



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

Northwest Regional Office • 3190 160th Avenue SE • Bellevue, Washington 98008-5452 • (425) 649-7000  
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May 1, 2020

Tim Jackson, Public Works Operations Manager  
City of Snohomish  
116 Union Ave  
Snohomish, WA 98290-2943

Re: **WARNING LETTER** for National Pollutant Discharge Elimination System (NPDES)  
Permit No. WA0029548 for Snohomish STP

Dear Tim Jackson:

This letter is to inform you that your facility was out of compliance with the conditions in your wastewater discharge permit as listed below:

| Month/Year    | Outfall | Monitoring Parameter         | Type           | Sample Measurement | Units   | Max Limit |
|---------------|---------|------------------------------|----------------|--------------------|---------|-----------|
| February 2020 | 1       | Total Suspended Solids (TSS) | Weekly Average | 1064.77            | Lbs/Day | 1051      |

Non-compliance notifications are required by your permit. The checked item below indicates if further notification is required regarding the above violation(s).

- ☐ No further action is required. You have already submitted a notice of non-compliance or explained the cause of the violation(s) in your Discharge Monitoring Report (DMR). You have already complied with this requirement.
- ☒ **You must resubmit this notice by June 1, 2020.** Although you submitted a notice of non-compliance with your February DMR, it did not provide an adequate explanation of the steps taken to avoid the violation, if any. In particular, the notification did not discuss operation at the CSO pump station or whether the City implemented recommendations from the 2014 Combined Sewer Overflow Management Plan. Please refer to your permit for more information about submitting a non-compliance notification.

Ecology understands that the City did not experience an overflow from either CSO outfall during this period. While we appreciate the City's commitment to avoiding CSO discharges, this violation raises concern that the City may have done so by exceeding the treatment plant's hydraulic capacity. The intent of the 2014 Combined Sewer Overflow Management Plan was to provide the City with a documented strategy for evaluating when a CSO discharge is appropriate during high flow conditions, such as those experienced in February 2020. The permit authorizes CSO discharges during wet weather when flows exceed the treatable capacity of the treatment plant.

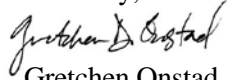
Ecology uses the DMR to evaluate compliance with permit requirements. If you fail to comply with the conditions of your permit, Ecology may take formal administrative enforcement action, including issuing orders and penalties. Ecology's enforcement authority for NPDES permits is governed by Chapter 173-220-230 of the Washington Administrative Code (WAC). Ecology's enforcement authority for state waste discharge permits is governed by Chapter 173-216 of the Washington Administrative Code (WAC).

Please contact your permit manager Shawn McKone at (425) 649-7037 or by email at [shawn.mckone@ecy.wa.gov](mailto:shawn.mckone@ecy.wa.gov) if you have any further questions.

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Sincerely,



Gretchen Onstad  
Compliance Specialist  
Water Quality Program

cc: Central Files: Snohomish STP, WA0029548, WQ 6.4

e-cc: Tim Jackson, City of Snohomish, [jackson@snohomishwa.gov](mailto:jackson@snohomishwa.gov)  
Duane Leach, WWTP Operator, City of Snohomish, [leach@snohomishwa.gov](mailto:leach@snohomishwa.gov)  
Shawn McKone, Permit Manager, Ecology  
Laura Fricke, Municipal Unit Supervisor, Ecology