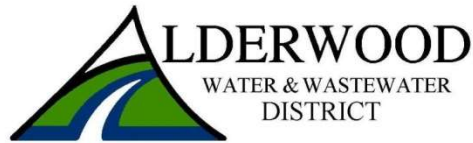


Alderwood Water & Wastewater District

Please view comments from Alderwood Water & Wastewater District included in attached document.



3626 - 156th Street SW • Lynnwood, WA 98087-5021 • 425-743-4605 • 425-742-4562 Fax • www.awwd.com

August 13, 2021

Original via Electronic Submittal
Via <http://wq.ecology.commentinput.com/?id=QFKVE>

Eleanor Ott, PSNGP Permit Writer
Department of Ecology, Water Quality Program
PO Box 47600
Olympia, WA 98504-7600

Subject: Draft Puget Sound Nutrient General Permit and Fact Sheet
Comments

Alderwood Water & Wastewater District (District) appreciates the opportunity to comment on the Department of Ecology's (Ecology) Draft Puget Sound Nutrient General Permit (PSNGP) and Draft Fact Sheet dated June 16, 2021. Alderwood operates the Picnic Point Wastewater Treatment Facility (PPWWTF) which is a 6.0 MGD treatment facility. Alderwood also contracts with King County and the City of Everett for treatment of wastewater from drainage basins within our service area. Alderwood values environmental stewardship and is committed to our shared responsibility to protect and improve water quality in Puget Sound. The District designed, permitted, built, and operates a state-of-the-art wastewater treatment facility that produces clean effluent that significantly exceeds current permit discharge requirements and staff continue to participate in the nutrient reduction effort to improve water quality in Puget Sound.

The District shares the concerns about water quality in Puget Sound and recognizes Ecology's responsibility to maintain compliance with water quality standards. We appreciate the efforts being taken by Ecology to examine how nutrients contribute to DO reductions. There are many scientific uncertainties associated with the understanding of DO depletions in Puget Sound and the use of the Salish Sea Model (SSM) as a tool to support the proposed regulatory requirements. A full understanding of local and regional impacts has not been fully developed or explained. The district is concerned about the impacts of implementing new regulatory requirements prior to verifying modeling results with sampling and data analysis or fully exploring the effectiveness and costs of available treatment technology.

This letter provides general comments on the PSNGP followed by specific comments on the permit and related fact sheet.

The District believes that a general permit is not the appropriate mechanism for this effort due to varying discharge characteristics of the covered facilities, varying permit

requirements proposed in the draft permit, and the individual analysis required for each facility as it relates to AKART.

As indicated by State and Federal rules as well as text in the draft fact sheet accompanying this draft permit, a general permit is appropriate when the **discharge characteristics are sufficiently similar**, and a **standard set of permit requirements** can effectively provide environmental protection and comply with water quality stands for discharges¹. The discharge characteristics for the covered facilities are not “sufficiently similar” as can be seen by the fact that this permit separates the dischargers into different categories of ‘Dominant’ and ‘Small’ based on perceived impact from the discharge. This draft permit also does not set standard permit requirements which can be seen by the varying requirements for each category of discharger including the different action levels, optimization requirements, and reporting requirements as well as the exemption to requirements for an individual discharger.

The fact sheet specifically acknowledges that the AKART provision needs evaluation on a case-by-case basis given its direct ties to economic impact; What constitutes AKART at one facility may be different at the next; and consideration of size differences, available space for expansion, costs of additional treatment, and rate payer considerations must be taken into account.² As Ecology has acknowledged, AKART evaluation is an individual evaluation and the outcomes of each individual evaluation will produce varied results in the “reasonable” treatment capacity for each individual facility proposed to be regulated under this general permit.

Alderwood recognizes the difficulty Ecology has experienced in evaluating how to implement this general permit and appreciates the effort made to consider the implications to individual facilities as this is not a “one size fits all” situation. This difficulty shows that a general permit is not the appropriate mechanism to cover the variability of each facility and situation and thus is not the right approach. Additionally, Ecology admits that each facility is unique with how it should evaluate nutrient treatment. These controls should be included in individual permits.

Ecology is proposing two permits to regulate a single discharge. In some areas the draft PSNGP duplicates information in the individual permit and in some cases the language in the draft PSNGP conflicts with the individual permit. The language in the draft PSNGP and draft fact sheet is confusing for how/when/if the PSNGP supersedes the individual permit; this will lead to misinterpretation. This second permit for the same discharge is not only confusing but it is in direct conflict with the Clean Water Act, which does not allow for issuance of a general permit for the same discharge that has been issued an individual permit.

