

City of Deer Park (Clint Drury)

Please see the attached comments on the City of Deer Park's Fact Sheet and draft permit ST0008016.



City of Deer Park

316 E. Crawford • P.O. Box F • Deer Park Washington 99006
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April 20, 2026

Jordan Hultgren
Permit Writer/Facility Engineer
Washington State Department of Ecology
4601 North Monroe St.
Spokane, WA 99205-1295

Subject: City of Deer Park Comments on Fact Sheet, State Waste Discharge Permit ST0008016

Dear Jordan Hultgren:

The City of Deer Park appreciates the opportunity to review and provide comments on the Fact Sheet for State Waste Discharge Permit ST0008016. After reviewing the document, the City offers the following clarifications and requested updates to ensure the information contained in the Fact Sheet accurately reflects current facility operations and documentation.

Page 4 – Background Information, Table 1 Facility Information: This item has been updated. Please update the 'Contact at Facility' to read: Clint Drury, Water/Wastewater Director.

Page 6 – Facility description, 1. History: This item has been updated. Under the third bullet point, please include that the new injection point was switched to chlorine gas compared to the previous use of hypochlorite.

Page 14 – Third Paragraph: This item still requires updating. Please note and change language to reflect: “Deer Park has stated that the spray head within the land treatment area, located within 500 feet of the residential well at 1020 W Deer Park Milan Road on Lateral #9, was removed in 2025.”

The City appreciates Ecology’s work on the permit and Fact Sheet development and requests that these updates be incorporated into the final document. If there are any questions regarding these comments or if additional clarification is needed, please feel free to contact me at cdrury@ci.deerpark.wa.us or 509-276-8802.

Sincerely,

Clint Drury
Water/Wastewater Director
City of Deer Park



City of Deer Park

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March 10, 2026

Jordan Hultgren
Permit Writer/Facility Engineer
Washington State Department of Ecology
4601 North Monroe St.
Spokane, WA 99205-1295

Subject: Comments on Draft Permit, State Waste Discharge Permit ST0008016

Dear Jordan Hultgren,

The City of Deer Park appreciates the opportunity to review the draft permit and provide comments. The City values its working relationship with the Washington State Department of Ecology and offers the following comments and requests for consideration.

1. Page 6 – Daily Load Calculation

The City appreciates the clarity regarding calculating the daily load as a monthly average as described in the Redbook. However, the Redbook is specific to analytical values that are measured, whereas loading is a calculated value. The City interprets the Redbook to mean that when calculating the monthly average load, the following should be used:

- a. **Constituent Concentration** – The average of the constituent values as determined by analytical analysis. For example, BOD is sampled twice per month, and the average of those two samples would be used to calculate the BOD load.
- b. **Flow** – The volume of water applied each day of the month as measured by the flow meters.
- c. **Land Area** – The acres of each field as reported in City documents.

An example calculation for a theoretical July is provided in Table 1.

2. Page 6 – Maximum pH Limit

Land treatment activities typically lower soil pH, which must be carefully monitored to avoid unproductive soil conditions. To mitigate low pH, farmers often add soil amendments to raise soil pH (for example, ash). High pH in irrigation reuse water is generally not a concern for farming operations and can often be beneficial to soil conditions. Requiring the addition of acid to lower effluent pH when soil amendments are needed to increase soil pH is counterproductive. The City respectfully requests reconsideration of the proposed maximum pH limit of 9.0.

3. Page 7, Table 3 – Groundwater Limits

At this time, insufficient information is available to determine whether the land treatment area is having an impact on groundwater quality. The proposed limits appear to assume that Deer Park is fully responsible for groundwater conditions. If these limits are exceeded, mitigation measures could be required even though the City may not have control over the source of groundwater conditions. The City requests consideration of removing these enforcement limits until it is demonstrated that groundwater impacts are attributable to the City's land treatment activities.

4. Page 9, Table 5 – Monitoring Requirements

a. **pH Monitoring** – Daily pH sampling, and the eventual requirement for continuous monitoring, appears overly burdensome given that pH values do not change significantly and the primary concern is maintaining appropriate soil pH over the long term. Daily or continuous pH monitoring does not provide meaningful benefit for a land treatment facility. The City also has concerns regarding the location and maintenance of an effluent pH probe, as no practical installation locations have been identified. The City requests consideration of removing the daily and continuous monitoring requirements in favor of the previous monthly sampling requirement.

b. **Weekly BOD and TSS Loading Calculations** – Weekly BOD and TSS loading calculations may create confusion and are not particularly helpful given that permit limits are based on monthly average pounds per acre per day. The weekly calculation would represent the total pounds applied on the day the sample was taken and would not correspond to a specific field or provide meaningful operational information. The City requests consideration of removing the weekly bulk loading requirement.

c. **Sampling Frequency** – Because effluent is drawn from large storage reservoirs and the constituent concentrations do not change quickly, increasing sampling from monthly to weekly appears unnecessarily burdensome and unlikely to provide significant additional value. The City requests consideration of returning to the previous monthly sampling requirement.

