

Reata Ranches  
186 Vinehill Dr  
Walla Walla, WA

August 15, 2024

Via Electronic Mail  
Washington Department of Ecology  
c/o Nick Acklam, Section Manager ERO Toxic Cleanup Program

Re: Urgent Concerns Regarding Water Filtration System at 106 N 2nd Ave, Walla Walla, WA

Dear Mr. Acklam,

I am writing to address a critical issue with the water filtration system at 106 N 2nd Ave, Walla Walla, WA. Our investigation reveals a significant discrepancy between the intended design and the actual implementation, compromising the system's effectiveness.

Key Concern:

The current implementation appears to have created a closed-loop system that continuously recycles groundwater through the filtration system and back into the ground, rather than properly disposing of it via the city sewer system.

This concern stems from the actual setup (*Attachment-1*) differing markedly from the intended design (*Attachment-2*).

The intended design is for filtered water to be transported from the filtration system to the Rose Street sewer for normal sanitary water processing. Instead, the water is being sent to a janitorial sink within the building, which is not connected to the Rose Street sewer, but rather to a 2nd Ave sewer line that we have confirmed is broken. We suspect that the broken line allows the water to re-enter the ground and be reintroduced directly to the basement groundwater sumps, thus making a closed-loop system.

Evidence supporting our concern:

1. Unusual Water Levels: Despite the current August dry season and lack of significant rainfall, our ground water sumps are removing substantial amounts of water. This is unprecedented in our nearly 10-year ownership of the property.
2. Broken Sewer Line: We have confirmed that the 2nd Ave sewer line is compromised between our building and the sewer main. This issue likely stems from city-led construction in 2018, which we have been urging the City to address since that time.

These observations strongly suggest that the filtration system is operating in a closed loop, continuously recycling groundwater instead of properly disposing of it.

We urgently request that the Department of Ecology:

1. Immediately validate that filtered water is being properly transported to a Walla Walla sewer line.
2. Redesign and reimplement the system promptly if the current setup is confirmed to be ineffective.

Please note that we consider this a high-priority matter. In the absence of immediate action from your department, we will conduct our own validation measures and seek reimbursement for associated costs.

We look forward to your swift response and corrective actions.

