

Water System Plan Review Comments

1. There is an executive summary table of contents, but no executive summary. Since all goals and policies were supposed to have been in the executive summary, the various subsequent references to them within the document (at or near the beginning of nearly every chapter) lack context. Including them where indicated should resolve that.

Olympia Response: It appears that the executive summary was inadvertently left out of the electric submittal of the draft WSP (but included in the hard copy). It has been included in the final version of the Water System Plan.

2. 1.3. Service area – land use and zoning. pp. 7-8. Development of the City’s 2025 comp plan update has already begun.

Olympia Response. The following revision has been made in the above referenced location (Chapter 1, page 7) to address the comment: A required periodic review and update of the City of Olympia Comprehensive Plan has started and will be completed by June 30, 2025. ~~is expected to begin in late 2023 for completion by June 30, 2025.~~

3. 2.1. Federal and state – planning and financial requirements – water system plans. p. 4. The current water system plan approval period is ten years, not six (WAC 246-290-100(9). 2017 amendment). Is this the reason the City’s plan is for 2021-2016 (noting that the prior plan approval didn’t expire until January 22, 2022)? If the City wishes to pursue a ten-year approval, it could update the entire draft toward that end.

Olympia Response. WAC 246-290-100(9) allows for a 6 to 10-year WSP approval. As stated at the pre-plan meeting and reflected in the WSP pre-plan notes, Olympia is interested in a 6-year approval period. No changes have been made to address this comment.

4. 5.3 Planned water conservation activities, beginning p9. In addition to the listed measures, perhaps you’ll want to add that the City’s Unified Development Code contains numerous drought-tolerant landscaping provisions.

Olympia Response: The following revision has been made in the above referenced location (Chapter 5, page 9) to address the comment: “Title 16.60 OMC and Title 18.36 OMC contain native vegetation landscaping provisions” has been added to Table 5.7 Planned Water Conservation Activities (2021-2026), under outdoor.

5. 6.3 Groundwater recharge – McAllister Wellfield Mitigation – Infiltration Facility, p.8. Has the existing groundwater model been used to evaluate any downgradient effects of the Woodland Creek Community Park Groundwater Recharge Facility? Are there any limits on drilling new drinking water wells in an area that would directly receive the reclaimed water?

Olympia Response: Yes, groundwater flow paths and travel times were calculated with MODPATH using the groundwater flow field simulated by MODFLOW. Flow paths and time of travel are described between the infiltration facility and locations of discharge in a September 2010 *Woodland Creek Reclaimed Water Infiltration Analysis Final Report* prepared by Pacific Groundwater Group. There are no known limits on drilling new drinking water wells in an area that would directly receive the reclaimed water, other than those established by the Washington State Department of Ecology related to obtaining water rights or those associated with the Thurston County Coordinated Water System Plan limiting new individual wells within designated public water system service areas. No changes have been made to address this comment.

6. 6.3. Financial Considerations (2014) – Summary of results. P.12. We understand that the cost-benefit analysis showed that groundwater recharge of reclaimed water is the most cost-effective way to use reclaimed water. Please engage with our office if any new specific groundwater recharge projects are proposed.

Olympia Response: Yes, we will engage DOH when groundwater recharge projects are proposed. No changes have been made to address this comment.

7. 7.4 Contaminant source inventory – notification of inventory findings, p. 18. Please review against WAC 246-290-133(3)(v) and (vii). The City may need to adjust its notifications to regulatory agencies and emergency responders to include additional information besides what is mentioned here.

Olympia Response: When completing our next contaminant source inventory, which is expected to be completed by Fall 2023, we will review our notification against Washington Administrative Code requirements. No changes have been made to address this comment.

8. 11.1 Water quality regulations – regulations and revisions to be implemented 2021-2026 – Per-and-Polyfluoroalkyl Substances Rule (PFAS), p.5. Please update discussion of MCLS and SALs here, as well as that on pp. 17-18.

Olympia Response: To address this comment, the following changes have been made:

Chapter 11, page 5:

Per-and Polyfluoroalkyl Substances Rule (PFAS)

Per-and Polyfluoroalkyl Substances (PFAS) are a family of chemicals that are in many consumer products, stain, water and nonstick coatings and certain types of firefighting foams. These chemicals are persistent in the environment and are found in the air, soil, and water. There is no current Federal maximum containment level for PFAS compounds although EPA has begun rulemaking. See Section 11.3 Because of the serious health concerns of PFAS Washington State Department of Health decided to regulate five of these compounds. In November 2021 The Washington State Board of Health set State Action Level's (SAL) for PFOA, PFOS, PFNA, PFBS and FPHxS. The City will begin sampling October 2023. This sampling requirement overlaps with the required PFAS sampling included in the UCMR 5 rule. This will help with staff time and sampling costs required by both rules. - Because of the serious health concerns of PFAS Washington State Department of Health decided the regulated some of these compounds. The Washington State Board of Health is in the process of setting a State Action Level (SAL). This rule should be finalized by the end of 2021. Some of the sampling requirements should overlap with the required PFAS sampling included in the UCMR-5 rule. This will help with staff time and sampling costs required by both rules.