The action levels proposed for the dominant WWTPs have been based on small subsets of data in some cases and the use of an Ecology-developed calculation tool that uses a “bootstrapping” statistical method to calculate the annual load. This process

¹ Page 12: Draft Fact sheet for the State of Washington Puget Sound Nutrient General Permit

² Page 18: Draft Fact sheet for the State of Washington Puget Sound Nutrient General Permit

for setting effluent limits should be reconsidered. The reference in the draft fact sheet for bootstrapping is *Wikipedia* which is not a legitimate reference for permitting purposes.

The Nitrogen Optimization Plan and Report requirements in the draft PSNGP are not clearly described and the optimization (treatment optimization) are not clearly defined. Efforts required to meet the optimization requirement are unclear. The timeline for accomplishing the efforts required are aggressive for meeting the objective of fully evaluating and documenting the success/failure of an optimization effort to meet the reporting deadlines associated with the effort. In many cases, it will take longer than a year (reporting period) to effectively document baseline data, make an optimization change and stabilize the process, collect new data, and evaluate the effects of the effort. It is unclear if an optimization effort can span longer than one reporting period and if it does how that affects compliance with the narrative requirements. As a result, operators may be required to rush through the process to get something to report to meet the narrative requirement, but the effort will have no real value and likely no real positive outcome for Puget Sound.

There was significant discussion and agreement regarding optimization efforts during the PSNGP Advisory Committee meeting. One of the specific topics discussed included what would happen if an optimization effort caused an upset and subsequent exceedance of discharge limits in the individual permit for a facility. All parties participating in the discussion agreed that there should be some protection provided to the permittee under these circumstances. The preliminary draft addressed this concern, but this language was removed from the current draft PSNGP. This will cause a direct conflict between the two permits for facilities attempting an optimization effort should this effort cause an unanticipated upset to the process that cannot be corrected quickly enough to prevent an exceedance.

Attached you will find specific comments that reference specific text or sections in the Draft PSNGP and Draft Fact Sheet. In addition, the District requests that Ecology respond to the following questions and comments regarding Ecology's legal authority to issue a general permit:

1. EPA and Ecology regulations are clear that a general permit and individual permit coverage for the same discharge cannot co-exist. In response to comments, please explain how these regulations do not apply to the proposed general permit.
2. In response to comments, please explain whether coverage under the general permit will be mandatory or voluntary.
3. Condition S3 prohibits discharges that cause or contribute to violations of water quality standards. It is not clear if this prohibition applies to any pollutant or

chemical in a facility's discharge, to just nutrients, or only to total inorganic nitrogen.

- a. In response to comments, please explain the scope of the prohibition in permit. Does the prohibition only apply to total inorganic nitrogen?
4. Condition S3.B states that Ecology "presumes" a facility will be in compliance with water quality standards unless monitoring data or other site-specific information demonstrates that a discharge causes or contributes to a violation of water quality standards when the facility "fully" complies with "all permit conditions, including planning, optimization, sampling, monitoring, reporting, waste management, and recordkeeping conditions."
 - a. In response to comments, Please explain Ecology's basis for its presumption that compliance with permit conditions will result in compliance with water quality standards.
 - b. In response to comments, please explain whether discharges from a facility at or below the total inorganic nitrogen action levels in Condition S4.B will cause or contribute to a violation of water quality standards.
 5. The draft fact sheet states that the "draft general permit supersedes effluent requirements related to total inorganic nitrogen in the individual NPDES permits..." Draft Fact Sheet, at 13.
 - a. In response to comments, please explain Ecology's basis for its authority to supersede or modify conditions in an individual NPDES permit without following the regulatory requirements for modification of an NPDES permit.
 - b. In response to comments, please explain whether Ecology has the authority to supersede or modify the conditions in an expired but administratively continued NPDES permit. Additionally, please explain the basis for this authority.
 6. In *Washington Dairy Federation v. Department of Ecology*, 2021 WL 2660024, *13, __ Wn. App. ____ (Div. II June 29, 2021) (*citing* WAC 173-226-100(1)(j)(ii)), the court ruled that with NPDES Ecology must "issue a fact sheet that includes an explanation of how the permits meet groundwater and surface water quality standards."
 - a. In response to comments, please explain how the proposed permit narrative effluent limits will meet water quality standards for dissolved oxygen.
 - b. In response to comments, please explain whether a facility in full compliance with the permit and discharging total inorganic nitrogen at or below action levels in Condition S4.B will be meeting water quality standards for dissolved oxygen. Please explain the basis for Ecology's answer to this question.

