



DEPARTMENT OF PUBLIC WORKS

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April 27, 2023

Steven Eberl, Washington State Department of Ecology
Southwest Region Office
Water Quality Program
PO Box 47775
Olympia, WA 98504-7775

RECEIVED

MAY 05 2023

**WA State Department
of Ecology (SWRO)**

**SUBJECT: Cowlitz County Headquarters Landfill - State Waste Discharge Permit ST6248
Leachate Management Engineering Report**

Dear Mr. Eberl:

I am writing in response to the comment letter dated April 6, 2023, regarding the Engineering Report Cowlitz County submitted on January 31, 2023. We have had an opportunity to review the comments and have great concerns with them.

The comments that we received on the report expand the scope of the original order that the County address the elevated level of Biochemical Oxygen Demand (BOD₅) in the leachate from the Headquarters Landfill. The comments are requiring the County to address the ammonia level in the leachate. This requirement is based on comments received from Duane Leaf of the Three Rivers Regional Wastewater Authority (TRRWA) stating that TRRWA does not accept discharges with ammonia concentrations above 44 mg/L. The current state waste discharge permit for Cowlitz County Headquarters Landfill does not include any limits on the level of ammonia that is discharged to the treatment plant. Increasing the scope to include investigating, designing, and constructing a treatment method for ammonia will greatly increase the timeline of any corrections being made to the plant and is beyond the scope of our permit.

I am requesting that the Department of Ecology revise the comments to only address the BOD₅ requirements as outlined in the County's permit. The ammonia may be addressed at a later date if it becomes a requirement of future permits. It is my understanding that TRWWA is about to start a headworks study to review the limits of constituents in industrial waste discharged to their plant that might impact operations and update their pre-treatment policy. Any requirements that address constituents in future State Waste Discharge Permits for the County should be based on this study, not old limits.

In addition, the Three Rivers Regional Wastewater Authority Discharge Pretreatment Policy, adopted May 9, 2012, states that if a concentration above 44mg/L of Total Ammonia is released "such Users shall be subject to surcharges". We are currently discussing this issue outside of this process as it is not a requirement of the current permit.

Please reach out to me at eugeniss@cowlitzwa.gov or by phone at (360) 577 – 3030 ext. 6538 to discuss how we should proceed.

Sincerely,



SUSAN EUGENIS, P.E.

County Engineer

SE:ec