

Department of Natural Resources and Parks **Wastewater Treatment Division**

King Street Center, KSC-NR-5501 201 South Jackson Street Seattle, WA 98104-3855

June 14, 2021

VIA ELECTRONIC MAIL ONLY

Ms. Ryika Hooshangi, Board President Sammamish Plateau Water 1510 228th Avenue SE Sammamish, WA 98075 ryika.hooshangi@spwater.org

Dear Ms. Hooshangi:

I am following up on your April 30, 2021, letter on behalf of the King County Executive. The Wastewater Treatment Division (WTD) is working with the Prosecuting Attorney's Office and we anticipate having a draft cost share agreement available for your review by the end of this month. The District also requested clarification on several items. On the question of flexibility in funding, WTD is willing to allow some of the \$5.927 million for Interim Improvement 4 to be used for other interim capacity improvements, such as Interim Improvement 2 identified in the January 2021 study, provided we agree on terms as part of the cost share agreement.

On the timing of completion for the County's Sammamish Plateau Diversion Project (Phase 1), WTD is continuing its works to keep this project on schedule for completion in 2030. The District requests that WTD pay additional costs if the Diversion Project is not completed by the end of 2030. An agreement to complete a project of this magnitude by a specified date is typically part of a sewer contract extension.

The District's letter also mentions revisiting the Conveyance System Improvement Plan and whether to consider options other than the Diversion Project. WTD is happy to schedule time to discuss this idea further with District staff.

Finally, the District has requested more information on WTD's concerns with assets proposed for a transfer by the District. As noted at the March 22, 2021, Board meeting, WTD is not interested in purchasing these assets. Attachment A to this letter provides more information on issues related to these assets from WTD's perspective.

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I look forward to continuing to work closely with the District to resolve capacity needs and look forward to reaching agreement with the District quickly on the cost share agreement for the \$5.927 million in interim improvements. If you have any further questions, please contact me at 206-477-5501 or Bruce.Kessler@kingcounty.gov.

Sincerely,

DocuSigned by:

Brůče Kessler, PE, PMP

Deputy Division Director

Attachment

cc: Sammamish Plateau Water Board of Commissioners

Kamuron Gurol, Division Director, Wastewater Treatment Division (WTD), Department of Natural Resources and Parks (DNRP)

Sharman Herrin, Government Relations Administrator, WTD, DNRP

Attachment A

This information is a follow-up to your request for more information on concerns King County's Wastewater Treatment Division (WTD) has regarding the assets proposed for transfer by Sammamish Plateau Water (District). Following the District's formal request on August 6, 2020, to transfer a portion of its assets, WTD formed a team of operations, engineering, financial and planning staff to evaluate the assets. As I noted at the March 22, 2021, District Board meeting, WTD has identified several issues which are described in more detail below.

The first issue relates to ventilation rates in (National Fire Protection Association) NFPA 820 for dry well air exchanges. The NFPA 820 is a national standard that provides requirements for protection against fire and explosion hazards specific to wastewater treatment facilities and their associated collection systems. WTD did not receive sufficient documentation from the District on compliance with NFPA 820 for the Inglewood, North Lake, and Central Lake Lift Stations and the control structure.

Another area is the NFPA 70 and 70E for Arch Flash ratings and Short Circuit Power Coordination ratings on the electrical equipment at the three lift stations. NFPA 70E is a national standard to avoid workplace injuries and fatalities due to shock, electrocution, arc flash, and arc blast, and assists in complying with Occupational Safety and Health Administration (OSHA) 1910 Subpart S and OSHA 1926 Subpart K. WTD had questions regarding visual indications on the electrical panels at the three District lift stations and arch flash boundary warning indication for the electrical equipment.

There are also several other areas that WTD did not receive sufficient documentation. Those are the performance of Hazardous Energy Isolation as required by Washington Administrative Code (WAC) 296-803 and NFPA requirements for fire monitoring and suppressions systems. WTD also did not receive the necessary documentation related to compliance with ANSI/ ASME B30 or WAC 296-24 regarding Indoor Overhead Cranes. Also, WTD did not receive documentation regarding the odor control facilities compliance with Puget Sound Clean Air Agency standards for odor control and NFPA 820 ventilation rates for wet well access.

WAC 296-809 requires assessments of confined spaces. WTD did not receive any documentation from the District on these required assessments. A confined space program manual must reflect the current WAC 296-809 language. WTD also did not receive sufficient information on how rescue services are used for a confined space entry for the District's facilities.

Another area of interest is the Fall Protection Work Plans for ladder access into the dry wells of the North and Central Lift Stations. The Fall Protection Program must reflect the current WAC 296-880 standard. The on-site fall protection equipment should be tagged or labeled to confirm that it is American National Standards Institute (ANSI) Z359 Compliant.

From an operations perspective, the Inglewood Hills, North Lake, and Central Lift Stations do not have bypass outfalls and, therefore, do not have a way to divert flows away from the stations in the event of equipment failures.

The upstream storage for the District's lift stations is limited, providing less than 30 minutes for operations staff to respond to emergencies. Also, the current telemetry at the Central Lift Station does not appear to be synced with the other lift stations on the same network.

Finally, WTD did not receive any recent CCTV videos of the District's pipelines which are documented per current industry standards (Pipeline Assessment Certification Program (PACP) standards). Current information is necessary to develop a baseline condition of the pipelines.

This information is based on WTD's evaluation of the assets with the information provided by the District. I hope this information is helpful. If you have any questions or would like to meet to further discuss, please contact me at 206-477-5501.