



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

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May 12, 2015

Lynne Danielson, General Manager  
Olympic View Water and Sewer District  
8128 228<sup>th</sup> Street SW  
Edmonds, WA 98026-8981

RE: Amendment No. 2 to the 2007 Olympic View Water and Sewer District Comprehensive Sewer Plan

Dear Ms. Danielson:

The Department of Ecology has reviewed Amendment No. 2 to the 2007 Olympic View Water and Sewer District's (OVWSD) Comprehensive Sewer Plan, submitted by PACE Engineers on March 26, 2015. Based on our review, Ecology cannot approve the document as a comprehensive sewer plan amendment. The document does not adequately discuss the feasibility of proposed alternatives or present an appropriate cost analysis of the alternatives. State regulations (WAC 173-240-050) require comprehensive sewer plans that are approved by Ecology to include appropriate planning-level information on the costs and feasibility of proposed projects.

Ecology is aware of a dispute between OVWSD and King County Wastewater Treatment Division over proposed service to the Point Wells area that is discussed in this amendment. Ecology does not have jurisdiction to resolve such disputes and this review is not intended to offer any opinion related to the dispute. Ecology's review is limited to assessing the plan's compliance with state water quality laws.

Chapter 90.48.110 requires Ecology's review and approval of all planning and engineering documents related to the construction of new sewage systems to verify that proposed projects adequately protect water quality. Under this authority, Ecology reviewed this document strictly to ensure that it complies with the requirements of a comprehensive sewer plan, as described in WAC 173-240-050. The comments listed below identify areas where this document does not comply with requirements in the above regulation. The District must resolve the following issues before Ecology can approve the amendment.

1. The amendment must clarify differences in the corporate and service territory boundaries between this amendment and the originally approved 2007 Comprehensive Sewer Plan. Figures 1 and 2 of this amendment show boundaries that differ from boundaries shown in figures 1.1 and 1.3 of the 2007 Comprehensive Sewer Plan, specifically with respect to the Point Wells area. The "Franchises and Agreements" section (section 5 on page 11) of the amendment does not discuss



how the current boundary was established. Please provide a brief historical overview of the boundary to describe how and when the current corporate boundary was established. While Ecology does not establish or approve boundaries, general sewer plans and their amendments must demonstrate that the proponent has clear legal authority to provide service to the area identified in the plan. Ecology cannot approve this amendment without understanding how the lines were established.

2. The amendment does not provide any information regarding estimated costs associated with capital improvements needed to implement the plan. A clear discussion of the cost for service, including debt service for capital improvements and long term operations and maintenance, is a requirement of all general sewer plans developed under WAC 173-240-050. Ecology cannot approve this document without a discussion of the financial impacts to current and future rate payers.
3. The document provides only a conceptual analysis of alternatives without identifying a preferred alternative that is based on a cost analysis or a technical feasibility analysis. As noted in comment 2, the amendment does not present cost estimates necessary for planning level decision. The Amendment also does not clearly present general engineering and technical constraints for the alternatives that are necessary to justify a planning-level decision.
4. Although Chapter 4 of the 2007 Comprehensive Sewer Plan presents general engineering standards for the district, the amendment must discuss whether those standards are appropriate for the proposed expansion and, if not, identify how site and project specific designs will be developed. If standards in Chapter 4 are not appropriate, the District will need to submit a more detailed engineering report and design documents to Ecology for review and approval prior to constructing any facilities.
5. The second paragraph on page 20 states that “Olympic View currently owns approximately 11.8 MGD capacity in [the Edmonds WWTP]”, which is the full capacity of that plant. This is an apparent, yet important, typographical error since the paragraph also states that the district has 1.35 MGD in reserve capacity at the Edmonds plant. Please correct to state the actual capacity held by Olympic View.
6. The text on page 20 projects that 2.2 MGD of treatment capacity is needed to accommodate the proposed Point Wells development, which is more than the existing reserve capacity the District has at the Edmonds WWTP. Although the text identifies a necessity to acquire more capacity at the Edmonds WWTP, it does not discuss the feasibility of this acquisition or whether the district has had preliminary discussions with the City. There is also no discussion about the extent of

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treatment capacity increase the District needs to accommodate both the Point Wells development and future growth. Please identify the full amount of treatment capacity the District needs to accommodate all future flows and discuss the feasibility for an increase in the agreement with Edmonds.

7. Alternative 2 (new force main parallel to existing King County main) proposes connecting the new main to the Edmonds Interceptor, but there is no apparent discussion about whether that interceptor has capacity to accept this flow. Please provide information that validates that this interceptor has sufficient capacity or identify the extent of improvements that may be necessary to connect the new force main to this interceptor.
8. Would Alternative 3 (construction along the BNRR right of way) require any rail crossings or specialized construction required by the railroad (such as encasement in steel pipe)? Has the district had any preliminary discussions with BNRR to gauge the feasibility of negotiating construction within their right of way?

If you have any questions concerning this review, please feel free to contact me at (425) 649-7037 or via email at [shawn.mckone@ecy.wa.gov](mailto:shawn.mckone@ecy.wa.gov).

Sincerely,



Shawn McKone, PE  
Water Quality Permit Manager

cc: Eilean Davis, PACE Engineers  
Susan Boyd, PACE Engineers  
Ecology Central Files, Olympic View Water District WQ 4.5