



STATE OF WASHINGTON

DEPARTMENT OF HEALTH

DIVISION OF ENVIRONMENTAL PUBLIC HEALTH

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November 3, 2015

Melanie Corey
Executive Director
Housing Authority of Skagit County
1650 Port Drive
Burlington, Washington 98233-3106

Re: Connection to Sewer; Raspberry Ridge Large On-site Sewage Systems (LOSS);
System IDs SKG10 and SKG19, Skagit County

Dear Ms. Corey:

In 2011, Washington State Department of Health issued compliance actions to the Housing Authority of Skagit County because of failures of the large on-site sewage systems (LOSS) serving apartments known as Raspberry Ridge I and Raspberry Ridge II.

In January 2012, I sent your predecessor a letter verifying the need to take action. I urged the housing authority to connect the apartments to City of Burlington sanitary sewer in order to protect basic public health and safety and the environment.

When that wasn't possible, your organization worked with my LOSS staff to design and install repairs to the two systems to improve sewage treatment and stop surfacing effluent. Despite these efforts and vigilant operation and maintenance, we still believe that the best solution is connection to the city sewer.

Based on soil conditions, periodic high groundwater, and high sewage strength, we think the risk of future failure is high. Basic public health and safety and the environment could be jeopardized again.

To reiterate what I stated in 2012, our rule allows the following remedies for LOSS failure.

| Remedies | Department of Health Comments |
|--|---|
| Connect residences, structures, lots, and units that are connected to the failing LOSS to <u>another LOSS</u> with sufficient approved capacity or to a <u>sanitary sewer system</u> , if available. | There is no other LOSS nearby for Raspberry Ridge systems to connect to. Connection to Burlington sanitary sewer appears feasible, with City approval and sewer extension. |
| Apply to Department of Ecology for a National Pollutant Discharge Elimination System permit or a state waste discharge permit, if effluent will be discharged to the land surface or into waters of the state. | This is a lengthy process and would result in significant costs to develop a treatment plant and disposal/discharge point. Skagit River water quality is a concern. |
| Cease serving some or all dwellings, structures, lots, or units to reduce the risk to public health. | Reduction in volume of sewage could be a temporary solution, but would reduce the number of housing units available for use. |
| Disconnect all customers; shut down and abandon the LOSS. | This is the option of last resort. |

I'm pleased to find that you've obtained funding from the legislature for sewer extension and connection; and have continued working with city and county governments to get approval to extend and connect to the city's sewage treatment system. As a public health official, I strongly support this outcome for Raspberry Ridge.

If you have questions for us, please contact LOSS staff Jeanne Andreasson P.E. at Jeanne.Andreasson@doh.wa.gov or (360) 236-3360, or Denise Lahmann P.E. at Denise.Lahmann@doh.wa.gov or (360) 236-3348.

Sincerely,



Maryanne Guichard
Assistant Secretary

Enclosure

cc: Corinne Story, Skagit County Public Health Department
Jennifer Johnson, Skagit County Public Health Department
Gary Christensen, Skagit County Planning and Development Services
Bryan Harrison, City of Burlington
Margaret Fleek, City of Burlington
Mark Henley, Department of Ecology
Jeanne Andreasson P.E., LOSS Engineer, Department of Health
Denise Lahmann P.E., LOSS Supervisor, Department of Health

Washington Administrative Code 246-272B-07450 Failures

- (1) LOSS or LOSS component failures include, but are not limited to:
 - (a) Sewage or partially treated sewage on the ground;
 - (b) Sewage backing up into a connected residence or structure caused by slow soil absorption of the treated effluent or other failure;
 - (c) Sewage or partially treated sewage leaking from a septic tank, pump chamber, holding system or collection system;
 - (d) Cesspools or seepage pits where evidence of groundwater or surface water quality degradation exists;
 - (e) Plant growth above the drainfield that indicates the effluent is not filtering down through the soil profile;
 - (f) Inadequately treated effluent contaminating groundwater or surface water; or
 - (g) Noncompliance with standards stipulated in the operating permit.

- (2) The owner shall address and correct all failures immediately. LOSS component failures that can be corrected by repair or replacement must follow the requirements in WAC 246-272B-07400.

- (3) The owner of a LOSS that has a failure shall report the condition to the department by telephone or by e-mail within one business day of discovery.

- (4) The department may require:
 - (a) Modifications, reduction in capacity, changes in operations, additional monitoring, temporary use of a holding tank, or other emergency measures in order to reduce or eliminate the risk to public health and actual or potential environmental contamination;
 - (b) Residences, structures, lots, and units that are connected to the failing LOSS to connect to another LOSS with sufficient approved capacity or to a sanitary sewer system, if available;
 - (c) The LOSS owner to apply for a National Pollutant Discharge Elimination System permit or a state waste discharge permit from the department of ecology, if effluent will be discharged to the land surface or into surface water; or
 - (d) The LOSS to be shut down and abandoned, according to WAC 246-272B-07500.

- (5) When the owner is directed by the department to discontinue operation of a LOSS or to cease serving some or all dwellings, structures, lots, or units, the owner shall give department-approved written notice to all affected customers and property owners within ten business days, return receipt requested.

- (6) The department may direct the owner to discontinue use of the LOSS or any portion of the LOSS due to a system or component failure.