

City of Anacortes WWTP
Draft Puget Sound Nutrient General Permit Comments
By: Rebecca Fox (Plant Manager) & Corrin Hamburg (Laboratory Supervisor)



August 13, 2021

The City of Anacortes respectfully submits the following comments on the Draft Puget Sound Nutrient General Permit (NGP).

WWTP Discharger Categories:

- In addition to the current proposed TIN load categories of dominant (D) and small (S) for the 58 affected wastewater treatment plants (WWTPs), the City of Anacortes suggest a third classification of **Moderate (M) TIN load WWTP** be added as a middle category solely for monitoring frequency purposes. Permittees with moderate TIN loads would include WWTPs that discharge **100-1,000 lbs/day**. Based on the Action Levels presented within the Draft NGP there are a total of 13 WWTPs that would fall under the proposed Moderate TIN load category. Moderate TIN Loaders would have the potential to discharge a combined total of **2,698,400 lbs/year**. The total potential discharge for the Moderate TIN Loaders is **10%** of the potential discharge of the **remaining 14 remaining Dominant TIN Loaders**.
 - **Category Proposal:**
 - Small <100 lbs/day
 - Moderate 100-1,000 lbs/day
 - Potential Loading: 2,698,400 lbs/year (10% of Dominant TIN Loader total)
 - Dominant >1,000lbs/day
 - Potential Loading: 26,323,400 lbs/yr

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Wastewater Treatment Plant	Catego	Proposed Class	lbs/yr	lbs/day	Sum lbs/yr
Birch Bay Sewage Treatment Plant (STP) WA0029556 D	D	M	64,600	177	2,698,400
Snohomish STP WA0029548 D	D	M	78,900	216	
Lakota WWTP WA0022624 D	D	M	118,000	323	
Anacortes WWTP WA0020257 D	D	M	163,000	447	
Port Angeles WWTP WA0023973 D	D	M	170,000	466	
Salmon Creek WWTP WA0022772 D	D	M	195,000	534	
Port Orchard WWTP (South Kitsap WRF) WA0020346 D	D	M	208,000	570	
Redondo WWTP WA0023451 D	D	M	241,000	660	
LOTT Budd Inlet WRF WA0037061 D	D	M	243,000	666	
Edmonds STP WA0024058 D	D	M	250,000	685	
Miller Creek WWTP WA0022764 D	D	M	289,900	794	
Tacoma North No. 3 WWTP WA0037214 D	D	M	336,000	921	
Lynnwood STP WA0024031 D	D	M	341,000	934	
Mt Vernon WWTP WA0024074 D	D		380,000	1041	26,323,400
King County, Brightwater WWTP WA0032247 D	D		419,000	1148	
Bremerton WWTP WA0029289 D	D		577,000	1581	
Chambers Creek WWTP WA0039624 D	D		577,000	1581	
Marysville STP WA0022497 D	D		577,000	1581	
Lighthouse Point WRF/Blaine STP WA0022641 D	D		583,000	1597	
Midway Sewer District WWTP WA0020958 D	D		601,400	1648	
Post Point WWTP (Bellingham STP) WA0023744 D	D		969,000	2655	
King County, South WWTP WA0029581 D	D		1,530,000	4192	
King County, West Point WWTP WA0029181 D	D		1,810,000	4959	
Everett STP WA0024490 D	D		1,880,000	5151	
Tacoma Central No. 1 WWTP WA0037087 D	D		2,410,000	6603	
Lake Stevens Sewer District WWTP WA0020893 D	D		6,670,000	18274	
Kitsap County, Central Kitsap WWTP WA0030520 D	D		7,340,000	20110	

Monitoring Schedule for Moderate TIN Load Permittees:

- Monitoring proposal for Moderate TIN Loader category
 - **Sample Frequency:**
 - Reduce to 1 time per week.
 - Sample frequency of 2 times per week is too frequent for Moderate TIN Loaders. This would nearly double Anacortes laboratory expenses, this does not include staff hours for operators, the laboratory supervisor and management.
 - Testing 1 time per week testing is more reasonable for scheduling and financial considerations.
 - **Exclude Weekends & Holidays:**
 - Anacortes is a mid-sized WWTP with limited staffing levels on Weekends and Holidays. Current staffing levels would not support the additional proposed sampling and testing requirements.

