



# The City of Othello

**SHAWN R. LOGAN**

Mayor

**Spencer Williams**  
Finance Officer

**Anne Henning**  
Community Development Director

**Tania D. Morelos**  
City Clerk

**Dave Rehaume**  
Chief of Police

**Curt Carpenter**  
Public Works Director

**Abner Garza**  
IT Director

April 22, 2024

Mr. Rob Buchert, Senior Compliance Specialist  
Water Quality Program  
Department of Ecology  
4601 N Monroe Street  
Spokane, WA 99205-1265

## **RE: Update letter from the City of Othello**

Mr. Rob Buchert,

We are writing to provide an update on behalf of the City of Othello regarding our ongoing efforts to comply with our NPDES permit. We want to communicate our progress and changes in our wastewater treatment process since our November response letter. Reiterating our understanding that there is an urgent need to improve our treatment process.

We will address the following:

1. What steps **HAVE BEEN** taken to comply with NPDES Permit.
2. What steps **ARE BEING** taken to comply with NPDES Permit.

## **Current Wastewater Planning**

The City continues to work with consulting engineers Anderson Perry & Associates, Inc (AP), on the task of evaluating treatment and disposal alternatives needed to meet the final effluent limits by 2030. The facility planning process is moving forward promisingly with the help of the City's Department of Ecology permit manager Diana Washington. When the facility plan is complete it will provide an evaluation of mechanical and environmental treatment alternatives capable of meeting discharge standards for the various disposal/reuse options that are being

considered. Diana has been a great help in assisting AP in steering the City towards the best option for sustainable future compliance.

Along with this analysis, the City has been working with AP to bring about short-term solutions to improve treatment plant performance. An evaluation of options to provide supplemental aeration to improve dissolved oxygen levels in the treatment plant effluent has been initiated. A pilot study is also being proposed to evaluate the effectiveness of potentially covering the final lagoon cell to reduce algae growth, and thereby improve the quality of the treatment plant effluent by reducing the TSS and increasing the dissolved oxygen levels.

In addition, as the weather warms the City is preparing for another chemical algae treatment, this treatment has shown positive results to assist in preventing TSS violations during the summer months. The chemical treatment plan is ongoing and will continue until a long-term solution from the facility plan is online.

The City signed a trial agreement with EnBiorganic Technologies for adding a microbiological process in December of 2023. The microbiological process system went online on February 16, 2024. The process microbiologically doses influent wastewater with bacteria aimed at lowering BOD and TSS in the City's effluent. The City is hopeful that this will create positive effluent test results that comply with our NPDES permit.

The City continues to work with Tetra Tech Engineering services drafting a permit renewal application and assisting the City in planning for the future. It is of great concern to the City that the steps taken for long-term planning are directed effectively towards its goal of continued compliance.

In summary, the City continues to work with Ecology staff and our consultants to identify and fund solutions for the near-term effluent violations and longer-term planning process. Design of a facility that meets all the requirements of our NPDES permit is the goal. However, great urgency continues to be applied to the current investigation of solutions that will bring the City into compliance now.

### **Reported Violations**

Since our last letter the City has violated our permit a total of 6 times, all of these violations have to do with algae contributing to TSS removal violations. As discussed earlier, we understand that this is unacceptable and are working towards effective solutions to eliminate these violations moving forward.

### **Effluent Limit Violations**

As listed in Table 1A. of permit.

Item No.	Violation Description	Occurrence
1	Total Suspended Solids (TSS)	Frequent throughout Year.
	<b>Total Violations</b>	<b>6</b>

### **Violation Causes/Prevention of Future Violations**

The following describes the causes and the City's actions to address each of the violations attaining to Effluent Violations reported on discharge monitoring reports since the City's last letter.

#### **1. Solids Residue, Total Suspended (TSS)**

The facultative lagoon treatment system is prone to TSS violations resulting from algae growth as part of the natural BOD treatment process. It has been noted that algae growth in the lagoons decreases in the winter months, as the weather cools, and TSS percent removal violations attributed to algae also decrease in the winter months. Until new infrastructure allows for aeration and/or covering a portion of the final pond, there will continue to be a high potential for violation of the current NPDES permit limits.

Methods the City is taking to reduce effluent TSS violations include:

- Investigating supplemental aeration and pond cover with an AP pilot study.
- Chemically treating according to algae management plan implemented by City Staff.
- Addition of microorganisms to treatment process at the influent for nutrient removal, using Enbiorganic Technologies.

### **Action Items**

1. The City is working with AP to develop a facility plan that will allow the city to meet all the permit requirements in the future. AP is also assisting the City to eliminate current violations.
2. The long-term solution is the design and implementation of new wastewater treatment facilities. The City is focused on this goal but will continue progress with short-term solutions, emphasizing meeting permit requirements now until the new system is operational.

To conclude, The City of Othello understands the importance and urgency of the design and implementation of new treatment solutions now and for the future. This letter is an attempt to keep you informed of our efforts and provide details that will communicate our proactive approach to fixing this problem. We will continue to communicate our progress moving forward, and we hope that you will inform us of any new information necessary for our success in this area. The City will continue to pursue all options pertaining to more effective treatment, while proactively working towards a solution that will sustain future growth and better water quality.

If you have any questions, please don't hesitate to contact us.

Sincerely,

City of Othello

A handwritten signature in black ink, reading "Shawn R. Logan". The signature is written in a cursive style with a large, stylized "S" and "L".

Shawn Logan, Mayor

cc: Diana Washington, PE, Ecology  
Jake Hollopeter, PE, Anderson Perry  
John Wells, PE, Anderson Perry  
Curt Carpenter, Public Works Director  
Sam Harris, Lead Wastewater Operator