7. In *Washington Dairy Federation v. Department of Ecology*, 2021 WL 2660024, *23 ___ Wn. App. ___ (Div. II June 29, 2021), the court ruled that Ecology must consider climate change impacts in issuing a NPDES permit.
 - a. In response to comments, please explain how Ecology has evaluated the potential impact of additional treatment systems and technology for increased energy consumption at treatment plants or otherwise associated with targeted treatment technologies.

The District cares deeply about water quality in Puget Sound and our region and we have continued to demonstrate this by making wastewater treatment decisions that result in discharge of effluent that exceeds permitted requirements. However, this current Draft PSNGP is based on disputed science, unrealistic timelines for compliance, unknown cost to water quality benefit, and apparent disregard for the costs to the public. Thank you in advance for your consideration.

Respectfully,



Dick McKinley
General Manager

Attachment

- c: The Honorable Derek Stanford, State Senate
The Honorable Maarko Liias, State Senate
The Honorable Jesse Solomon, State Senate
The Honorable Steve Hobbs, State Senate
The Honorable Davina Duerr, House of Representatives
The Honorable Shelley Kloba, House of Representatives
The Honorable Strom Peterson, House of Representatives
The Honorable Lillian Ortiz-Self, House of Representatives
The Honorable Cindy Ryu, House of Representatives
The Honorable Lauren Davis, House of Representatives
The Honorable John Lovick, House of Representatives
The Honorable April Berg, House of Representatives
Eleanor Ott, Department of Ecology – Hard Copy
Heather Earnheart, M&O Director
John McClellan, E&D Director
Joe Carter, WWTF Manager
Josiah Hartom, Engineer

DRAFT PUGET SOUND NUTRIENT GENERAL PERMIT		
Comments from Alderwood Water & Wastewater District (DRAFT 8/6/21)		
Page Label	Permit Section	Comment/Question
11	S2. D.	Public notification for every process change or testing change seems to be a deterrent.
11	S3. A.	Ecology has already stated that the water quality standard is not being met. Doesn't this mean that the discharge would not be authorized.
13	S4. Table 5	If a permittee exceeds an action level, is it a permit violation?
14	S4. C.	If a facility optimizes for maximum nitrogen removal but exceeds the action limit, what strategy or options remain for that facility since they have presumably exhausted the options?
15	S4. C. 1b (par 2)	How does Ecology define "reasonable implementation costs"?
15	S4. C. 1b (par 2)	Most optimization efforts will take longer than one year from start to finish if the data collection and adaptive management effort is done correctly.
15	S4. C. 1c	Initial sampling and analysis to apply to a developed model to help determine expected TIN removal will take time - This assumes a facility has a model to use. It will take much longer (likely longer than 1 year) if they need to develop a model also.
16	S4. C. 2. a. iv.	How will Ecology handle a potential exceedance to an individual permit requirement resulting from optimization efforts?
16	S4. C. 2. b. i.	Does this include accredited and non-accredited data (collected for process control purposes)? Or only accredited data?
17	S4. C. 3. (entire section)	Current Pretreatment authority does not extend to residential properties. Does Ecology have known and successful strategies for these efforts that facilities can use for consideration? If yes, please provide them.
17	S4. D. 1. c.	This appears to be moving to capital improvements over optimization. Design and construction of capital projects generally take longer than 5 years. What is the consequence if a proposed solution cannot be implemented within the 5-year requirement or if 10% reduction is not achieved?
18	S4. E. 1.	This exception is an example showing that the permit requirements are not "standard" for all dischargers. This should not be part of a general permit.
18	S4. E. 2.	Would this exclude BNR and tertiary treatment? Ecology argued that tertiary treatment was unreasonable and did not fit under AKART.
18	S4. E. 3.	What is the basis for 3 mg/L here?
19	S4. E. 5. c. iii.	What is the purpose of the request for utility rate structure details?
20	S4. E. 5. d. ii.	What is the basis for "affordability"
20	S4. E. 5. d. iii.	Utility rate structures must be based on cost of service. Please describe how alternative rate structures could be applied.
23	S5. B. 1. a. iii.	Who sets the optimization goal? Seems self-set? What are the criteria for determining the goal?
23	S5. B. 1. a. iv.	How does Ecology define reasonable? What is reasonable implementation cost?
23	S5. B. 1. a. iv.	Can options that reduce capacity be excluded? If not how will those be evaluated as flows increase to a plant?

