
Appendix A

RWSP CSO Planning Assumptions, Policies, and Implementation

RWSP CSO Planning Assumptions

Following is the list of assumptions used for CSO planning in the Regional Wastewater Services Plan (RWSP). These assumptions are still valid except where noted as being updated in the 2004 RWSP Update.

- During 1997 RWSP public involvement process, citizens ranked CSO control as a top priority
- King County shall design, construct, operate, and maintain its facilities in accordance with standards established by regulatory agencies and manuals of practice for engineering, so as to meet or exceed regulatory requirements for air, water, and solids emissions, as well as ensure worker, public, and system safety.
- King County will meet the state CSO control standard of one untreated overflow per year on average, recognizing that this may become more stringent in the future due to ESA.
- The City of Seattle has controlled all its CSOs, and no further deterioration in its system is expected.
2004 Update: The City was required to monitor all of its CSO locations and found that some of its CSOs are not controlled. The City was required to develop an amendment to its 1988 plan to bring all sites into control. The control approach chosen by the City is to optimize conveyance and store flows for later transfer to the County for treatment at West Point.
- The RWSP CSO control program includes storage tanks and on-site treatment. Investigation is needed to determine if a roof drain disconnection program conducted by homeowners would be cost-effective before it is used for control.
- King County shall give the highest priority for control to CSO discharges that have the highest potential to impact human health, bathing beaches, and/or species listed under ESA.
- The County will develop CSO programs and projects based on assessments of water quality and contaminated sediments.
- Although King County's wastewater collection system is impacted by the intrusion of clean stormwater, conveyance and treatment facilities shall not be designed for the interception, collection, and treatment of clean stormwater.
- The County will develop a contaminated sediment management plan.
2004 Update: The plan was completed in 1999 and is being implemented.

RWSP CSO Policies and Implementation

The following are RWSP policies for the CSO control program and the status of their implementation as of the 2004 RWSP Update. Implementation status as of 2006, compiled as a part of the CSO control program review, is noted.

Combined Sewer Overflow Policies	How is Policy Being Implemented?
CSOCP-1: King County shall plan to control CSO discharges and to work with state and federal agencies to develop cost-effective regulations that protect water quality. King County shall meet the requirements of state and federal regulations and agreements.	<p>The County has participated in the Washington State Department of Ecology process to define the CSO "event."</p> <p>King County is participating in Ecology's deliberations on new water quality standards and 303(d) listing policies.</p> <p>The Sediment Management Program is investigating if proposed levels of CSO control will be sufficient to meet sediment standards and is working to obtain sediment impact zones for current discharges that cannot meet standards until control projects are completed.</p>
CSOCP-2: King County shall give the highest priority for control to CSO discharges that have the highest potential to impact human health, bathing beaches and/or species listed under ESA.	<p>The Denny Way/Lake Union control project, located at a heavily used public park, and the Henderson/Martin Luther King/Norfolk control project, located on Lake Washington near a public beach, are currently in construction and will be complete in 2005.</p> <p>2006 Status: <i>Projects were completed May 2005.</i></p> <p>The current RWSP project schedule aligns with these priorities.</p> <p>Risk assessments are being conducted as part of some early sediment cleanup actions to determine if there is potential for localized risk from individual CSOs or if there are sediment impacts to ESA-listed species.</p>

