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Submitted Via Puget Sound Nutrient Reduction Draft Plan Online Form
(https://wq.ecology.commentinput.com/?id=9ruD7M5ie)

Jeremy Reiman
Department of Ecology, Water Quality Program
300 Desmond Dr SE
Olympia, WA 98504

Dear Mr. Reiman,

Thank you for the opportunity for Port Townsend Paper Corporation (PTPC) to provide comments on Ecology's Draft Puget Sound Nutrient Reduction Plan (draft plan).

PTPC, operating since 1928, produces sustainable Kraft pulp, Kraft paper, containerboard, and various specialty paper products by blending virgin and recycled fibers. Based in Port Townsend, Washington, Jefferson County, the mill sits directly along Port Townsend Bay, a key maritime corridor to the greater Puget Sound area.

Our primary concerns with the draft plan include the following:

1. Industrial dischargers are being lumped in with the municipal WWTPs as point sources.

> "Executive Summary: Results from modeling efforts have shown that excessive nutrient loading from human activities are lowering DO levels in multiple Puget Sound embayments, with domestic wastewater treatment plants contributing around two-thirds of the human-sourced nitrogen pollution."
>
> "Domestic WWTPs and industrial facilities discharging into Puget Sound represent around two-thirds of the total human nitrogen load to the Sound (Ahmed et al, 2019, Figueroa-Kaminsky et al. 2025)."

As you see above, the first quote says domestic wastewater treatment plants contribute around two-thirds of human-sourced nitrogen pollution. The second quote lumps in industrial facilities as well.

Figueroa-Kaminsky et al. (2025) states: "For reference, there are 10 industrial facilities in WA waters of the Salish Sea, which contribute about 1.7% of the total TN load from all U.S. marine point sources in 2014."

Ahmed (2019) citation gives 50-60% point source contributions whereas Vol2 (Figueroa-Kaminsky) citation below gives 63% – 73%, thus the 2/3rds statement. The 2/3rds is the most recent.

We can calculate the relative contributions from WWTPs and industrial then:
50-73% range = (48.3 – 71.3%; ~29,000 – 31,000 kg/day) WWTPs + industrial (1.7% or ~600-650 kg/day)

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- Note that "…Additionally, past research has shown that atmospheric deposition into Puget Sound's waters is a minor source of nitrogen (Ahmed et al., 2019)…"

With industrial source contributions being a relatively small portion of the contributing sources, the category should not be grouped with WWTPs. Any reductions, caps and/or limits developed for these sources, should be considered separately from municipal WWTP as well.

2. As a result of #1 (industrials being lumped with WWTPs), all point sources are capped at 2014 discharge levels.

PTPC believes more current modeling data should be considered. 2014 data is not representative of current and near future conditions in the Puget Sound Area.

3. Petroleum refineries and pulp mills are single out as only examples of industrial facilities.

PTPC, the only Pulp Mill currently discharging to the Puget Sound, requests Ecology highlight better the range of the 10 industrial facilities on Puget Sound.