REGION 10
SEATTLE, WA 98101

August 25, 2025

Jeremy Reiman
Washington State Department of Ecology
Water Quality Program
P.O. Box 47600
Olympia, WA 98504-7600
email: jere461@ecy.wa.gov

Dear Mr. Reiman:

The U.S. Environmental Protection Agency has reviewed the Draft Puget Sound Nutrient Reduction Plan, which was released for public comment by the Washington State Department of Ecology on June 12, 2025.

EPA supports Ecology's efforts to improve and protect water quality in Puget Sound with the Nutrient Reduction Plan, even as the population grows across the region. While implementing the Plan will require upgrades in nitrogen removal at municipal treatment plants and nitrogen reductions in tributary watersheds, EPA supports the necessary actions by Ecology to address water quality in Puget Sound and continued engagement with partners, stakeholders, and communities.

EPA also commends the scientific work that provides the foundation for the Plan. Ecology's modeling program has adopted, refined, and applied the Salish Sea Model, originally developed by Pacific Northwest National Laboratory, to amass a comprehensive body of information about dissolved oxygen impacts and the nutrient controls necessary to preserve the Sound.

EPA's specific comments on the Nutrient Reduction Plan are listed below.

Marine Point Source Targets

1. We understand and support the nitrogen targets for small dischargers being equal to 2014 loadings from those facilities. However, as noted in the Plan and in the Bounding Scenarios Report, many small facilities do not have monthly (or any) nitrogen data for 2014. We are concerned that the estimates for these facilities may not be reflective of actual discharges. For example, while nitrogen data are not available for 2014 for Lummi Gooseberry Point and Sandy Point facilities, ammonia, total Kjeldahl nitrogen, and nitrate + nitrite concentrations were reported for four quarters in 2015 and 2016. Applying those concentrations to 2014 flows from

the facilities results in significantly larger total nitrogen (TN) loads than what are listed in Appendix E. We encourage Ecology to revise the individual facility loadings in Appendix E with updated facility data (or new estimates based on updated data) where it is available.

2. The Plan sets basin-wide loading targets for point sources, but the individual facility loadings that are summed into the total basin loading targets are termed "model inputs" rather than "targets." To make clear that the Plan is establishing targets for the individual point sources, EPA recommends that the individual loadings in text as well as in Appendices E and F be listed as the individual "targets" (or, alternatively, "wasteload allocations") for each facility. These loadings, after any adjustments or corrections based on public comment, should be translated into permit limits in the next permit cycle.

3. On page 40 of the draft, it states that "Most EPA-permitted facilities are currently required to conduct nutrient monitoring and have reporting and planning requirements that mirror those found in the 2022 General Permit." However, EPA has not issued permits with requirements similar to the Puget Sound Nutrient General Permit. EPA withdrew the three permits issued in 2024 (i.e., Sandy Point WWTP, Gooseberry Point WWTP, and Tulalip WWTP) that contained such requirements. The remaining EPA-permitted facilities permits have some nutrient monitoring, but not extensive monitoring requirements, and some only require monitoring for ammonia as opposed to total nitrogen. A more accurate description is: Most EPA-permitted facilities are currently required to conduct only limited nutrient monitoring. All nine privately owned domestic WWTPs (i.e. those not eligible for General Permit coverage) and most state industrial facilities are currently required to monitor for nutrients.

Water Quality Standards

4. Appendix D provides a good description of the history and current status of Washington's natural conditions criteria. However, Ecology should make it clear in the body of the Plan that until EPA approves these revisions, the natural conditions criteria are not applicable under the Clean Water Act.

5. The reference to 'A Performance-based Approach for Developing Site-Specific Natural Conditions Criteria for Aquatic Life in Washington' (previously Publication 24-10-017) in Appendix D should be revised to reflect the most recent version of the document, currently Publication 25-10-022. Also, per Ecology, this document is not rule language, but it supports the 2024 natural conditions rulemaking. Once finalized, it will be submitted to the EPA, along with the revised natural conditions criteria, for review and action under the CWA.[1]

Schedule and Milestones

6. The Plan states on page 13 that if Ecology "…cannot meet water quality standards with this approach, the requirement to develop a TMDL still remains." The Plan also states on page 23 that "states should periodically evaluate ARPs to determine if such approaches are still expected to be more immediately beneficial or practicable, in the near-term, at achieving water

[1] https://ecology.wa.gov/water-shorelines/water-quality/water-quality-standards/updates-to-the-standards#rule

quality standards, rather than pursuing a TMDL. If not, the ARP should be re-evaluated to determine whether a higher priority for TMDL development should be assigned to the impaired waterbody." The Plan appropriately describes Ecology's approach to effectiveness monitoring, which is a key component of an ARP. EPA suggests additional clarity around when TMDL development would begin if the Plan is not making sufficient progress towards attaining water quality standards

We appreciate the opportunity to work with Ecology and look forward to continued coordination as you finalize the Plan. If you would like to discuss these comments, feel free to reach me at (206) 553-6328 or Wu.Jennifer@epa.gov.

Sincerely,

JENNIFER WU

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Date: 2025.08.25 15:01:06 -07'00'

Jenny Wu
Manager, Watersheds Section
Water Division

cc: Ben Rau, Ecology