

City of Langley

Subject: Ecology's Preliminary Determination to Develop a Puget Sound Nutrients General Permit

The City of Langley is not in favor of a General Permit to control nutrients in discharges from domestic wastewater treatment plants WWTP. Each WWTP discharging to the sound is already bound by an individual permit. It is unclear how a general permit would improve upon the individual permit approach. The individual permit is facility focused, evaluates discharge loads and mixing zones. A general permit places additional burden on resources both within the City and within the DOE. This is an unnecessary additional cost which would be passed on to our 617 rate payers, and further restrict already stretched funds used for capital improvements within our aging system.

It is stated in the request for comment "this comment period is an opportunity for systems to provide information about the wastewater treatment plant and Puget Sound water quality". The City feels that this is a classic example of putting the cart before the horse. If additional data is required in order to make a decision that data should be collected prior to placing additional requirements on these facilities.

The City of Langley believes the Individual Permit is the best approach to control the impact that a facility has on the receiving body of water. This process is already in place, is clearly understood, and is facility focused. For these reasons the City does not support Ecology in the pursuit of a general permit at this time.