board meeting of the calendar year, and shall serve for one year (per BROP Section 3.02).

The primary functions of each position are as follows:

- **Chair.** The Chair presides at meetings of the Board, performs all duties incident to the office, and performs other duties as may be determined by resolution of the Board. (BROP Section 3.05).
- **Vice-Chair.** The Vice-Chair performs the duties of the Chair in the absence of the Chair (BROP Section 3.06).
- **Secretary.** The Secretary is responsible for the minutes of and notice for Board proceedings and is the custodian of the corporate records of the Alliance (BROP Section 3.07).

The June 20 meeting is the first regular Board meeting of 2025. As such, it is appropriate for the Board to appoint three Officers to serve for 2025. A brief history of the elected officials serving as Board officers is illustrated in the following table for reference.

Table 1. History of Alliance Board of Directors Officers

YEAR	CHAIR	VICE-CHAIR	SECRETARY
2025	TBD	TBD	TBD
2024	Bowman/ Battle Ground	Onslow/ Ridgefield	Marshall/ Clark County
2023	Bowman/ Battle Ground	Onslow/ Ridgefield	Harker/ Clark Regional
2022	Bowman/ Battle Ground	Onslow/ Ridgefield	Harker/ Clark Regional
2021	Onslow/ Ridgefield	Harker/ Clark Regional	Olson/ Clark County
2020	Bowman/ Battle Ground	Onslow/ Ridgefield	Olson/ Clark County
2019	Onslow/ Ridgefield	Olson/ Clark County	Phelps/ Battle Ground
2018	Onslow/ Ridgefield	Olson/ Clark County	Phelps/ Battle Ground
2017	Bowman/ Battle Ground	Onslow/ Ridgefield	Olson/ Clark County
2016	Harker/ Clark Regional	Bowman/ Battle Ground	Olson/ Clark County
2015	Mielke/ Clark County	Harker/ Clark Regional	Onslow/ Ridgefield
2014	Onslow/ Ridgefield	Mielke/ Clark County	Kimsey/ Clark Regional
2013	Walters/ Battle Ground	Onslow/ Ridgefield	Kimsey/ Clark Regional

ACTION REQUESTED: Election of the Chair, Vice-Chair and Secretary by motions.

Discovery Clean Water Alliance

Staff Report

Board Meeting of June 20, 2025

6b. Operator Report – Treatment Plants – First Quarter 2025

STAFF CONTACTS	PHONE	EMAIL
Matt Jenkins, Wastewater Operations Manager	360-719-1680	mjenkins@crwwd.com

PURPOSE: This report will cover the Operations program update.

Please see the attached presentations covering the following:

- Operator Report Q1 2025
  - Salmon Creek Treatment Plant
    - Operations and Treatment Performance
    - Maintenance Accomplishments and Priorities
  - Ridgefield Treatment Plant
    - Operations and Treatment Performance
    - Maintenance Accomplishments and Priorities
  - Alliance Transmission System
    - Transmission System Operations
    - Transmission System Maintenance

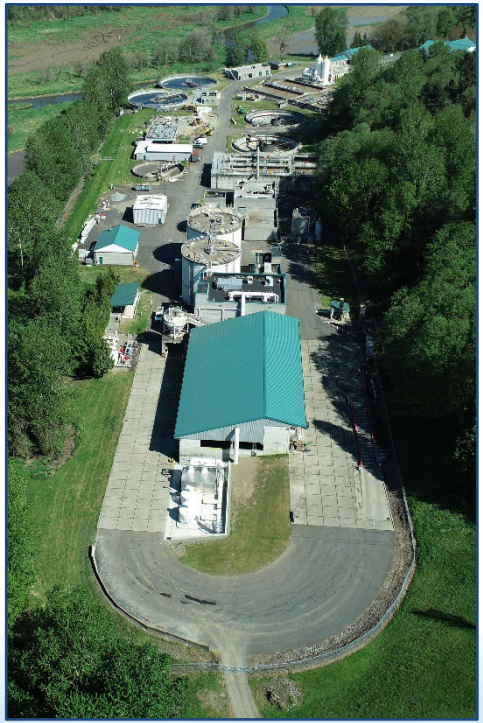
ACTION REQUESTED: No specific action required. Please provide policy-level guidance for the various activities described in this report.

Discovery Clean Water Alliance

Operations Program Update

Alliance Board of Directors
June 20, 2025

Operator Report – Treatment Plants

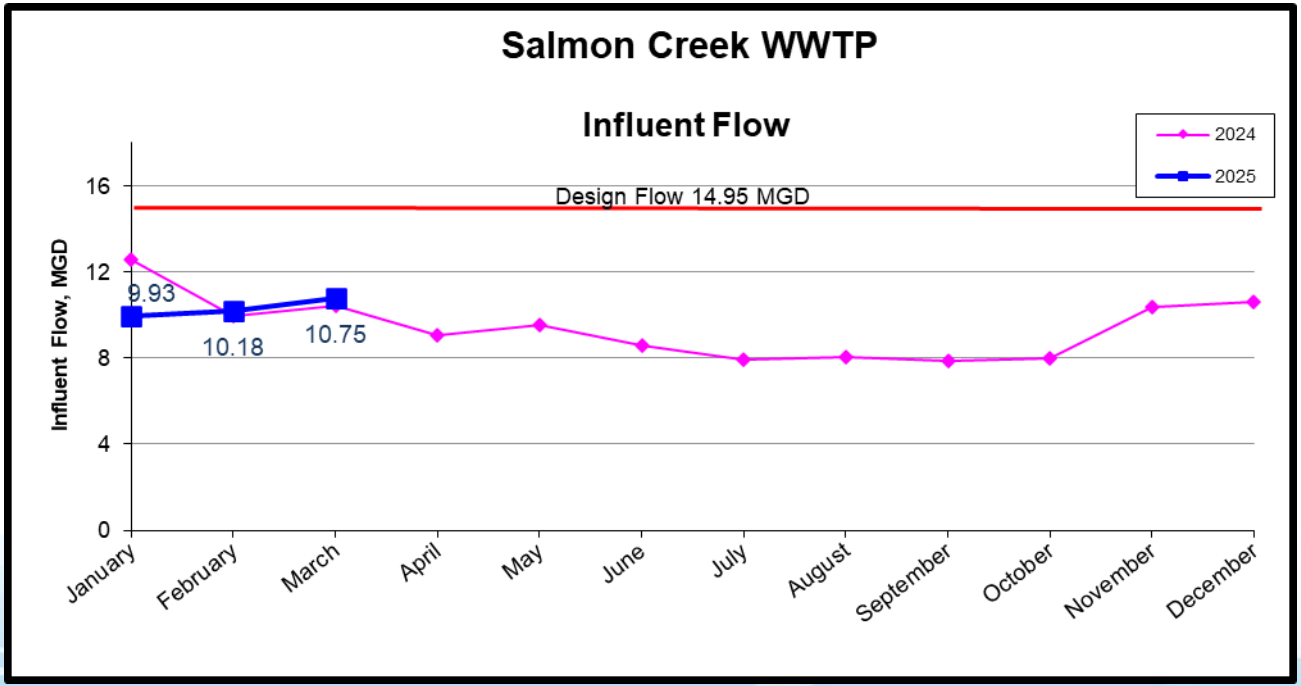


- Salmon Creek Treatment Plant
  - Operations and Treatment Performance
  - Maintenance Accomplishments and Priorities
- Ridgefield Treatment Plant
  - Operations and Treatment Performance
  - Maintenance Accomplishments and Priorities
- Alliance Transmission System
  - Transmission System Operations
  - Transmission System Maintenance

Salmon Creek Treatment Plant

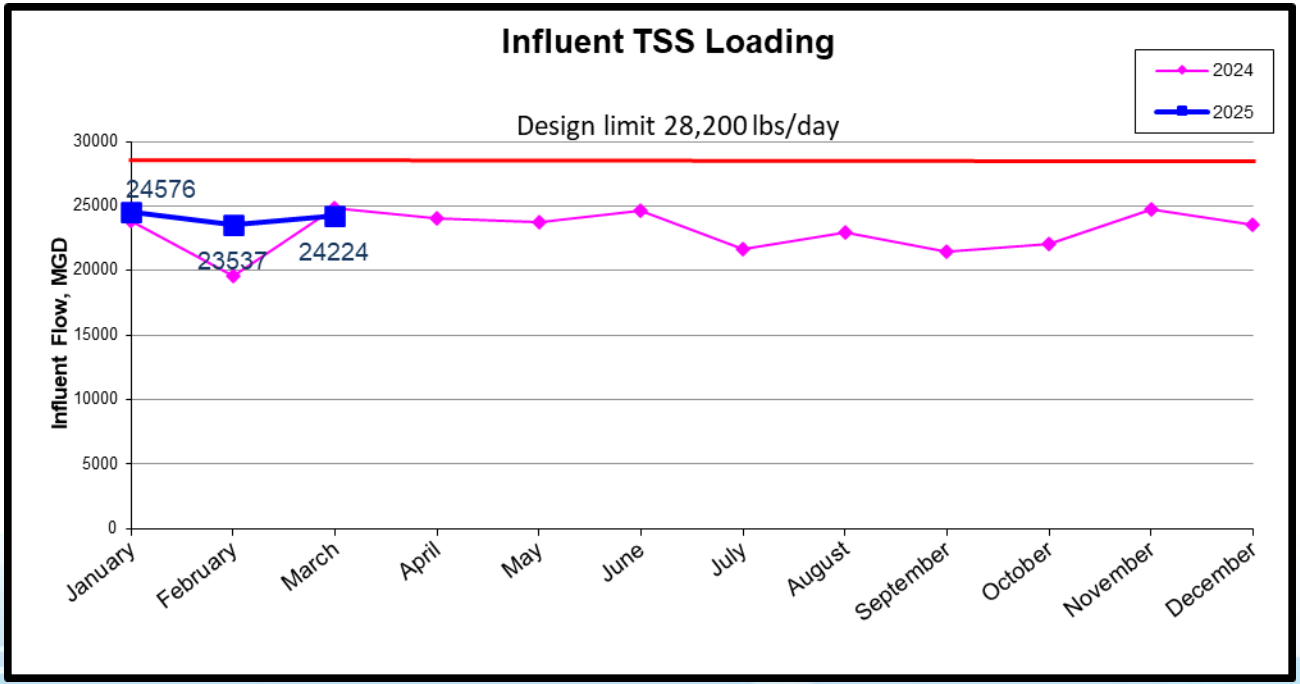
SCTP Operations and Treatment Performance

- First Quarter Performance



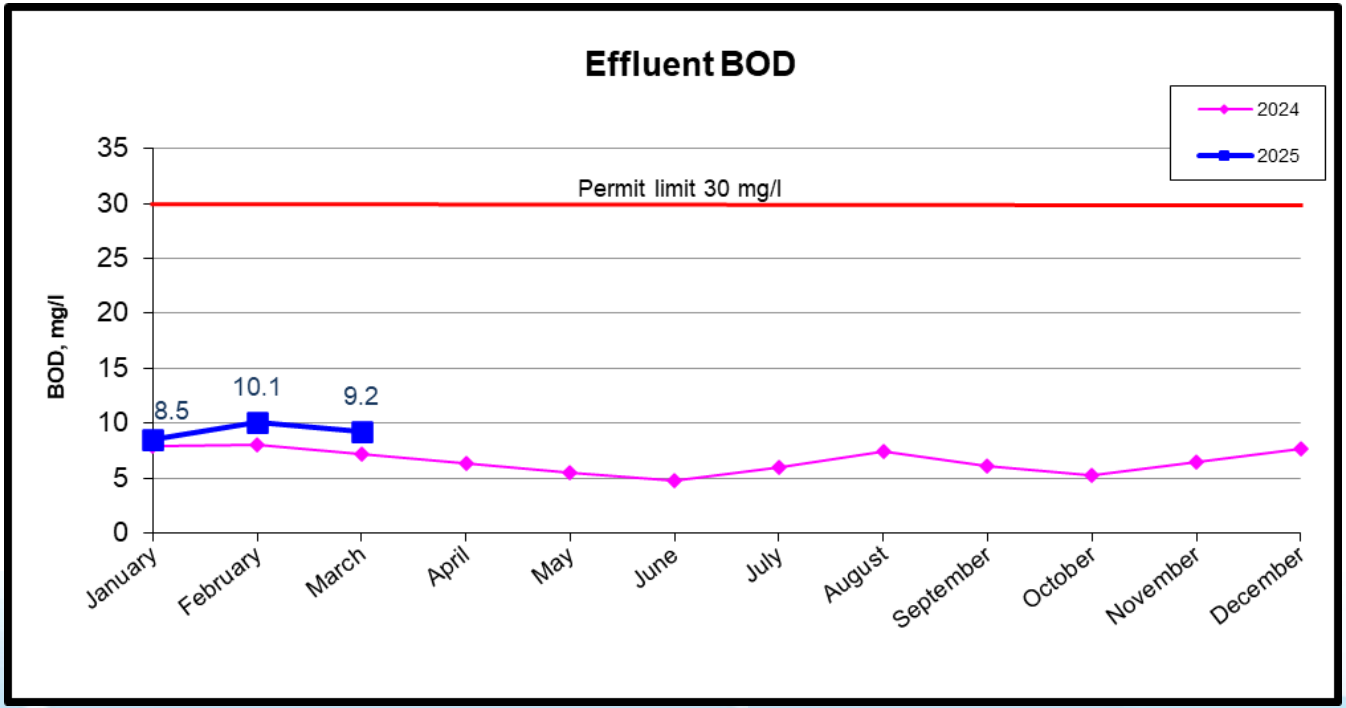
SCTP Operations and Treatment Performance

- First Quarter Performance



SCTP Operations and Treatment Performance

- First Quarter Performance



Operations and Treatment Performance

- First Quarter Performance
  - SCTP's treatment performance has met all permit requirements during the first quarter with average waste removals of 98%.
  - Staff continued work with the construction team on commissioning and integrating new equipment related to the Phase 5 expansion (Aeration Basin #7, new effluent pipeline).
  - Staff worked to optimize the plant processes and improve efficiency and stability of treatment.

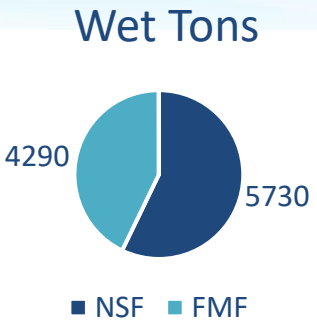
Operations and Treatment Performance

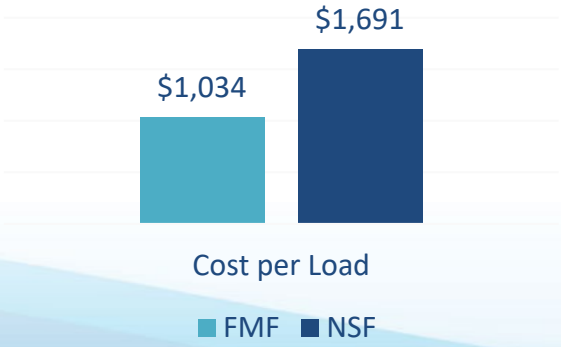
- Operations staff submitted the 2024 annual biosolids report to Department of Ecology.
- Staff prepared benchmark testing, records and procedures for the annual Lab accreditation renewal.
- Several operators are continuing to pursue advance licenses.
- Operations and engineering are working with Vaughn Pumps to improve digester recirculation pumping, and lower downtime and labor related to cleaning.

Representatives from Pumptech and Vaughn assess the digester recirculation pumps.

Operations and Treatment Performance

- During the first quarter of 2025, SCTP began storing biosolids for “dry season” hauling to the Lewis County sites managed by Fire Mountain Farms.
- An estimated 4,290 wet tons (143 truck loads) will be hauled to Lewis County from SCTP in 2025.
- Maximizing hauling to Lewis county provides a significant program savings ($94k across 143 Loads).





Maintenance Accomplishments and Priorities

- Maintenance performed the replacement of the mechanism and drive for primary clarifier #4.
- Staff completed key repairs on several critical components and systems at SCTP.
- Maintenance continued to update MMS (Lucity) with equipment inspection data. The data will be used to assess the condition of SCTP's assets as part of the Asset Management Program.

Maintenance prepares for entering the primary clarifier.

Maintenance Accomplishments and Priorities

- Maintenance staff have continued to perform preventative and critical repairs at SCTP.
- Staff have continued their efforts to optimize shop space for specialized work and inventory storage.

