

# City of Mount Vernon

## Comments on the Preliminary Draft Puget Sound Nutrient General Permit.

- The proposed monitoring schedule is time consuming and costly in what you are requiring for a facility that has an average daily flow of 3.4 MGD. We are being required to monitor 4 times per week due to our design capacity of 15 MGD. The 15 MGD flow is designed for hydraulic capacity not biological treatment. We completed a \$38,500,000 upgrade in 2008 to meet the requirements of our Order on Consent to reduce our CSO's to no more than one per year. We have met those requirements. If we are required to change our process and go into BNR mode for nutrient removal our plant capacity will be reduced to 7.6 MGD.

We would like our monitoring requirements to be more reasonable and actually reflect our actual average daily flow of 3.4 MGD.

The proposed monitoring schedule will create an increase in the need of both financial and staffing requirements. It will also create additional staffing requirements on weekends to complete required monitoring. Is Ecology providing funds to offset these unexpected increases to our budget?

- DOE conducted field studies to assess water quality conditions in the Lower Skagit River. DOE subsequently completed a Total Maximum Daily Load (TMDL) study of the Lower Skagit River for DO in 1997. The studies and modeling evaluated the effect of current and projected waste loads and non-point loads on dissolved oxygen. At that time, the DO criterion for our receiving waters, 8.0 mg/l Class A Excellent, was being met.

Has there been any additional studies to counter these findings? Have the water quality standards changed since the study was performed?

- What will the permit fees be? What will the fees be based off of?

- If we are required to change our process to BNR mode to meet nutrient removal requirements our plant capacity will be reduced in half. What considerations will be given for not meeting our Order on Consent to reduce our CSO's to no more than one per year?