

# City of Edmonds

August 13, 2021

The City of Edmonds (Edmonds) respectfully submits the following comments on the Department of Ecology, Draft Puget Sound Nutrient General Permit (PSNGP). The comments have been developed by Edmonds staff working in collaboration with our engineering consultant, Jacobs.

If you have any questions regarding these comments, please do not hesitate to contact Pamela Randolph, Wastewater Treatment Plant Manager, at 425.771.0237, or by e-mail at [pamela.randolph@edmondswa.gov](mailto:pamela.randolph@edmondswa.gov).

1. General. The monitoring, analysis and reporting requirements of the Draft PSNGP will place a substantial economic burden on dischargers, necessitating the addition of staff, budgeting of outside laboratory services, budgeting of outside consulting services, and costs for optimization implementation. These new expenditures have not been captured within existing budgets and rate structures, and dischargers should be given a one-year period to obtain the required outside services, funding and utility rate adjustments before the new requirements for PSNGP reports, submittals, and reporting take effect.

2. Tables 1 and 2, Summary of Permit Report Submittals and Required On-Site Documentation. There is a large number of Permit Report Submittals and On-Site Documentation(s) required by the PSNGP; however, not all are listed in Tables 1 and 2. For example, the Annual Report does not appear in Table 1. It would be of great assistance if all of the PSNGP submittal and documentation requirements are concisely summarized in Tables 1 and 2 to help POTWs navigate through and better comply with these requirements.

3. S2.D Modification of Permit Coverage, Significant Process Changes. Please clarify/elaborate with examples of a significant process change due to a corrective action. Presumably this would only apply to plant or process modifications that go beyond the scope of plant optimization which are mostly operational modifications.

4. S4.B, Table 5 Dominant WWTPS, TIN Action Levels. Please elaborate on the basis of the TIN action levels in Table 5. The values are changed from the AL0 levels in the preliminary draft permit for many facilities, e.g. reduced significantly for King County plants and moderately increased for Edmonds. For Edmonds, the action level increased from the AL0 of 409,000 lb/yr in the preliminary draft permit to 419,000 lb/yr. The current Edmonds Action Level is still considerably lower than the 478,000 lb/yr that would be obtained if a sampling frequency of 1 sample per month is used in the Bootstrap method to better reflect the historical dataset, as detailed in our comments submitted to Ecology on 3/15/2021 on the preliminary draft permit, under comment No. 6, Nutrient action level calculations. Please explain the basis of the current Edmonds Action Level value and why the proposed adjustment based on 1 sample per month does not appear to have been taken into consideration. Please also confirm that the No. 2 and No. 3 comments in Edmonds' 3/15/2021 comments on the data gaps and outliers have been addressed.

5. S4.C Nitrogen Optimization Plan, General. The Nitrogen Optimization Plan and prioritized optimization strategies do not appear to be separate, up-front Ecology submittals. Rather, they are

submitted through the Annual Reports. Please confirm.

6. S4.C Nitrogen Optimization Plan, General. Is development of prioritized list of optimization strategies to be completed in first year of permit?

7. S4.C Nitrogen Optimization Plan, General. How is: "By May 1, 2022, select at least one optimization strategy for implementation" determined and communicated to Ecology? It is said that "The Permittee may exclude any optimization strategy considered but found to exceed a reasonable implementation cost or timeframe that exceeds one year. Documentation must include an explanation of the rationale and financial criteria used in the exclusion determination." Is the selection solely at the City's discretion based on what the City deems as a reasonable implementation cost? This selection does not appear to be a separate, up-front Ecology submittal, but submitted through the Annual Reports. Please confirm.

8. S4.C.3 Influent Nitrogen Reduction Measures/Source Control. Influent nitrogen reduction measures/source controls are best performed as part of the comprehensive Nutrient Reduction Evaluation as opposed to the more tactical Annual Reports, to provide the necessary time for the required evaluations and facilitate a holistic assessment of reduction opportunities. Can flexibility be allowed for permittee to develop a program to reduce influent TIN loads as part of either the optimization plan or the Nutrient Reduction Evaluation? Also, please elaborate and provide guidance on how to "Identify strategies for reducing TIN from new multi-family/dense residential developments and commercial buildings." Will this require monitoring of flows/loads and installation of equipment such as grease traps?

