

Roy Light

I am assuming that a new general permit would require permit coordination, permit fees and additional administration. It seems more logical to simply add this to the NPDES permits as they come up for renewal to reduce the financial burden on the rate payers and the level of needed bureaucracy. Also, if you want to change treatment performance to reduce nutrients you should figure out a way to finance this change, rather than another unfunded mandate. It is going to be expensive to implement this change