Salmon Creek Treatment Plant

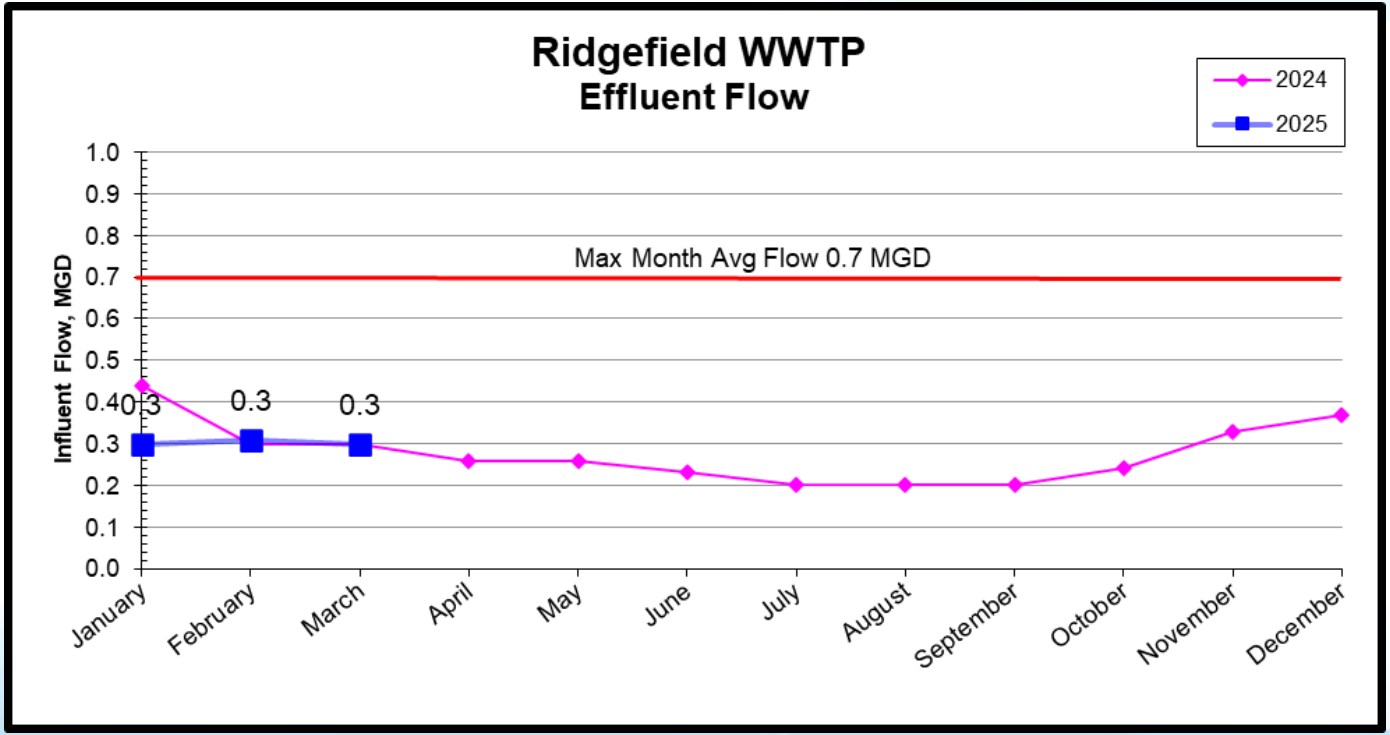
Priority	# Work Orders
1 - High (ASAP)	27
2 - Medium (Within 5 Days)	38
3 - Preventive/Predictive	796
4 - Planned Maintenance	15
5 - Projects	17
Total Work Orders:	**893**

SCTP Q1 work order completion report from Lucity

Ridgefield Treatment Plant

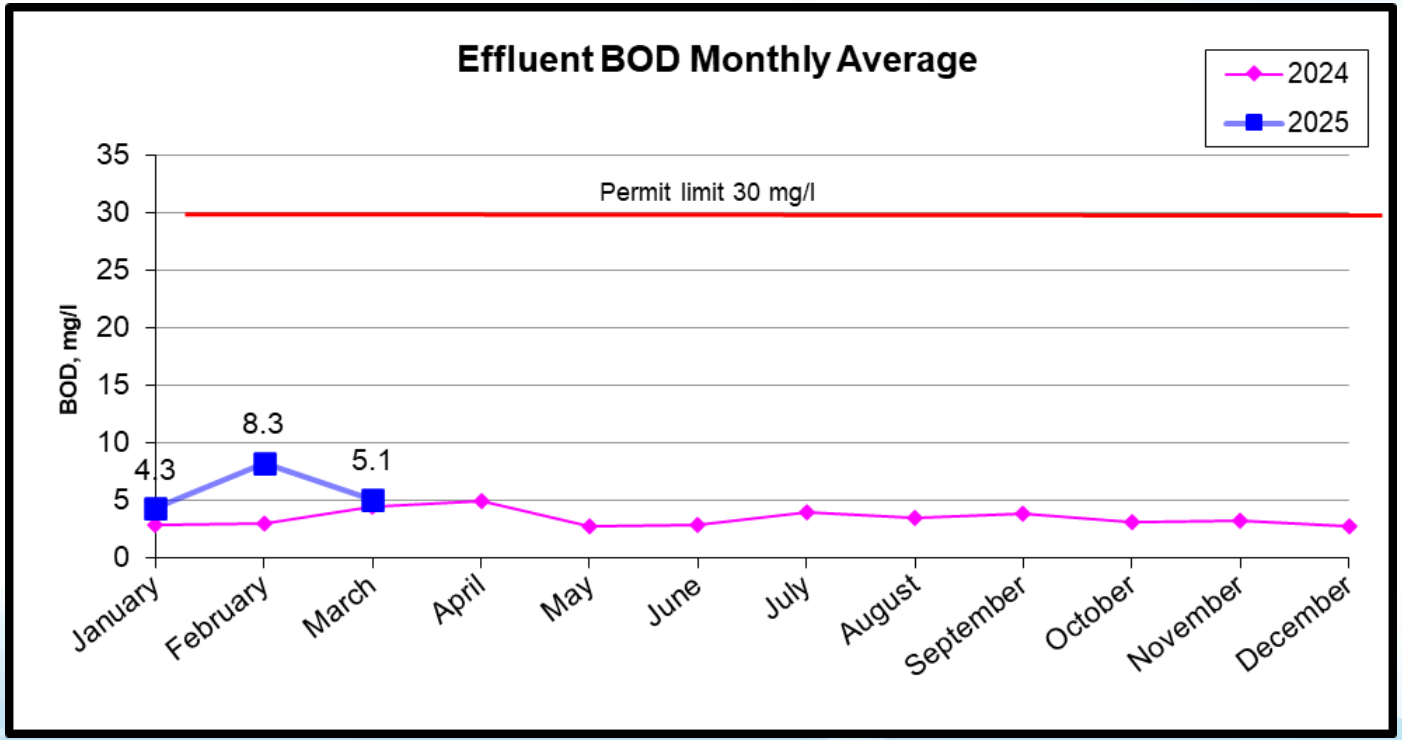
RTP Operations and Treatment Performance

- First Quarter Performance



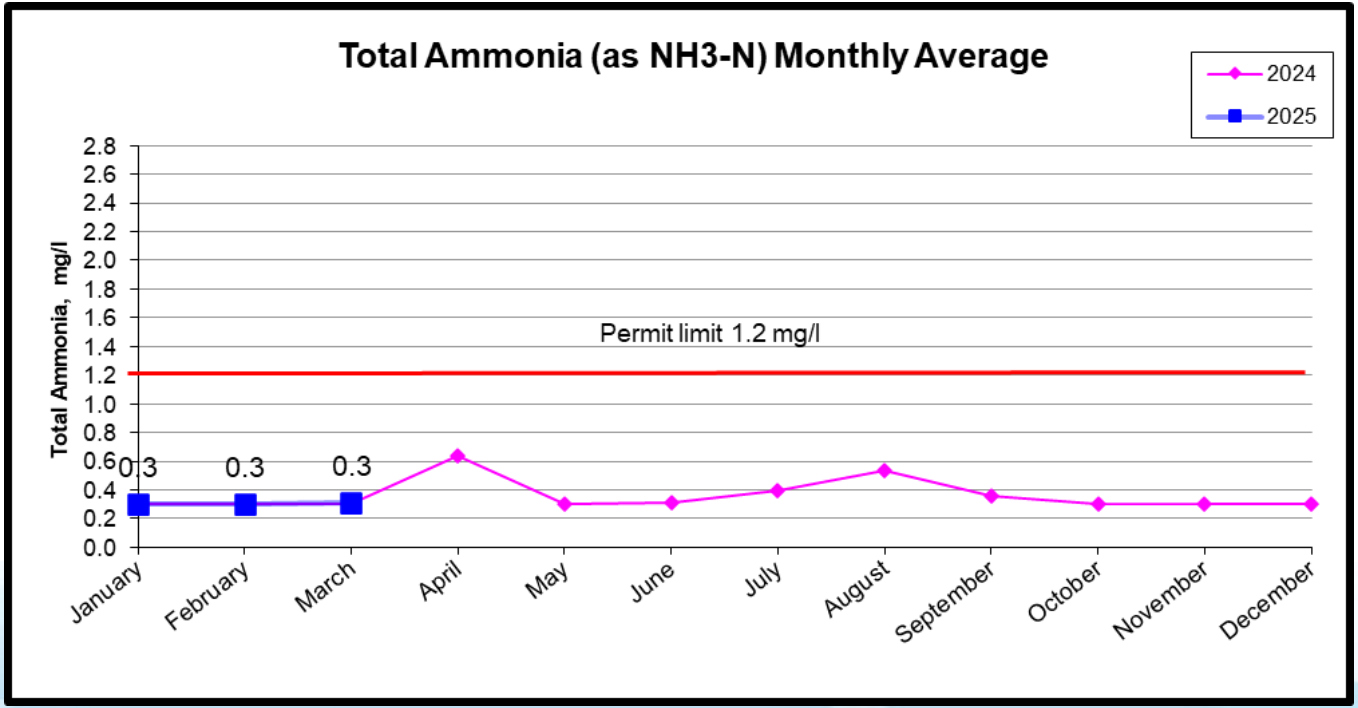
RTP Operations and Treatment Performance

- First Quarter Performance



RTP Operations and Treatment Performance

- First Quarter Performance



Operations and Treatment Performance

- RTP operators have maintained a very stable process through Q1 2025
- Staff have worked to optimize the plant and learn how the aeration basin upgrades will change the process characteristics.
- Staff have worked with the City of Ridgefield on optimizing the site for additional workspace and storage.

RTP's South Aeration Basin with flow baffling installed.

Maintenance Accomplishments and Priorities

- Operators continue completing preventive and planned maintenance
- Maintenance completed replacement of one of the plant's aeration blowers
- Secondary clarifier 2 was placed online to prepare for inspection of secondary clarifier 1.

Ridgefield Treatment Plant

Priority	# Work Orders	Percentage
1 - High (ASAP)	1	1%
2 - Medium (Within 5 Days)	1	1%
3 - Preventive/Predictive	78	94%
4 - Planned Maintenance	2	2%
5 - Projects	1	1%
Total Work Orders:	**83**	**8%**

RTP Q1 work order completion report from Lucity

Alliance Transmission System

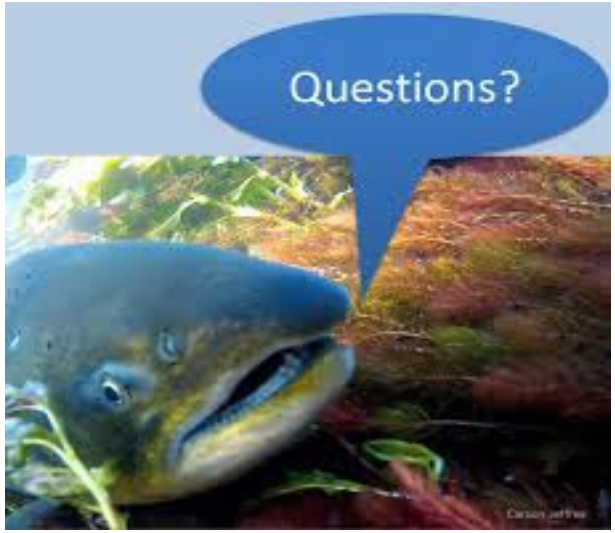
Transmission System Operations

- Preventive and planned maintenance items are up to date
- The station's equipment continues to operate well
- Staff conducted flow testing in Q1 2025

Transmission System Maintenance

- 117th Street pump station remained online for Q1
- The preventive and critical maintenance items are complete and up to date
- SCTP staff conducted flow testing to assist with the Alliance GSP efforts

Operations Update



Matt Jenkins

Wastewater Operations Manager
Clark Regional Wastewater District

Administrative Lead
Discovery Clean Water Alliance

(360) 719-1680
mjenkins@crwwd.com

Discovery Clean Water Alliance

Staff Report

Board Meeting of June 20, 2025

6c. Capital Program Report – First Quarter 2025

STAFF CONTACTS	PHONE	EMAIL
John M. Peterson, P.E., Alliance Executive Director	360-993-8819	jpeterson@crwwd.com

PURPOSE: This staff report provides an update on the ongoing capital program and capital project activities for the Regional Assets (RAs).

Please see the attached presentation covering the following:

- Capital Program Report
    - CIP Program Updates – Capacity and Regulatory Drivers
    - Repair and Replacement Program Updates
    - Building Systems Repair and Replacement Program Updates
    - Annual Repair and Replacement Program Allowance Updates

ACTION REQUESTED: No specific action required. Please provide policy-level guidance for the various activities described in this report.

Discovery Clean Water Alliance

Capital Program Report

Alliance
Board of Directors
June 20, 2025

Capital Program Report

Purpose:

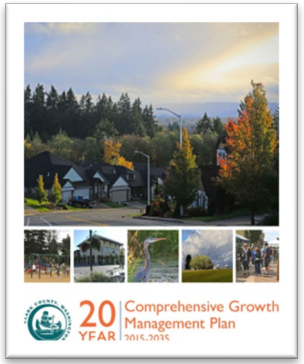
- Capital Program Update
- Downpayment for Budget Amendment for late 2025
  - Current program based on mid-2024 data
  - Intent is always no new revenue
  - Recommendations at September Meeting

Dynamic Program Environment

Capital Program Report

Dynamic Program Environment

- GMA Required Planning Updates



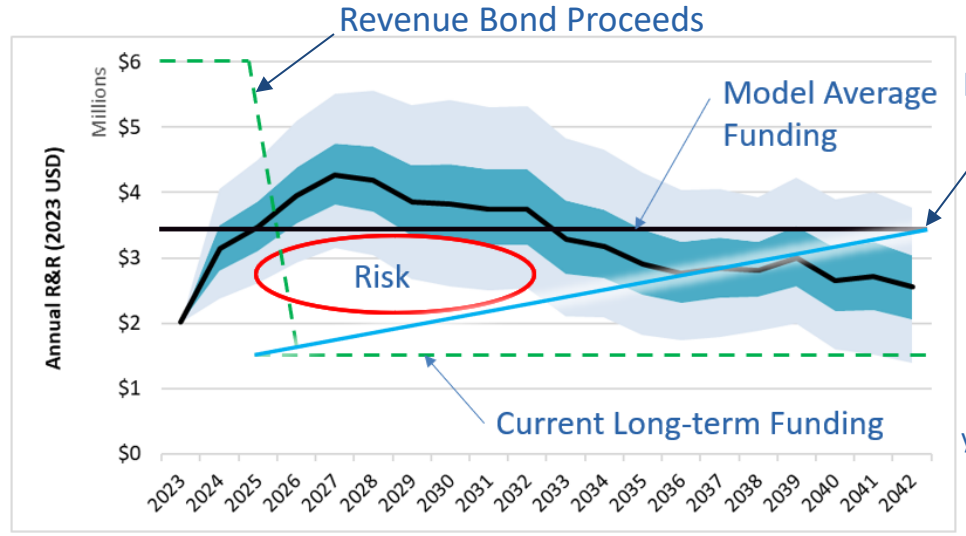
  - County Comprehensive Plan →
    - Cities Comprehensive Plan →
      - Collection System GSPs (CR & BG) →
        - Alliance GSP/Phase 6 Engineering Report

- Recommend pushing back Phase 6 related design activities

Capital Program Report

Dynamic Program Environment

- Asset Management Program in Development
  - Risk component embraced by Alliance
  - New Project Needs Being Identified
    - Typically Smaller Projects
    - Some High Priority/ On-Demand Needs



Increasing Funding over 20 years

(Alliance Board also requested 10- & 15-year options)

Probabilistic Forecast, Annual R&R ($/year)

Capital Program Report

Dynamic Program Environment

- Normal cost updates as design progresses
  - New project needs being defined
  - One project with change in scope
- Engineering Resources Limited
  - District staff transitions
  - Consultant resources limited
- Equipment Often Made Internationally
  - Evaluating potential tariff impacts
  - BABA compliant equipment
  - Potential 10-25% equipment cost increase
- Contractor Payments Lagging (L&I release, etc.)