23	S5. B. 1. a. iv.	Most optimization efforts will take longer than one year from start to finish if the data collection and adaptive management effort is done correctly.
24	S5. B. 2. b. i.	Define "applicable monitoring data". Does this include data obtained by non-accredited testing?
24	S5. B. 2. b. ii.	For removal rate we will need influent motoring. Assuming this is covered in section 6 for monitoring reqs.
24	S5. B. 3.	What options has Ecology considered for reducing loads due to septage handling at WWTFs? What programs or controls does Ecology anticipate here - growth moratoriums, zoning restrictions, plumbing code modifications, other??
24	S5. B. 3. a.	How would this effect our existing pretreatment program? This item has the potential for requiring additional staffing to evaluate, permit, and monitor.
24	S5. B. 3. b.	Current Pretreatment authority does not extend to residential properties. Does Ecology have known and successful strategies for these efforts that facilities can use for consideration? If yes, please provide them.
24	S5. C. 1.	What nitrogen reduction goal is this AKART analysis intended to achieve (i.e. 10% reduction, 10 mg/L, 8 mg/L, 3 mg/L, other? The technology evaluated may be different depending on the target reduction. Please clarify.
25	S5. C. 3. b. ii.	What is the intent here?
26	S5. C. 3. d. ii.	What is the basis for "affordability"?
26	S5. C. 3. d. iii.	Utility rate structures must be based on cost of service. Please describe how alternative rate structures could be applied.
26	S6. A. Influent Sampling Requirements	How would continuous monitoring using non-accredited methods for process control purposes be treated?
26	S6. A. Influent Sampling Requirements	How would continuous monitoring using accredited methods be treated?
32	S6. D.	Flow measurement is covered in the individual permit. This is another area where language could conflict or there could be separate violations of each permit for failure to complete each step.
33	S6. E.	"Flow and internal process control parameters are exempt from this requirement". Would these results still need to be reported on the DMR?
33	S7.	If this occurs, would the covered permittees have 2 permits regulating nitrogen discharge?
33	S8.	This section already exists in our individual permit (Section S7) and this language differs from that in the individual permit. This is another section where there could potentially be violations of 2 permits for the same action or where there could be conflicting requirements due to the different text.
34	S9. B. 1. a.	This should be an "or" statement.
35	S9. B. 5. a.	Does this include additional monitoring for process control? If yes, this conflicts with language in the last sentence of S.6.E.7. "Internal process control parameters are exempt from this requirement". Does this apply if additional monitoring is performed using a test procedure that is a non-accredited method?
35	S9. D. 3.	Is the table reference correct? Table 6 is the bubble permit allocations
38	G1.	No longer target language, this sounds like a typical violation requirement. Is exceeding a "target value" a permit violation? If not, where does it explain that in this permit?

40	G5. G.	How many permits is Ecology considering as an option for the same discharge? Isn't "specific general permit" a contradiction to the general permit rule?
41	G7.	No leniency for optimization efforts, i.e. PH to the NPDES requirements? There was significant discussion and agreement with Advisory Committee to provide this leniency during optimization efforts. Language covering this was included in the preliminary draft and was removed and tightened to be a violation in this draft. Please explain reasoning.
41	G8.	Wouldn't this be in the form of a Notice of Intent to reapply following renewal similar to the Biosolids General Permit?
41	G10.	Several of the general conditions included in this permit are similar to those found in individual permits. However, the text is not always the same. These could be conflicts and duplicate violations.
44	G20. C.	Why does this general permit condition require reporting of planned changes for sludge use or disposal practices? This is covered in the individual permit.
48	Appendix A - Definitions	Several definitions in this draft PSNGP are different than the definitions of the same words in our Individual permit (specifically AKART, Best Management Practices, NPDES, TMDL to name a few). Why? What implications are there to the individual permit as a result of the differences?