Combined Sewer Overflow Policies	How is Policy Being Implemented?
<p>CSOCP-3: Where King County is responsible for stormwater as a result of a CSO control project, the county shall participate with the City of Seattle in the municipal stormwater national pollutant discharge elimination system permit application process.</p>	<p>King County WTD has been participating in the discussions on renewal of the NPDES municipal stormwater permit. Ecology has clarified that the Lander storm drain does not require King County to be a co-permittee with the City of Seattle, but the Densmore drain project does.</p> <p>The City drainage ordinance exempting the City from responsibility for source control in combined areas raised awareness that there is a gap in stormwater pollution prevention services in the combined areas. The City and County are currently in discussion to address this need.</p> <p><i>2006 Status: The City's new NPDES permit (12/1/05) now requires that their Nine Minimum Controls pollution prevention programs be implemented in the combined areas. Coordination discussions between the County and City will be needed.</i></p>
<p>CSOCP-4: Although King County's wastewater collection system is impacted by the intrusion of clean stormwater, conveyance and treatment facilities shall not be designed for the interception, collection and treatment of clean stormwater.</p>	<p>Discussions are underway with the City of Seattle and the Washington State Department of Transportation regarding possible discharge of stormwater and dewatering water to the King County system. The County is reviewing the industrial waste dewatering water policies.</p>
<p>CSOCP-5: King County shall accept stormwater runoff from industrial sources and shall establish a fee to capture the cost of transporting and treating this stormwater. Specific authorization for such discharge is required.</p>	<p>The Industrial Waste Program recovers costs for such discharges.</p>
<p>CSOCP-6: King County, in conjunction with the city of Seattle, shall implement stormwater management programs in a cooperative manner that results in a coordinated joint effort and avoids duplicative or conflicting programs.</p>	<p>Management programs are being jointly conducted in basins discharging to sediment cleanup sites to identify potential sources of recontamination and control those sources. King County is negotiating with the City of Seattle regarding which agency should be responsible for stormwater pollution prevention activities in the combined sewer areas of the City.</p> <p><i>2006 Status: The County has contributed significantly to the planning for stormwater management related to the Alaskan Way Viaduct replacement project. See CSOCP-4. The City's new NPDES permit requires the City to perform the Nine Minimum Controls stormwater pollution prevention activities in the combined sewer areas of the City. See CSOCP-3.</i></p>
<p>CSOCP-7: King County shall develop a long-range sediment management strategy to prioritize clean up of contaminated sediments at specific CSO locations.</p>	<p>Completed in 1999 and in implementation.</p>

Combined Sewer Overflow Policies	How is Policy Being Implemented?
<p>CSOCP-8: King County shall use the results of the 1998 water quality assessment to assess CSO control projects and priorities before issuing the year 2000 CSO update required by the county's national pollutant discharge elimination system permit. Prior to the year 2005 CSO update, the executive shall evaluate the benefits of CSO control projects along with other pollution control projects developed by King County and other agencies. This CSO program review will include, but not be limited to the following: maximizing use of existing CSO control facilities; identifying the public and environmental health benefits of continuing the CSO control program; ensuring projects are in compliance with new regulatory requirements and objectives such as the ESA and the Wastewater Habitat Conservation Plan; analyzing rate impacts; ensuring that the program review will honor and be consistent with long-standing existing commitments; assessing public opinion; and integrating the CSO control program with other water/sediment quality improvement programs for the region. Based on its consideration of the CSO program review, the RWQC may make recommendations for modifying or amending the CSO program to the council.</p>	<p>Water Quality Assessment (WQA) results are used in development of cleanup actions and in decisions about when the Sediment Management Program will need to be involved in other initiatives. The CSO program review and 2005 update process are just beginning and will be reported on in the 2007 RWSP 3-year update report. Regional focus groups are planned to assess public opinion for the 2005 CSO plan update.</p> <p><i>2006 Status: In the 2004 renewed NPDES permit, Ecology changed the due date for the next CSO plan update to 2008. This CSO program review addresses all of the required information. (See Chapter 4 of the program review report.) Public involvement is rescheduled to 2007: Predesign will begin in mid 2006 for the next projects (Barton, Murray, North Beach, and South Magnolia).</i></p>
<p>CSOCP-9: Unless specifically approved by the council, no new projects shall be undertaken by the county until the CSO program review has been presented to the council for its consideration. CSO project approval prior to completion of CSO program review (beyond those authorized in this subsection) may be granted based on, but not limited to, the following: availability of grant funding; opportunities for increased cost-effectiveness through joint projects with other agencies; ensuring compliance with new regulatory requirements; or responding to emergency public health situations. The council shall request advice from the RWQC when considering new CSO projects. King County shall continue implementation of CSO control projects underway as of the effective date of this section, which are the Denny Way/Lake Union, Henderson/Martin Luther King/Norfolk Harbor, and Alki CSO treatment plants.</p>	<p>No projects beyond those listed are under way at this time. The CSO plan update will consider accelerating the Ballard project at the request of the City of Seattle, parts of the King and Connecticut projects as needed to coordinate with the WSDOT Viaduct & Seawall replacement project, and other projects associated with Superfund sediment remediation projects.</p> <p><i>2006 Status: Ballard CSO control will likely be met through the project to replace the failing siphon. The City is considering whether to contribute incremental costs to the siphon project to size it to control its CSOs in the area. WSDOT is developing cost estimates to include pipelines for the future Kingdome/Connecticut project in its replacement of the viaduct. WSDOT structures may obstruct planned pipelines and result in increased costs if pipelines are not included in WSDOT construction. The County will weigh the costs to accelerate installation of these pipelines after the estimates are provided.</i></p>