Capital Program Report

CIP Program Updates – Capacity and Regulatory Drivers

Capital Improvement Program			Project Status Report
	Project:	SCTP Phase 5A (Outfall/Effluent Pipeline) Expansion	Construction complete/pipeline in service. Completing project documentation, staff training, permit closeout, property owner release. Some 2024 work paid in 2025.
	Project:	SCTP Phase 5B (Treatment Plant) Expansion	AB 7 recently placed into service. Site restoration occurring in June/July. Resolving warranty issues with some new equipment. Some 2024 work paid in 2025. Engineering closeout with Ecology pending final completion.
new co	*Project:*	SCTP CEPT Pilot	Work complete. Final report sent to Ecology. Some 2024 work paid in 2025.
	Project:	Alliance General Sewer Plan	Work ongoing. Slower start due to Comprehensive Planning efforts. No work booked in 2024. Will shift cash flow forward in budget amendment process.
	Project:	SCTP Phase 6 Expansion (without UV)	
		Engineering Report	Engineering Report work to follow planning update, once Phase 6 project is defined.
		Design/Permitting	Design work likely to shift to 2027, following planning updates.
	Project:	SCTP Class A Biosolids Upgrade	Design work likely to shift to 2027, following planning updates.
	Project:	RTP Secondary Treatment Process Improvements	Project complete. Engineering closeout with Ecology ongoing. More work completed in 2024 than originally budgeted.
new	*Project:*	RTP Effluent Cooling	Possible new project. Working with Ecology on terms of new discharge permit.
new	*Project:*	BG Force Main Relocation (Eaton Road Project)	Possible new project. Working with City staff to define possible scope and cost.

Legend:

- *Project Contracted*
- *Project in Final Design (60-90-100%)*
- *Project in Pre-Design (Basis of Design to 30%)*
- *Project Temporarily On Hold*

- Updated costs provided at September meeting

Capital Program Report

CIP Program Updates – Capacity and Regulatory Drivers

SCTP Phase 5A (Outfall/Effluent Pipeline) Expansion

Before

After

West across Lake River

Before

After

West of Salmon Creek

Capital Program Report

CIP Program Updates – Capacity and Regulatory Drivers

SCTP Phase 5B (Treatment Plant) Expansion

Aeration Basin 7

Capital Program Report

CIP Program Updates – Capacity and Regulatory Drivers

RTP Aeration Basin Baffles

Capital Program Report

Repair and Replacement Program Updates

Repair and Replacement Program		Project Status Report
co *Project:*	SCTP Primary Clarifier Mechanism Replacements	Carryover project to be completed in 2025, as planned.
co *Project:*	SCTP Primary Sludge Pump Replacement	Carryover project to be completed in 2025, as planned.
new co *Project:*	SCTP Network Separation	Work completed. Some work finished/billed in 2025.
new co *Project:*	SCTP Fire Alarm Replacement	Work completed. Some work finished/billed in 2025.
1 *Project:*	SCTP Dewatering Equipment Replacement	Project at 90% design. Addressing equipment selection (larger units for growth and to avoid swing shift), potential tariff impacts (equipment and steel). Some change in scope (e.g., interim dewatering system needed to complete installation). Cost being updated.
2 *Project:*	117th Street Pump Station Controls Replacement	Project on track for implementation summer/fall 2025, as planned. Schedule tight.
3 *Project:*	SCTP UV System Replacement	Project at 99% design. Applying $3M federal "earmark". Review BABA compliance options with Alliance Board and Committees.
4 *Project:*	SCTP Influent Flow Meter Replacements	Scoping project, start work in second half 2025 for 2026 implementation.
5 *Project:*	SCTP Aeration Equipment Replacement (Blowers 1-4)	Basis of Design report complete. Starting design process. Seeking $2M federal "earmark" in FY26.
6 *Project:*	SCTP Thickening Equipment Replacement	Project temporarily on hold to align with Phase 6. Start of work likely deferred to 2027.
7 *Project:*	SCTP Waste Gas Burner Replacement	Project temporarily on hold to align with Phase 6. Start of work likely deferred to 2027.
8 *Project:*	SCTP Influent Screen Replacement (Phase 6)	Project temporarily on hold to align with Phase 6. Start of work likely deferred to 2027.
9 *Project:*	SCTP Secondary Clarifier Rehabilitation	Project temporarily on hold to align with Phase 6. Start of work likely deferred to 2027.

Legend:

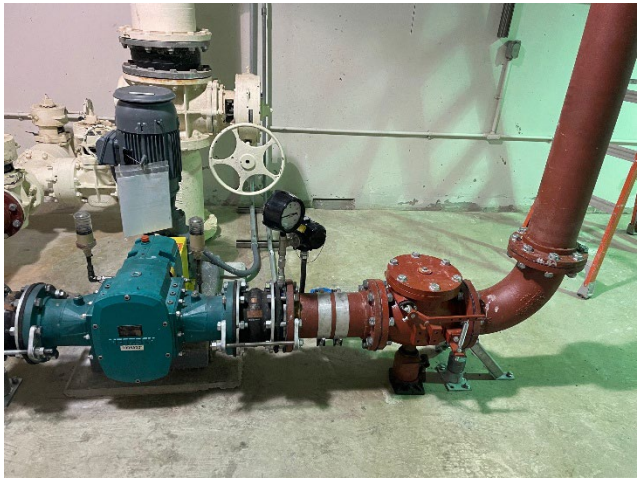
- *Project Contracted*
- *Project in Final Design (60-90-100%)*
- *Project in Pre-Design (Basis of Design to 30%)*
- *Project Temporarily On Hold*

- Updated costs provided at September meeting

Capital Program Report

Repair and Replacement Program Updates

SCTP Primary Sludge Pump Replacement



Capital Program Report

SCTP UV System Replacement Update

Work Completed:

- $3M Federal “earmark” applied to project
- EPA STAG grant application complete
- Federal purchasing policy complete
- Design 99% complete
- EPA sole source waiver granted
- District Board sole source waiver granted
- Clark County site plan and shoreline review completed

Capital Program Report

SCTP UV System Replacement Update

Work Remaining To Bid Project:

- Clark County engineering approvals (stormwater)
- EPA NEPA Review
- EPA Finalize Grant Agreement
- EPA BABA Waiver
  - UV equipment is made in London, Ontario (Canada)

Capital Program Report

SCTP UV System Replacement Update

Work Remaining To Bid Project:

- EPA BABA Waiver Steps
- Currently on Step 4

1. Waiver request package is sent to EPA HQ. May 19, 2025 | Email from EPA
2. EPA HQ reviews the request and initiates market research in an attempt to identify a BABA-compliant product.
3. If no product is identified, documentation is prepared to post for public comment.
4. EPA leadership reviews the documentation, before it is sent to the Made in America Office (MIAO), which operates out of the Office of Management and Budget, for review.
5. Once we receive clearance, the documentation is posted for a 15-day public comment period.
6. Following the public comment period, EPA reviews any comments received.
7. If no BABA-compliant products are identified through the public comment period, then a decision memo is prepared and routed for EPA leadership/MIAO review.
8. Once we receive clearance, the final waiver may be signed.

Capital Program Report

SCTP UV System Replacement Update

Decision Point:

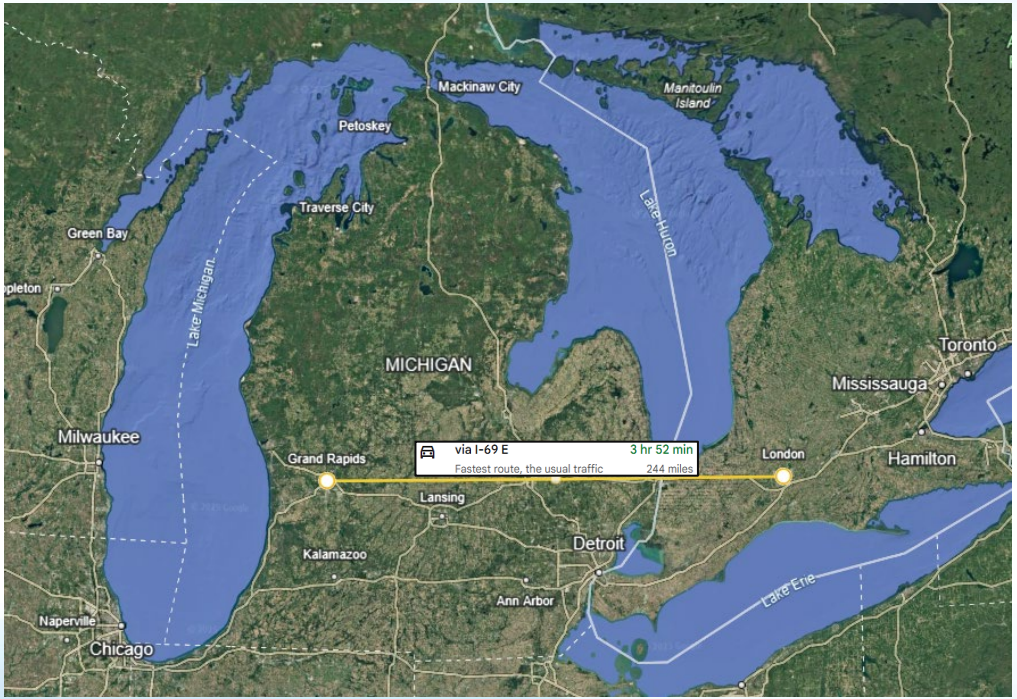
- **Option 1** – Continue to pursue BABA waiver
  - No BABA waivers approved by EPA this year
  - Risk – timing and outcome of BABA waiver unknown
  - Risk – project costs continue to escalate with construction market
  - Risk – unknown tariff costs at time equipment shipped
- **Option 2** – Trojan establishing new facility in Grand Rapids, MI
  - Indicates BABA compliant equipment production starts 1Q2026
  - Also resolves tariff risk
  - Increase in cost – $286k (domestic labor and materials)
  - Risk – QC issues with new facility?
  - BABA waiver may be impossible to attain

Capital Program Report

SCTP UV System Replacement Update

Project Team Recommendation:

- Option 2 is least risk, most predictable outcome
- Grant dollars help offset BABA compliance costs
- Need to confirm viability of domestic option



Capital Program Report

Building Systems Repair and Replacement

Program Updates

Building Systems R&R Program (Allowance)		Project Status Report
new co *Project:*	*SCTP Door R&R*	Work completed. Some work finished/billed in 2025.
new co *Project:*	*SCTP Roof R&R*	Work completed. Some work finished/billed in 2025.
Project:	*Operations Center HVAC Replacement*	VRF System endorsed by Alliance Board/Committees in 1Q 2025. Design ongoing for 2026 construction. Construction sequencing plan TBD.
Project:	*Lighting Replacement*	Work contracted. Materials being procured. Project constructed 3Q/4Q 2025. Seeking Energy Smart Credits.
Project:	*Building 10 Ceiling Repair*	Work contracted. Materials being procured. Project constructed 3Q 2025. Seeking insurance proceeds.
new co *Project:*	*SCTP Shop Overhead Door Replacement*	Work completed. Some work finished/billed in 2025.
new co *Project:*	*117th Street PS Fire Alarm System*	Work completed. Some work finished/billed in 2025.
Project:	*SCTP Snow Barriers for Metal Roofs*	New safety project. Need to define scope/approach with existing roof structures, confirm cost.
Project:	*SCTP Entrance Gate Replacement*	New project. Need planning update to define any improvements to plant entrance.
Project:	*Allowance*	Maintain small allowance for on-demand work until program is fully defined.

Legend:

- *Project Contracted*
- *Project in Final Design (60-90-100%)*
- *Project in Pre-Design (Basis of Design to 30%)*
- *Project Temporarily On Hold*

- Updated costs provided at September meeting

Capital Program Report

Annual Repair and Replacement Program

Allowance Updates

Annual R&R Allowance		Project Status Report
1 *Project:*	*SCTP Groundwater Well No. 1 Replacement*	New project. Top operational need as existing well could not be rehabilitated. Running on Well 2 now with no redundancy. Working to define scope and cost of project.
2 *Project:*	*SCTP Prelim./Primary Odor Control Imp. (recirculation)*	Priority operations project. On hold pending engineering resources and budget capacity confirmation.
3 *Project:*	*SCTP Solids Area Odor Control Imp. (prefilter)*	Priority operations project. On hold pending engineering resources and budget capacity confirmation.
Project:	*Allowance*	Maintain small allowance for on-demand work until program is fully defined.

Legend:

- *Project Contracted*
- *Project in Final Design (60-90-100%)*
- *Project in Pre-Design (Basis of Design to 30%)*
- *Project Temporarily On Hold*

- Updated costs provided at September meeting

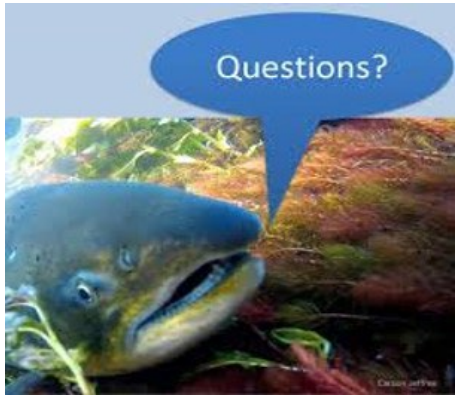
Capital Program Report

Annual Repair and Replacement Program

Allowance Updates

SCTP Groundwater Well No. 1 Replacement

Capital Program Report



John M. Peterson, P.E.

Executive Director
Discovery Clean Water Alliance

General Manager
Clark Regional Wastewater District

(360) 993-8819
jpeterson@crwwd.com

Discovery Clean Water Alliance

Staff Report

Board Meeting of June 20, 2025

6d. Treasurer Report – First Quarter 2025

STAFF CONTACTS	PHONE	EMAIL
David Logan, Alliance Treasurer	360-993-8802	dlogan@crwwd.com

PURPOSE: The goal of the Treasurer Report is to provide a quarterly update of ongoing activities in the financial and treasury areas of responsibility for the Alliance.

Please see the attached presentation covering the following:

- Financial Management / Reporting Update
  - First Quarter 2025 Financial Report
- Budget/Annual Report/Audit Update
  - 2024 Annual Comprehensive Financial Report/SAO Audit
  - 2025/2026 Budget Amendment

ACTION REQUESTED: No specific action required. Please provide policy-level guidance for the various activities described in this report.

Discovery Clean Water Alliance

Treasurer Report

Alliance
Board of Directors
June 20, 2025

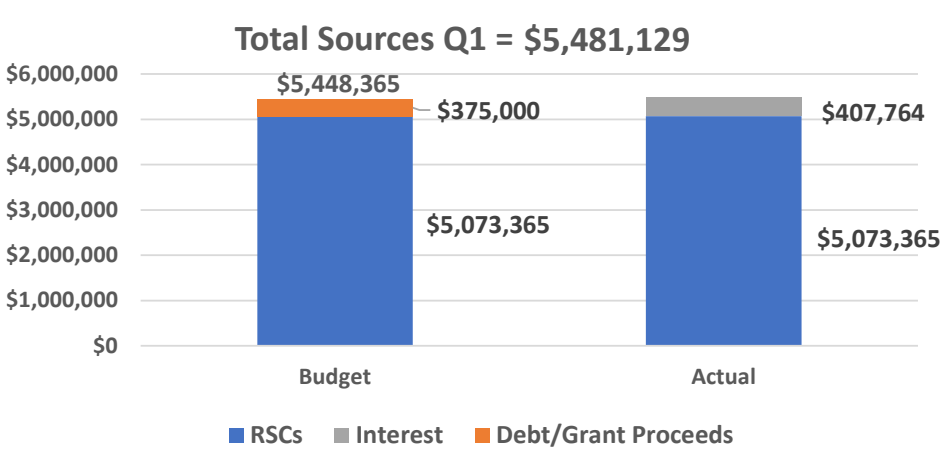
Treasurer Report

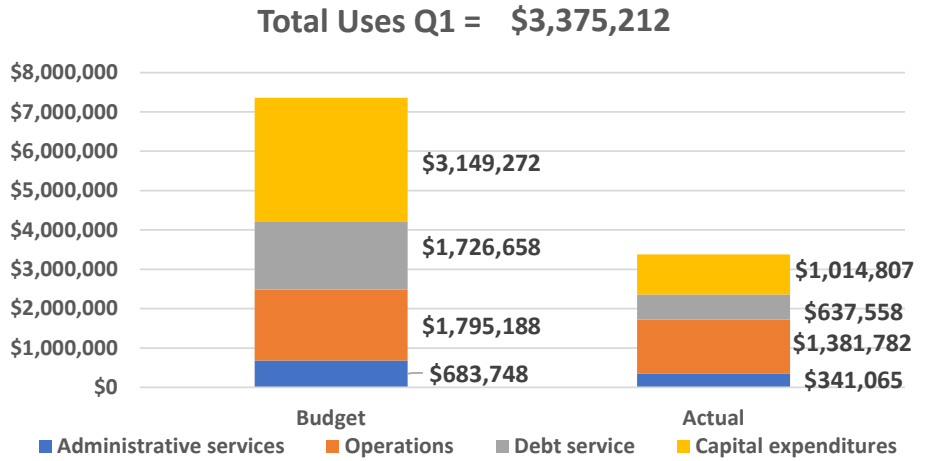
- Financial Management / Reporting Update
  - First Quarter 2025 Financial Report
- Budget/Annual Report/Audit Update
  - 2025/2026 Operating & Capital Budget Amendment Calendar

