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August 16, 2021
WW-21019

Eleanor Ott, P.E.
Washington State Department of Ecology
PO Box 47696
Olympia, WA 98504-7696

Subject: Comments on the Puget Sound Nutrients General Permit (PSNGP) and Fact Sheet

Dear Ms. Ott:

Pierce County appreciates the opportunity to provide comments on the Puget Sound Nutrients General Permit and Fact Sheet. In accordance with the direction provided, Pierce County's comments are attached and have also been submitted online on the Department of Ecology's website.

Pierce County has been proactive in the planning, financing, and building of capacity to treat our community's wastewater to much higher standards than has been required under NPDES Permit No. WA0039624. The County invested over \$350M, Pierce County's largest capital project, to achieve this goal. We are interested in protecting this investment, while at the same time developing a certain and reasonable path forward to accomplish our mutual goals with Ecology.

In support of the broader effort, Pierce County has been a collaborative partner throughout this process. This includes actively participating as a utility representative on the General Permit Advisory Committee. Pierce County worked side-by-side with representatives from the regulatory agencies, the environmental community, as well as our other utility colleagues to assist in the development of the draft recommendations document, which was considered during the development of this draft PSNGP and Fact Sheet.

Pierce County's recommendations and comments are included in comprehensive tables (Draft PSNGP Pierce County Sewer Division Comments and Draft Fact Sheet Pierce County Sewer Division Comments) for both the draft permit and fact sheet, along with this transmittal letter. We would like to highlight the following key concerns that relate to both direct impacts to the Chambers Creek Regional Wastewater Treatment Plant (CCRWWTP), as well as broader regional and long-range concerns including specific concerns about conditions that have been added to the Puget Sound Nutrients General Permit since the Preliminary DRAFT PSNGP was published:

- **Excessive Reporting Requirements:**
 - The permit documentation requirements within this permit are excessive and would create an administrative hardship to the Sewer Division. Nutrient reduction, though important, is only one area of treatment within a highly integrated system. Focusing so much attention on documenting every step of this process (especially for early adopters) is not the best area to focus the utility's attention as it does nothing to improve the overall performance of active seasonal nutrient reduction processes.

- **Nutrient Reduction Evaluation:**
 - AKART assessment for achieving concentrations of 3 mg/L (or equivalent load reduction) on both an annual average and seasonal average basis.
 - Requiring facilities to assess 3 mg/L on an annual basis before WQBELs can be established is premature and would divert resources away from the current optimization goals. In-depth analysis should be conducted based on the water quality standards that will be identified through the bounding scenario runs with the Salish Sea Model (SSM) and not on arbitrary and unsubstantiated performance goals.

- **Incentives for Early Adopters:**
 - The excessive reporting requirements within this draft permit do not take in to account the effort early adopters have taken to reduce nutrients, nor does it streamline the reporting process to account for facilities that are further ahead than others. Plants that are currently implementing seasonal nutrient reduction efforts should not have to justify their efforts if they can show the plant is reducing nitrogen below the action levels.

- **Categories for Domestic WWTPs**
 - The term 'dominant' is not appropriate for classifying larger WWTPs that discharge to the Puget Sound. This term dominant can be perceived as negative and does not accurately reflect the situation. The term 'Largest Loaders' is used within the Fact Sheet and better reflects the situation. Pierce County would propose using 'Largest Loaders' (LL) for large dischargers and 'Smallest Loaders' (SL) for small quantity dischargers.

- **Develop a Multifaceted Long-Term Puget Sound Water Quality Program:**
 - This program should track the nitrogen reduction efforts and ensure the implementation strategy is working as intended to support the water quality goals of the Puget Sound. Ultimately, solutions will likely require actions outside of any one agency's governance/authority. The new General Permit should provide a pathway towards development of collaborative partnerships to do so.

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Should you have any questions about these comments please contact me at (253) 798-3031 or Patrick.Kongslie@piercecountywa.gov.

Sincerely,



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Sewer Maintenance & Operations Manager
Pierce County Planning & Public Works

PK:srd

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