



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

15 W Yakima Ave, Ste 200 • Yakima, WA 98902-3452 • (509) 575-2490

January 31, 2011

Cauffman Family Trustees
John R and Janet L Cauffman, Trustees
27017 Thornhill Drive
Sun City, AZ 85373

Re: Community Sewer and Wastewater District Disposal of Treated Wastewater

Dear Cauffman Trust;

The purpose of this letter is to update you on the wastewater issues at your property near Kennewick, Washington known as Santiago Country View Estates.

The Washington State Department of Ecology (Ecology) issued the mobile home park's State Waste Discharge Permit No. ST-5529 on August 8, 2008, with an effective date of October 1, 2008. The permit expires on September 30, 2013. A copy of the permit is enclosed for your reference. The park is authorized to discharge treated wastewater to evaporation/infiltration ponds at the permitted location subject to limitations for the parameters of Biological Oxygen Demand (BOD), Dissolved Oxygen Demand (DO), Total Coliform Bacteria, Total soluble solids (TSS) and pH.

Several years ago, during the permit writing process, Ecology and your property manager, Richard Simonian had discussions about the possible outcomes for the wastewater. We talked primarily about installing lined evaporation ponds or using unlined ponds and infiltration as the disposal methods. The permit reflected these options and gave you time to study the options and come to a well reasoned conclusion of what option would best suit the situation.

A letter was sent to Mr. Richard Simonian dated February 6, 2008. This letter presents our guidance on the concept of All Known, Available, and Reasonable Methods of Prevention, Control, and Treatment (AKART). Please see the attached letter addressed to Mr. Simonian and how it applies to the submitted engineering report. A basic question that AKART engineering report must answer is capacity of the treatment system.

On January 28, 2008, Harms Engineering Inc. submitted an engineering report on your behalf to Ecology that defined a path forward for the park. This engineering report was approved on May 9, 2008 and the work was to have been completed by April 1, 2010. The requirements in the current permit were based upon the approved engineering report and the schedule of compliance in the permit gave you two years to complete the work, a more than reasonable time.

On January 5, 2011, Len Harms, P.E. sent Ecology a letter containing discussions of groundwater monitoring and several options for wastewater disposal. Harms asked that this letter be accepted as an addendum to an earlier engineering report. Ecology has reviewed Mr. Harm's letter. **Ecology will not accept the letter as an addendum to the engineering report.**



This request is denied because the wastewater from the park is infiltrated into the ground; the permit required that a Hydrogeologic Evaluation be completed to evaluate the impacts of the discharge on groundwater quality. This study included installing groundwater monitoring wells and sampling and analysis. A Scope of Work for this evaluation was to have been submitted by December 1, 2008, with completion of the study over the next several months. A Scope of Work was not received and no progress has been made.

Even though Ecology has granted verbal time extensions for your permit's submittals, it is your responsibility to act in a timely manner. If results of the Hydrogeologic Study demonstrate that ground water contamination is occurring, Ecology will modify the discharge limitations (probably making them more stringent) when the permit is renewed. We will also work with you in determining what treatment process will be appropriate resulting from the study and you will be required to implement those improvements.

Ecology expected that by now, the necessary improvements to the wastewater disposal issues at the park would have been identified and resolved. This has not happened and we are essentially in the same situation as several years ago. Additionally, in the recent correspondence from Mr. Harms on your behalf, he acknowledges that the footprint of the property is not large enough to properly dispose of the volume of wastewater that would be generated if the park would have 200 units, but still bases his analysis on there being 200 homes on site. According to Harms, you will need additional acreage and that none is available.

Ecology's position has not changed. The Hydrogeologic Evaluation must be completed if the park continues to discharge its treated wastewater using infiltration into the ground. Because this evaluation was not completed, we do not have a definitive answer as to the extent of the impact your wastewater is having on groundwater, even at your current population. Furthermore, Benton County may have approved a Special Use Permit for over 200 homes, but it is Ecology's position that until the wastewater issues are resolved, no additional homes should be added to the system.

Should you have any questions or need any additional information, please contact me at (509) 454-7846.

Sincerely,



Jim Yates
Environmental Engineer/Facilities Manager
Water Quality Program

By Certified Mail 7009 2250 0004 4952 4805

By Certified Mail cc: Len Harms Engineering, Inc.
Richard Simonian, Community Sewer and Water District
Wes Burkhead, Community Sewer and Water District