Sincerely,

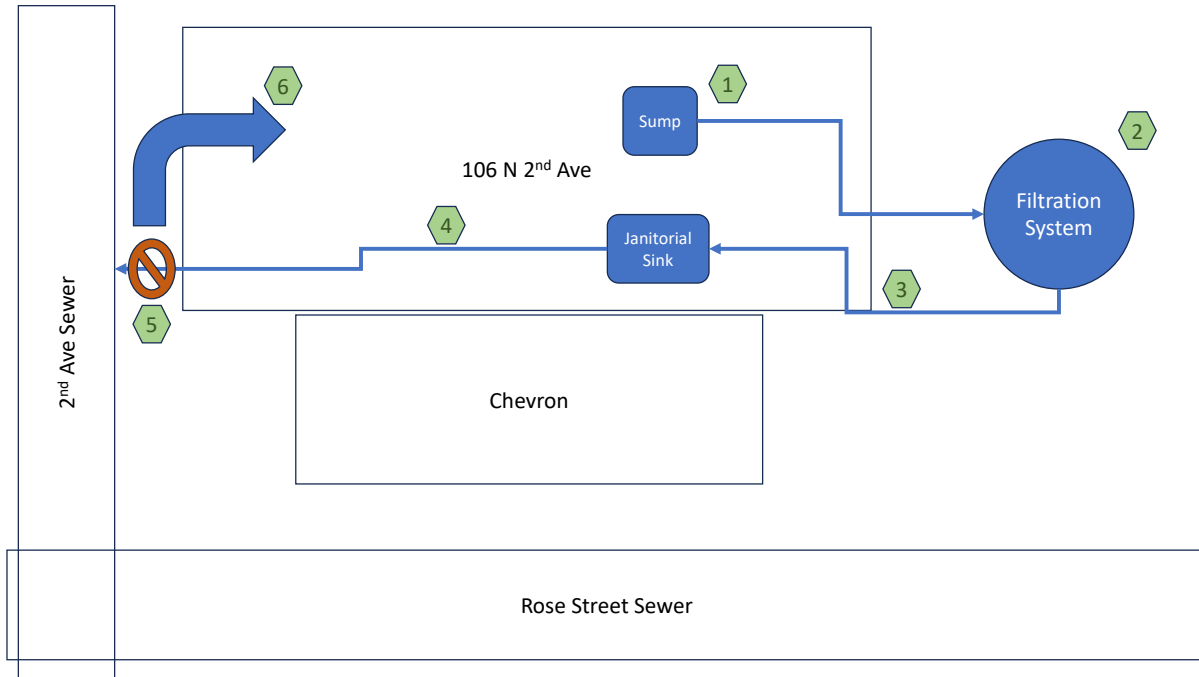
*Sam Rudnick*

Sam Rudnick  
Managing Partner, Reata Ranches

Distribution: This letter will be shared widely with relevant stakeholders to the 2023 Rose Street Chevron gasoline spill.

Attachment 1: Actual Implementation of the filtration system  
Attachment 2: Intended design of the filtration system

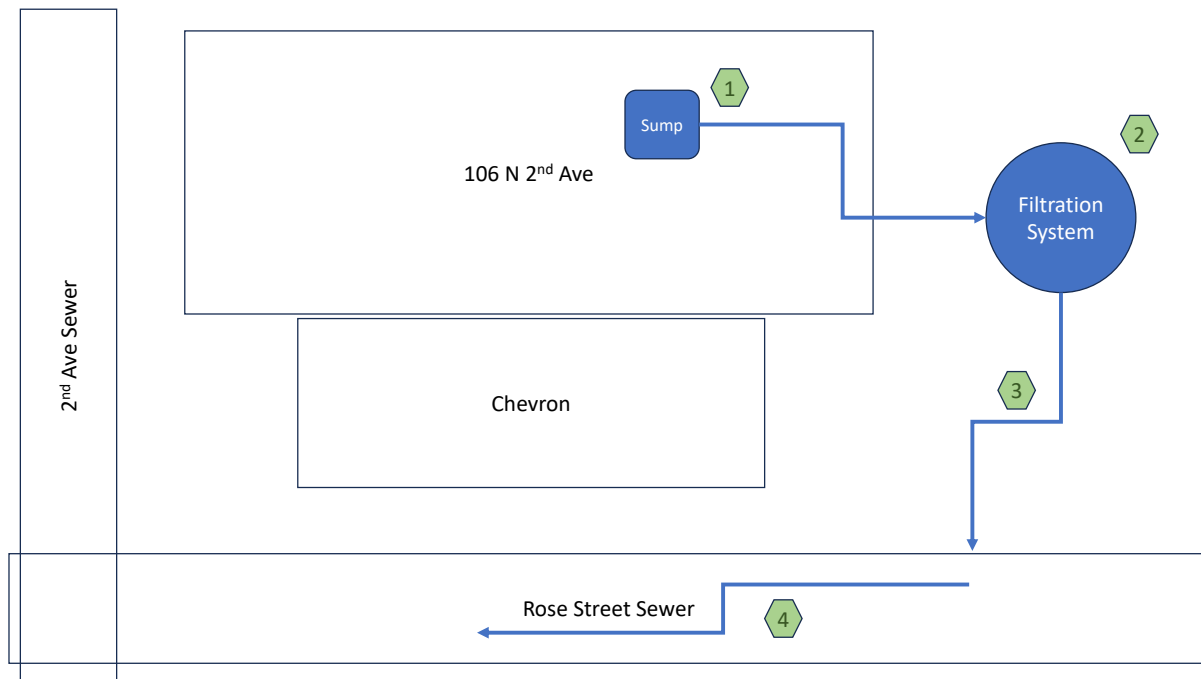
**Attachment 1: Actual Implementation of the filtration system**



**Description of actual system implementation resulting in closed-loop process**

1. Ground water is pumped from basement sump to filtration system in parking lot
2. Ground water is filtered
3. Filtered water is pumped to janitorial sink
4. Janitorial sink drains outside building toward 2<sup>nd</sup> Ave Sewer
5. Filtered water is prevented from reaching 2<sup>nd</sup> Ave Sewer due to break in line between the building exterior and sewer main
6. Filtered water rejoins ground water and process begins again at Step 1

**Attachment 2: Intended design of the filtration system**



**Description of intended system design**

1. Ground water is pumped from basement sump to filtration system in parking lot
2. Ground water is filtered
3. Filtered water is pumped to Rose Street Sewer
4. Filtered water joins common city sewage for processing in city sewage treatment facility