



## WASHINGTON WATER SERVICE

**Rosario Operations** 107 Firehouse Lane  
Eastsound, WA 98245 Tel: (877) 408-4060

Department of Ecology  
PO Box 74600  
Olympia, WA 98504-7600  
Attn. Kevin Leung  
Puget Sound Nutrient Source Reduction Project Manager

RE: Response to the proposed Puget Sound Nutrients General Permit

Dear Mr. Leung,

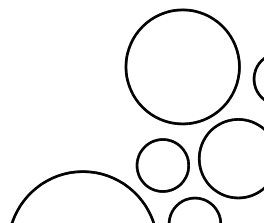
As the technical capabilities of various treatment types vary, it would seem *varying* limits shall be required for different types of treatment facilities. It would also follow that the volume of discharge would have a more significant effect than the concentration. As the plant operated by Washington Water Service (Rosario 29891) is limited to an average of 0.07 MGD effluent, the impact on the receiving waters is significantly less than that of an urban waste water treatment plant.

If the General Permit is chosen as the vehicle with which DOE moves forward to achieve the goals determined to be in the best interest of the environment and the public, I would strongly suggest that within the permit there be specified demonstrably achievable goals specific to treatment type with appropriate and available proven technology with which to achieve set goals.

Washington Water Service takes issue with the percentage reductions that are presently required. Instead, the focus should be placed on the volume discharged therein for all the regulated pollutants now and in the future to meet the goal of improving the health of the receiving waters. Eventually previously unregulated chemicals, medications and by-products will be identified and regulated as well. The fastest way to succeed in the goals set out will be to limit the volume of these constituents in our waste streams.

It will be our intention, regardless of the specific direction taken, to work as responsible stewards in partnership with our regulators to take the right course of action at the appropriate time. I would be remiss if I did not point out that, as this organization operates with financial obligations and budgets which are projected at least two years in the future, we need information as early in the process as possible.

We know and appreciate that DOE has been an excellent partner in the past and consistently worked with us, the concern of possible penalties and liabilities must be present in our





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deliberations. We will move as quickly as possible to comply with new requirements and significant operational changes would typically be a 3-5 year lead-time.

I appreciate the opportunity to have my concerns and suggestions heard and contribute to your process.

Respectfully,  
Roy Stanton  
Local Manager WWSC  
Cc Dustin Bilhimer  
Matt Brown