DRAFT FACT SHEET FOR THE STATE OF WASHINGTON PUGET SOUND NUTRIENT GENERAL PERMIT		
Comments from Alderwood Water & Wastewater District (DRAFT 8/6/21)		
Page #	Paragraph Reference	Comment/Question
12	Par 2 "All marine Point sources proposed..."	Not all dischargers proposed for coverage under this permit are marine dischargers.
12	Par 2 Last Sentence related to electing to use individual permit	If this occurs, would the facility still be subject to the general permit also? Ecology is recognizing that this general permit may not work for all covered facilities. This shows that this would be more appropriately regulated through individual permits.
13	Par 2 related to prioritizing permit reissuance...	Please provide a projected schedule for addressing the current permit backlog for administratively extended permits.
13	Par 2	Please explain how the federal and state rules regarding NPDES permits will allow issuance of this general permit without voiding/replacing individual permits for facilities with administratively extended permits.
16	SEPA COMPLIANCE: exemption	This SEPA exemption is acknowledging that this PSNGP is regulating the same discharge as the individual NPDES permit.
16	ADDITIONAL SEPA REVIEW FOR PERMITTEES	Ecology needs to define "additions to wastewater treatment process", "substantially", and optimization as they relate to SEPA requirements. An optimization effort may require physical alteration, modification, or addition to the WW process requiring SEPA.
17	PERMIT LIMITS Par 2 last sentence	Would this exclude BNR and tertiary treatment? Ecology argued that tertiary treatment was unreasonable and did not fit under AKART.

17	WQBELs Par 2 sentence 2 "infeasible"	Explain how numerical effluent limits are infeasible. Ecology has already indicated that they will be proposing numeric limits in the near future which acknowledges that they are feasible. BMPs are not appropriate under this CFR.
17	WQBELs Par 2 sentence 3 re: permit conditions	Ecology has acknowledged that the proposed BMPs are not designed to meet water quality standards but are an attempt to prevent the conditions from worsening. Explain how issuance of these BMPs meets the intent of the CFR.
18	Last Par re: 303(d) comments	Ecology should regulate nutrient discharge in individual permits.
18	Last Par re: AKART provision needs evaluation on "case-by-case basis..."	This paragraph acknowledges Ecology's understanding that this in an individual evaluation and effort that will produce varied results. This is more appropriate in an individual permit.
24	First Par directly below Table 3. re: DO standards	Please identify which requirement(s) in this permit are "based on attaining the numeric marine DO criteria"?
30	Par 3 re: "...permitting authority make the determination..."	Please explain how Ecology came to this determination. If the SSM was used in this determination, please explain how it has the precision to predict this.
31	Par 2 re: Ecology use of optimization scenarios	Ecology should use the TMDL process if the goal is to issue waste load allocations.
31	Puget Sound NRP Par 1 re: Use of NRP to address reduction of human nutrient sources	This general permit process will not improve water quality and it does not address "all human nutrient sources". Please explain how this process will result in faster water quality improvement.
32	AUTHORITY OT INCLUDE NON-NUMERIC WQ BASED LIMITED First Sentence	Explain how numerical effluent limits are infeasible. Ecology has already indicated that they will be proposing numeric limits in the near future which acknowledges that they are feasible.
32	RATIONALE FOR NON-NUMERIC WQBEL Last sentence that carries to page 33	Please explain how the model runs to date specifically show the impact of specific individual discharges in other areas and where those effects can be seen.
33	Par 2 Sentence 2 "...Ecology has enough information..."	Ecology acknowledges that numeric WQBELs are feasible.
33	Par 2 Final Sentence "In a receiving water as complex as Puget Sound..."	This works should be completed prior to issuance of permits.
33	Par 3 Sentence 1 re: BMPs and numeric effluent limits infeasible.	Explain how numerical effluent limits are infeasible. Ecology has already indicated that they will be proposing numeric limits in the near future which acknowledges that they are feasible. BMPs are not appropriate under this CFR.
34	Par 3 Sentence 1 re: "...optimize existing treatment and begin planning for the future."	This statement implies that POTWs are not already planning for the future.
34	Par 5 Sentence 1 re: "...supplements the individual NPDES permits..."	Please explain how the proposed PSNGP "supplements" the individual permit. Which permit takes precedence?
35	Condition S3. Compliance with Standards Par 2 of section re: compliance.	A statement in a fact sheet does not prove that a discharge meets water quality standards and does not protect dischargers.
35	Condition S3. Compliance with Standards Par 3 of section re: "Permittee must take corrective action..."	Ecology has already acknowledged that compliance with the permit conditions will not get a permittee closer to meeting water quality standards. Please explain how Ecology will determine when additional monitoring may be required and how this would be applied to a permittee.