Financial Management/ Reporting Update

First Quarter 2025 Financial Report

• All Funds – Sources and Uses





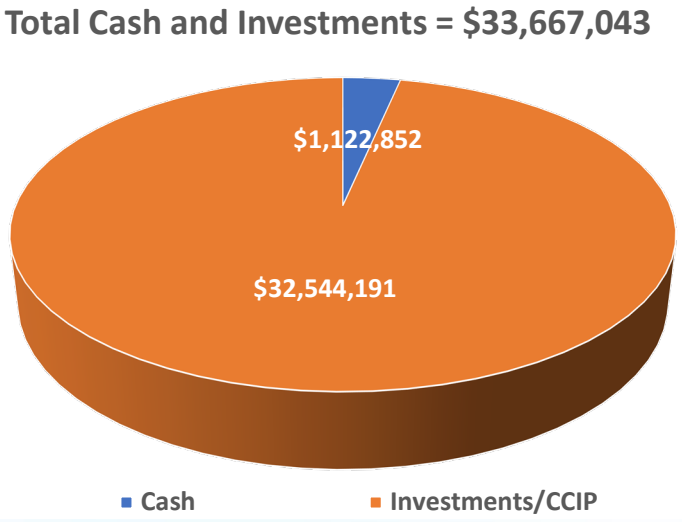
- RSCs – $5.1M; 93.1% of budget
- Interest income – $0.4M*
- Debt/grant proceeds – Budgeted $3M EPA grant

* Not formally budgeted

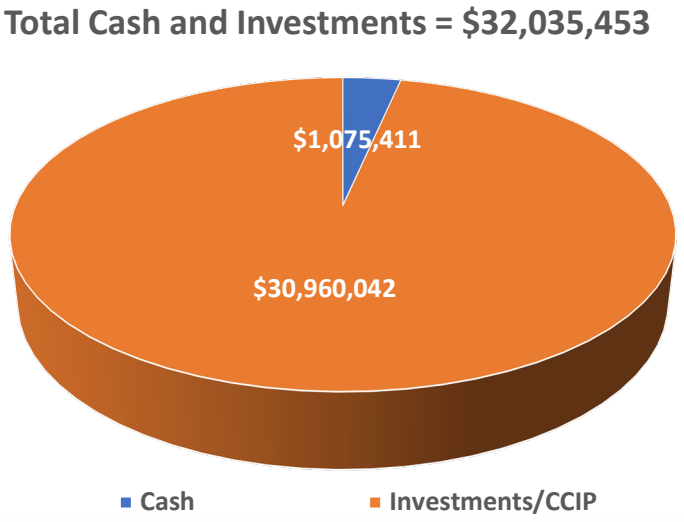
- Administrative services – $0.3M; under budget 50.1% due to unfilled Administrative Lead positions.
- Operations – $1.4M; 23.0% under budget
- Debt service – $0.6M; 63.1% under budget due to timing of debt service payments
- Capital – $1.0M; 67.8% under budget

First Quarter 2025 Financial Report

- **All Funds - Cash and Investments**



As of March 31, 2025



As of December 31, 2024

Budget / Annual Report / Audit Update

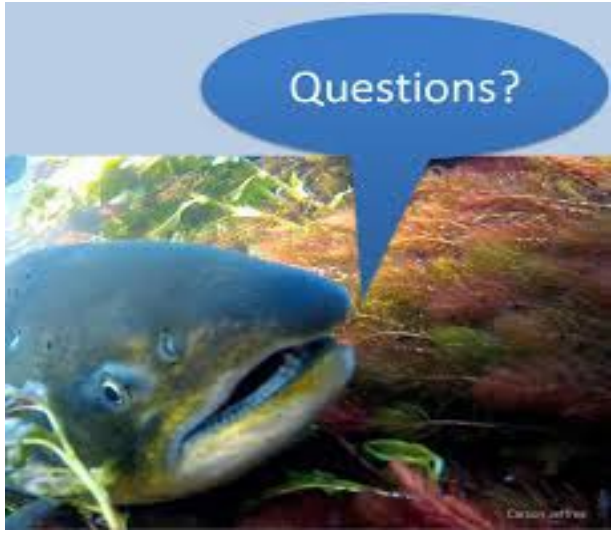
2024 Annual Comprehensive Financial Report (ACFR) and SAO Audit

- **January/February/March** – Annual Report preparation
- **March** – SAO audit began
- **May** – SAO audit field work ended; Annual Report uploaded to SAO
- **June** – Clean audit opinion: no findings, no recommendations to management; Annual Report submitted to GFOA for Certificate of Achievement award

2025/2026 Operating & Capital Budget Amendment Calendar

- June 20 – 2025-2026 Budget Amendment Process
- September 19 – Draft Operating and Capital Budget and RSCs Amendment reviewed with Board
- December 19 – Final Operating and Capital Budget and RSCs Amendment adopted by Board

Treasurer Report



David Logan
Treasurer,
Discovery Clean Water Alliance

Finance Director,
Clark Regional Wastewater District

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dlogan@crwwd.com

Discovery Clean Water Alliance

Staff Report

Board Meeting of June 20, 2025

6e. Regulatory Compliance Program Report

STAFF CONTACTS	PHONE	EMAIL
Kristen Thomas, Regulatory Compliance Manager	360-993-8833	kthomas@crwwd.com

PURPOSE: This report provides a quarterly update for the Board of Directors on Administrative Lead (AL) activities related to regulatory tracking and compliance.

Please see the attached presentation covering the following:

- Industrial Pretreatment Program
- Washington Wastewater-Based Epidemiology (WAWBE) Project
- PFAS: Federal & State Regulation
- PFAS in Biosolids: Processes and Timelines
- Permit Updates
- General Sewer Plan / Phase 6 Engineering Report

Attachments:

A. Ridgefield Treatment Plant May 23 Ecology Comment Letter

ACTION REQUESTED: No specific action required. Please provide policy-level guidance for the various activities described in this report.

Discovery Clean Water Alliance

Regulatory Compliance Program Report

Alliance
Board of Directors
June 20, 2025

Regulatory Program Report

- Industrial Pretreatment Program
- WA Wastewater-Based Epidemiology (WAWBE) Project
- PFAS: Federal & State Regulation
- PFAS in Biosolids: Processes & Timelines
- Permit Updates
- General Sewer Plan / Phase 6 Engineering Report Update

Industrial Pretreatment Program

Industrial Pretreatment Program

Industrial User (IU) Permitting & Compliance Monitoring

- All SIUs and MIUs in compliance with program requirements
- 2024 report submitted to Ecology in Q1 2025
- Annual SIU monitoring activities in Q2/Q3 2025

Fats, Oils and Grease (FOG) Program

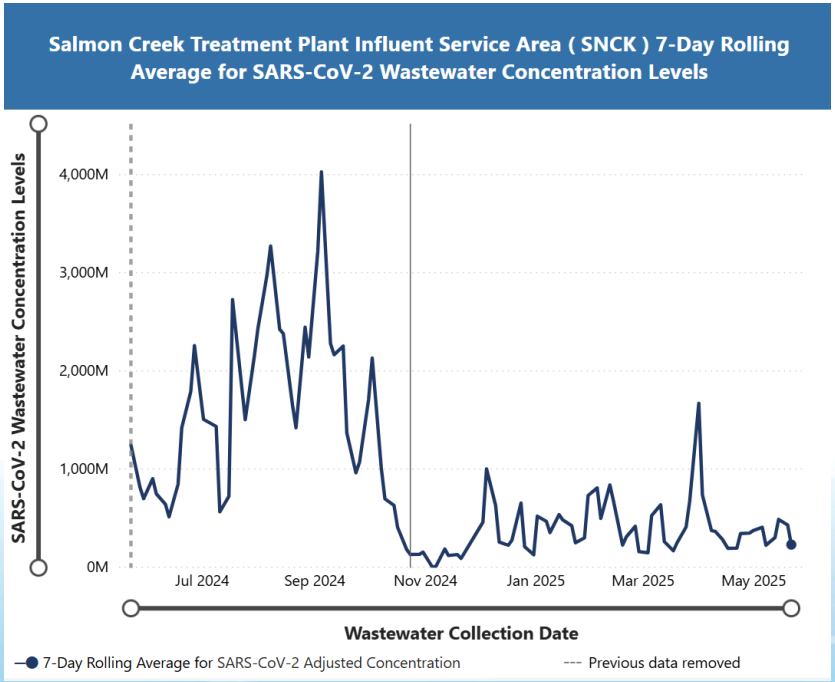
- 426 Current FOG Users (+5 from Q4 2024)
- Q1 2025 inspections:
  - 117 facility inspections
  - 99% overall compliance rate
- FOG software implementation complete; adding pretreatment module in Q3/Q4 2025

Washington Wastewater-Based Epidemiology (WAWBE) Project

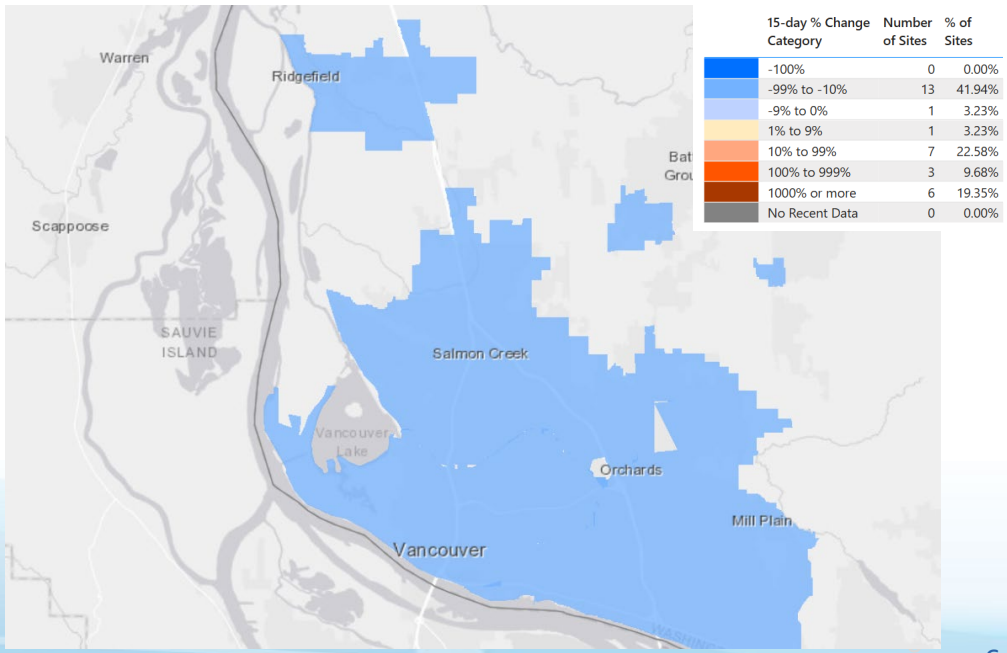
Washington Wastewater-Based Epidemiology (WAWBE) Project

- WA Dept. of Health - Monitoring for COVID-19, Influenza and RSV

SCTP Results as of 5/29/25:



Statewide trends – 15-day Percent Change:



PFAS:
Federal & State Regulation

PFAS – Federal Regulatory Efforts

New Administration – Key Priorities & Actions:

Strengthening the Science

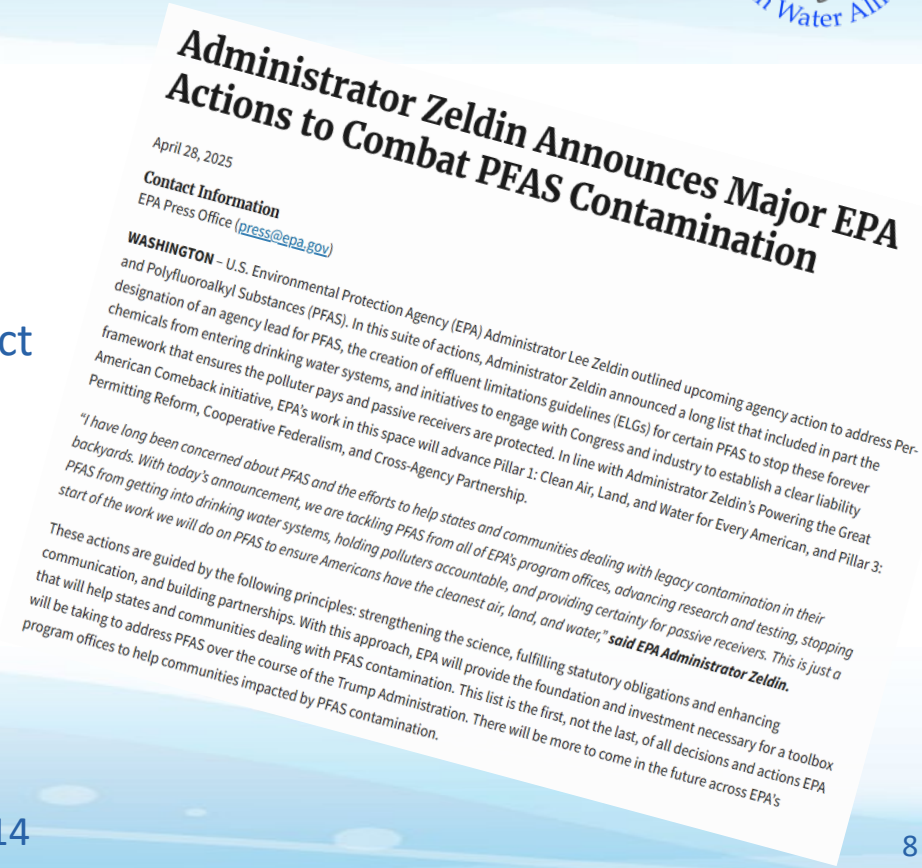
- Fill data gaps & advance technologies

Statutory Obligations & Communication

- Focus on manufacturing & sources
- Establish “polluter pays” framework & protect “passive receivers”
  - Extended timeline for compliance with DW MCLs for PFOA/PFOS; plans to rescind standards for four other PFAS compounds

Building Partnerships

- Support states’ remediation efforts
- Determine path forward for biosolids RA
  - Comment period extended through August 14



Administrator Zeldin Announces Major EPA Actions to Combat PFAS Contamination

April 28, 2025

Contact Information
EPA Press Office (press@epa.gov)

WASHINGTON – U.S. Environmental Protection Agency (EPA) Administrator Lee Zeldin outlined upcoming agency action to address Per- and Polyfluoroalkyl Substances (PFAS). In this suite of actions, Administrator Zeldin announced a long list that included in part the designation of an agency lead for PFAS, the creation of effluent limitations guidelines (ELGs) for certain PFAS to stop these forever chemicals from entering drinking water systems, and initiatives to engage with Congress and industry to establish a clear liability framework that ensures the polluter pays and passive receivers are protected. In line with Administrator Zeldin’s Powering the Great American Comeback initiative, EPA’s work in this space will advance Pillar 1: Clean Air, Land, and Water for Every American, and Pillar 3: Permitting Reform, Cooperative Federalism, and Cross-Agency Partnership.

“I have long been concerned about PFAS and the efforts to help states and communities dealing with legacy contamination in their backyards. With today’s announcement, we are tackling PFAS from all of EPA’s program offices, advancing research and testing, stopping PFAS from getting into drinking water systems, holding polluters accountable, and providing certainty for passive receivers. This is just a start of the work we will do on PFAS to ensure Americans have the cleanest air, land, and water,” ***said EPA Administrator Zeldin.***

These actions are guided by the following principles: strengthening the science, fulfilling statutory obligations and enhancing communication, and building partnerships. With this approach, EPA will provide the foundation and investment necessary for a toolbox that will help states and communities dealing with PFAS contamination. This list is the first, not the last, of all decisions and actions EPA will be taking to address PFAS over the course of the Trump Administration. There will be more to come in the future across EPA’s program offices to help communities impacted by PFAS contamination.

