



King County

Department of Natural Resources and Parks
Wastewater Treatment Division

Brightwater Treatment Plant
22505 State Route 9 SE
Woodinville, WA 98072

August 28, 2024

Sean Wilson, P.E.
Washington Department of Ecology
Northwest Regional Office
PO Box 330316
Shoreline, WA 98133-9716

Jun Naotsuka
Public Health – Seattle and King County
401 5th Avenue
Seattle, WA 98104

Re: Discharge of C3 Water, Brightwater Treatment Plant, August 26, 2024

Dear Mr. Wilson and Mr. Naotsuka:

On August 26, 2024, approximately 54,000 gallons of C3 water (membrane effluent prior to disinfection) from Brightwater Treatment Plant was discharged to the Delta Pond, an on-site stormwater pond system located at 22505 State Route 9 SE in Woodinville, Washington (Figure 1). This incident was reported to the Washington State Department of Ecology and assigned ERTS #733296.

On August 26, 2024, at approximately 12:45 p.m., Brightwater Operations staff were pumping C3 water from a membrane basin in order to empty it. The basin was being cleaned and inspected as it was suspected to contain chips/pieces of coating that could damage the plant's membranes. The basin had previously been flushed and drained several times with C3 water and therefore contained minimal residual solids. The plan involved discharging the basin water to the sewer to avoid recycling it to the plant and damaging the membranes. Prior to pumping, staff valved the storm drain system to the sewer, in case there was leakage from the hose used to pump down the basin. The hose used for draining the basin was mistakenly directed to the north foundation drain system of the plant. The north foundation system drains ground water flow from underneath the membrane tanks and aeration basins to Delta Pond in the South Wetscape of the on-site stormwater pond system (Figure 2). The pumping was stopped at approximately 3:00 p.m. The Delta Pond also receives rain and surface water. All of the C3 water was contained within Brightwater's on-site stormwater management system, which is not accessible to the public. There was no discharge out of the lower South Wetscape that receives flow from Delta Pond.

Operations staff immediately deployed to the stormwater pond system to collect samples.

Sean Wilson
Jun Naotsuka
August 28, 2024
Page 2

Three samples for fecal coliforms were collected on August 26, 2024: two from the foundation drain discharge (SW3) – one of which had a lot of debris and silt, and one from the surface of Delta Pond (Figure 2). Three samples for nitrate plus nitrite (NOx) were collected: one from SW3, one from Delta Pond and one from the outlet of Delta Pond at the north end of the South Wetscape. Results from both analyses are in Table 1. The SW3 fecal coliforms and NOx results from August 26 are similar to results from the routine monthly sampling conducted by King County Environmental Lab (KCEL) on August 19, 2024 (Table 1).

Corrective and preventative action will include:

- labeling all foundation drains and catch basins that cannot be valved to the plant influent with “no spill, goes to wetlands” signs.
- relabeling catch basins and other maintenance holes so that the labels are more visible
- providing a brief training for non-Brightwater staff who are performing work that might impact the stormwater system.
- creating a refresher training video so that training can be conducted at will.
- providing more frequent training requirements for onsite staff with an emphasis on spill response.

If you have any questions about this overflow event, please feel free to contact me at 206-477-5600.

Sincerely,

DocuSigned by:



6971F10C62DA49E...

Rebecca Singer

Operations Manager

I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

cc: Kamuron Gurol, Director, Wastewater Treatment Division (WTD), Department of Natural Resources and Parks (DNRP)
Bruce Kessler, Deputy Director, WTD, DNRP
Jeff Lafer, Project/Program Manager IV, WTD, DNRP
Matt Nolan, Brightwater Treatment Plant Manager, WTD, DNRP
Chapin Brackett, Process and Environmental Compliance Manager, WTD, DNRP

