

# LOTT Clean Water Alliance

LOTT Clean Water Alliance  
500 Adams St. NE  
Olympia, WA 98501

March 15, 2021

Eleanor Ott, P.E.  
Water Quality Program  
Washington State Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504-7600

RE: Comments on the Preliminary Puget Sound Nutrient General Permit  
LOTT Clean Water Alliance

Dear Ms. Ott,

LOTT has been providing nutrient removal for 26 years at the Budd Inlet Treatment Plant. We are one of the few Puget Sound plants subject to stringent discharge permit limits for nutrients. We are also subject to an active TMDL that indicates 20% of the dissolved oxygen impairment to our receiving waters is from wastewater discharges and non-point sources north of Budd Inlet. LOTT is encouraged that the proposed Puget Sound Nutrient General Permit provides a pathway to reduce a portion of this nutrient loading.

LOTT upgraded its secondary treatment plant in the early 1990s to meet nutrient removal requirements. The upgrade involved new treatment basins/tankage to provide aeration and anoxic zones and piping to recycle treated wastewater through the zones repeatedly. The upgrade cost over \$30 million at the time. Once the system was built, LOTT began to optimize the process, taking advantage of some of the actions listed in Tier 1 and Tier 2. LOTT has just begun an ambitious upgrade of the nutrient removal system to further optimize the process. Construction of the current project will cost about \$29 million. LOTT ratepayers' investments in nutrient removal have been substantial.

Thank you for the opportunity to provide comments on the preliminary draft nutrients permit. LOTT's comments are presented below.

1) LOTT requests treatment plants that discharge less than 10 mg/L AND that stay under the AL0 threshold be exempt from optimization requirements and from the annual optimization report requirement. The rationale/benefit of requiring optimization and an optimization report from that category of dischargers is not clear, and would be burdensome. It would also be burdensome to Ecology, who would have to spend limited resources tracking and reviewing reports for plants that are meeting expectations for nutrient reduction. It should also be noted that plants like LOTT that already have nutrient removal processes are actively optimizing 24/7 ♦ documenting those many daily steps appears unnecessary and unproductive. An exemption would make the steps outlined in the Appendix A Action Level Flow Chart more equitable. Currently, the chart does not acknowledge a scenario in which plants that discharge

less than 10 mg/L also stay under AL0. That level of performance should be recognized by reducing optimization requirements.

2) LOTT is concerned about the cost and staff time implications of the dual monitoring and reporting requirements. It would be helpful to understand how the General Permit and Individual Permit reporting requirements will be streamlined.

3) Treatment plants without existing nutrient removal processes are unlikely to have adequate tankage to support effective aeration and anoxic zones. Without the tankage, the benefit of many of the Tier 1 and 2 optimization actions is likely to be limited.

4) The methodology used to set the AL0 and AL1 thresholds seems reasonable and workable.

5) In section III D, page 11, a reference is made to design flow. Please specify to which design flow this refers (Maximum Month Design Flow (MMDF), Maximum Day Design Flow, or Peak Hourly Design Flow).

6) Please include units for AL0 and AL1 in Table 4.

7) Bioaugmentation might be a good addition to Tier 3.

8) The types, information, and triggers required for the various reports and plan are unclear. A table with this information would help illustrate the differences for each of these.

a. It seems that the annual report and the annual plan are the same thing. Are they?

b. Is the Nutrient Reduction Evaluation report supposed to be a one-time requirement, due at the end of the permit term? If this requirement will be addressed by C1, why is it listed separately?

9) In Section VI C, page 27, a reference is made to TN. Should this be TIN?

10) LOTT is in favor of a regional study, option C1, where Ecology gathers the needed data for all plants of all sizes.

11) The two options given for regional studies do not seem to be in conflict. LOTT supports both. Thank you for your consideration.

