



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

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November 10, 2014

Mr. Bart Stepp, P.E.
Public Works Director
City of Woodland
300 East Scott Avenue
Woodland, WA 98674

Re: City of Woodland Wastewater Treatment Plant Inspection, October 29, 2014

Dear Mr. Stepp:

I visited the City's treatment works on October 29th for an unannounced inspection. Thank you for joining me.

We are very concerned with treatment plant operations as they were revealed to us on this inspection. Several areas in particular require the cities immediate attention. Those are:

- Laboratory equipment & procedures;
- Recordkeeping and accuracy of required submittals;
- Site safety, alarm, and response protocols;
- Maintenance Management programs and procedures.

The attached inspection form provides further details on these observed deficiencies.

We request your written response to our inspection findings by November 30, 2015. We strongly suggest that the city engage outside expertise to assist it in addressing operations management at the plant.

If we can assist in this matter or if you have questions regarding this review, please contact me at (360) 407-6277.

Sincerely,

David J. Knight, PE
Environmental Engineer, Municipal Unit
Southwest Regional Office
Water Quality Program

DK:

Enclosure: EPA inspection form

cc: Robert Choate, City of Woodland,
File: Clark County, Woodland STP, NPDES Permit Correspondence



signs, and no warning or alarm on the telemetry that the blower was offline. When the operator opened up the power panel, one breaker had been pulled, but it was unclear if that related to the blower, and the operator did not know what the breaker was pulled for. The facility needs to confirm all alarms are working as intended, and that when a condition occurs which could affect effluent quality (such as a bulb burnout), it triggers an alarm. The UV system presently only causes an alarm when "UV intensity" is down to 70%. It is not possible to confirm that the effluent is properly disinfected at this intensity level, as bulbs nearer the meter could mask the effects of bulbs burned out on the other side of the UV chamber. Any bulb burnout should cause an alarm. The intensity meter was designed to capture the gradual decrease in intensity that occurs as bulbs age, triggering a complete bulb replacement at that level. The operator related they were not getting an alarm and responding for each bulb burnout. He relayed that the week prior he had changed two burned out bulbs (of 8) at the same time even though intensity was not below 70% and there was no alarm. City should update the alarm section of their O&M Manual to ensure that all key equipment shutoffs and pump station power failures or high water alarms create alarm conditions, and address how these alarms and the response taken is to be documented in the log book.

Maintenance Management programs and procedures: The approved O&M Manual was observed to contain an appendix containing some spreadsheets showing maintenance intervals for major pieces of equipment and allowing for recording of when such maintenance was conducted. No records were found to show that these forms were used, that maintenance intervals were tracked, or that maintenance was being either forecast or recorded when complete. For the blower being serviced it was unclear who was doing this work, how it was determined to be necessary, or how it was being recorded as completed. The operator on site indicated it was a maintenance staff person doing this work.

POTW Operations: There was no tracking of performance data such as settleability or effluent quality over time versus other key metrics such as sludge age, the food to micro-organism ratio, effective time under aeration, or power use per loading or unit volume treated. SBR#3 was not in service, and it appeared it had never been used. To fulfill its role as a backup device, it should be regularly exercised to ensure that it could be used in times when one of the other two SBRs was inoperable for whatever reason. There was a process control worksheet, however it did not appear to have been fully completed, and I was unable to locate any instructions on its use.

Name(s) and Signature(s) of Inspector(s) David J. Knight, P.E. 	Agency/Office/Home and Fax Numbers Ecology/SWRO (360) 407-6277	Date 11/5/14
Signature of Management O&A Reviewer Greg Zentner, P.E. 	Agency/Office/Phone and Fax numbers Ecology/SWRO (360) 407-6272	Date 11/6/2014