35	Bullet Point 4 re: AKART and evaluation alternatives to meet 3 mg/L TIN	Please explain the basis for 3 mg/L.
39	Par 2 Last Sentence re: developed permit issuance schedule for private treatment plants	Please provide a copy of this schedule and explain how this will be accomplished without impacting the updates to individual permits and the submittal schedule required by this draft PSNGP.
39	S2. APPLICATION FOR COVERAGE Section A. ".. each eligible POTW MUST submit..." application	Confirm that coverage is mandatory for the listed POTWs to continue discharging to Puget Sound.
40	ACTION LEVEL CALCULATION Last par on page re: AL0	It may be possible that future numeric WQBELs will show that a facility could discharge at a load amount higher than the amount generated for the AL0 through the bootstrapping method. Please explain how the anti-backsliding rule will work in this situation.
42	Par 2 "Sampling requirements in Condition S6 will increase sampling density.."	Ecology should wait to get this consistent sample data set before setting action levels.
42	Par 2 "Ecology cannot reassess the action level if influent loads increased during the first year of the draft general permit."	Please explain "influent loads increased during the first year". Does this mean influent BOD loading within the first year of the permit? Does this mean in comparison with the year prior to the first year of the permit term? Something else? Please be more concise.
42	DRAFT CONDITION S4.C NITROGEN OPTIMIZATION PLAN	Please explain how a report is a BMP.
44	First Sentence "Plants that do not use an activated sludge process are encouraged to focus more on influent load reductions..."	Please provide examples of successful projects that have achieved influent load reductions without a scalping plant upstream of the POTW.
46	<i>Draft condition S4.C.2 Optimization Implementation</i> Par 2 of section - last sentence of par re: Lab accreditation and process control	If process control monitoring is done using samples at the effluent location and non-accredited testing methods to get the analysis result, do these non-accredited results need to be reported on the DMR?
46	<i>Draft Condition S4.C.3 Influent Nitrogen Reduction Measures/Source Control</i> "Permittees must also develop a program to reduce influent TIN loads.	Please identify reasonable and successful options for reduction of influent TIN.
47	Par 1 Last sentence "...Permittees must also begin to identify different approaches for reducing TIN from new dense residential development..."	Provide examples of how reducing TIN from resident development can occur without regulatory changes to building and plumbing codes and explain the timeline Ecology expects this effort.
47	<i>Draft Condition S4.D. Action Level Exceedance Corrective Actions</i> ; Par 2 "Strategies considered for reducing loading..."	All of these options require substantial capital planning and investment. This does not meet the stated optimization definition from Ecology. Please provide justification for this requirement.
48	<i>Draft Condition S4. E Nutrient Reduction Evaluation</i> Par 1 of section related to LOTT.	Providing exceptions for a facility covered under this permit continues to recognize that a general permit is not applicable in this situation.

48	<i>Draft Condition S4. E Nutrient Reduction Evaluation</i> Par 2 Last Sentence re: "Completion of planning exercise during first permit term.."	A POTW cannot adequately plan for process and equipment modifications without knowing what the final limit to be achieved is. It is a waste of time and ratepayer money to plan for the unknown. Starting this process without the numeric WQBELs is a waste of time and money for our ratepayers and will not achieve the intended goal of reducing time to achieve the numeric limits.
50	Par 2 Last sentence re "... site-specific evaluation is now required..."	This is why it would be better to have nutrient requirements in individual permits.
50	Par 3 NRE requirements to evaluate lower limit of technology estimated at 3 mg/L TIN.	Ecology is requiring efforts to a concentration that the "estimate" to be 3 mg/L. Please explain basis for using an estimate to determine that this would be the expected requirement limit for numeric WQBELs.
51	<i>Environmental Justice Review</i>	Please explain how this effort would occur for agencies that have contracts with other utilities for conveyance and treatment where the rates are set through a long term contract.
51	<i>Environmental Justice Review</i> Par 2 re: alternative wastewater rates to be considered	Washington State Constitution requires utility rates to be based on cost of service. Please explain how this would be applied without a change to the constitution.
52	AKART ANALYSIS	Does Ecology have specific guidance on this requirement? If yes, please provide reference.
53	Par 3 "Ecology has not provided an effluent treatment target because each discharger must make the determination regarding what constitutes a "reasonable" level of treatment.."	Is there a definition of "reasonable"?
63	Bootstrapping (statistics) reference	Wikipedia is not an appropriate reference for a permit document or applied statistics, especially when used to set a regulatory limit.
71	APPENDIX B - GLOSSARY	Several definitions in this draft PSNGP and fact sheet are different than the definitions of the same words in our Individual permit (specifically AKART, Best Management Practices, NPDES, TMDL to name a few). Why? What implications are there to the individual permit as a result of the differences?