PFAS – Federal Regulatory Efforts

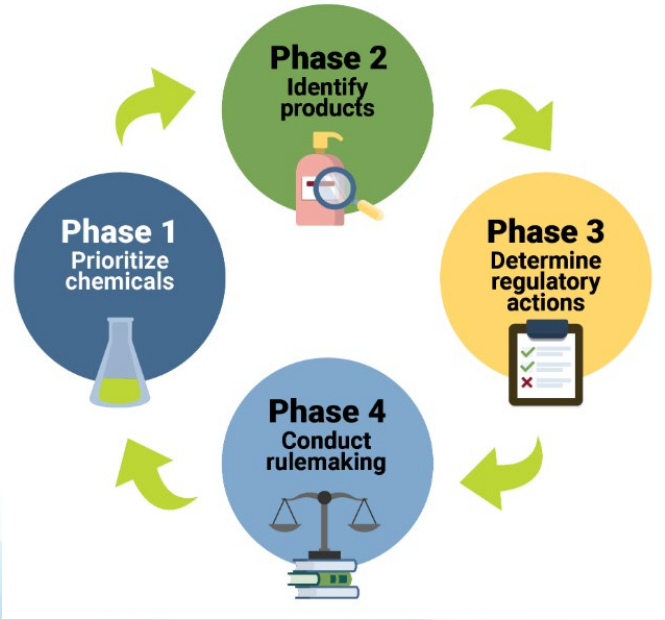
Actions in Process Under Previous Administration:

- **POTW "Influent Study"**
  - Status/timeline unclear under new administration
- **Human Health WQ Criteria**
  - Public comment extended through April 2025
- **PFAS Testing Methods (EPA 1633, 1621)**
  - Public comment through March 2025; promulgation anticipated soon
- **Resource Conservation and Recovery Act (RCRA):**
  - Proposal to list 9 PFAS as "hazardous constituents" (chemicals of concern) – pending finalization
- **CERCLA designations (hazardous substances):**
  - PFOA, PFOS designations finalized in 2024, additional PFAS designations pending
  - Continued focus on legislative exemption for utilities

PFAS – State Regulatory Efforts

Focused on source reduction & pollution prevention

- **NPDES Permit Requirements**
  - WWTP Monitoring, Pretreatment Program
- **Aquatic Life WQ Criteria (PFOA, PFOS)**
  - EPA draft recommendations adopted and in effect
- **Safer Products for WA Program**
  - Cycle 1.5 – Phase 4 Rulemaking
    - Public comment through July; final rule by Dec.
    - Firefighting PPE, apparel, cleaning products, vehicle washes/waxes
  - Cycle 2 – Phase 2 Identify Priority Products
    - Final report published June 2025
    - Packaging, cosmetics, cleaning/household products



PFAS in Biosolids: Processes & Timelines

PFAS in Biosolids: Processes & Timelines

Federal Regulatory Actions: EPA PFAS Roadmap

Biosolids Risk Assessment for PFOA/PFOS:

- Public comment extended through August 14
  - Identified as a key action by EPA administrator
- RA model and findings:
  - Focused on hypothetic scenarios for specific populations (i.e. “farm family”)
  - Does not assess risk to general public or other exposure pathways
  - Suggests there may be human health risks exceeding EPA thresholds in some scenarios
  - Does not include risk management
- Next steps:
  - “Determine path forward based on comments” per EPA press release

Risk Assessment – Conceptual Model

Source: EPA Webinar Slides, https://www.epa.gov/system/files/documents/2025-01/draft-ra-public-webinar-slides.pdf

PFAS in Biosolids: Processes & Timelines

State Regulatory Actions: Biosolids General Permit

- Reissued permit has been appealed
  - PCHB hearing set for September 2025
- Permit remains in effect while under appeal
- Application for Coverage submitted to Ecology for SCTP


Statewide General Permit for Biosolids Management

Issued: January 2, 2025
Effective: February 1, 2025
Expires: January 31, 2030

DEPARTMENT OF ECOLOGY
State of Washington

Peter Y. Lyon, Program Manager

January 2, 2025

Solid Waste Program
Washington State Department of Ecology
January 2025
Publication 25-07-001

PFAS in Biosolids: Processes & Timelines

Other State Actions: Ecology PFAS Study

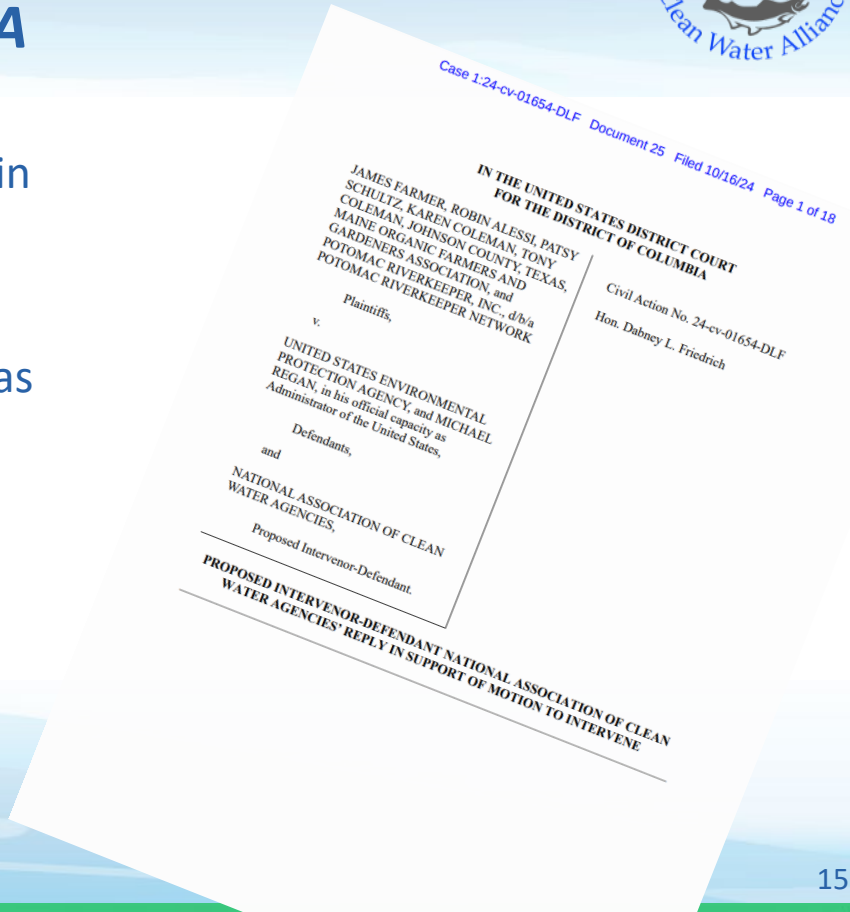
- **Purpose:**
  - WA Chemical Action Plan (CAP) Recommendation
  - Response to proposed WA legislation (2023-2024)
- **Goal:** Assess levels of PFAS in WA biosolids
- **Results:**
  - SCTP results appear typical for municipal biosolids
    - PFOA/PFOS results meet “no action” standard per Michigan Interim Strategy
- **Next steps:**
  - ECY to publish final report (timeline TBD)
  - SSB 5033 implementation
    - ECY guidance by 2026, sampling requirements for utilities in 2027-2028
  - Additional sampling at SCTP to support planning effort

ECY Staff collecting SCTP biosolids sample

PFAS in Biosolids: Processes & Timelines

Legal Actions: *Farmer et al. v. US EPA*

- Federal lawsuit seeks to force PFAS regulation in biosolids, bypassing rulemaking process and public input
- NACWA & EPA filed motion to dismiss; court has not yet ruled


Case 1:24-cv-01654-DLF Document 25 Filed 10/16/24 Page 1 of 18

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA

JAMES FARMER, ROBIN ALESSI, PATSY SCHULTZ, KAREN COLEMAN, TONY COLEMAN, JOHNSON COUNTY, TEXAS, MAINE ORGANIC FARMERS AND GARDENERS ASSOCIATION, and POTOMAC RIVERKEEPER, INC., d/b/a POTOMAC RIVERKEEPER NETWORK

Plaintiffs,

v.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, and MICHAEL REGAN, in his official capacity as Administrator of the United States,

Defendants,

and

NATIONAL ASSOCIATION OF CLEAN WATER AGENCIES,

Proposed Intervenor-Defendant.

Civil Action No. 24-cv-01654-DLF

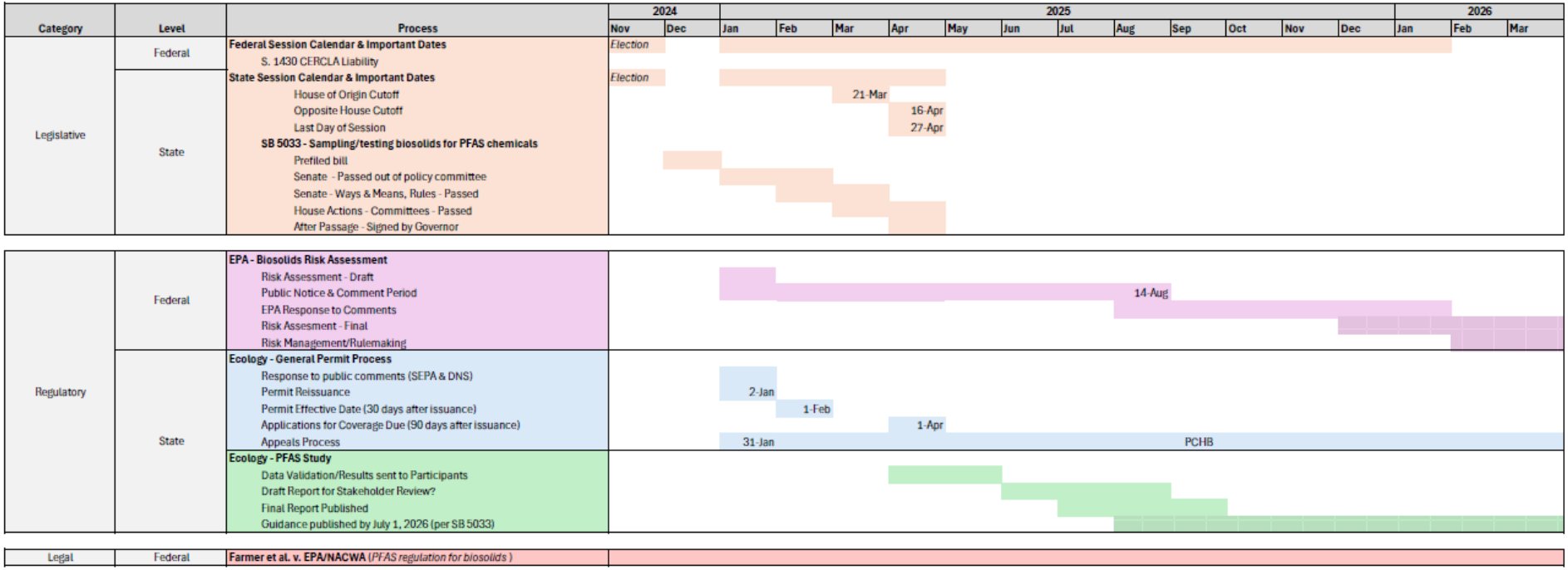
Hon. Dabney L. Friedrich

PROPOSED INTERVENOR-DEFENDANT NATIONAL ASSOCIATION OF CLEAN WATER AGENCIES' REPLY IN SUPPORT OF MOTION TO INTERVENE

Biosolids Processes and Timelines

BIOSOLIDS PROCESSES AND TIMELINES

UPDATED 6/3/25

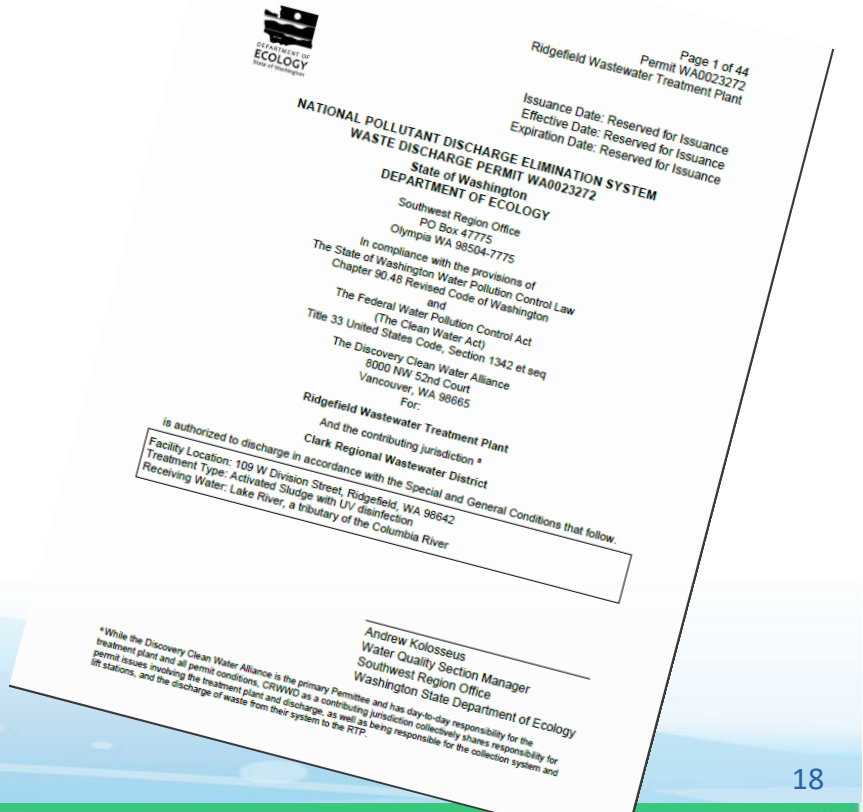


Permit Updates

Permit Updates

National Pollutant Discharge Elimination System (NPDES) Permits

- **Ridgefield WWTP:**
  - Ecology issued draft permit for entity review
    - Proposed new requirements
      - Temperature effluent limit (24°C)
      - Additional monitoring parameters
    - Comments submitted in May (attached)
  - Public comment period in June/July
  - Permit reissuance anticipated in Q3 2025
- **City of Vancouver – Westside WWTP**
  - CRWWD named on permit for collection system flows (contributing jurisdiction)
  - Draft permit in development



DEPARTMENT OF ECOLOGY

Page 1 of 44
Permit WA0023272
Ridgefield Wastewater Treatment Plant

Issuance Date: Reserved for Issuance
Effective Date: Reserved for Issuance
Expiration Date: Reserved for Issuance

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
WASTE DISCHARGE PERMIT WA0023272
State of Washington
DEPARTMENT OF ECOLOGY

Southwest Region Office
PO Box 47775
Olympia WA 98504-7775

In compliance with the provisions of
The State of Washington Water Pollution Control Law
Chapter 90.48 Revised Code of Washington
and
The Federal Water Pollution Control Act
(The Clean Water Act)
Title 33 United States Code, Section 1342 et seq

The Discovery Clean Water Alliance
8000 NW 52nd Court
Vancouver, WA 98665
For:

Ridgefield Wastewater Treatment Plant
And the contributing jurisdiction *
Clark Regional Wastewater District

is authorized to discharge in accordance with the Special and General Conditions that follow.

Facility Location: 109 W Division Street, Ridgefield, WA 98642
Treatment Type: Activated Sludge with UV disinfection
Receiving Water: Lake River, a tributary of the Columbia River

Andrew Kolosseus
Water Quality Section Manager
Southwest Region Office
Washington State Department of Ecology

*While the Discovery Clean Water Alliance is the primary Permittee and has day-to-day responsibility for the treatment plant and all permit conditions, CRWWD as a contributing jurisdiction collectively shares responsibility for permit issues involving the treatment plant and discharge, as well as being responsible for the collection system and lift stations, and the discharge of waste from their system to the RTP.

General Sewer Plan / Phase 6 Engineering Report Update

General Sewer Plan / Phase 6 Engineering Report Update

Initial work in process:

- **Flow and load modeling**
  - Informed by Battle Ground & District projections (County Comp Plan process)
  - Evaluating capacity of Battle Ground's EQ Basin and force main (align with City GSP update)
- **Solids management – alternatives evaluation**
  - Consideration of treatment technologies and end use products (market analysis)
  - Site tours in Q1/Q2 2025
- **Community Values Survey**
  - Launched in May; currently evaluating responses
  - Results will inform decision making, selection criteria

Picnic Point WWTP (Alderwood Water & Wastewater District)

General Sewer Plan / Phase 6 Engineering Report Update

Key Decisions & Outcomes:

- Battle Ground Transmission – alternatives & timing
- Biosolids Program – solids management options
- Digester gas – energy efficiencies & reuse
- Ridgefield Treatment Plant Decommissioning

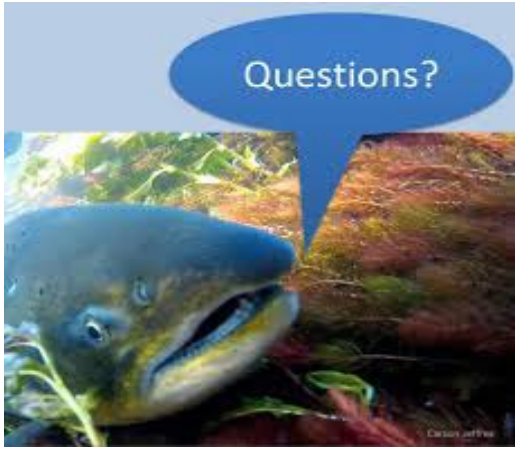
Next Steps/Upcoming work:

- Process modeling – ongoing
  - Coordination with District & Battle Ground GSP
- Public Outreach & Engagement
  - Evaluate survey results & develop decision criteria
  - Additional communication tools to be developed as project moves forward
- Develop decision model for complex evaluations
- Review & evaluate solids treatment options

Chambers Creek WWTP (Pierce Co.)

