

City of North Bend (Donald DeBerg)

Comment letter attached. Please note that the comment letter is a joint statement from the City of North Bend and the Sallal Water Association.



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January 26, 2026

Washington State Department of Ecology
Tricia Miller, Permit Coordinator
Water Quality Program
Northwest Region Office
PO Box 330316
Shoreline, WA 98133-9716

RE: Public Comments on National Pollutant Discharge Elimination System (NPDES) Permit No. WA0031836
Fire Training Academy
North Bend, WA

Ms. Miller,

The City of North Bend (the City) owns and operates a potable water system that supplies water to residential and commercial users within its service area. The sources for the water system consist of a spring source located near the base of Mt Si and a groundwater source (the Centennial Well), located on the public works campus. The Centennial Well is in hydraulic continuity with both the South Fork and Middle Fork of the Snoqualmie River and is located approximately 8.3 river miles downstream of the Fire Training Academy (FTA) along the South Fork Snoqualmie River. The City's primary mission regarding its water system is to ensure the delivery of safe drinking water to its customers.

The Sallal Water Association (Sallal) owns and operates a potable water system that supplies water to residential and commercial users within its service area. The sources for the water system consist of a wellfield located in the Seattle Public Utilities watershed near Rattlesnake Lake, a groundwater well located on 144th St SE approximately 2.4 miles from the Fire Training Academy (FTA) between the South Fork and the Middle Fork of the Snoqualmie River, and the Centennial Well located on the City of North Bend's public works campus. Sallal Water Association's primary mission is to ensure the delivery of safe drinking water to its customers.

City and Sallal staff have reviewed the proposed Reclaimed Water Permit (#ST0045506) and NPDES Permit (#WA0031836) for the FTA as well as attended the open house and public hearing held at the Mt Si Senior Center on January 15, 2026. Based on the information reviewed, the City and Sallal would like to submit the following comments regarding proposed NPDES Permit #WA0031836:

1. Condition S2.A Monitoring Schedule:

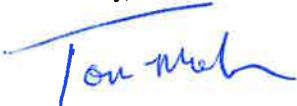
The City and Sallal request that the monitoring schedule for PFAS be increased from once per quarter to monthly for monitoring points 1 and 2. We would also prefer that this monitoring be conducted in the first two years that the permit is active, providing for 24 data points for each monitoring point. Sampling requirements should be reduced to quarterly after the first two years and remain quarterly for the remainder of the permit, unless Ecology finds that discharge limits are justified and necessary.

2. Ecology Action after monitoring is complete:

The City and Sallal request that Ecology immediately analyze the data at the completion of the 2-year monitoring period to determine if discharge limits for PFAS are justified and necessary. If Ecology finds it necessary to implement discharge limits at either or both monitoring points, the City and Sallal request that the permit be modified to a) add interim and final discharge limits to the permit at the affected monitoring point(s), b) require monthly testing for PFAS at the affected monitoring point(s), and c) add a compliance schedule for the design and construction of improvements necessary to treat PFAS to proposed final discharge limits. The interim discharge limits should be in-place until improvements are constructed and operational, at which time the final discharge limits should become active.

The City and Sallal would like to thank Ecology and the applicants for the opportunity to provide comment on this matter.

Sincerely,



Tom Mohr, P.E.
Public Works Director
City of North Bend



Devin Mettler
General Manager
Sallal Water Association



Donald DeBerg, P.E.
Deputy Public Works Director
City of North Bend



Tree Bergman
Water System Superintendent
Sallal Water Association