

Scott Wilson

Burden on Small Facilities

There are many facilities that this general permit and future limits would impact which are very small. Right now, the general permit considers a small plant to be less than 3 MGD. However, there are many plants that are significantly smaller. These plants are less than 0.3 MGD and their discharge to the Puget sound is extremely small relative to the rest of the plants listed in the general permit. Therefore, I think it would be appropriate for a 4th plant size designation to be considered in the general permit which considers the burden new permit requirements will have on these small systems. These small systems often don't have the same resources, staffing, budgets, experience and are often within hardship communities which will make any changes to their permit requirements more challenging to meet. I think it should be considered that these new requirements will give these facilities significant burden while they are contributing the least to the problem. As mentioned, a 4th plant size group, less than 300k gallons per day, should be considered with reduced permit limits, testing requirements, and additional time to meet future limits.

STEP Systems

The Fisherman Bay WWTP and Eastsound WWTP both treat wastewater from a Septic Tank Effluent Pump (STEP) system. The BOD to TKN ratio is very low on STEP system effluent entering these WWTPs. Not only are these plants extremely small and within a hardship community, but treating STEP system effluent poses an extra challenge and expense for these facilities to denitrify effectively. These facilities are also located within hardship communities, have systems discharging less than 200,000 gallons per day, and are discharging in a significantly less problematic area of the Puget sound. I think this additional challenge should be acknowledged and these facilities should be given reduced permit limits, testing requirements, and additional time to comply with limits.

Facilities Already Under Construction or Design

There are facilities that for some reason or another are already under the design or construction on improvements to their WWTPs. These facilities have spent years planning, budgeting, and paying for improvements to their existing wastewater treatment plants. I think it should be considered that if new permit limits are implemented right after their new plant is built, this will be an unfair extra burden and result in significant extra costs to plan, design, and pay for new improvements while they are still likely paying off the improvements just made. In these situations, I think additional time should be given to plan for and implement future improvements in a reasonable timeline. It should also be considered that the AL limits have been based on data from these facilities existing plants and this data should not necessarily be used and that new data should be gathered and potentially the AL limits should be adjusted when the new plant improvements are online.

Authority of Permit Manager

Obviously, every plant is unique and brings with it unique challenges to adequately treat wastewater. I think more authority should be given to the DOE permit managers over the requirements of the systems they manage and that a blanket general permit might not be the best solution for every plant. These permit managers know their systems in detail and should be allowed to use their best judgement on what is appropriate for each facility.

Timing

Overall, I think the timing these new nutrient removal permit requirements are being implemented is too fast and that facilities should be given ample time to plan for and implement new requirements. In small hardship communities located in remote areas, it can be hard to find staffing and funds to implement new requirements. It should be understood that all facilities do not have the ability to respond as quickly as others and should be given additional time to prepare. My suggestion would be to develop what the future requirements would be, and in many cases, inform the facilities that planning would be required at the time of their next General Sewer Plan or Facilities Plan.

Thank you for considering these comments.