Picnic Point WWTP (Alderwood Water & Wastewater District)

Regulatory Program Report



Kristen Thomas
Regulatory Compliance Manager
Clark Regional Wastewater District

(360) 993-8833
kthomas@crwwd.com

Attachment A

Discovery Clean Water Alliance

8000 NE 52nd Court
Vancouver, WA 98665
360.993.8823
www.DiscoveryCWA.org

May 23, 2025

Via Email

Alisha Mckittrick
Department of Ecology
Southwest Region Office – WQ
PO Box 47775
Olympia, WA 98504-7775
alisha.mckittrick@ecy.wa.gov

RE: Entity Review Comments for Ridgefield Treatment Plant National Pollutant Discharge Elimination System (NPDES) Draft Permit No. WA0023272 and Fact Sheet

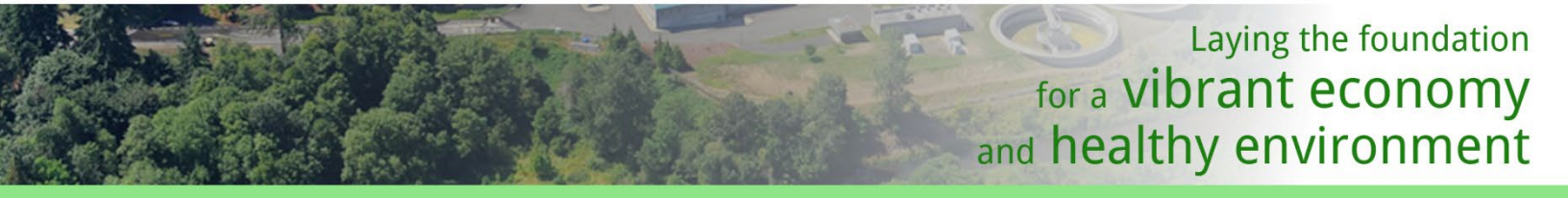
Dear Ms. Mckittrick:

Thank you for the opportunity to review and provide comments on the draft Permit and Fact Sheet for the Ridgefield Treatment Plant (RTP). Enclosed you will find specific comments on both documents, as requested, which have been developed by our technical consultants at Jacobs and District staff.

To facilitate Ecology's consideration of our detailed comments, I offer these higher-level perspectives and concerns. Please include this letter as part of our comments, which are provided in the context of my responsibilities as the Executive Director for the Discovery Clean Water Alliance (Alliance) and the General Manager for the Clark Regional Wastewater District (District).

The Alliance and District take very seriously the responsibility to protect public health and the environment. As clean water professionals, our staff will always strive for 100% compliance with any NPDES Permit requirement as a core part of our mission and practice. The draft Permit has caused significant concern for me, the District, and the Alliance because, for the first time, it includes a new maximum daily effluent limit for temperature that was completely unexpected. Because this requirement was never previously communicated to us as a possible Permit requirement in our regular conversations with Ecology, this proposed requirement is alarming. Of particular concern is the fact that the facility has never been designed for and does not have any control mechanisms to influence effluent temperature. Based on actual facility temperature data, the Permit, as written, will put the facility in *immediate non-compliance* with temperature limit during the summer months with no ability to meet that Permit requirement.

While we share Ecology's concerns for the water quality of Lake River, as you must understand, permittees cannot be placed in jeopardy for non-compliance with Permit requirements that they cannot control.



Consequently, we ask that Ecology consider the following relevant facts and re-evaluate the proposed temperature limit in the Permit:

- *Redirection of Collection System Limiting Overall Discharge to Lake River*. The District is pursuing a long-term objective to redirect the Ridgefield collection system to send flows to the Salmon Creek Treatment Plant (SCTP) with plans to decommission the RTP and the associated discharge to Lake River. This plan is outlined in *Clark Regional Wastewater District Comprehensive General Sewer Plan, 2017*, previously submitted to Ecology (see specifically Section 10.1.3 Ridgefield Flow Diversion Plan with 8 total phases, of which 4 are complete and phases 5 & 6 are in design). The District has made substantial progress toward this goal at the cost of many tens of millions of dollars, with approximately 68% of the Ridgefield service area currently flowing to SCTP. This means that only a small portion of Ridgefield still flows to the RTP, which means that there are low flows and low heat loads in the critical summer months. This progress in reducing flows and the corresponding benefits to Lake River do not appear to be reflected in the Fact Sheet narrative and Permit temperature limit and should be considered as part of the evaluation process.

- *Ecology Guidance on Evaluation of Discharges to Impaired Streams*. Please see our detailed Permit comments citing specific Ecology guidance on how to evaluate discharges to impaired streams, which include options that do not require effluent limits when (a) the discharge represents a very small proportion of the receiving stream flows and (b) the effect of the discharge is below an allowable 0.3 degrees C increase. Both situations apply here and should be evaluated and explained in the Fact Sheet. Given the substantial progress removing effluent discharged to Lake River, the negligible impact on Lake River allowed by these provisions is a reasonable consideration. This is especially important in the context of the RTP discharge being so close to the Lake River mouth and connection with the Columbia River. Applying the relevant Ecology guidance establishes that no temperature limit is required. Any efforts to engineer, construct, and operate facilities that would further cool the effluent (which would be required to comply with a potential temperature limit) will not provide any meaningful benefit to Lake River in the short distance between the discharge and the Columbia River. Upstream issues affecting the overall health of Lake River will remain unaddressed.

- *Seriousness of Non-Compliance*. We appreciate the verbal assurances provided to our staff that Ecology would exercise judgment and enforcement discretion in addressing the Permit violations that would be the inevitable consequence of retaining a temperature limit in the Permit. Unfortunately, these assurances provide no protection for the Alliance and District against third-party lawsuits for non-compliance. It is simply not reasonable to issue a permit with a requirement that the permittee has no chance of meeting. To the extent Ecology insists on imposing a temperature limit (it should not), then it should be calculated at the 99th percentile to minimize the risk of liability for violations – especially when the District has no ability to control the temperature of the effluent.

The remainder of our comments are identified and explained in the attached document. In summary, we request Ecology reconsider the basis of the proposed temperature limit and remove it from the Permit. A much more valuable use of public resources would be for the District to continue to make progress

eliminating this discharge to Lake River rather than investing in effluent cooling technologies that would be required for reliable Permit compliance. Compelling the District to invest significant public funds to install cooling technologies now – when it has plans to entirely eliminate the discharge – would impose a significant cost to the ratepayers without any real benefit to Lake River. And, to install cooling technologies, the District would have to divert resources away from its efforts to remove the discharge from Lake River, which is presumably a result that Ecology does not intend.

If you have any questions, would like to discuss, or need additional information, please feel free to contact me via email at jpeterson@crwwd.com or by telephone at (360) 993-8819.

Sincerely,

John M. Peterson, P.E.
Executive Director
Discovery Clean Water Alliance

General Manager
Clark Regional Wastewater District

Enclosures: Entity Review Comments – Permit and Fact Sheet, with attachments

CC: Ellie Ott (WA Department of Ecology)
Bolun Wang (WA Department of Ecology)
Kristen Thomas (District Regulatory Compliance Manager)
Matt Jenkins (District Wastewater Operations Manager)

Permit Comments

Comment No.	Page/Section	Comment	Proposed Change
1	Table 2 - Effluent limits (page 5)	The previously established fecal coliform limits that are retained here are a water quality-based limit according to the previous (2003) fact sheet, but the water quality criteria for fecal coliform bacteria are expired, so the basis for these limits as retained is not clear. The updated water quality criteria is new information that was not available when the previous limits were established, and replacement of the previous limits with the TBELs for fecal coliform bacteria under WAC 173-221 is allowable under the antibacksliding provisions of the Clean Water Act.	Update Table 2 with the TBELs for fecal coliform bacteria: 200/100 ml for monthly and 400/100 ml for weekly.
2	Table 2 - Effluent limits (page 5)	Total Ammonia parameter should be labeled as "Total Ammonia as N"	Update text to "Total Ammonia as N".
3	Table 2 - Effluent limits (page 5)	**Magnitude of discharge.** The discharge represents a very small proportion of the receiving water (<0.5 %) at critical conditions and should not require a temperature limit, according to the following Ecology guidance document cited in Chapter 6, Section 3.2.6.1 of the 2018 Permit Writer's Manual (see Attachment 1): *Water Quality Program Guidance Manual Procedures to Implement the State's Temperature Standards through NPDES Permits, Publication no. 06-10-100, October 2010* . This logic, as shown in Figure 2.1 (see Attachment 2), is that if the discharge is not significant enough to require a reasonable potential determination, no temperature limit is required. Maximum effluent flow = 0.7 MGD (1.1 cfs) Lake River 7Q10 = 400 cfs 1.1 cfs / 400 cfs = 0.275% The calculation above shows the discharge is a very small proportion of the receiving water. Under actual current conditions, effluent flows during the dry season are even lower than 0.7 MGD. These facts support eliminating the temperature limit from the permit because the discharge is not significant enough to require a reasonable potential analysis and, consequently, no temperature limit is required or appropriate.	Remove the maximum daily temperature limit from the permit.
4	Table 2 - Effluent limits (page 5)	**Allowable temperature increase.** The change in temperature at the edge of the mixing zone under a conservative calculation is also well below the allowed 0.3 deg C increase allowed prior to a TMDL regardless of background temperature, based on the following guidance cited in the 2018 Permit Writer's Manual: Section 4.A.1 (see Attachment 3), *Water Quality Program Guidance Manual Procedures to Implement the State's Temperature Standards through NPDES Permits,* Publication no. 06-10-100, October 2010. (Te-Tc)/Dilution (Te = 95th% effluent temp, Tc= temp criterion) For Ridgefield: Te=24.0 deg C and the criterion=17.5 deg C Change in temperature at edge of MZ = (24.0-17.5)/42.1 = 0.15 deg C. This is half of the allowable value of 0.3 deg C, even with a conservative dilution factor that does not account for the lower effluent flows currently being discharged due to the ongoing process of preparing for decommissioning the Ridgefield WWTP. This assessment (0.3 deg C human warming allowance) is consistent with the cited Ecology temperature implementation guidance (2010) as well as the current NPDES permits for the Willapa Regional WWTP (March 2025) and the Kittitas POTW (February 2024).	Remove the maximum daily temperature limit from the permit, consistent with the methodology applied in other recently received permit.
5	Table 2 - Effluent limits (page 5)	**Compliance.** The proposed performance-based effluent temperature limit of 24.0 deg C (95th percentile) would immediately put the District out of compliance 5% of the time (by definition), which is estimated to be 10-20 times per year based on past continuous monitoring data. A performance-based maximum daily effluent temperature limit of 25.0 deg C (existing 99th percentile) is more consistent with the intent of a performance-based limit (to ensure the pollutant does not increase further) and would allow more reliable compliance (fewer than 10 exceedances expected per year, based on past continuous monitoring data).	Remove the maximum daily temperature limit from the permit. If a maximum daily temperature limit must remain, it should be based on the 99th percentile effluent temperature (25.0 deg C).
6	Table 2 - Effluent limits (page 5)	A maximum daily effluent limit of 4.4 mg/L ammonia-N is allowable to protect against exceedances of the aquatic life criteria at the edge of the mixing zone boundary. The receiving water is not limited for ammonia and the current limit of 3.14 mg/L was based on outdated dilution factors. Adjusting to a new maximum daily effluent limit of 4.4 mg/L is consistent with the CWA (refer to Fact Sheet comment 10).	Update the maximum daily effluent ammonia limit to 4.4 mg/L in Table 2.

Permit Comments

Comment No.	Page/Section	Comment	Proposed Change
7	Table 5 - Final wastewater effluent	Monthly CBOD monitoring is not necessary to refine the DO sag analysis for a future potential permit renewal. The existing DO sag analysis (Streeter-Phelps calculations) applied a conservative assumption for effluent CBOD of 40 mg/L, which exceeds the permitted effluent BOD concentration of 30 mg/L. In addition, the Streeter-Phelps assessment predicted the critical DO depression occurs 18 miles downstream. The outfall is only 2 miles upstream from the mouth of the Columbia River. This analysis did not take into account the dilution that occurs within the Columbia River. This further demonstrates this assessment is extremely conservative. Therefore, there is no benefit to requiring CBOD monitoring to be used for a future DO analysis.	Remove the monthly CBOD monitoring requirements from the permit.
8	Table 5 - Final wastewater effluent	pH, monitoring frequency should be daily and sample type should be grab (not composite)	The pH monitoring frequency should be daily and sample type should be grab (not composite).
9	Table 5 - Final wastewater effluent	The RTP has worked diligently to ensure effluent alkalinity remains above standards, including process upgrades to the Mixed Liquor Recycle (MLR) Systems. The basis for requiring additional alkalinity monitoring is not addressed in the Fact Sheet.	Remove the requirement for alkalinity monitoring or provide the basis for this monitoring requirement in the Fact Sheet.
10	Table 5 - Final wastewater effluent	Change sample type for Temperature from "Measurement" to "Metered/recorded"	Change sample type for Temperature from "Measurement" to "Metered/recorded".
11	S2.C. Flow measurement, field measurement, and continuous monitoring devices	RTP does not use chlorine as a disinfection method.	Remove the following text: " c. Must calibrate continuous chlorine measurement instruments using a grab sample analyzed in the laboratory within 15 minutes of sampling. "
12	S4.E Infiltration and Inflow Evaluation	Depending on the timeline for decommissioning the plant, this permit condition may become moot and result in effort ultimately not needed for another permit renewal.	Remove the requirement for an I/I evaluation from the permit.
13	References	Several of the references listed are not cited in the permit including: Donneker, et al., Ecology (2021), Frick et al., Kilpatrick et al., and Wilson et al.	Remove the references that are not cited in the permit.

- Lethality to developing fish embryos can be expected to occur at a 1-DMax temperature greater than 17.5°C (63.5°F).
- To protect aquatic organisms, discharge plume temperatures must be maintained such that fish could not be entrained (based on plume time of travel) for more than two seconds at temperatures above 33°C (91.4°F) to avoid creating areas that will cause near instantaneous lethality.

3.2.6.1 Determining Reasonable Potential for Temperature

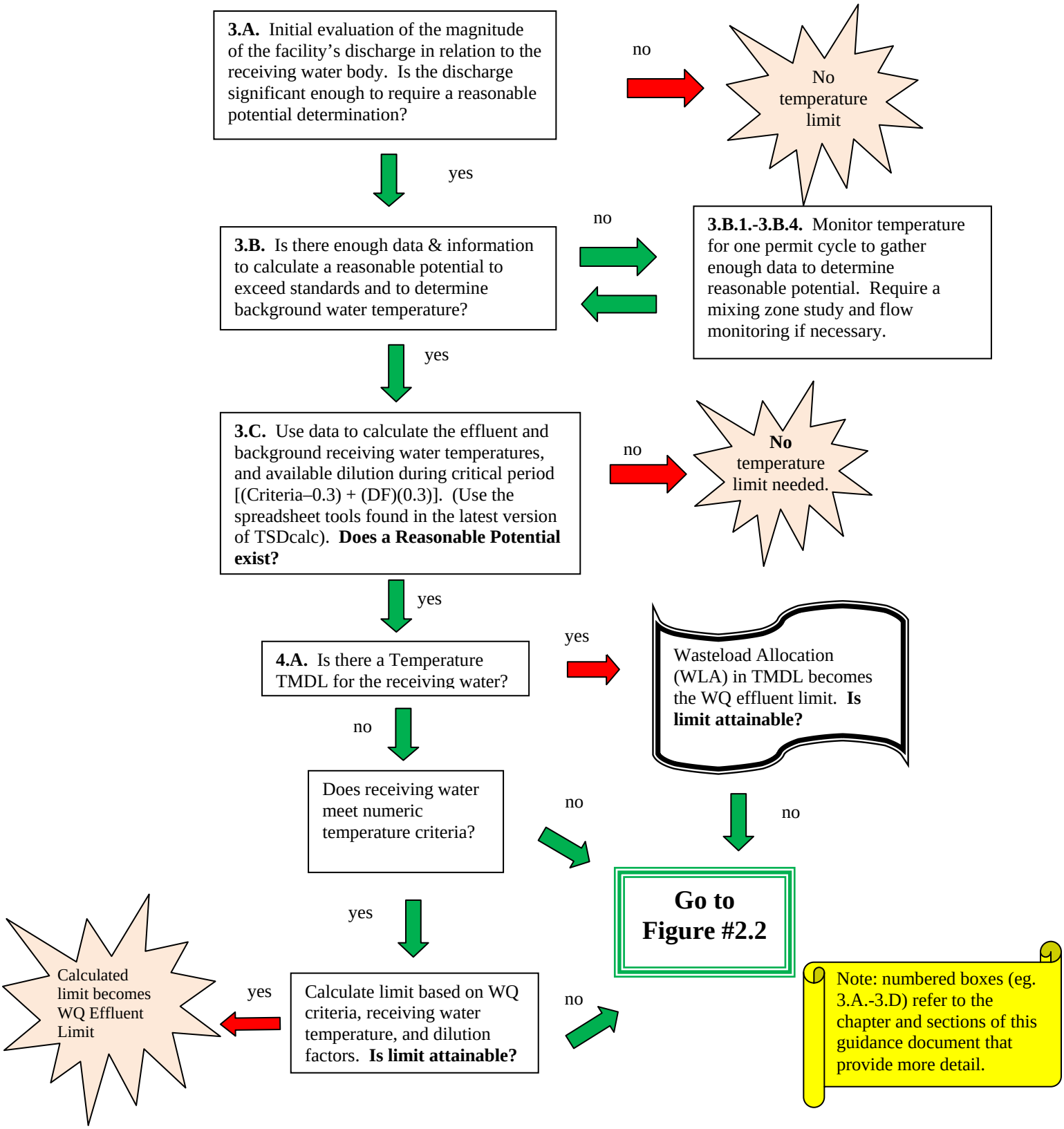
Permit writers should first determine if an applicable temperature TMDL has been approved, or is in development, before conducting reasonable potential analysis. If an approved TMDL exists, reasonable potential does not need to be established. WLAs in the TMDL must be used to determine appropriate water quality-based effluent limits.

