

City of Arlington Comments on  
Preliminary Draft of the Puget Sound Nutrient General Permit,  
March 15, 2021

Page	Section	Reference	Remark
1	II.A.	4 <sup>th</sup> pgh	We understand WWTPs located upstream of the downstream-most freshwater monitoring station in a basin are included with the remainder of the basin as “anthropogenic background” (point and non-point sources, collectively). 1) What efforts are proposed to expand monitoring upstream of these WWTPs? 2) WWTPs should be stakeholders in expanding/establishing this monitoring program. 3) What are the criteria that excluded these WWTPs from coverage in the first permit cycle that would need to be satisfied for coverage under the second permit cycle?
9	III.C.	AL <sub>0</sub> inset	The City supports using the 99% UCL for calculation of AL <sub>0</sub> to in order to allow operators more freedom in adaptively managing for system optimization. Tighter thresholds, at least initially, could serve as an impediment to overall nutrient reductions, e.g., by curbing adaptive efforts using measures that may pair the potential for greater reduction rates with greater risk of failure.
18	IV.B.	Last pgh	While we appreciate the cost savings and simplicity of collecting a single sample, and can appreciate the benefit to Ecology staff if permittees report the same sample twice—once for each permit—this is an unnecessary duplication of data in the 21 <sup>st</sup> century. Ecology should maintain a single water quality database with all related records for each facility. This would avoid errors and discrepancies by allowing various permit administrators to query the same set of data.
20	V.B.	Entire section	The City may choose to comment in greater detail during review of the formal draft regarding the appropriateness of the specific optimization actions in each Tier—1, 2, and 3.
20	V.B.	Entire section	It is not clear that the permit recognizes optimization actions are not necessarily one size fits all with respect to targeted pollutants. E.g., some actions to reduce TIN in marine waters could inhibit maximum reduction of phosphorus in fresh waters in a situation where phosphorus has the greater relative impact
22	V.C.	Tier 3 Inset	The scope of Tier 3 actions that WWTPs must take (under the scenarios described) SHOULD vary by facility size. They SHOULD ALSO vary based on the extent their AL <sub>1</sub> exceedance is outside the range of 3-10 mg/L.
22	V.C.	Tier 3 actions	These actions should include exploration of secondary treatment of nitrogen removal by routing effluent through constructed wetlands.
22	V.D.	Reporting Inset	A standardized form is preferred because it removes opportunities for errors in technical judgement, and facilitates rapid entry and reporting.