Sincerely,

Lisa Dennis-Perez

Director of Environmental Planning & Communications

LOTT Clean Water Alliance  
500 Adams St. NE  
Olympia, WA 98501

March 15, 2021

Eleanor Ott, P.E.  
Water Quality Program  
Washington State Department of Ecology  
P.O. Box 47600  
Olympia, WA 98504-7600

RE: Comments on the Preliminary Puget Sound Nutrient General Permit  
LOTT Clean Water Alliance

Dear Ms. Ott,

LOTT has been providing nutrient removal for 26 years at the Budd Inlet Treatment Plant. We are one of the few Puget Sound plants subject to stringent discharge permit limits for nutrients. We are also subject to an active TMDL that indicates 20% of the dissolved oxygen impairment to our receiving waters is from wastewater discharges and non-point sources north of Budd Inlet. LOTT is encouraged that the proposed Puget Sound Nutrient General Permit provides a pathway to reduce a portion of this nutrient loading.

LOTT upgraded its secondary treatment plant in the early 1990s to meet nutrient removal requirements. The upgrade involved new treatment basins/tankage to provide aeration and anoxic zones and piping to recycle treated wastewater through the zones repeatedly. The upgrade cost over \$30 million at the time. Once the system was built, LOTT began to optimize the process, taking advantage of some of the actions listed in Tier 1 and Tier 2. LOTT has just begun an ambitious upgrade of the nutrient removal system to further optimize the process. Construction of the current project will cost about \$29 million. LOTT ratepayers' investments in nutrient removal have been substantial.

Thank you for the opportunity to provide comments on the preliminary draft nutrients permit. LOTT's comments are presented below.

- 1) LOTT requests treatment plants that discharge less than 10 mg/L AND that stay under the AL<sub>0</sub> threshold be exempt from optimization requirements and from the annual optimization report requirement. The rationale/benefit of requiring optimization and an optimization report from that category of dischargers is not clear, and would be burdensome. It would also be burdensome to Ecology, who would have to spend limited resources tracking and reviewing reports for plants that are meeting expectations for nutrient reduction. It should also be noted that plants like LOTT that already have nutrient removal processes are actively optimizing 24/7 – documenting those many daily steps appears unnecessary and unproductive. An exemption would make the steps outlined in the Appendix A Action Level Flow Chart more equitable. Currently, the chart does not acknowledge a scenario in which plants that discharge less than 10

mg/L also stay under  $AL_0$ . That level of performance should be recognized by reducing optimization requirements.

- 2) LOTT is concerned about the cost and staff time implications of the dual monitoring and reporting requirements. It would be helpful to understand how the General Permit and Individual Permit reporting requirements will be streamlined.
- 3) Treatment plants without existing nutrient removal processes are unlikely to have adequate tankage to support effective aeration and anoxic zones. Without the tankage, the benefit of many of the Tier 1 and 2 optimization actions is likely to be limited.
- 4) The methodology used to set the  $AL_0$  and  $AL_1$  thresholds seems reasonable and workable.
- 5) In section III D, page 11, a reference is made to design flow. Please specify to which design flow this refers (Maximum Month Design Flow (MMDF), Maximum Day Design Flow, or Peak Hourly Design Flow).
- 6) Please include units for  $AL_0$  and  $AL_1$  in Table 4.
- 7) Bioaugmentation might be a good addition to Tier 3.
- 8) The types, information, and triggers required for the various reports and plan are unclear. A table with this information would help illustrate the differences for each of these.
  - a. It seems that the annual report and the annual plan are the same thing. Are they?
  - b. Is the Nutrient Reduction Evaluation report supposed to be a one-time requirement, due at the end of the permit term? If this requirement will be addressed by C1, why is it listed separately?
- 9) In Section VI C, page 27, a reference is made to TN. Should this be TIN?
- 10) LOTT is in favor of a regional study, option C1, where Ecology gathers the needed data for all plants of all sizes.
- 11) The two options given for regional studies do not seem to be in conflict. LOTT supports both.

Thank you for your consideration.

Sincerely,

Lisa Dennis-Perez  
Director of Environmental Planning & Communications