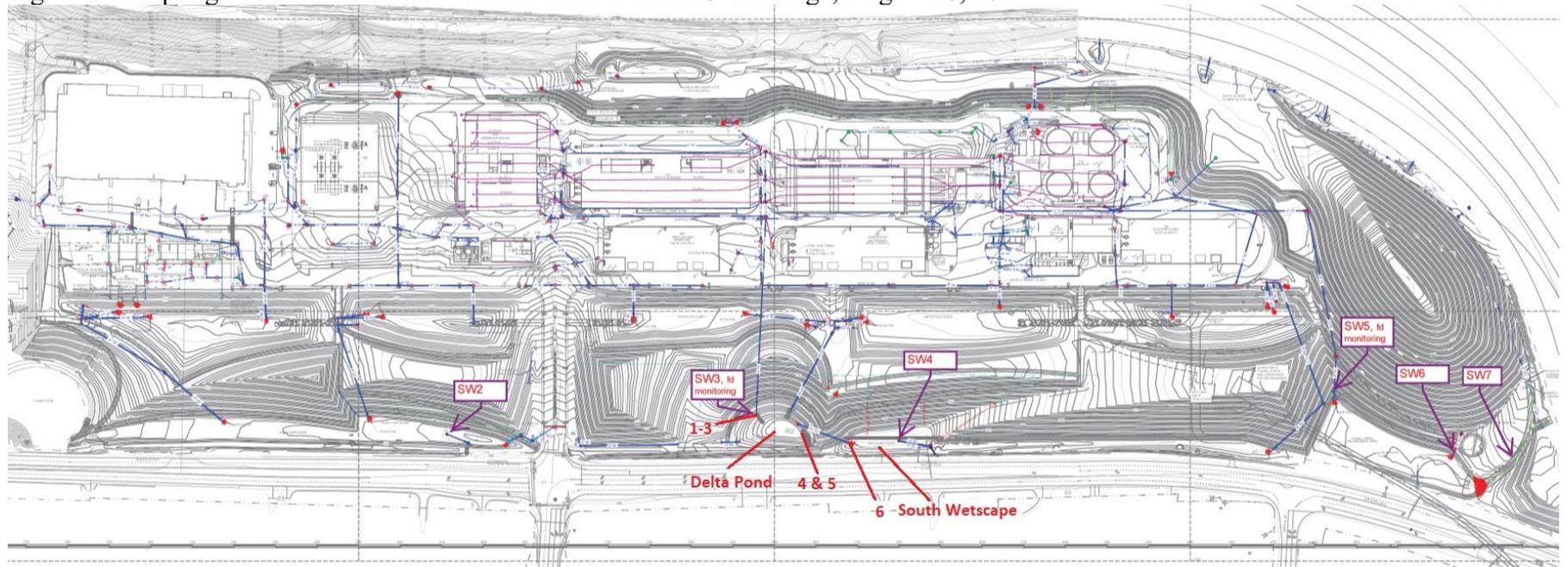
Sean Wilson
Jun Naotsuka
August 28, 2024
Page 3

Figure 1. Aerial view of Brightwater Treatment Plant with Delta Pond and South Wetscape identified.



Sean Wilson
Jun Naotsuka
August 28, 2024
Page 4

Figure 2. Sampling locations for fecal coliforms and NOx for C3 discharge, August 26, 2024.



Sean Wilson
 Jun Naotsuka
 August 28, 2024
 Page 5

Table 1. Results of fecal coliform and NOx samples collected by KCEL on August 19, 2024 (routine monthly sampling) and by Operations on August 26, 2024. Fecal coliform results are as colony forming units per 100-mL (CFU/100-mL).

Map #	Date	Time	Location	Fecal Coliform (CFU/100-mL)	NOx (mg-N/L)
1	8/19/2024	11:23 a.m.	SW3	<1.0	1.7*
1	8/26/2024	4:04 p.m.	SW3	--	1.7
2	8/26/2024	4:06 p.m.	SW3	0.0	--
3	8/26/2024	4:13 p.m.	SW3	E12.4	--
4	8/26/2024	4:17 p.m.	Delta Pond	151	--
5	8/26/2024	4:18 p.m.	Delta Pond	--	0.02
6	8/26/2024	4:25 p.m.	Delta Pond out	--	0.73

*Results are nitrate, not nitrate plus nitrite