



Public Works Department
City of Bellingham

April 3, 2025

Mr. David Matthews/Mr Greg Lipnickey
c/o Department of Ecology
913 Squalicum Way #101
Bellingham, WA 98225
davm461@ecy.wa.gov/glip461@ecy.wa.gov

RE: Notification of reportable event, permit WA 0023744.

Dear Mr. Matthews,

The evening of 4/1/25 the Post Point Wastewater Treatment Plant experienced a lack of chlorination of the final effluent. From instantaneous total chlorine readings taken at the end of the chlorine contact basin on 4/1/25 we know this event started at 17:40 and lasted for approximately 4 hours and 48 minutes corresponding to a total flow of 2.89 million gallons. Full chlorination was resumed at 21:19 with observation of total chlorine residual at the end of the contact basin by 22:23. The cause of the incident had to do with an overfeed of sodium bisulfite, the agent used to dechlorinate our final effluent prior to discharge.

Over the past few weeks, we have been having feed issues with our sodium bisulfite system, which resulted in multiple pump failures. These issues never resulted in a failure to dechlorinate, but we were experiencing build-up on our feed system lines which concerned us about our ability to rely on this system. After investigating the issue, we determined that the cause was likely the dechlorination agent itself. We believe we got a load of sodium bisulfite that was not up to our typical purity standards. For confidence in dechlorination agent dosing, we decided that we needed to eliminate the batch of sodium bisulfite that was causing feed system problems. We performed small-scale trials on wasting sodium bisulfite in the first week of March 2025, and calculated that after bringing the levels down to a bare minimum, we should not encounter any unintended consequences or water quality issues.

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We then called for a new batch of sodium bisulfite and worked to clear and clean what was remaining in the existing tank on 04/01/25. Operations ran smoothly until it was observed at 15:38 that the chlorine measured at the head of the chlorine contact basin fell to zero. After troubleshooting, manual chlorination was initiated utilizing granular calcium hypochlorite at the secondary clarifier weirs, where normal chlorination occurs. At this time, between 19:40 and 20:15 the manual chlorination was sufficient to override the overfeed of bisulfite to observe at the online analyzer at the head of the chlorine contact basin evidenced by periodic observances of total residual chlorine.

Samples were collected to assess the level of fecal coliform at the end of the contact basin during the event and the results are depicted in the table below:

Samples collected at final effluent 4/1/15- 4/2/25

Date/Time	Fecal Coliform (cfu/100 ml)
4/1/25 18:30	41,000
4/1/25 19:00	59,000
4/1/25 20:00	50,000
4/1/25 21:00	51,000
4/1/25 22:00	45,000
4/1/25 23:00	<20
4/2/25 00:00	20
4/2/25 01:00	<20

Twenty-four hour reporting provisions per Section S3.F of permit WA0023744 were conducted on April 1, 2025 at the following times:

1. Dept. of Ecology - 5:54 pm
2. DOH Shellfish - 5:59 pm
3. Whatcom Co. Dept. of Health - 6:06 pm
4. Lummi Tribe - 6:15 pm

We believe that the sodium bisulfite delivered to us was of inferior quality and the issue was related to a higher concentration of this chemical at the lower level of the tank that was not anticipated nor accounted for in calculations on the emptying of this tank. We have not previously had an inferior load of bisulfite delivered to us that I am aware of, and I am working with the chemical supplier to ensure the quality of our dichlorination agent is maintained.

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To address the possibility of another bad batch of bisulfite requiring us to drain the tanks in the future, we are plumbing in an extra hose attachment and valving system that will allow us to control the location of where the bisulfite is drained. This should eliminate any requirement to drain this chemical into the Process in the future.

In addition, we have identified limitations in our disinfection pumping system to be able to handle spikes in dosing requirements. We were able to construct a temporary auxiliary dosing system to aid us during this event and have started the process of designing a permanent emergency alternative to our disinfection system to avoid these issues in the future.

Please let me know if you need any further information on the reduced disinfection incident at the Post Point Wastewater Plant.

Best Regards,

A handwritten signature in blue ink, appearing to read "Yohann Misquitta".

Yohann Misquitta

Chief Operator Wastewater
City of Bellingham Dept. of Public Works

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