Paul Pickett

• It's wonderful that you are doing "Straight to Implementation" approach and getting permits in place. But your position is weaker without a TMDL in place for South Sound nutrients. Issuing permits is important, but also put a TMDL in place to strengthen the case of what's needed.
• II.C: There is a missed opportunity to remove WWTPs up in the watershed. They should be included in the General Permit, if only to require monitoring.
• The Nutrient Action Levels are complex and one area where assessment of the methodology is needed. This look like a key part of the permit – who has to take action and who doesn't. Describe how plant size is taken into consideration. Describe how the economic base of the plant is considered.
• The tiered monitoring structure seems reasonable. Some analysis into the monitoring should be described to show whether the correct parameters are being monitoring at a reasonable frequency.
• The Optimization section seems fuzzy. It is difficult to understand exactly what it proposes. It also could benefit from a stronger engineering-based approach with firm and clear expectations and assessment metrics. An NPDES permit is not a group counseling session, it's a regulatory prescription.
• The Planning Section is even fuzzier. It appears to overlap the Optimization section, which is confusing. The idea of a "layer of onion" approach is good, but it needs to be laid out more clearly in defined components, with the interaction of components described. What you seem to be suggesting is: 1) the plant-based engineering assessment; 2) a source assessment – how to reduce nutrients with upstream strategies in the communities feeding the WWTP; 3) regional strategies for cooperation or consolidation between plants, or consistent source control strategies at a regional scale. This needs more analysis and a restructuring with revisions for clarity and focus.
• I'm not sure how Ecology can mandate any regional activities beyond what an individual plant controls. Ecology should consider rule-making for regional activities.
• The modeling is mentioned in several areas. It drives this permit in many ways, but it's also mentioned as being inadequate for some decisions. This could be explained more clearly.
• Overall the structure and benefits of the permit should be explained from a high level. The permit appears to just do a lot of paper shuffling while nutrient loads continue to climb. If this is not true, evidence should be provided about his it will effectively reduce nutrients.
o The permit should trigger actions that reduce nutrients "immediately" (i.e. in the first 5-year permit cycle). The current draft permit looks like it requires a lot of planning and paperwork, but little substantive and quantifiable results.
o Has the age of the plant been considered – older plants would be ripe for upgrade.
o Do the annual reports have teeth – are they linked to monitoring so reductions can be demonstrated?
o Permits are supposed to have effluent limits. Does it set enforceable permit limits at the beginning and end of the first 5-year permit cycle? Does it lay out a long-term target for nutrient reduction with a reasonable horizon of planning, funding, engineering, construction, and initiation of treatment operations?