The process of determining reasonable potential is similar to other pollutants except no transformation or prediction of the 95th percentile is required. Figure 21 below illustrates the administrative process. PermitCalc contains spreadsheets for determining reasonable potential and effluent limits for temperature, when required. A companion document explaining temperature implementation is available on the Water Quality web site (Ecology Publication 06-10-100).

Guidance for permittees to conduct temperature sampling and a model QAPP are available.

Permit writers should realize that in cases where dilution factors are approximately six or less, an effluent limit derived for the critical mid-summer or supplemental period may cause a slight exceedance of the incremental allowance during the winter time. This probability of exceedance depends on changes in dilution factor and effluent temperature from summer to winter. The incremental restriction was formulated to prevent a change of temperature regime in situations where the ambient temperature was well below the criteria. An incremental rise of 1 or 2 degrees Celsius is well within the normal daily fluctuation in mid-winter and will not cause a change in the temperature regime.

Figure 2.1
Setting temperature WQ-based effluent limits in permits



- The relative contribution of the point source in relation to natural conditions.
- The relative nonpoint source contributions to the temperature impairment.
- Site-specific conditions at the facility that limit available control technologies.

4.A. When receiving water exceeds the temperature criteria

When a water body does not meet its assigned temperature criteria, the water is considered impaired and a total maximum daily load (TMDL) analysis is required. The TMDL assigns warming allowances to all human sources of warming in the watershed. These load allocations are designed to bring the water body into compliance with the temperature standards. Approved TMDLs will include wasteload allocations (WLA) for the existing point source discharges. The WLA becomes the basis for setting the water quality effluent limit in the permit.

Where documented data indicates that the receiving water background temperature at the point of discharge during critical conditions *does not meet the aquatic life temperature criteria and a TMDL has not been completed*, the permit writer should verify if the receiving water is listed on the 303(d) list: (http://www.ecy.wa.gov/programs/wq/303d/index.html).

If the receiving water is not on the 303(d) list, the permit writer should review the data to determine if it meets the criteria for 303(d) listing (see the WQ Policy 1-11 at: http://www.ecy.wa.gov/programs/wq/303d/wqp01-11-ch1Final2006.pdf). Staff in the Watershed Management Section who work on the Water Quality Assessment and 303(d) list are available to help if needed (email requests can be sent to 303d@ecy.wa.gov).

The permit writer should ensure that ambient receiving water data received from dischargers that meets the 303(d) listing criteria is placed in EIM for Watershed Management Section staff to use in the next Water Quality Assessment. If you have facility continuous temperature monitoring data or other receiving water data to add to EIM contact the 303(d) Coordinator in the Watershed Management Section by phone or email at 303d@ecy.wa.gov. Ecology will subsequently place the water body segment on the 303(d) list and prioritize it for a TMDL.

4.A.1. Setting effluent limits prior to completion of TMDL

In many cases, permit writers can establish final effluent limits that meet the applicable numeric temperature standards for point sources prior to completing a TMDL. However, in situations where the discharge cannot attain effluent limits and the receiving water does not meet numeric limits, the permit manager should apply interim performance-based limits while awaiting the outcome of a TMDL. This is especially appropriate where Ecology is conducting TMDLs for multiple source and additional parameters, and the combined results may better dictate the significance of the point source to the problem and the best course of action to bring the water body into compliance with the standards.

If the water body is on the 303(d) list or if the data indicates Ecology will place the water body on the next 303(d) list, the permit writer should develop and place in the permit interim performance-based limits that allow no increase in thermal loading. This approach is supported by EPA Region 10 temperature guidance to Pacific Northwest states and tribes, which states that

numeric criteria end-of-pipe effluent limits for temperature may not be necessary to meet applicable standards and protect salmonids in impaired waters. This is because the temperature effects from point source discharges generally diminish downstream quickly as heat is added and removed from a water body through natural equilibrium processes. See "EPA Region 10 Guidance for Pacific Northwest State and Tribal Temperature Water Quality Standards, 2003" at http://yosemite.epa.gov/R10/water.nsf/6cb1a1df2c49e4968825688200712cb7/b3f932e58e2f3b9488256d16007d3bca/$FILE/TempGuidanceEPAFinal.pdf.

Permit writers may issue permits prior to a TMDL that are based on a human warming allowance. *Prior to a TMDL, each point source may warm the receiving water at the edge of a mixing zone (i.e., 25% flow or 300 feet) by 0.3°C.* This is true regardless of the background temperature and even if doing so would cause the temperature at the edge of a mixing zone to exceed the numeric threshold criteria. Allowing a 0.3°C warming for each point source is reasonable and protective where the dilution factor is based on 25 percent or less of the critical flow. This is because the fully mixed effect on temperature is only a fraction (0.075°C or less) of the 0.3°C cumulative allowance for all human sources combined. A compliance schedule is not needed until Ecology completes the TMDL and establishes the natural system potential and wasteload allocations.

4.A.2. Setting performance-based interim limits

If performance-based interim limits are used, permit writers should establish both monthly average and maximum daily average temperature limits performance-based limits consistent with guidance in the permit writer's manual (Chapter IV). Formulas to derive performance limits are incorporated into PERFORMLIM in TSDCALC11.XLW (PERFORMLIM assumes the data is non-normally distributed.) Where the data are normally distributed, the permit writer can calculate the z-score for the percentile of the standardized normal distribution and apply it directly. (See Appendix E of the EPA TSD, 1991.)

Permit writers may use a performance-based interim limit while necessary monitoring and engineering studies are conducted. Where cost-effective remedies are linked to watershed-wide programs (e.g., trading), permit writers may continue to use an interim limit until a TMDL is developed.

Ecology cannot issue interim limits for new dischargers. Effluent limits for new discharges must meet both technology and water quality-based requirements when the discharge begins. New discharges to waters not meeting temperature criteria are allowed only if they are: (1) incorporated under a future reserve allocation of an established TMDL, or (2) if the effluent temperature would be no warmer than the conservative screening analysis described in Chapter 3.A: (Threshold Criteria - 0.3) + (Dilution Factor)(0.3).

Ecology cannot issue a permit to a new discharger if it will cause or contribute to the violation of water quality standards. It must limit conservative parameters to the water quality standard in the discharge (at end of pipe). Ecology concluded that a 0.3 increase in temperature at the edge of a mixing zone will measurably increase the impairment.

Fact Sheet Comments

Comment No.	Page/Section	Comment	Proposed Change
1	II.A. 2. Collection system status (Page 8)	The description of the Ridgefield collection system requires updating to reflect improvements since the previous permit.	Please replace the text in the section with the following: "The oldest part of the Ridgefield collection system consists of a network of 6-inch to 10-inch diameter concrete gravity sewers that were constructed in the 1950s. These are primarily located between Lake River and Gee Creek. The older sewers were not sized to accommodate future growth and carried local wastewater to the Ridgefield Treatment Plant (RTP), which was built in 1959. The collection system started to expand in the 1990s and has continued to expand since then. Gravity sewers installed in the 1990s and later have been PVC with diameters ranging between 8 and 30-inches. New developments have included pump stations and force mains. Pump stations and force mains constructed in the 1990's and 2000's established the infrastructure that bypasses the older gravity collection system that was not sized for growth. In the mid-2010s a multi-phased regional conveyance system, referred to as the Discovery Corridor Wastewater Transmission System (DCWTS), was constructed to convey wastewater from Ridgefield southward to the Salmon Creek Wastewater Management System. As of 2025, DCWTS receives over 68% of Ridgefield's wastewater and the remainder (32%) still flows to RTP. The Ridgefield sewer collection system that currently flows to the RTP is comprised of 141,000 LF of gravity sewer and force main and 5 pump stations, including all the older concrete pipelines."
2	II.B. Description of the receiving water (Page 9)	Please add a period after "intakes" in the following sentence: "There are no nearby drinking water intakes." Section IIIE of this fact sheet describes any receiving waterbody impairments.	Please add a period after "intakes" in the following sentence: "There are no nearby drinking water intakes." Section IIIE of this fact sheet describes any receiving waterbody impairments.
3	II.B. Description of the receiving water; Table 2 - Ambient background data (Page 9)	There are discrepancies between the data shown in Table 2 and the data used for the RPA in Appendix D. Table 2 shows an ambient total Ammonia-N concentration of 0.09 mg/L, but Appendix D uses 0 µg/L. Similarly, Table 2 shows a hardness of 73 mg/L as CaCO3, but Appendix D uses 60 mg/L. Appendix D also assumes an alkalinity of 60 mg/l, but it is not clear how this value was obtained (not included on Table 2).	Please clarify the discrepancies between the data in Table 2 and Appendix D and update the RPA or Table 2 values to ensure consistency.
4	II.D Wastewater Effluent characterization; Table 4 - Wastewater effluent characterization (Page 11)	Alkalinity units need to be correctly stated.	Add "as CaCO3" after mg/L.
5	II.E. Summary of compliance with previous permit issued (Page 11)	This section states that " Ridgefield Wastewater Treatment Plant has not consistently complied with the effluent limits and permit conditions throughout the duration of the permit issued on June 9, 2011." However, RTP has consistently met effluent limits for BOD, TSS, FC, pH, and total ammonia, with only a few numeric effluent violations for total ammonia, TSS, and FC. Table 5 primary shows monitoring violations (analysis not conducted) and design criteria warnings/exceedances (permit triggers).	Please update the statement to reflect consistent compliance with effluent limits.
6	II.E. Summary of compliance with previous permit issued; Table 5 - Violations and permit triggers (Page 12-14)	Change header from "Max. limit (85% design criteria)" to "Permit limit (85% design criteria)". For entries marked "analysis not conducted" add "NA" under the permit limit and measurement value columns.	Change header from "Max. limit (85% design criteria)" to "Permit limit (85% design criteria)". For entries marked "analysis not conducted" add "NA" under the permit limit and measurement value columns.

Fact Sheet Comments

Comment No.	Page/Section	Comment	Proposed Change
7	II.E. Summary of compliance with previous permit issued; Table 5 - Violations and permit triggers (Page 12-14)	The correct current max. daily and monthly average limit for total ammonia is 3.14 mg/L and 1.4 mg/L, respectively. The limits shown on this table (1.2 mg/l and 2.9 mg/l) are for Phase 2 capacity expansion (never implemented). Also the large number of significant figures for this ammonia result are not correct and indicate higher accuracy than actually achieved: 2.61667 mg/L.	Update Table 5 to reflect the correct applicable limits for ammonia: 3.14 mg/L max daily and 1.4 mg/L monthly average. Also please correct significant figures for ammonia result: 2.61667 mg/L to 2.6 mg/L.
8	II.E. Summary of compliance with previous permit issued; Table 6 - Permit submittals (Page 14)	Table 6 is missing the following submitted reports: Engineering Report, Noncompliance notifications, IPP (2022), and Plans for Maintaining Adequate Capacity	Add the following reports to Table 6: Engineering Report, Noncompliance notifications, IPP (2022), and Plans for Maintaining Adequate Capacity.
9	5. Mixing Zones; Table 10 - Critical conditions used to model the discharge	Table 10 shows two values for river velocity "0.26/0.84 ft/sec". However, it is not clear what those values represent.	Please clarify the values for river velocity shown in Table 10.
10	III.G. Evaluation of surface water quality-based effluent limits for numeric criteria 2. Dissolved Oxygen: BOD5 and Ammonia Effects (Page 27)	Ecology's analysis indicated that there is no reasonable potential to exceed the ammonia criteria. However, in order to ensure that the District continues to remove ammonia from their effluent, the permit is expected to retain effluent ammonia limits which can be re-calculated and updated based on current information. The calculation of effluent limits is based on background ammonia concentrations, available dilution, the variability of the effluent ammonia data and the frequency of ammonia sampling. The District used the information in the ammonia RPA provided in the fact sheet to calculate updated ammonia limits. This resulted in the average monthly limit remaining unchanged at 1.4 mg/L and an updated maximum daily limit of 4.4 mg/L (previously 3.1 mg/L). An updated maximum daily effluent limit for ammonia of 4.4 mg/L is consistent with Section 303(d)(4) of the CWA because Lake River is in compliance with the applicable ammonia criteria and the monthly average limit of 1.4 mg/L would remain the same, resulting in no measurable change to overall loading.	Update the text to: "The permit does not contain a limit on ammonia based on dissolved oxygen impacts. Ecology's analysis indicated that there is no reasonable potential to exceed the ammonia toxicity criteria. However, in order to ensure that the District continues to remove ammonia from their effluent, the permit includes effluent ammonia limits which are calculated using current information. The calculation of effluent limits is based on background ammonia concentrations, available dilution, the variability of the effluent ammonia data and the frequency of ammonia sampling. This resulted in the average monthly limit remaining unchanged at 1.4 mg/L and an updated maximum daily limit of 4.4 mg/L."
11	III.G. Evaluation of surface water quality-based effluent limits for numeric criteria 4. Bacteria (page 27)	This section states that "The previous permit included the primary contact recreation standard for fecal coliform as a performance-based effluent limit for fecal coliform bacteria." The previous FC limits are a water quality-based limit according to the previous (2003) fact sheet, but the water quality criteria for fecal coliform bacteria are expired, so the basis for these limits as retained is not clear. The updated water quality criteria is new information that was not available when the previous limits were established, and a change to the TBELs under WAC 173-221 are allowable under the antibacksliding provisions of the Clean Water Act.	Update text to: "Without effluent data for E. coli, Ecology cannot determine whether the discharge will violate the recreational use criterion for E. coli. Given that the characteristics of the receiving water and the discharge have not changed substantially since the analysis conducted in the previous permit cycle, and the transition is a change in bacterial indicator not more or less stringent than the previous criterion, the proposed permit will include the TBELs for fecal coliform. In addition, the permittee will be required to monitor for both fecal coliform and E. coli. Ecology will then use this data to assess the reasonable potential to exceed the applicable recreational use criterion in the next iteration of this permit. "
12	III.G. Evaluation of surface water quality-based effluent limits for numeric criteria 7. Temperature (page 30)	See comments 3 - 5 on the permit.	Update the fact sheet narrative accordingly to match any changes to the effluent temperature limit.
13	III.G. Evaluation of surface water quality-based effluent limits for numeric criteria 7. Temperature (page 30)	The first paragraph refers to temperature RPA calculations in Appendix D, but these are not included in Appendix D.	Remove the reference to Appendix D here.

