

David Ragsdale

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- Take caution not to open attachments or links unless you know the sender AND were expecting the attachment or the link. Nutrient Email Ellie Ott, As the former EPA employee most directly involved with Ecology's efforts to evaluate the water quality impacts of these discharges, it is very disturbing to see the state trying to once again avoid taking necessary regulatory action to protect water quality. Study of the impacts of WWTP discharges began with the Deschutes/Budd Inlet TMDL evaluation well over 20 years ago. To avoid completing a TMDL for nutrient impacts on Budd Inlet, Ecology decided to expand the study to evaluate the impacts of all central and south Puget Sound dischargers. After expending an incredible amount of limited federal and state funding, those studies conclusively demonstrated the impacts of these dischargers require that their nutrient loading be reduced. I am writing to object to Ecology's proposal to allow sewage treatment plants to continue to discharge nitrogen and toxics to Puget Sound at current unsafe levels of pollution that are already suffocating marine life, harming Chinook salmon and orcas, causing massive algal blooms, and fundamentally changing the food web. For over 20 years, Ecology has taken no regulatory action, just watching as water quality in Puget Sound has continued to deteriorate. Now, you propose to legalize the same do-nothing approach. Ecology's proposed general permit to allow 58 sewage treatment plants to continue polluting Puget Sound with unsafe levels of nitrogen fails to meet its responsibility to protect Puget Sound. This proposal is contrary to both the Clean Water Act and to Washington laws that require the use of modern sewage treatment to keep water quality as clean as possible. I urge you to change course. Ecology should stop dragging its feet and issue discharge permits with pollution limits that will protect Puget Sound now and into the future, when population increases and climate change will only make the situation even worse than it is today. Since the "reasonable potential" that the current discharges from these facilities are causing and contributing to degradation of water quality and designated beneficial uses, Ecology should immediately issue orders to limit any increased discharge of pollutants into the collection systems of these facilities while treatment upgrades are installed. Such orders would accomplish two important tasks. One, the degradation currently being caused by these discharges will not get worse during the interim. Second, not allowing additional connections to the WWTP will provide the most effective motivation to these dischargers to install treatment in the shortest reasonable time (the timeframe specified in WA state water quality standards). Please take the regulatory actions to protect water quality that is required by both state and federal law. David Ragsdale
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