5. Page 10, Table 6 – Groundwater Monitoring

Groundwater monitoring when fields are wet or snow-covered can be difficult because vehicle access is often limited. This is particularly true in December, when snow removal may be required to access monitoring wells. Additionally, driving vehicles across the fields during these conditions can create deep ruts that negatively impact crop production and farming equipment. The City would like to discuss the need for four sampling events per year and requests consideration of omitting the December sampling period.

6. Page 11, Table 7 – Soil Sampling Depth

a. Soil sampling results do not indicate that nutrients are moving beyond the current sampling depth of four feet. The City requests reconsideration of the requirement to sample to six feet.

b. Probe refusal is frequently encountered between three and four feet. Sampling to six feet will likely not be feasible in many locations and would result in additional refusal notations.

7. Page 27, Section S5.1 – Leak Detection Surveys

The City conducts ongoing leak detection by monitoring the volume of water captured in the interstitial space between the double liner layers of the lagoons. A leak would be indicated by a sudden increase in the volume of water captured and pumped back into the lagoons. The City requests consideration of revising the language to reflect this existing methodology for leak detection surveys.

8. Page 29, Section S6.C – Industrial User Survey

An industrial user survey appears unnecessarily burdensome given the size of Deer Park and the absence of significant industrial dischargers. The City requests reconsideration of this requirement.

9. Page 33, Section S10.B – ICMP Requirements

a. Section 1.b – Cultivation and Harvesting Estimates

Cultivation and harvesting projections can only reasonably be estimated based on historic performance. Expecting agricultural production to consistently meet design assumptions may be unrealistic due to the inherent variability of farming operations.

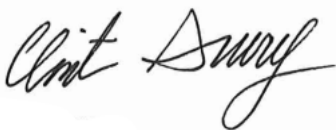
b. Section 1.e – Herbicide and Pesticide Application

Herbicide and pesticide applications depend on field observations and conditions that cannot be predicted a year in advance. Estimating these applications ahead of time may result in inaccurate reporting. The City recommends reporting herbicide and pesticide applications in the ICMP for the year in which they occur rather than forecasting them for the following year.

An example BOD loading calculation for a theoretical July is included as Table 1 for reference.

Thank you for the opportunity to provide comments on the draft permit. The City of Deer Park appreciates Ecology's consideration of these comments and looks forward to continuing to work collaboratively on this permit. Please feel free to contact me if you have any questions or concerns at cdrury@ci.deerpark.wa.us or 509-276-8802.

Sincerely,

A handwritten signature in black ink that reads "Clint Drury". The signature is written in a cursive, flowing style.

Clint Drury
Water/Wastewater Director
City of Deer Park

Table 1 – Example BOD loading Calculation

day	Acres	inches irrigated	MG irrigated	BOD, mg/l Measured	BOD, mg/l Average	Load, lb/ac Calculated
1-Jul	25	1.33	0.902817		38.6	11.6
2-Jul	25	0	0		38.6	0.0
3-Jul	25	0	0		38.6	0.0
4-Jul	25	0	0	45	38.6	0.0
5-Jul	25	0	0		38.6	0.0
6-Jul	25	0	0		38.6	0.0
7-Jul	25	1.6	1.086096		38.6	14.0
8-Jul	25	0	0		38.6	0.0
9-Jul	25	0	0		38.6	0.0
10-Jul	25	0	0		38.6	0.0
11-Jul	25	0	0	32	38.6	0.0
12-Jul	25	0	0		38.6	0.0
13-Jul	25	0	0		38.6	0.0
14-Jul	25	2	1.35762		38.6	17.5
15-Jul	25	0	0		38.6	0.0
16-Jul	25	0	0		38.6	0.0
17-Jul	25	0	0		38.6	0.0
18-Jul	25	0	0	48	38.6	0.0
19-Jul	25	0	0		38.6	0.0
20-Jul	25	0	0		38.6	0.0
21-Jul	25	1.5	1.018215		38.6	13.1
22-Jul	25	0	0		38.6	0.0
23-Jul	25	0	0		38.6	0.0
24-Jul	25	0	0		38.6	0.0
25-Jul	25	0	0	50	38.6	0.0
26-Jul	25	0	0		38.6	0.0
27-Jul	25	0	0		38.6	0.0
28-Jul	25	1.6	1.086096		38.6	14.0
29-Jul	25	0	0		38.6	0.0
30-Jul	25	0	0		38.6	0.0
31-Jul	25	0	0	18	38.6	0.0

Acres		AVE FLOW, MGD	Ave BOD, mg/l	Loading, lb/ac/day Calculated
25	Totals	0.176	38.6	2.26