

**THREE RIVERS REGIONAL
WASTEWATER AUTHORITY**
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Serving & Operated By:
Beacon Hill Water & Sewer District
City of Kelso
City of Longview
Cowlitz County

**THREE RIVERS REGIONAL WASTEWATER AUTHORITY
OPERATING BOARD
SPECIAL MEETING MINUTES
June 20, 2023**

1. CALL TO ORDER and INTRODUCTIONS

Chairman Hillger called the special meeting to order at 2:00 p.m. on Tuesday, June 20, 2023 in the Beacon Hill Water & Sewer District's Meeting Room. Those in attendance were:

Three Rivers Regional Wastewater Authority Representative:

Dell Hillger, Beacon Hill Water & Sewer District (Representative)

Ken Hash, City of Longview (Representative)

Patrick Harbison, Cowlitz County (Representative) (left at 3:31 p.m.)

Mike Kardas, Kelso (Representative)

Staff:

Duane Leaf, General Manager

Debbie Stanley, Clerk of the Board

Guest

Rich Gushman, Gibbs & Olson

Rich Bartel, Beacon Hill Water & Sewer District

Jason Gentemann, Complex Manager, Foster Farms

David Belt, Environmental Manager, Foster Farms

Don Hill, Director of Environmental Affairs, Foster Farms

2. PUBLIC COMMENTS

Mr. Hillger asked if there was any member of the public present other than Foster Farms and Gibbs & Olson staff and wants to make a comment to the Board. No public present, he proceeded with the meeting.

3. PROJECTS – HEADWORKS STUDY

Mr. Hillger stated that the purpose of the meeting is to discuss the study and both parties' concerns. He noted that the Board is open to consider options to resolve everyone's concerns. Introductions were made. Each Foster Farms' (FF) member explained their roles and intentions to help in the study where they can. Mr. Hill indicated that he is committed to get this resolved with open communications. Mr. Gentemann stated that he oversees the local plant with 700 employees. FF pays approximately \$3 million on water/sewer per year. They were able to drop their water usage by one gallon/bird over the last six months and is hoping to go down another one gallon/bird over the next six months. By doing so, it increases the BOD concentration. He requested that the TRRWA allow a 450 ppm daily BOD benchmark temporarily until the headworks study is completed. In addition, he would like surcharges to be based on monthly BOD average concentration of 350 ppm versus his proposed daily BOD benchmark of 450 ppm. Mr. Belt indicated that, to his knowledge, no other location that FF has plants have these limits, just surcharges. Mr. Hill expressed his concern that the limit language is harmful to FF rather than it being a benchmark. His contention is FF is not harming the environment, but any third party would see them as a polluter. He agrees that beyond the benchmark, there is a surcharge. It allows them to put mechanisms in place to correct the issue; it is the specific limit language that hurts FF.

Mr. Belt stated FF cannot do anything different without biological changes; but currently they can get to a BOD benchmark of 450 ppm. Mr. Leaf commented that before 2012, when the TRRWA Pretreatment Policy was adopted, BOD limits were at 250 ppm; he requested it be raised to 350 ppm; the local limit was never 450 ppm. Mr. Belt noted that the Department of Ecology (ECY) has told them that they will make changes to FF permit if it is recommended by TRRWA. He added that he has many emails from ECY and TRRWA with the interpretation and intent of the Pretreatment Policy that he can share with the Board. Mr. Leaf indicated that what Mr. Belt is saying is very different from what ECY said at the meeting with TRRWA Staff, FF Staff, and TRRWA Board Members last fall.

Mr. Hill stated that FF is simply asking the Board to change the language to temporarily set the monthly average limit at 350 ppm and a daily 450 ppm benchmark, with anything over the monthly average being at a surcharge until the study is completed. Mr. Gentemann commented that ECY says it is up to the TRRWA's interpretation of their policy. Mr. Hillger stated that the TRRWA Board will review all the parameters and discuss with ECY. Mr. Harbison noted that Mr. Leaf is trying to protect our plant while still helping the economic growth in our service area. Mr. Gentemann stated that this 450 ppm BOD limit did not hurt the plant in the past, so what harm is it over the next year until the study is finalized. Mr. Leaf indicated that in the summer it does currently impact the plant, let alone what it is likely to do if that loading is increased. Mr. Leaf indicated he would not agree to setting a higher BOD concentration, whether it be a limit or a benchmark, unless ECY says that is possible and there is evidence that a higher limit will not harm the plant under our current conditions. He also disagreed with FF paying surcharges on the monthly average, as that does not account for paying for spikes in treatment costs above the current 350 ppm BOD level, which is the cost model for surcharging.

Mr. Gentemann asked if the TRRWA plant has ever violated their BOD limit because of Foster Farms. Mr. Leaf commented, no, just a feather and grease slug from FF a few years ago. Mr. Gentemann asked what if we did a benchmark to a certain amount of high surcharges. When they do exceed a benchmark, they have to investigate and do a study. Mr. Belt stated that FF did a technology based "AKART" study in 1998. Mr. Gushman indicated that he has not seen any of FF's data; however, there could be an interim solution but he needs to see some data. He mentioned that he would like to see FF's DMR data and their 1998 study. He has not started on this study because he was waiting until after this workshop.

Mr. Belt questioned why FF would have to sample more often than other industries. Mr. Leaf stated that it all depends on discharge days. There was some discussion on why FF has two different samplers. Mr. Hill indicated that by going down to one sampler this would save them \$20,000/year in testing. Mr. Leaf commented that he does not have a concern with one sampler but wants ECY to secure the sampler. Mr. Belt asked to discuss the loading study parameter capacity. Mr. Leaf briefly explained SDCs and how they are charged and handled; they are a composite of flow based on a discharge that meets TRRWA limits. If we raise the BOD limit, it would affect how many SDCs as the loading per SDC would increase, which decreases the number of SDCs available. Mr. Leaf expressed his concern that we get such little flow in summer months; we have only one plant on-line and the flow goes very septic. If we have higher BODs coming into the plant, it affects the overall plant. This is exacerbated by spikes in loading. Our plant is biologically ran, not chemically. Mr. Belt asked if the study would include which side of the plant handles BODs better. Mr. Leaf indicated that they both are designed as mirror plants, but the south plant does not handle low flows as well. Mr. Belt asked if there is any non-potable water available (i.e. river) that could benefit the plant in the summer. The Board commented that regulations prevent that from being done.

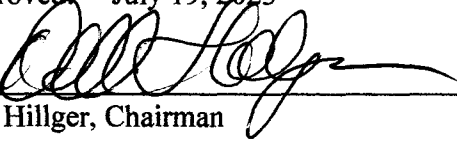
General discussion reiterating both parties' concerns was held. Mr. Hillger thanked FF for attending this workshop and the Board will discuss the parameters at tomorrow's Operating Board meeting.

4. **ADJOURNMENT**

Being no further business to come before the Three Rivers Regional Wastewater Authority, the meeting was adjourned at 3:45 p.m.

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Approved: July 19, 2023


Dell Hillger, Chairman


Debbie Stanley, Clerk of the Board