

Skagit County Clean Water District
“The Edison STEP System”

November 12, 2018

Ms. Jocelyn Jones
Washington State Department of Ecology

Re: Comments on WAC 173-230

Dear Ms. Jones;

On behalf of the Skagit County Clean Water District Board, the following comments and suggestions are offered regarding potential alterations and modifications to WAC 173-230.

As you may be aware, the unincorporated town of Edison Washington embarked nearly 20 years ago to address shellfish bed degradation by installing and operating a unique wastewater system that, for the complete operating history of the system, has dramatically improved the town’s effluent to the point that a recent DOE groundwater study concluded that *“The effluent is not degrading groundwater quality. Effluent may, in fact, be diluting ion concentration in ambient groundwater such as chlorine, bromide, and ammonium.”*

The Edison sewer system is a one-of-a-kind system in Washington State. No other system utilizes the combination of STEP Tanks together with down-stream screening, passive sludge settlement precipitation, UV disinfection and ground disposal. The system has approximately 60 residential connections, six commercial (restaurant) sites, one elementary school and no industrial users.

Every residential connection has an on-site individual STEP tank for pre-treatment/settlement and every commercial site has both a STEP Tank as well as a separate Grease Trap Tank. The system is monitored through a computer system and telemetry is in place to remotely monitor the entire operation. **The result of this specialized configuration yields a non-municipal treatment system where effluent is pre-treated and the ground is not used for treatment but rather only for disposal.**

Under the guidance and operational oversight of the Department of Ecology, the Edison LOSS system has heretofore operated without the need for a formal Operator. In fact, for the past nearly 20 years, DOE's own description of the system noted that "the system was designed to be operated without an Operator."

The LOSS system, owned and operated by Skagit County, is overseen by staff from both the County Planning and Permitting Department and the County Health Department. Additionally, the County contracts for District administration and system maintenance with outside vendors.

This administrative and operational arrangement has meant that, for the entire life of the Edison LOSS system, we have adequately and appropriately treated the effluent from the town, significantly contributing to the reopening of the area's shellfish beds.

It is with this historical context that we find ourselves needing to both defend our outstanding operational record and resist the current desire to have us inappropriately lumped into an operational category that will unnecessarily increase the operational costs for this small community through the requirement for a formal Operator and perhaps most importantly, not increase the ecological effectiveness of our system.

This point bears repeating – there is nothing that an Operator would do that is not currently being done – there are no chemicals used, no lagoons to operate, no treatment machinery to monitor and modulate. Again, DOE's own internal documentation declares that the system was designed to be operated without an Operator.

The Edison Board is therefore requesting that a new class be established for our unique LOSS/STEP system that would not require the need for an Operator. To this end, what follows are our formal comments on the salient sections of WAC 173.230:

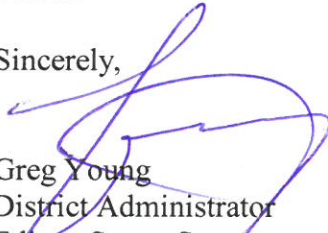
- 173-230-010 – It states "Operators must meet minimum standards to assure they are competent to operate and maintain *wastewater treatment plants*" (emphasis added). We would hold that per Section 173-230-020 (24) the definition of "Wastewater treatment plant" is: "... a facility..that, by design, requires the presence of an operator for its operation. It *does not* include any facility used exclusively by single family residence, septic tanks with subsoil absorption..." (emphasis added). Under this definition, the Edison LOSS/STEP system would not need an Operator.
- 173-230-020 – Edison does not fit under any of the Wastewater Treatment Plant methodologies enumerated in this section's definitions including subsection (1) Activated sludge process, subsection (2) Biofiltration, subsection (9) Extended aeration, or subsection (12) Lagoon. As previously noted, our treatment regimen is unique.

- 173-230-140 – It states in part – “Plants may be classified in a group different that indicated in this section if: (1) They have characteristics that make operation less complex or more difficult than other similar plants of the same flow or range; or ... (3) They use an approved method of wastewater treatment that is not included in this section” This language seems particularly well suited to Edison since we do provide “Primary wastewater treatment” due to our use of “screening” and “disinfection” (173-230-020 subsection (19)) but through DOE design and permitting, have a less complex operation and an approved method of wastewater treatment.

The Edison Board would therefore respectfully request that our system not be lumped into other classifications that would require the need for an Operator since not only by formal design but also through a long and distinguished operational history, we have proven that our unique system is fulfilling the ecological requirements that our local citizens took upon themselves to address nearly two decades ago.

Thank you for your time and attention. Should you need further information or have questions, please feel free to give me a call at 360.420.8626 or write to the address below.

Sincerely,



Greg Young
District Administrator
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Bellingham WA 98229
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