Fact Sheet Comments

Comment No.	Page/Section	Comment	Proposed Change
14	III.L. Comparison of effluent limits with the previous permit; Table 13 (Page 31)	The previously established fecal coliform limits that are retained here are a water quality-based limit according to the previous (2003) fact sheet, but the water quality criteria for fecal coliform bacteria are expired, so the basis for these limits as retained is not clear. The updated water quality criteria is new information that was not available when the previous limits were established, and replacement of the previous limits with the TBELs for fecal coliform bacteria under WAC 173-221 is allowable under the antibacksliding provisions of the Clean Water Act.	Update the fecal coliform limits in Table 13 to the TBELs of 200/100 ml for monthly and 400/100 ml for weekly.
15	III.L. Comparison of effluent limits with the previous permit; Table 13 (Page 31)	The Basis of Limit for Temperature is "WA", which is not defined.	Remove the Basis of Limit for Temperature from Table 13, per comments 3-5 on the permit.
16	Section IV. Monitoring Requirements	Monthly CBOD monitoring is not necessary to refine the DO sag analysis for a future potential permit renewal. The existing DO sag analysis (Streeter-Phelps calculations) applied a conservative assumption for effluent CBOD of 40 mg/L, which exceeds the permitted effluent BOD concentration of 30 mg/L. In addition, the Streeter-Phelps assessment predicted the critical DO depression occurs 18 miles downstream. The outfall is only 2 miles upstream from the mouth of the Columbia River. This analysis did not take into account the dilution that occurs within the Columbia River. This further demonstrates this assessment is extremely conservative. Therefore, there is no benefit to requiring CBOD monitoring to be used for a future DO analysis.	Remove the monitoring requirement for CBOD.
17	Section V.D. Pretreatment.	This section states that " The Alliance currently permits 3 significant industrial users (SIUs). Of these 3 SIUs, 3 are categorical." However, RTP does not receive discharge from these SIUs.	Please add the following statement: "These SIUs are located in the District collections system service area and flow to SCTP, not RTP. "
18	Appendix D (page 52)	Receiving water temperature is set to 25.4 C (highest 7-DADMax), while the highest annual 1-Dmax in Table 2 (Section II.B) is lower at 24.1 deg C. It is not expected that the 1-DMax would be lower than the 7-DADMax. Can Ecology confirm both of these values are accurate?	Confirm and update (if needed) the 7-DADMax receiving water temperatures in these locations.
19	Appendix D (page 53)	The effluent ammonia concentration of 1 ug/L in the RPA sheet is not correct, and the ambient ammonia concentration should be 90 ug/L (0.09 mg/L).	Request corrections to the effluent ammonia concentration to correspond to the 95th percentile, and the ambient ammonia concentration (should be 90 ug/L or 0.09 mg/L).
20	Appendix D (page 54)	The basis for the input of 6 mg/L as the effluent DO concentration is not clear, and the surface water quality criteria for DO shown as 9 mg/L where Table 11 confirms that it is 8 mg/L (lowest 1-day minimum).	Update the effluent DO concentration if needed and cite the basis (measurements or assumption), and update the water quality criteria from 9 mg/L to 8 mg/L.

Discovery Clean Water Alliance

Staff Report

Board Meeting of June 20, 2025

6f. Administrative Lead Report

STAFF CONTACTS	PHONE	EMAIL
John M. Peterson, P.E., Alliance Executive Director	360-993-8819	jpeterson@crwwd.com
Leanne Mattos, Board Clerk / Administrative Supervisor	360-993-8823	lmattos@crwwd.com

PURPOSE: The Alliance is a regional wastewater transmission and treatment utility now in its tenth year of operation. The Administrative Lead (AL) Report provides a quarterly update for the Board of Directors highlighting key efforts.

Please see the attached presentation covering the following topics:

- Federal Advocacy Update
  - Legislation
  - Funding
- State Advocacy Update
  - Legislation
  - Funding
- Communications Program Update

Attachments:

A. Spring E-Newsletter

ACTION REQUESTED: No specific action required. Please provide policy-level guidance for the various activities described in this report.

Discovery Clean Water Alliance

Administrative Lead Report

Alliance
Board of Directors
June 20, 2025

Administrative Lead Report

- Federal Advocacy Update
- State Advocacy Update
- Communications Program Update

Federal Advocacy Update

Federal Advocacy Update

- **Legislation – Priority Bills Are Back this Congress**
  - WIPPES Act
    - Bill reintroduced in House and Senate, referred to relevant committees
  - CERCLA Liability Protection (PFAS)
    - Bill reintroduced in the House by Representative Gluesenkamp Perez and referred to the relevant House committee
      - Cosponsors from both parties
    - Not yet introduced in Senate
  - Special District Grant Accessibility Act
    - Bill reintroduced in the House and referred to the relevant House committee
    - Not yet introduced in Senate
  - Bandwidth limited for these items at this time

Federal Advocacy Update

- **Funding**
  - CPF/CDS (“Earmark”) Request
    - SCTP Aeration Equipment Replacement Project
    - $2M Alliance request submitted to three federal offices (April)
    - If carried, would require passage of FY26 appropriations package

Wastewater Infrastructure Pollution Prevention and Environmental Safety (WIPPES Act)

The District requests your support of the WIPPES Act, which is widely supported by the national clean water sector, the wipes industry, environmental advocates, and wastewater utilities. This bipartisan legislation complements Washington State's existing "Do Not Flush" law by requiring national clear labeling and a penalty structure agreed to by the industry to ensure compliance with the law. Wastewater facilities like those managed by the District are regularly faced with maintenance challenges added costs, and safety risks due to the improper flushing of disposable wipes. These products do not break down in the wastewater system and create clogs that damage equipment, pose safety hazards to wastewater workers, and potentially cause sewage backups into homes and businesses and overflows into the environment. Wastewater utilities and their ratepayers bear the financial burden of these costly and preventable issues. At a national level, wet wipes are responsible for $441 million a year in additional operating costs at US clean water utilities.

Federal Investment Priorities

Discovery Clean Water Alliance: Salmon Creek Wastewater Treatment Plant (SCWTP) Aeration Equipment Replacement

The Alliance continues to make significant capital investments to add capacity and increase efficiency and reliability at the SCWTP. Ongoing corrective maintenance and energy inefficiencies are necessitating the need to replace aging positive displacement blowers, which are critical to the treatment process and among the most energy-intensive equipment at the facility. Replacing this equipment with more modern technology will benefit not only maintenance, but also provide an annual energy savings of $22,000, and reduce 350,000 kWh in electricity consumption.

The Alliance request: $2 million in Congressional funds to replace the Salmon Creek Wastewater Treatment Plant's Aeration Equipment.

Clark Regional Wastewater District: Stutz Road Septic Elimination Project

The District's Septic Elimination Program (SEP) has helped hundreds of homeowners since its inception, and funds from Congress have helped us make meaningful progress faster than we otherwise would have. There are approximately 1,400 septic systems in the District's service area that are reaching the end of their design life and are located on parcels that have no ability to connect to public sewer and move away from reliance on septic in the urban homeowners so they can afford to connect to low-income homeowners or highly sensitive environmental areas. We continue to prioritize projects adjacent to public sewer and provide funding incentives to areas. This year, this District is seeking to build on a previous-Congressionally-funded SEP project, Wallace Heights. Environmental hazards and the financial need are well known in this area, and the investment is supported by the residents. Congressional funding would allow the District to complete all the necessary projects in this area and further our goal of eliminating septic systems in our urban service area.

The District is requesting $2 million in Congressional funds for its Stutz Road Septic Elimination Project.

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State Advocacy Update

State Advocacy Update

- **Legislation**
  - Relevant Bills That Passed:
    - 5033 Biosolids/PFAS Chemicals
      - Sampling Program Defined: July 1, 2026
      - Testing Occurs: January 1, 2027 – June 30, 2028
      - Report to Legislature with Recommendations July 1, 2029
        - Includes advisory committee process
    - Several Bills regarding housing/density and public works bidding/contracting

State Advocacy Update

- **Legislation**
  - Relevant Bills That Did Not Pass:
    - 5380 Environmental Justice (EJ)
      - Adding EJ component to SEPA review process
    - 5360 Environmental Crimes
      - Potential to treat permit non-compliance as a crime
    - 1690 Water and Sewer System Needs Assessment
      - Sponsored by Representative Wylie
    - Bills likely to come back in some form next session

State Advocacy Update

- **Funding**
  - Capital Budget Project Support
    - SCTP Aeration Equipment Replacement Project
    - Sponsored by Senator Cortez
    - Not included in final budget

Clark Regional Wastewater District &
Discovery Clean Water Alliance Legislative Priorities

Protect Biosolids Programs

We agree: PFAS mitigation is imperative. But it is best done at the source. Failing to regulate the manufacturing process that brings PFAS into consumer products and the food chain while banning biosolids instead creates myriad unintended consequences.

- **Expense to farmers:** Biosolids are a low-cost alternative to commercial fertilizers. Farmers would have to use more commercial (often synthetic) fertilizers to make up for the loss of biosolids on their land. Additionally, most commercial fertilizers are less effective than biosolids at improving yield, reducing the amount of crops farmers harvest year by year.
- **Expense to ratepayers:** In districts where biosolids are reused, low operating costs keep utility bills for ratepayers in check. In addition, landfilling or incinerating biosolids instead of reuse is expensive and would increase costs for ratepayers an estimated $500,000 to $1.5 million per year.
- **Impacts to soil health:** Biosolids contain nitrogen and phosphorus, two non-renewable resources that are experiencing global shortages and are essential for soil fertility. Both are mined from rock through fossil-fuel intensive processes. Biosolids also improve the soil's water-holding capacity, which helps capture carbon and protects against flooding, and they contain many micro-nutrients that contribute to plant viability.
- **Impacts to GHG emissions:** Because critical elements like nitrogen and phosphorus would have to be replaced with commercial products mined from rock, removing biosolids from the market would increase GHG emissions from mining activities. GHG emissions are also produced during the incineration process and even from landfilling biosolids, the two alternative methods to dispose of biosolids if land application is banned.

We urge caution on any legislation that over-regulates biosolid usage without adequate research on and regulation around PFAS producers and the primary exposure for citizens in consumer products. A ban on biosolids would create far more problems than it would solve.

Fund Improvements to Wastewater Infrastructure

Ongoing corrective maintenance and energy inefficiencies are making it costly to continue using the aging positive displacement blowers at the Salmon Creek Treatment Plant (SCTP). By replacing them with new blower technology (turbo or similar), SCTP will benefit not only from maintenance and energy savings but also will have better process control, reliability and safety. Should funding be secured, permitting would commence in 2026 with construction

State Advocacy Update

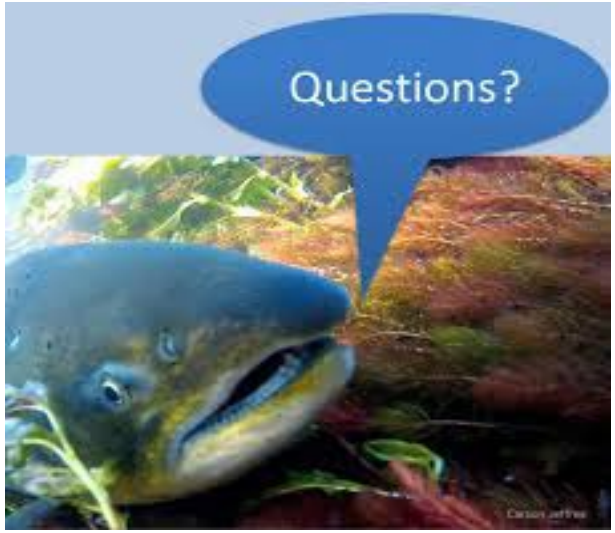
- **Funding**
  - Public Works Board (PWB) Loan Program
    - $365M available for 2025-2027
      - $100M for 2025 loan program
      - Balance for 2026 loan program
    - “Backloaded” due to impact of diverted funds

Communications Program Update

Communications Program Update

- **Recent/Upcoming Treatment Plant Tours**
  - Annual SCTP Open House – June 3
  - Ridgefield & Battle Ground Councilmembers – June 6
  - Spring E-News Letter attached

Administrative Lead Update



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Attachment A

Discovery Clean Water Alliance

Salmon Creek Treatment Plant

Spring 2025 Newsletter

Hello neighbor!

We hope you're enjoying the first few weeks of spring. The Alliance is hard at work making improvements to our facilities and operations. Read on for more information.

Save the date!

Salmon Creek Treatment Plant Annual Open House

Tuesday, June 3

6:00-7:30 p.m.

Join us this summer for our annual open house to learn about the treatment plant operations and the latest updates. Alliance staff will be available to answer questions and provide site tours. More information to come—mark your calendars!

Biosolids update

Our new biosolids hauling program is off to a great start! This program distributes biosolids (organic matter resulting from the treatment process) to farms for reuse as soil amendment and fertilizer. Late last year, the Alliance made changes to this program to reduce truck traffic, save money, and increase hauling reliability.

In November, the District took the first self-hauled load of biosolids to Natural

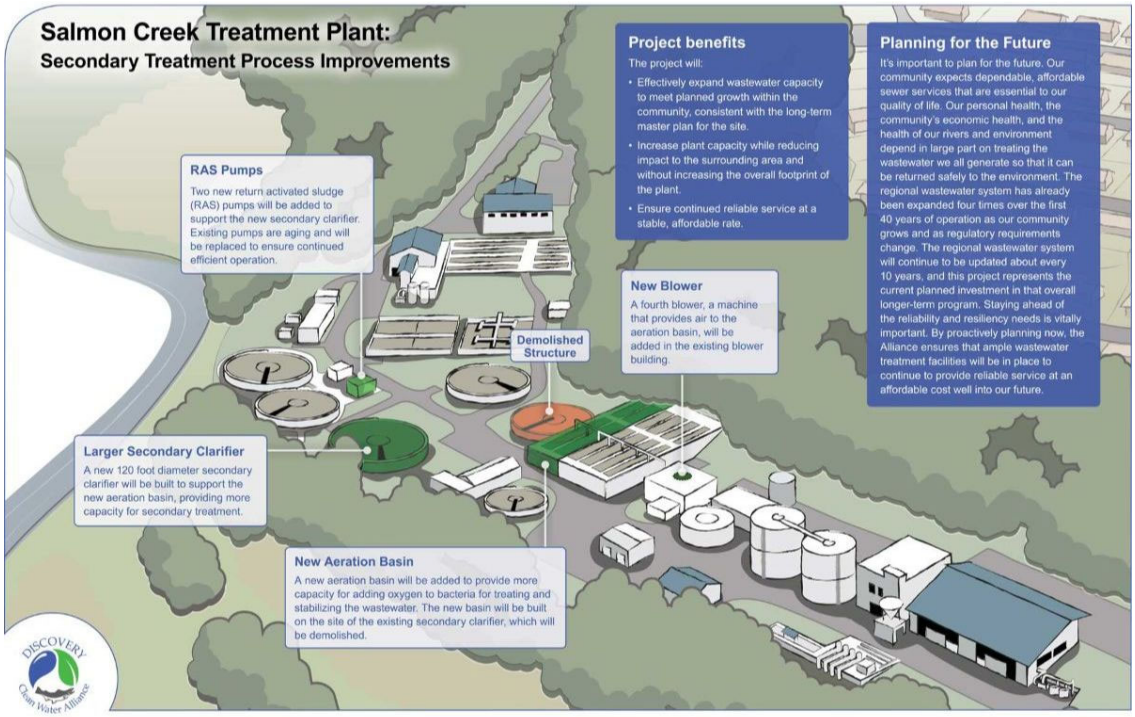
Selection Farms in Klickitat County. District staff have started discussions with Fire Mountain Farms in Lewis County about this year's biosolids loads.

Salmon Creek Treatment Plant | Ongoing construction

New pipeline now in service

Last year, the Alliance completed the installation of a new **1.5-mile-long, 48-inch pipeline (upsized from 30-inch)** to carry treated wastewater from the Salmon Creek Treatment Plant to the Columbia River. The last section of pipe was installed under Lake River in August and September, and the contractor then worked to restore the surrounding land and habitats. The pipeline was placed into service in January and is performing well.

Secondary treatment process improvements continue – completion expected mid-2025



As part of the Salmon Creek Treatment Plant Phase 5 projects, the Alliance is making several upgrades to increase the plant's treatment capacity to keep up with the region's growth. These improvements include installing a new secondary clarifier (completed in 2023) and building a new aeration basin. The Alliance has also made several improvements to systems inside existing buildings.

- 2022: Construction began
- 2023: Secondary clarifier completed
- 2024: Aeration basin under construction
- 2025: Completion expected mid-year

Aeration basins

The Alliance's contractor has completed the structural, mechanical and electrical work at new Aeration Basin No. 7. The new structure was placed into

operation in March. Aeration Basin 5 & 6 modifications are currently in process and the entire set of three basins will be operational by end of April.

Civil/yard work
The contractor will begin backfilling and prepping designated areas for asphalt and concrete curb work this May. The project should be mostly complete in June.

Salmon Creek Treatment Plant | Upcoming Construction

The Alliance is replacing dewatering equipment at the plant, and construction could begin by the end of the year. We are also planning to replace the plant's ultraviolet disinfection system, though this work is dependent on receiving federal approvals. Work will likely start in 2026.

Next Discovery Clean Water Alliance Board Meeting

Date: Friday, June 20
Time: 10:00 am - 12:00 pm
Location: District Board of Commissioners Meeting Room
8000 NE 52nd Court, Vancouver, WA

Our Team

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For more information, visit: DiscoveryCWA.org
