



August 16, 2021
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Subject: "DRAFT PUGET SOUND NUTRIENT GENERAL PERMIT" Comments

Ecology has requested comment regarding the Draft Puget Sound Nutrient General Permit for municipal Wastewater Treatment Plant (WWTP) discharges to Puget Sound. The City of Port Angeles has reviewed the Department of Ecology's draft general permit and appreciates the opportunity to submit comments.

The City of Port Angeles would like to better understand the water quality and scientific basis for including Port Angeles in the Puget Sound Nutrients General Permit. The scope of the Salish Sea Model map (Figure 1) that identifies potential permittees extends far outside of the Puget Sound and adjoining water bodies as previously defined by Ecology in WAC 173-228. The purpose of WAC 173-228 was to establish a Vessel Sewage No Discharge Zone (Figure 2) to protect health, water quality, and sensitive marine resources.

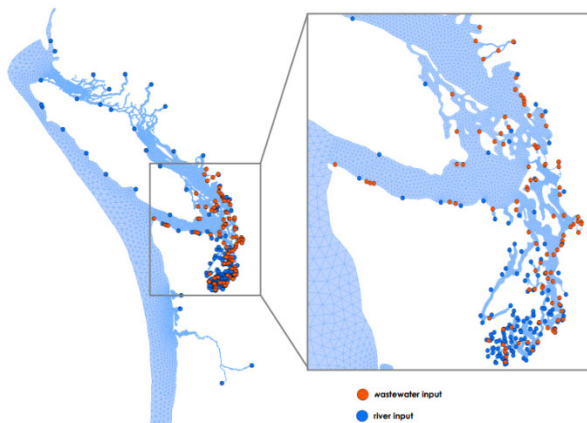


Figure 1 Map of all Point Source Discharges included in the Salish Sea Model

(Note: This map includes all wastewater sources included as point source discharges in the Salish Sea Model, including Ecology-permitted domestic and industrial facilities, EPA-permitted facilities, and Canadian facilities.)

Figure 1

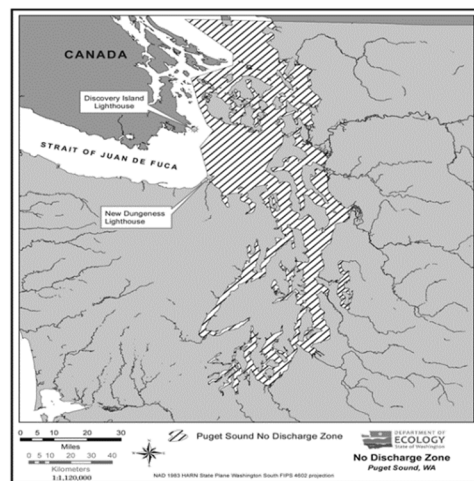


Figure 2

Stakeholders at the City of Port Angeles noted a discontinuity in the boundaries defined in the two figures above. The majority of the Strait of Juan de Fuca falls outside of the Puget Sound No Discharge Zone, allowing vessels to discharge sewage/blackwater whether treated or untreated within three miles of the City of Port Angeles Wastewater Treatment Plant primary outfall. The inconsistency of these regulatory boundaries around the Strait of Juan de Fuca, the distance from the critical areas, and the size of the Port Angeles WWTP raises questions about the validity of including the City of Port Angeles in the "Puget Sound Nutrient General Permit".

A map of the Puget Sound Nitrogen Monitoring Stations (Figure 3) provided by Ecology does not identify any DO measurement stations in the Strait of Juan de Fuca.

- Does Ecology have evidence that discharges from the City of Port Angeles WWTP influence Puget Sound Water Quality?
- Under what conditions and what percent contribution does the City of Port Angeles wastewater treatment plant influence Puget Sound water quality?

The nutrient monitoring stations in Figure 3 appear to align with the Figure 2 Puget Sound No Discharge Zone. The City of Port Angeles WWTP discharge is 14 miles West of this zone boundary.

