Chance Berthiaume

Please see the attached PDF for complete comments.

Electronic comments (PSNGP): https://wq.ecology.commentinput.com/?id=N4irG73c6

William Weaver
Department of Ecology
P.O. Box 47696
Olympia, WA 98504-7696

Subject: Comments for Draft Puget Sound Nutrient General Permit (2025 Reissuance)

Dear Mr. Weaver:

The City of Bremerton (City) offers the following comments on the Draft Puget Sound Nutrient General Permit issued in June 2025 (Draft PSNGP).

1. The Draft PSNGP lacks specific language stating that dischargers will be considered in NPDES permit compliance should effluent limits be exceeded as a result of optimization efforts or pilot studies related to nitrogen reduction. Such protections were included in original PSNGP drafts but were removed in the first (invalidated) PSNGP and remain absent in the current Draft NGP. Absence of such provisions opens dischargers to compliance risk when testing new technologies and/or operating more aggressively to achieve some degree of nitrogen removal in infrastructure not designed for such purposes. Please add the language back into the permit.

2. For treatment facilities such as the City's designed for conventional high-rate activated sludge, secondary treatment for BOD and TSS removal only, it is possible that some optimization measures may be able to marginally reduce nitrogen discharges over baseline conditions. However, such optimization measures cannot be reasonably expected to provide full year-round nitrogen removal to meet future water quality-based effluent limits (WQBELs) originally expected to be in the range of 3 to 10 mg TIN/L but now foreshadowed as 3 mg TN/L year-round in the draft Puget Sound Nutrient Reduction Plan for the City's discharge to Sinclair Inlet. Significant facility upgrades will be required to achieve such limits, and associated costs will be orders of magnitude greater than those for optimization efforts. Preliminary engineering studies estimated the 20-year net present value of upgrades to achieve 3 mg TIN/L is more than $190 million and would be $200 million total (April 2021 dollars) if side stream treatment is included as an interim upgrade. Estimated current costs are anticipated to be significantly higher due to elevated cost

escalation in recent years as well as the more stringent limits suggested in the draft PSNRP. Nitrogen removal requirements alone could result in unaffordable sewer rates in the City and ignores all of the other financial demands that must be met for the City's collection system, wet weather CSO control, the pretreatment program, biosolids management, and asset management renewal and replacement costs to sustain existing levels of treatment.

A circumstance unique to the City is the presence of US Navy vessels at Naval Base Kitsap-Bremerton (NBK). The number of NBK vessels in port can vary and is outside the City's control. Further, the Navy does not provide vessel schedule projections for security reasons. Uncertainty and variability in vessel portage and associated wastewater generation complicates Action Level (AL) management for the City. As an example, the Navy brought the USS Nimitz supercarrier to Bremerton in July 2023. Ship company for the Nimitz is over 3,500 sailors excluding the air wing. Should the Navy require this full company to support activities, the sailors themselves would increase Bremerton's population by 8% without accounting for associated family members and/or contractors supporting Navy activities related to the Nimitz.

In order to accommodate the potential for sudden and dramatic changes in population driven by US Navy activities, we request that Ecology's PSNGP or Bremerton's individual permit allow for provisional AL variances or temporary modifications to account for such population changes outside the City's control. We ask that the permit structure open the door for such temporary modifications, with the mechanistic details to be developed in more detail during permit development. An example approach could involve benchmarking and accounting of Navy base activities and associated transient population changes. The City does not currently track such movements in detail, and the feasibility of such an approach or comparable approach require further development.

The absence of capacity to accommodate challenging site-specific circumstances of this nature may preclude the City from opting in to the PSNGP.

3. Condition S5.C.3 requires the Nitrogen Optimization Plan and Report to investigate influent nitrogen reduction measures from sources such as septage handling practices, commercial, dense residential and industrial sources. The City recognizes the Draft PSNGP does not require pre-treatment or full satellite treatment for existing or new sources of such nitrogen loads, per se. Nonetheless, the City emphasizes that the cost of hypothetical distributed pretreatment approaches and resultant impacts on affordability are not understood. Distributed treatment approaches increase the number of assets to be maintained and associated operations costs. Initial consideration during the original PSNGP confirmed the lack of practical opportunities for influent nitrogen reduction.
   To encourage environmentally responsible waste disposal, the City currently accepts RV discharges at no cost, and septage and leachate at minimal cost. Although policies could be changed to eliminate or discourage such influent sources, the City prefers to be a good environmental actor rather than institute policies that which may result in illegal discharges

of these waste streams to more environmentally sensitive locations or dumping and discharge to state waters without treatment.

Another example is that the City may need to eliminate or delay projects currently planned to improve water quality since they would expand our wastewater collection system. For example, if eliminated or delayed, the City's planned extension of service to unsewered areas (including waterfront properties) would reduce influent nitrogen load growth but come at the cost of delaying these infrastructure improvements ultimately protective of water quality.

Finally, in efforts to limit influent TIN load growth in absence of a growth allowance, the City may be forced to reconsider approving on-going residential development which supports the goals of the Growth Management Act, along with its position on urban growth area commitments which were made without consideration of PSNGP requirements.

Sincerely,

Chance W Berthiaume
Interim Director of Public Works and Utilities