Chapter 11, page 17:

Changing Lead and Copper Rule

Two changes to the lead and Cooper Rule include the Lead and Copper Rule Revisions (LCRR) and the Lead and Copper Rule Improvements (LCRI). The first part of the LCCR is the Lead Service Line Inventory (LSLI). The City is currently working on ~~the thisthis~~ requirement and has hired a consultant to assist with compliance with the this rule by October 16, 2024. The EPA is currently working on the Lead and Copper Rule Improvements and are anticipating finalizing the rule by October 2024. See Section 11.1 for additional information. Changes to the lead and Cooper Rule include are expected to require the Utility to conduct a lead service line inventory and make the inventory available to customers, among other requirements. If the rule is finalized and adopted by

Per -and Polyfluoroalkyl Substances Rule (PFAS)

Because of the serious health concerns of PFAS, Washington State Department of Health decided to ~~he~~ regulated ~~some of these compounds~~ PFOA, PFOS, PFNA, FPBS AND ~~PFHxS~~ by setting State Action Levels. See [Section 11.1 for additional information.](#)

~~In March 2023, EPA proposed a National Primary Drinking Water Regulation (NPDWR) to establish a legally enforceable MCL for six PFAS contaminants. These include PFOA, PFAS, PFNA, HFPO-DA, PFHxS, and PFBS. EPA anticipates finalizing this rule by the end of 2023. The City of Olympia will continue to monitor this rule development and come into compliance when required. The Washington State Board of Health is in the process of setting a State Action Level (SAL). This rule should be finalized by the end of 2021 and is expected to include sampling requirements. See Section 11.1 for additional information.~~

9. 11.3 Emerging issues – water quality impact of future Briggs Well, p. 17. If the Briggs Well is developed, we recommend treating to remove manganese. Even at low source levels, manganese can accumulate in the distribution system and be released at higher concentrations than the source during a chemical or hydraulic upset. For this reason, it may make sense to consider seasonal usage of Hoffman Well (SO8) or installing treatment earlier than planned to manage legacy manganese in the distribution system.

Olympia Response: Thank you for your comment regarding Briggs Well development. Currently, use of the Hoffman well is restricted to supplement supply only during peak hour demands. For example, as reported in Table 3.3 (Source Production Summary), the 2017-2019 average use in million gallons per day for the Hoffman well is as follows:

- June: 0.23
- July: 0.04
- August 0.00
- TOTAL ANNUAL: 0.27

No changes have been made to address this comment.

10. 12.1 Operations and maintenance regulations – operator certification – Table 12.2, p.4. Please update staff information if turnover has occurred since this was drafted.

Olympia Response: The following staff member information has been added to Table 12.2 to address this comment: [John Edwards, 010928, WDW 4, CCS, WTPO 1.](#)

11. 12.1. Operations and maintenance regulations – cross connection control, p.7. This section states that one need was remaining, to replace backflow management software allowing testers to input their own results into the software program. This is not discussed further, please either address or describe why it is not addressed.

Olympia Response: The following revision has been made to address this comment at the location identified above (Chapter 12, page 7): ~~One need remains-~~ which is scheduled for implementation by the City's IS (Information Services) Department in the third quarter of 2023. Replacing backflow management software allowing testers to input their own software program.

12. Please update the cover page to integrate items marked “pending” (which have since been provided separately).

Olympia Response: The (Appendices) cover page has been updated to address this comment. Additionally, documentation of the City of Olympia Council approval of the WSP has been added as Appendix Item ES4.

13. Please number the pages, add WSP table of contents, and create a single integrated document.

Olympia Response: The requested changes have been made.

14. 3.3.1, 3.2.1, 3.4.1, Objective 5A-C performance measures. 3.5.1, 3.6.1, 3.8.3 (at end). 3.9.3 (at end), 3.10.3 (at end), and 3.11.3. Please update/replace “to be further developed”.

Olympia Response: It is assumed that comment 14 is in reference to Appendix ES4, Water System Plan Implementation, Staffing and Monitoring, Working Draft January 18, 2022. The introduction to this appendix item states: *“Although not a regulatory requirement, the City of Olympia Drinking Water Utility (Utility) has elected to demonstrate its commitment to Water System Plan implementation by including this implementation strategy as a Water System Plan appendix item. Since this implementation strategy is intended for internal purposes, it is considered a working draft, with refinement expected to occur in 2022 as reorganization details are worked through”.* As we continued to consider this an internal document which is still underdevelopment, no changes have been made to address this comment.

15. Appendix 1-4. There seems to be an erroneous “Appendix C Intertie Agreement Between the Cities of Tumwater and Olympia” cover sheet inserted following the title page, before the document.

Olympia Response: The cover page has been removed to address this comment.

16. Please check to see if there are some missing exhibits on approximately pp. 742-746.

Olympia Response: Required changes have been made to address this comment.

17. The most recent contaminant inventory is 2019-2020. Has another been conducted?

Olympia Response: The next contaminant inventory is scheduled to be completed by fall 2023 (which is 2 years after our last source contaminant inventory).

18. Page numbering. Please change the page numbering so it does not start over at 1 with each chapter. We suggest moving all individual chapter tables of contents with page numbering to the beginning to form a single table of contents rather than separate, unnumbered ones at the beginning with the only numbered tables at the beginning of each chapter.

Olympia Response: We have reworked the page number throughout the document. We hope the revision meets your formatting expectations.

19. The WSP needs your engineer’s stamp and signature before we can approve it.

Olympia Response: The requested information has been provided.