



RECEIVED

OCT 22 2019

DEPARTMENT OF ECOLOGY

October 18, 2019

Water Quality Permit Coordinator
Northwest Regional Office
State of Washington Department of Ecology
3190 160th Avenue SE
Bellevue, WA 98008-5452

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

On behalf of the City of Bremerton I would like to thank Ecology (ECY) for the opportunity to comment on the proposed Puget Sound Nutrient General Permit for domestic wastewater treatment plants (WWTPs) that discharge to the Puget Sound. ECY's proposed permit would introduce new concepts that will likely impact clean water utilities as the state continues to develop nutrient management plans for Puget Sound. This letter is intended to supplement the responses from the Coalition for Clean Water and the Puget Sound Clean Water Utilities, of which the City is a member, with additional comments that are specific to Bremerton.

Bremerton takes justifiable pride in our wastewater infrastructure and the staff that operate and maintain it, and we view ourselves as a leader in protecting the health of the Puget Sound. Our leadership role is evidenced by our nearly annual receipt of Ecology's Outstanding Wastewater Treatment Plant Award, and further confirmed by our being the first complex system in Washington State to reduce Combined Sewer Overflows (CSOs) to less than one per year per outfall in compliance with State law. This reduction of more than 99.9% in CSO events and volume resulted in our receipt of numerous accolades from the Governor, Puget Soundkeeper Alliance, and ECY. While we're proud of this accomplishment, it was the result of a \$50M investment which included the assumption of approximately \$35M in loan debt by the City and its ratepayers. Payment on this debt will continue until 2029 when the last loan will finally be paid off. We believe this debt burden should be a consideration when considering the implementation of any new regulations.

Consideration should also be given to the unique operational issues at our plant that we're actively working with ECY to understand and address, and it should be noted that correction of these issues may require improvements from the US Navy which would be largely outside our control. While we've historically maintained compliance with the NPDES Permit for both of our WWTPs, ECY recently shifted our BOD₅ discharge limits to CBOD due to impacts from saline wastewater discharges originating from Puget Sound Naval Shipyard (PSNS). The saline wastewater discharge from PSNS presents significant technical, operational, and economic

impacts as described below in greater detail. Further, we do not currently understand how this discharge would impact our ability to comply with any new permit requirements.

Elevated salinity levels were first noticed in December 2014, coinciding with the onset of chronic WWTP process upsets and permit violations. Although we have been working with ECY and PSNS to address saltwater discharges to enable the WWTP to return to historical permit compliance reliability, progress has been slow. We have retained a consultant to evaluate the adverse impacts of the saline wastewater discharge on the condition and capacity of the existing collection system, WWTP infrastructure, and biosolids land application site. We anticipate that the study will determine that significant capital expenditures will be necessary to address salinity-related corrosion and other issues. Such capital projects are essential to the reliability of existing infrastructure and wastewater treatment. The prioritization of such projects versus potential nutrient removal projects must be considered. Furthermore, saline wastewater can adversely impact biological nitrogen removal processes. Thus, this issue presents a technical challenge requiring time to understand the implications of salinity on the feasibility, design, and cost of potential nutrient removal requirements in the event salinity is not addressed at the source by PSNS in a timely manner.

The City wants to be part of the solution in addressing Puget Sound water quality issues when robust scientific analysis shows that higher levels of treatment provide meaningful and demonstrable environmental benefits. While being a good steward of environmental resources, we must also be a good steward of fiscal resources. We strive to manage clean water infrastructure maintenance and improvement projects in a responsible manner balancing the prioritization of different projects and competing demands for capital dollars. Recognizing our significant ongoing and anticipated capital expenditures and technical challenges identified above, we request that the general permit include provisions that allow the City time to identify and implement cost-effective nutrient control measures according to a schedule that considers our utility-wide infrastructure needs and unique technical challenges arising from the ongoing discharge of saline wastewater from PSNS.

Please contact me if you have any questions regarding the City's current salinity study. We look forward to being an active participant in ongoing discussions of ECY's proposed Puget Sound General Nutrients Permit.

Sincerely,



Tom Knuckey, PE
Director of Public Works and Utilities