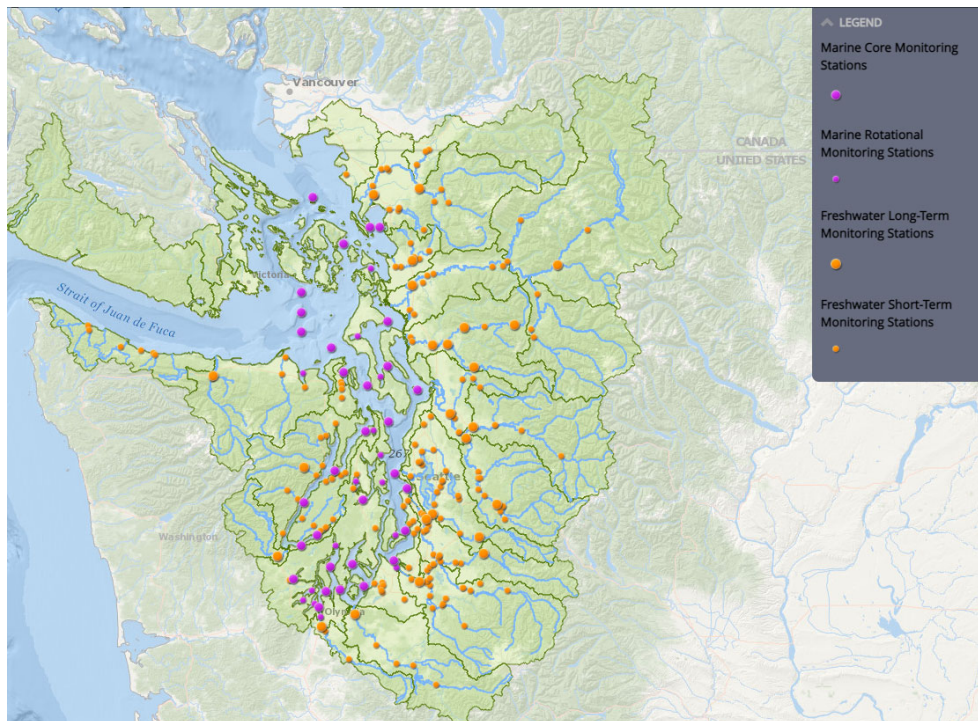


Figure 3

Ecologies “Response to Comments: 2014 Draft Petition to Designate the Waters of the Puget Sound as a No Discharge Zone” (Publication no. 15-10-001) outlines the considerations and science used to establish the NDZ in RTC #14:

“As Ecology considers the geographic extent of a NDZ, it will consider such factors as water quality and public health impacts, pumpout availability, cost-benefit, cost impact, water movement, hydrology, flushing, vessel movements and locations, sensitive water bodies, recreational impacts, aquatic life and habitat, tribal interests, stakeholder input, clarity of a boundary line and implementation and other considerations. There are four areas of the Puget Sound that are beyond 3 miles from shore (two large areas -west of Whidbey Island and north of the San Juan Islands).”

Using these same criteria with minor adjustments for municipal WWTP’s, listed below with edits single lined and new language underlined, how has the science changed to move the line of delineation out to the West boundary of the Strait of Juan de Fuca?

- Watery Quality
- Public Health Impacts
- ~~Pumpout Availability~~ – WWTP Design
- Implementation of Growth Management Act in Rural Communities
- Cost-Benefit
- Cost-Impact
- Water Movement
- Hydrology
- Flushing
- ~~Vessel Movements and Locations~~ – WWTP Locations
- Sensitive Water Bodies
- Recreational Impacts
- Aquatic Life and Habitat
- Tribal Interests
- Stakeholder Input
- Clarity of Boundary Line and Implementation
- Other Considerations

The City of Port Angeles requests Ecology provide:

1. Salish Sea model evidence showing the negative impact the City of Port Angeles WWTP has on the Puget Sound.
2. If the model predicts impact what is the percent contribution?
3. Under what conditions does this impact manifest itself?

The following comments are focused on the content and implementation of the General Permit.

- There is no accommodation for growth or development without risking the trigger of expensive capital improvements.
- Port Angeles has recently completed a series of major Combined Sewer Overflow (CSO) capital projects at a cost of \$45,780,000. For a community the size of Port Angeles this is a significant expenditure. The service of these debts continues out to the year 2034. Funding an additional major capital project to add tertiary treatment to the WWTP would put additional strain on Port Angeles rate payers. The recent CSO projects have almost completely eliminated the previous chronic CSO discharges.
- The City of Port Angeles WWTP is currently operating well below the design capacity and the Growth Management Act directs city planners to designate urban growth areas to help protect critical areas. However, the City will not be able to utilize this WWTP capacity for UGA wastewater utility expansion without risk of triggering the AL requirement of expensive capital improvements to the WWTP.
- The City of Port Angeles WWTP is currently the only facility accepting deliveries of septage in Clallam County. As Clallam County's rural population grows along with Clallam County Environmental Health's focus on septic system inspection compliance as required by Washington Administrative Code (WAC) Chapter 246-272A, septage deliveries to the Port Angeles WWTP will continue to grow. (Currently ~2% of nutrient loading). The City of Port Angeles cannot accept increases in septage without risk of triggering AL requirements. The City has no control over the surrounding county growth. Septage will be part of the Environmental Justice Review. The City will be required to increase the cost to process septage as City of Port Angeles rate payers should not be subsidizing this waste stream.

- How will general permit limits, AL, be adjusted once new data is gathered using the new general permit testing results?
- How will ecology determine baseline versus improved or optimized conditions? Will facilities that reduce Nitrogen through optimization or capital improvements have new baseline caps calculated for reduced TIN limits based on new lower baselines?
- What scientific method was used to determine the cutoff between the Small and Dominant categories? Please provide the documents that support this designation and how it was established.

