



**UNITED STATES ENVIRONMENTAL PROTECTION  
AGENCY  
REGION 10**

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WATER  
DIVISION

July 25, 2022

Mr. Ben Watson  
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Water Quality Program  
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RE: EPA Comments on the *Budd Inlet Total Maximum Daily Load for Dissolved Oxygen*

The U.S. Environmental Protection Agency has reviewed the Washington Department of Ecology's draft *Budd Inlet Total Maximum Daily Load for Dissolved Oxygen*, which was released for public comment on June 8, 2022. EPA's comments on the TMDL report are listed below.

1. EPA requests that Ecology add a brief description of the rationale used for determining reductions from tributaries and setting the WWTP wasteload allocations (which appear to be either capped at or reduced from existing (1997) loadings, depending on the season). This information is needed to provide support for key decisions in the allocation process. EPA also requests Ecology describe how those decisions were balanced with the bubble allocation and the allocation to Capitol Lake.
2. The TMDL is detailed in assigning seasonally variable loadings to all known individual point sources and tributaries. However, the document does not provide the assumed concentration target of the allocated pollutants (i.e., TN, DIN, and TOC) for each point source discharge and tributary entering Puget Sound. Without this information, it is not possible to discern the effluent quality Ecology assigned to each point source and the target concentrations assigned to tributaries. EPA requests that Ecology provide this information for point sources and tributaries. EPA recognizes that this is a substantial amount of information to add to the document given the multiple pollutants and seasonal variation. Thus, at a minimum, EPA requests that Ecology provide the range of concentrations used in the allocations for each point source and tributary, as well as the minimum concentration and the month in which it is assigned.
3. The waterbodies in Table 1 do not align with the waterbodies included on 2014-2018 303(d) list, and EPA requests that Ecology double-check this list. Our records show 15 waterbodies included on the 2014-2018 303(d) list as impaired for DO in Budd Inlet. This includes Listing IDs 3769 and 3770, which are not currently listed in Table 1.

We appreciate the opportunity to work closely with Ecology and look forward to continued coordination as you finalize this TMDL report. If you would like to discuss these comments, feel free to reach me at 206-553-0692 or [magdangal.miranda@epa.gov](mailto:magdangal.miranda@epa.gov).

Sincerely,

Miranda Magdangal  
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