

Phase I, WW Phase II, and EWA PH II Formal Draft Comments

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WWA Phase II	Appendix 2	22 of 40	Under the 'City of Puyallup' Section the first and third bullet points are almost the same (except for one word) and one of the bullets should be removed.
WWA Phase II	Appendix 2	26 of 40	Since the numbers provided are estimates and approximations, the City believes this should be reflected in the language. For example under 'City of Puyallup, bullet 1 'The Permittee shall construct and implement water quality improvement projects (WQIPs) that are <u>estimated to</u> achieve a combined average annual sediment reduction of 155 ons per year by the end of 2012. This represents <u>approximately</u> 94% of the 20 year TMDL implementation target.
WWA Phase II	Appendix 2	27 of 40	We believe bullet 2 should read 'The Permittee shall construct and implement WQIPs that <u>remove or</u> treat 21.5 MG...'
WWA Phase II	Appendix 2	27 of 40	Regarding Bullet 6. It is our position that any facility that has been monitored to determine actual removal or treatment rates should be able to use that study/monitoring data as a basis for the function and credit for that structure. There are many instances where the WWSM's prescriptive treatment flow rates for the mechanical facilities may not agree with removal rates based on field conditions/water quality inputs. We do believe that if the facilities are not working as planned/designed they should be upgraded to ensure the intended removal rates. However, the facility removal rate should be able to be counted as indicated by monitoring while the additional treatment retrofits/upgrades are being designed and implemented, as long as there is adequate monitoring data to back up the partial removal efficiency. There are cases where we sound Engineering could dictate using partial treatment from one device that may be underperforming and install a second device to bridge the gap to the required basic or enhanced treatment levels. If you do not have on the ground data for the facility, it makes sense to us to use the designated treatment flow rates, but if actual data has been obtained in the installed location, that should always be utilized.