

## Draft Puget Sound Nutrient General Permit Comments

- Section S.4.C.3 requires development of a program to reduce influent nitrogen loading as part of the annual optimization report. Because such measures are mostly outside the direct control of the utility, generally requiring changes to City or County codes, there is likely few or no immediate actions a utility could take. Please provide more information on what is expected, as it could take several years to develop and institute the necessary programmatic changes.
- Section S.4.D.1.a requires determining the number of days an action level was exceeded. More information is needed, as it is unclear how this is to be figured from an annual limit. Is this based on figuring out how many days before the end of the year the annual limit was reached?
- Section S.4.D.1.c requires preparation of an engineering report on how to reduce TIN by 10% if the action level is exceeded. Section S.4.D.1.d requires this be implemented if the action level is exceeded two years in a row or 3 years total. For many smaller facilities (less than a few MGD), it may be most cost-effective to implement a solution that focuses on the higher level reduction needed ultimately, rather than undergoing two separate projects. Given that, can the engineering report submitted be the nutrient reduction evaluation (rather than a separate report)? If practical, can they then implement a phased approach that may not immediately target 3 mg/L TIN, pending the development of limits for each facility?
- Initial discussions with personnel at Ecology suggested that nutrient reduction evaluation included in prior general sewer plans or engineering reports could be accepted as the required nutrient reduction evaluation under Section S.4.E. Is that still possible or will all facilities need a completely new evaluation regardless of past work? Will this evaluation serve as an engineering report for future implementation, such that another report need not be submitted prior to implementation?
- Section S.4.E.3 (as well as other sections) references only 3 mg/L as the target for the evaluation, and no longer mentions 8-10 mg/L as was noted in the preliminary draft permit. It is presumed that this does not necessarily mean all facilities will need to meet a 3 mg/L limit as part of the initial limits (i.e., dischargers with smaller loads that do not have a significant far field impact and are not discharged directly into critical areas), but must have a plan to achieve it, correct? Presumably, consideration of a phased approach to meet 3 mg/L TIN would still be a practical consideration for plants that may not need to meet 3 mg/L TIN initially?
- Section S.4.E.3 (as well as other sections) also references an annual or seasonal average. What season, as this could make a big difference in the requirements for some facilities?
- Footnote b for Table 11 states that “2/week means two (2) times during each week and on a rotational basis throughout the days of the week.” Does this mean that sampling is expected to occur every day of the week at different times? Many of the facilities don’t have staff that work weekends to collect and analyze samples, and a schedule that rotates through every day of the week would require most of those facilities to hire additional staff at significant expense. Instead, for facilities that aren’t already staffed 7 days a week, sampling should be limited to Monday-Thursday so that sample collection and analysis do not require work on the weekends and hiring of additional staff.

- Appendix A defines a day as midnight to midnight. Few plants are staffed 24 hours, and so typically samples are collected in the morning (8 am to 8 am). As this has not been an issue prior, presumably this will be fine for sample collection under the general permit?
- Appendix C reference many different attachments. Presumably most, or all, of these would be contained in a single annual report, correct?