9. S4.D.1.a Action Level Exceedance Corrective Actions. The compliance with the PSNGP is assessed by annual mass loadings in accordance with the Action Level trigger values. A reasonable approach to economically achieve the compliance is to optimize the TIN removal seasonally, i.e. achieving higher TIN removals in summer and lower TIN removals in winter. Corrective actions under S4.D.1.a would require a retrospective assessment of exceedances on an individual day basis. The assessment of exceedance of the equivalent daily TIN action level (=annual TIN Action Level/365 days) would be incomplete or inaccurate unless a plant quantified TIN daily, year-round, and targeted the same level of TIN removal without seasonal variations. The goal of the PSNGP is to reduce annual mass loadings of TIN to the Sound, and the assessment of daily exceedance values does not contribute to meeting that objective.

10. S4.E, Nutrient Reduction Evaluation. AKART analyses have not been commonly performed on/for municipal wastewater treatment plants, and in particular for nitrogen removal. Since so many AKART analyses will be performed under the PSNGP, it would be beneficial and efficient for Ecology to provide additional guidance to help frame the AKART analysis and financial test considerations, including a proposed list of treatment technologies that are required to be analyzed, at a minimum.

11. S4.E, Nutrient Reduction Evaluation. The AKART analysis narrative in the Nutrient Reduction Evaluation, Section S4.E appears very focused on treatment plant-based grey infrastructure approaches. Can non-point source reductions and WAC 173-201A-450-offsets/trading also be considered in the AKART analysis?

12. S4.E.5.c, Economic Evaluation for Nutrient Reduction Evaluation. The permittee is required to

"Develop capital, operation and maintenance costs and 20-year net present value using the real discount rate in the most current Appendix C to Office of Management and Budget Circular No. A-94 for each technology alternative evaluated." There are a variety of AKART processes, some of which will very likely be considered but found inapplicable/inappropriate due to site-specific conditions and thus excluded from more detailed evaluation. Economic analysis for these screened-out alternatives will be costly and unnecessary, and a narrowing process should be allowed to provide an efficient assessment framework. Please confirm that economic evaluations are not required for alternatives that are considered but screened out as inapplicable/inappropriate under a narrowing process.

13. S4.E.5.d, Environmental Justice (EJ) Review. Edmonds is relatively unique in that it receives wastewater from not only the City, but also from portions of adjacent communities of Mountlake Terrace, Ronald Wastewater District District/City of Shoreline, Olympic View Water and Sewer District, and the City of Lynnwood. Mountlake Terrace in-turn provides wastewater service to a portion of Brier. In addition, the City receives varying flows from a portion of the King County wastewater system and exports a portion of its flow to King County. The City of Edmonds sends a significant amount of flow to the Lynnwood wastewater plant. Edmonds residents are required to pay their proportional share of all O&M and Capital treatment plant upgrades. City of Edmonds residents would potentially be required to pay for upgrades of two treatment plants that are uniquely situated and will be significantly expensive to upgrade. The Edmonds service area is so diverse; demographics so widely dispersed across varying government jurisdictions; and source flows so variable given the King County flow transfer, that we see no way to develop an accurate and defensible EJ review. What may be affordable for one of the component service area communities may not be affordable for another.

14. S6 Monitoring Schedules and Sampling Requirements. The effective date for start of PSNGP influent/effluent monitoring should be identified (e.g., within "X" calendar days of the effective date of the PSNGP permit coverage). A minimum 60-day allowance should be made for municipalities to put into place sampling and analysis plans and obtain any necessary outside services.

15. S9,A. Currently DMRs for individual NPDES permit are submitted by 15th of the following month. Please confirm that 28th day of following month will be the deadline for the DMR submitting for purposes of meeting both the individual and general permits, and one submission per month is needed for meeting both permits.

16. S4.D.1.d. "If a Permittee exceeds an action level two years in a row, or for a third year during the permit term, the Permittee must begin to reduce nitrogen loads by implementing the proposed approach submitted per S4.D.1.c following Ecology's written approval". No specific deadline is specified for the implementation of the proposed approach. The proposed approach most likely would involve modifications to the operations and may take time to optimize to achieve the desired TIN reduction. Is the permittee not required to achieve the TIN reduction by a certain deadline, provided that they start implementing the approach?

17. G1 Discharge Violations. "All discharges and activities authorized by this general permit must be consistent with the terms and conditions of this general permit. Any discharge of any pollutant at a level in excess of that identified and authorized by the general permit is a violation of the terms and conditions of this permit." Is the exceedance of the TIN Action Level a violation, or something

that merely triggers corrective actions under S4.D, and is therefore not considered as a violation provided corrective actions are taken?



# CITY OF EDMONDS

[www.edmondswa.gov](http://www.edmondswa.gov)

## WASTEWATER TREATMENT PLANT

200 2ND AVENUE S. • EDMONDS, WA 98020

(425) 771-0237 • FAX (425) 771-0255

MIKE NELSON  
MAYOR

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