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Project: Pateros FP & GSP; Ecology Funding Agreement WQC-2021-PateCo-00027

Reviewed between 2/6/2023 and 8/8/2024 by Coleman Miller

Comments for adherence w/ [WAC 173-240-050](#) and [WAC 173-240-060](#)

Comments:

	Section or Page	Comment	Response
1	Figure 4-1 / Page 50	WAC 173-240-050-d-ii: Figure 4.1, PDF pg. 50 shows sizes but lacks slope, capacity, or direction of flow of existing trunk sewers, nor does it provide identification of trunk sewers. No tabular data found that would address slope, capacity, or direction of flow. Trunk sewers are shown on Figure 4-2 on the plan, and should be also shown on Drawing 4-1, Existing Sewer System; add the symbol to the legend on Figure 4-1.	Trunk mains and flow arrows added to Figure 4-1. Tabular data including flow direction, slope, pipe size, and capacity for existing trunk mains may be found in Appendix F-Hydraulic Capacity.
2	Figure 4-2 / page 52	WAC 173-240-050-d-ii: Boundaries of basins are shown. Needs direction-of-flow arrows.	Flow arrows have been added to Figure 4-2 for existing trunk mains.
3	Figure 4-4 / page 75	WAC 173-240-050-d-iii: The Figure lacks slope, capacity, or direction of flow of proposed trunk sewers. Trunk sewers ARE differentiated on the plan and legend. No tabular data found.	Proposed trunk sewers are shown on Figure 4-4 and described in Table 4-2. Proposed trunk main slope and capacity are tabulated in Table 4-2. Flow direction arrows have been added to Figure 4-4.
4	Figure 4-4 / page 75	WAC 173-240-050-d-iv: Warren Ave Lift (Pump?) station locations not clearly indicated or titled on Figure 4- 4. Is the Warren Lift Station the same as the Main Lift Station?	The Warren Ave Lift Station and Main Lift Station are two separate lift stations. The Warren Ave Lift Station is located along Warren Ave between Eveline St and Chris St. Labeling on Figure 4-4 was modified for clarity.
5	Figure 3-2	WAC 173-240-050-d-v: Figure 2-2 is a USGS topo map but does not show drainage. Figure 3-2 shows future growth and is the most appropriate included map to show proposed and existing streets.	Surface drainage flow arrows have been added to Figure 2-2. Existing streets and ROW where known, are shown on Figure 3-2. No new streets are proposed at this time.
6	Figure 2-4	WAC 173-240-050-d-vi: Figure 2-4. Needs flow direction of major streams, needs high/low water elevations at outfall and controlled overflow locations. Note all potential discharge locations.	Figure 2-4 updated to show flow direction and high/low water elevations at outfall.

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7	Section 3	WAC 173-240-050-e: High population trend. Mostly based on estimates not supported by past population growth future projections. Requested confirmation. This could benefit from another look.	<p>City staff responded directly to this question. Their response is as follows:</p> <p>“We appreciate ECY’s comment. In response, we would like to say that Pateros has put considerable effort into selecting the population growth projections included in the Facility Plan. We believe the projections are an accurate representation of the growth potential of the area; and we selected the growth projections based on our knowledge of community and understating of developments that have been discussed with the City to date.</p> <p>During the planning process the City considered both historical population data and available population projections (including OFM projections for Okanogan County) both of which are documented in the Facility Plan. The process for selecting the growth figures included working with our planning and engineering consultants, obtaining City staff comments/recommendations, review and comment by the City’s wastewater committee, and review/discussion/acceptance by the City Council for incorporation into the Facility Plan projections. During this process the population figures were discussed at two separate public meeting (4/18/22, 9/19/22) which were open for public input. “</p>
8	General	WAC 173-240-050-l: Discussion on O&M projections and how they would affect the wastewater charge per ERU were not found. Both debt service and O&M need to be in a table with annual (or monthly) charges per ERU, and a table with the present worth of each of these costs, over the life cycle (probably not over 50-years but more than 20-years) of the facility.	Refer to Table 7-7 Footnote 2. No additional O&M expenses are anticipated as a result of the plan’s recommended improvements. The improvements are expected to decrease O&M expenses and therefore current sewer rates will cover long-term O&M expenses.

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9	General	WAC 173-240-050-m: Provide statement regarding compliance with any adopted water quality management plan under the Federal Water pollution Control Act.	Refer to new Section 1.2.2 added which reads: <i>"To the best of our knowledge there is no adopted water quality management plan under the Federal Water Pollution Control Act, however, Pateros is in compliance with their NPDES permit and local, County and State planning documents. Refer to Section 2.9 below."</i>
10	General	WAC 173-240-050-m: Requested update of tables with 2021, 2022 and 2023 data, especially population in Table 3-1 and flow/BOD/TSS in table 5-3, 5-4, and 5-5	Table 3-1 is updated to include 2021, 2022, & 2023 OFM population estimates. Regarding influent and effluent flows: a new Section 5.3.3 Recent Influent / Effluent Trends Following 2024 ECY Review was added to the report. We analyzed the City's most recent DMR data to identify whether trends have deviated from previously reported DMRs. We found no discernible changes to the City's influent flows and therefore concluded that the data provided in the Draft WWFP is still representative of the City's influent /effluent characteristics.
11	General	WAC 173-240-060-e: Provide description of the receiving water, applicable water quality standards, and how water quality standards will be met outside any applicable dilution zone	The receiving water description is presented in Section 2.4.5 of the WWFP. Water quality standards outside the applicable dilution zone of the plant meet or exceed the NPDES discharge parameters. Per WAC 173-201A-510, waste discharge permits must include conditions that ensure the discharge will meet the surface water quality standards. Applicable water quality standards are set by the Department of Ecology in the City's NPDES Permit which are presented in Table 5.2 of the WWFP.
12	General	WAC 173-240-060-g: Include basic design data and sizing calculations of each unit of the treatment works. Expected efficiencies of each unit and also of the entire plant, and character of effluent anticipated.	Refer to new Section 6.4 Summary of Recommended Facility Improvements. Table 6-9 includes design flow, loading, and effluent criteria. Table 6-10 summarizes existing and proposed treatment facility improvements.
13	General	WAC 173-240-060-h: Include discussion of the various sites available and the advantages and disadvantages of the site or sites recommended. The proximity of the residences or developed areas to any treatment works. The relationship of the twenty-five year and on hundred-year flood to the treatment plant site and the various plant units	Refer to Section 6.3.7. A fourth bullet point was added to address this comment.

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14	Figure 2-1	WAC 173-240-060-i: Identify location of the plant effluent	Refer to Figure 2-1 for outfall location. Refer also to Section 6.3.6 for a description of the outfall and recommendations. Outfall location shown of Figure 2-1 is approximate and based on the City's understanding of where the outfall discharges into the Columbia River. The plan recommends the outfall be video inspected and the exact location end of the outfall discharge be located.
15	General	WAC 173-240-060-l: Provide detailed outfall analysis	The plan recommends the outfall be video inspected and the exact location end of the outfall discharge be located. The outfall analysis is not included in this plan and will be available under separate cover after the analysis has been completed.