



P.O. Box 128
Longview, WA 98632-7080
www.ci.longview.wa.us

DATE

Subject: Water Supply Protection - Class I and II Operations
Wellhead Protection Area - Mint Farm Wellfield

To Whom It May Concern:

In an effort to protect the health and safety of the citizens of our community, the Longview City Council has adopted an ordinance to increase water supply protection and prevent contamination of the Mint Farm groundwater aquifer being developed as a municipal source of drinking water supply. You are receiving this letter to inform you about the purpose of the ordinance and the requirements it introduces for certain classifications of non-residential activities based on the volume of hazardous materials managed. Attached is a copy of the recently adopted water supply protection ordinance.

The purpose of the water supply protection ordinance is to protect municipal drinking water supply by establishing development regulations and minimum standards to reduce the risk of contaminants entering the source aquifer. Through extensive study, the City has established a Wellhead Protection Area and prohibits the discharge of contaminants within its boundary. In addition to using best management practices, certain facilities will be required to implement additional precautions to minimize risk.

Commercial operations will be classified by the type and volume of materials being managed and those presenting greater risk will be subject to additional review. Class I Operations are defined as operations which manage over 220 pounds of hazardous materials at any time within a one year time period. Class II Operations are defined as operations which manage over 2,220 pounds of hazardous materials at any time within a one year time period.

Within 180 days of the date of this letter, all Class I and Class II Operations are required to comply with the following minimum standards:

1. Adopt and implement the operational Best Management Practices described in LMC Chapter 17.100 to ensure your operation minimizes the potential risks to drinking water. Certain operations and activities, including but not limited to commercial animal handling, composting, printing, painting, wood treatment, landscaping, road maintenance, fueling, auto repair and scrap yards, will be required to implement additional source control measures from the City's Stormwater Manual as applicable.

- a. Separate and prevent hazardous materials from entering the stormwater system, septic systems and drywells;
 - b. Contain and immediately abate accidental releases, properly recycle or dispose of the hazardous materials, and notify the City within 24 hours;
 - c. Clean and maintain oil/water separators in accordance with the City's Stormwater Manual;
 - d. Manage and minimally apply pesticides, herbicides, fungicides and fertilizers in accordance with the City's Stormwater Manual;
 - e. Decommission unused or abandoned water wells in accordance with WAC 173-160-381;
 - f. Label hazardous material containers and tanks in accordance with Uniform Fire Code, OSHA and/or Washington State Dangerous Waste Regulations;
 - g. Maintain any container, tank, pipe or pump holding hazardous materials and repair or replace leaking equipment promptly;
 - h. Provide adequate volume of impervious secondary containment in areas where hazardous materials are loaded, unloaded, transferred or stored.
2. Develop and implement a Spill and Emergency Response Plan (SERP) to prevent releases and provide measures for treating and disposing of hazardous materials in the event of a spill. The SERP must be updated every five years, or earlier as needed to reflect significant changes in operation, and shall be made available to the City upon request.
 3. Perform regular site inspections in all areas where hazardous materials are managed to identify malfunctioning or deteriorated equipment or containers, operator errors, discharges or other conditions which may lead to the release of hazardous materials. Inspections must be made at least annually, and maintain a written record of the inspections.
 4. Provide annual training to inform all employees about the contamination risks associated with on-site operations. Employees must know and understand the type and location of hazardous materials and related material safety data sheets, how to detect the presence or release of hazardous materials, how to protect themselves against a release, how to locate and use the SERP, and how to prevent the contamination of surface and groundwater.
 5. Class II operations shall prepare and submit to the City, a Closure Plan describing the manner in which their facility will be closed in order to protect surface and groundwater by preventing the release of hazardous materials during or post-closure. The Closure Plan must be updated every five years, or earlier when the volume of hazardous material increased by 25 percent or more.
 6. Upon request, Class I and II Operations shall prepare and submit to the City an Engineering and Operating Report describing the materials and processes associated with their operation, discussion of any discharges, and describing provisions for any future expansion plans.

Existing Class II operations and all bulk petroleum operations within the Wellhead Protection Area are nonconforming uses. A request to become conforming must be filed with the City within 90 days of the date of this letter, and the operation must take the necessary actions to meet all applicable provisions of the water supply protection ordinance to the City's satisfaction. New development is subject to additional restrictions. Unless an Adjustment is approved by the City, new or replacement septic systems, new heating oil tanks, or direct infiltration facilities will not be permitted in the Wellhead Protection Area.

Certain activities are strictly prohibited in the Wellhead Protection Area regardless of operating status, including hard chrome plating, outdoor wood preservation, chemical lagoons and pits, sewage cesspools, radioactive waste disposal, municipal waste disposal, hydraulic fracturing, and any other activities determined by the City to pose unacceptable risk to groundwater quality.

The City may inspect any facility known to manage hazardous materials or reasonably believed to be a potential source of illicit discharge into the Wellhead Protection Area. If best management practices are not being followed or persons willfully contaminate or attempt to contaminate the drinking water supply, the City will pursue enforcement actions to the fullest extent possible.

The Mint Farm aquifer is a critical resource which must be protected in order to safeguard the future of our community. To successfully control illicit discharges and prevent contamination to the aquifer, the City is offering education and technical assistance to businesses, industry and the general public to explain how to implement water resource protection and pollution control practices. If you have questions, would like more information about education opportunities, or feel you have received this letter in error, please contact Amy Blain, Project Manager at 360.442.5206.

Sincerely,

Jeff D. Cameron, P.E.
Public Works Director