

SUMMARY RESPONSE:

Puget Sound Nutrient General Permit Comments:

Page 1 Section II.A: Describing the Puget Sound Dischargers as contributors does not provide a strong case for limiting the permit to only Puget Sound Dischargers.

Page 7 Section III.A and B: The sections does not provide a magnitude of the how much WWTPs contribute to low DO or how often, only that nutrients from plants have a reasonable potential to effect DO. The sections appear to be missing information on how the proposed load triggers will impact DO during the term of the permit. The sections do identify that more science is needed to establish WQBELs.

Page 8, 9 & 10 Section III.C: Using the highest confidence level is preferable, however it is still based on the assumptions that the plants, going forward, will behave in a manner similar to how it performed during the period that the historic data set was recorded, which may or may not be the case. Plant efficiencies relative to nitrogen can change depending on how a plant targets other permit requirements. While historic data is a good starting point, new data should be collected before limits are established.

Page 11 Section E: As it appears, utilities with multiple plants would be required to experiment with optimization on nitrogen reduction at each plant at the same time. Given limited staffing resources, we would suggest allowing for staggered optimization timeframes between plants or combining limits while performing optimization at a single plant.

Page 11 Section III.E Table 4: For municipalities owning two treatment plants, which discharge to the same basin of the Puget Sound, does DOE consider the bubble general permit?

Page 14 Section IV.A, last paragraph, first sentence: Reference to Tables 1-3 should be Tables 5-7.

Page 19 Section V.A, 1st paragraph, last sentence: Is the Monitoring and Reporting preliminary draft referring to section IV or is it referring to separate document? Same question in the 4th paragraph

Page 19 Section V.C: Moving to Planning Requirements if AL₁ is exceeded in the first permit cycle is not practical before nitrogen targets are known.

Page 23 Section V.D. Nutrient Plan Components, c.ii: It appears impractical to assume plants not designed for nitrogen reduction to reach and remain below 10 mg even with all optimization strategies in use. It may be better to target a percent reduction from initial level or levels after the baseline year.

Page 23 Section V.D. Nutrient Optimization Plan Components, c.ii.2: For treatment plants that don't have the nutrient removal capability (processed designed for BOD and TSS removal only) and currently maintain TIN loadings below ALo, does para 2 mean to evaluate Tier 1 actions listed above?