The City of Port Angeles’s wastewater discharge in the Strait of Juan de Fuca is 14 miles west of the Puget Sound no discharge zone boundary. This zone was established based on scientific analysis of marine hydraulics, water quality and sensitive water bodies, flow characteristics, and cost among other requirements listed above.

We request Ecology provides Salish Sea modeling data that shows the negative impact of the Port Angeles WWTP discharge on Puget Sound water quality and the time required to have this data analyzed and evaluated by the City of Port Angeles.

In response to the specific testing and response requirements included in the “DRAFT PUGET SOUND NUTRIENT GENERAL PERMIT” the City of Port Angeles has the following comment.

The small “S” versus dominate “D” discharger designation appears arbitrary and does not properly characterize the contributor’s volume. Of the twenty-seven (27) WWTPs characterized as “D” the thirteen (13) largest represent 90% of the total discharge (Chart 1).

	Wastewater Treatment Plant	NPDES Permit	Action Level TIN lbs/year	Outfall Number	% of Total	% Aggregate
1	Blaine STP (Lighthouse Point WRF)	WA0022641	18,200	001	0.06%	100.00%
2	Birch Bay Sewage Treatment Plant (STP)	WA0029556	64,600	001	0.23%	99.94%
3	Snohomish STP	WA0029548	78,900	001	0.28%	99.71%
4	Lake Stevens Sewer District WWTP	WA0020893	118,000	002	0.41%	99.43%
5	Anacortes WWTP	WA0020257	163,000	001	0.57%	99.02%
6	Port Angeles WWTP	WA0023973	170,000	001/002	0.60%	98.44%
7	Salmon Creek WWTP 3	WA0022772	195,000	001	0.69%	97.85%
8	Port Orchard WWTP (South Kitsap WRF)	WA0020346	208,000	001	0.73%	97.16%
9	Redondo WWTP 2	WA0023451	241,000	001	0.85%	96.43%
10	LOTT Budd Inlet WWTF	WA0037061	243,000	001	0.85%	95.58%
11	Kitsap County Central Kitsap WWTP	WA0030520	250,000	001	0.88%	94.73%
12	Miller Creek WWTP 3	WA0022764	289,900	001	1.02%	93.85%
13	Tacoma North No. 3 WWTP 4	WA0037214	336,000	001	1.18%	92.83%
14	Lynnwood STP	WA0024031	341,000	001	1.20%	91.65%
15	Mt Vernon WWTP	WA0024074	380,000	004	1.34%	90.46%
16	Edmonds STP	WA0024058	419,000	001	1.47%	89.12%
17	Bremerton WWTP	WA0029289	577,000	001	2.03%	87.65%
18	Marysville STP	WA0022497	577,000	100/001	2.03%	85.62%
19	Lakota WWTP 2	WA0022624	583,000	001	2.05%	83.59%
20	Midway Sewer District WWTP	WA0020958	601,400	001	2.11%	81.55%
21	Post Point WWTP (Bellingham STP)	WA0023744	969,000	001	3.40%	79.43%
22	Everett STP	WA0024490	1,530,000	100/015	5.38%	76.03%
23	King County Brightwater WWTP 1	WA0032247	1,810,000	001	6.36%	70.65%
24	Chambers Creek WWTP	WA0039624	1,880,000	001	6.61%	64.29%
25	Tacoma Central No. 1 WWTP 4	WA0037087	2,410,000	001	8.47%	57.69%
26	King County West Point WWTP 1	WA0029181	6,670,000	001	23.43%	49.22%
27	King County South WWTP 1	WA0029581	7,340,000	001	25.79%	25.79%
	TOTAL		28,463,000		100%	

Chart 1

How can the remaining fourteen (14) lowest dischargers on this list still be considered and labeled as dominate when they represent less than 10% of the total?

The “dominate” category grossly mis-characterizes low to medium dischargers. The “D” category includes Birch Bay Sewage Treatment Plant (STP) with an action level of 64,600 lbs/year and King County South WWTP with an action level of 7,340,000 lbs/year. These two plants have over two (2) orders of magnitude difference in the discharge limits.

If the City of Port Angeles is included in the general permit we propose Ecology add a middle tier with reduced testing frequency and modify the “Nitrogen Optimization Plan and Report” requirements to better reflect the minimal influence these facilities have on Salish Sea TIN levels. Small dischargers and communities have limited resources and customer bases to absorb these increased testing, modeling, and tertiary treatment costs.

Thomas A. Hunter
Thomas A. Hunter (Aug 16, 2021 09:54 PDT)

Aug 16, 2021

Thomas Hunter, *Director of Public Works & Utilities*

Nutrient General Permit Comment 8-16-21

Final Audit Report

2021-08-16

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