



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

Northwest Region Office

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November 4, 2022

Kamuron Gurol, Director
Wastewater Treatment Division
King County Dept. of Natural Resources & Parks
201 S. Jackson St., KSC-NR-5500
Seattle, WA 98104

Re: Georgetown Wet Weather Treatment Station use pending update of National Pollutant Discharge Elimination System Permit (NPDES) No. WA0029181

Dear Kamuron Gurol:

Congratulations to King County on your near completion of the Georgetown Wet Weather Treatment Station (GWWTS). This Combined Sewer Overflow (CSO) treatment facility is important infrastructure for controlling discharges of untreated mixtures of sewage, industrial wastewater, and stormwater under state and federal laws. In addition, this facility will provide critical protections for the Duwamish River within the Lower Duwamish Waterway Superfund site. This letter responds to your request for clarification on discharges from the GWWTS during the interim period until your NPDES Permit No. WA0029181 (Permit) for the West Point wastewater treatment plant and associated CSOs is updated.

As we have discussed, your Permit conditionally authorizes discharges to waters of the state. The GWWTS is designed for multiple uses. This includes storage and release of combined flows into the conveyance system for treatment at the West Point wastewater treatment plant, as well as treatment of combined flows and discharge to the Duwamish River under certain conditions defined in the approved facility engineering report. The Permit does not regulate the use of the facility for storage, nor does it limit or prohibit the County from using the GWWTS for storage or for treatment and discharge of effluent back into the conveyance system (e.g., GWWTS operating in a non-discharging mode).

The Department of Ecology (Ecology) recognizes the GWWTS as a crucial component to the County's CSO control efforts in the Duwamish basin. The GWWTS project includes infrastructure that will redirect untreated combined sewage that would otherwise flow through two existing outfalls without treatment (Brandon and South Michigan) into the Duwamish River. The project improves the County's ability to store excess flow during storm events and adds advanced at-site treatment for the portion of combined sewage the system cannot store. This new treatment facility includes a new outfall located adjacent to the existing South

Michigan outfall. Combined sewage treated at GWWTS and discharged through the new outfall will provide environmental and public health protection as compared to untreated CSO discharges through the Brandon and South Michigan outfalls.

Ecology is currently developing draft revisions to the Permit, which expired in 2020 and remains in effect per WAC 173-220-180(5). The Permit updates will not be in place prior to King County's completion of the GWWTS. This means that it is possible, depending on weather events in the coming months, that King County will be in a situation where it makes the most sense to use the GWWTS for treatment and discharge during one or more CSO events even though the facility and outfall is not currently covered under the Permit. In that situation, Ecology supports King County's use of the GWWTS and discharge of treated combined sewage from the new outfall prior to the Permit update rather than continuing to discharge untreated CSOs from the Brandon and/or South Michigan outfalls. This action will minimize pollutants discharged to the Duwamish River.

The Permit currently has requirements in Table 3 that apply to King County's other four CSO treatment facilities, including but not limited to monitoring and reporting. Ecology recommends that King County conduct monitoring of any GWWTS discharges to waters of the state consistent with Parts 1 and 2 of Table 3 that are applicable to all CSO treatment plants until an updated Permit is in effect. Ecology requests that King County submit this data on a monthly basis as an attachment to the WQWebDMR for the month discharge(s) occurred.

As we have discussed, Ecology is developing draft language to update the Permit. That update will include technology-based limits and additional monitoring requirements specific to GWWTS. We anticipate releasing a draft permit for public comment before the end of 2022. We are working toward issuing an updated Permit before April 2023. Providing treatment for CSOs is more protective of environmental and public health than discharging untreated combined sewage. Because of this, Ecology will not pursue formal enforcement actions against King County for treated CSO discharges from the GWWTS that occur consistent with the provisions in this letter and prior to the effective date of the updated Permit.

Please contact Shawn McKone (206-594-0158) if you have questions.

Sincerely,



Rachel McCrea
Water Quality Section Manager
Northwest Region Office

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PARIS Permit No. WA0029181