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- **Exclude Rotational Basis:**
 - Sampling on a rotational basis adds logistic time and coordination that most mid-sized plants are unable to accommodate.
 - Scheduling lab work based on a continual rotational basis is challenging and leaves a lot of opportunities for error. Lab work follows a well-defined weekly schedule to ensure tests are not missed or conducted on the wrong day. Rotating testing through the days of the week requires a 5-week schedule, resulting in a different schedule each week and each month since there are 4 weeks in a month. This rotation would be confusing to staff and hard to track. Current composite sampling includes setting samplers up on Sunday and collecting samples Monday through Friday when staffing levels are adequate.
- **Exclude CBOD from Sampling on a Rotational Basis, Exclude CBOD Sampling on Weekends & Holidays:**
 - CBOD hold time is insufficient to collect sample on weekends and holidays then hold sample for testing on weekdays when plant is fully staffed.
 - If the in-house is unable to analyze CBOD samples, local environmental labs are not able to meet the holding time requirements for samples collected on a rotational basis throughout seven calendar days.

Proposed monitoring schedule for Moderate TIN Load category:

Table for Moderate TIN Loaders – Influent

Parameter	Units & Specifications	Minimum Sampling Frequency	Analytical Method ¹	Laboratory Quantitation Level ^a	Sample Type
CBOD ₅	mg/L	1/week ^b	SM5210-B	2 mg/L	24-hour composite ^d
Total Ammonia	mg/L as N	2/week ^b	SM4500-NH ₃ -B/C/D/E/F/G/H	0.02 mg/L	24-hour composite ^d
Nitrate plus	mg/L as N	1/month ^c	SM4500-NO ₃ -E/F/H	0.1 mg/L	24-hour composite ^d
Nitrite Nitrogen					
Total Kjeldahl Nitrogen (TKN)	mg/L as N	1/month ^c	SM4500-N _{org} -B/C and SM4500-NH ₃ -B/C/D/E/F/G/H	0.3 mg/L	24-hour composite ^d

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Table for Moderate TIN Loaders - Effluent

Parameter	Units & Specifications	Minimum Sampling Frequency	Analytical Method ⁱ	Laboratory Quantitation Level ^k	Sample Type
Flow ^a	MGD	1/week ^b	-	-	Metered/recorded
CBOD ₅ ^a	mg/L	1/week ^b	SM5210-B	2 mg/L	24-hour composite ^d
Total Organic Carbon	mg/L	1/month ^c	SM5310-B/C/D	1 mg/L	24-hour composite ^d
Total Ammonia	mg/L as N	1/week ^b	SM4500-NH ₃ -B/C/D/E/F/G/H	0.02 mg/L	24-hour composite ^d
Nitrate plus Nitrite Nitrogen	mg/L as N	1/week ^b	SM4500-NO ₃ -E/F/H	0.1 mg/L	24-hour composite ^d
TKN	mg/L as N	1/month ^c	SM4500-N _{org} -B/C and SM4500-NH ₃ -B/C/D/E/F/G/H	0.3 mg/L	24-hour composite ^d
Total Inorganic Nitrogen	mg/L as N	1/week ^b	-	-	Calculated ^f

Parameter	Units & Specifications	Minimum Sampling Frequency	Analytical Method ⁱ	Laboratory Quantitation Level ^k	Sample Type
Total Inorganic Nitrogen	Lbs/day	1/week ^b	-	-	Calculated ^g
Average Monthly Total Inorganic Nitrogen	Lbs	1/month ^c	-	-	Calculated ^h
Annual Total Inorganic Nitrogen, year to date	Lbs	1/month ^c	-	-	Calculated ⁱ

Proposed Footnote

b 1/week means two 1 times during each week and on a rotational basis throughout the days of the week.

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Table 1. Summary of Permit Report Submittals:

- Include all required report submittals
 - Add Annual Report and Nutrient Reduction Plan submittals for Dominant Loaders
 - Add Nutrient Optimization Plan and AKART Analysis submittals for Small Loaders

If you have any question regarding these comment, please don't hesitate to contact Rebecca Fox, Wastewater Treatment Plant Manger, at 360.299.1501 or by email at beckyf@cityofanacortes.org.