

# NPDES Permit Renewal – West Point Treatment Plant

## Update and Summary of Public Comments

MWPAAC – General Meeting

August 23, 2023

Public  
Comment  
Process and  
Permit  
Renewal  
Overview

- **Ecology permit renewal process:**
  - **Responses to comments**
  - **Final permit issuance considerations**
  - **Timeline**
- **Comment letters - overview**
- **Summary of comment topics**
- **Next Steps and Q&A**

Ecology's  
Process –

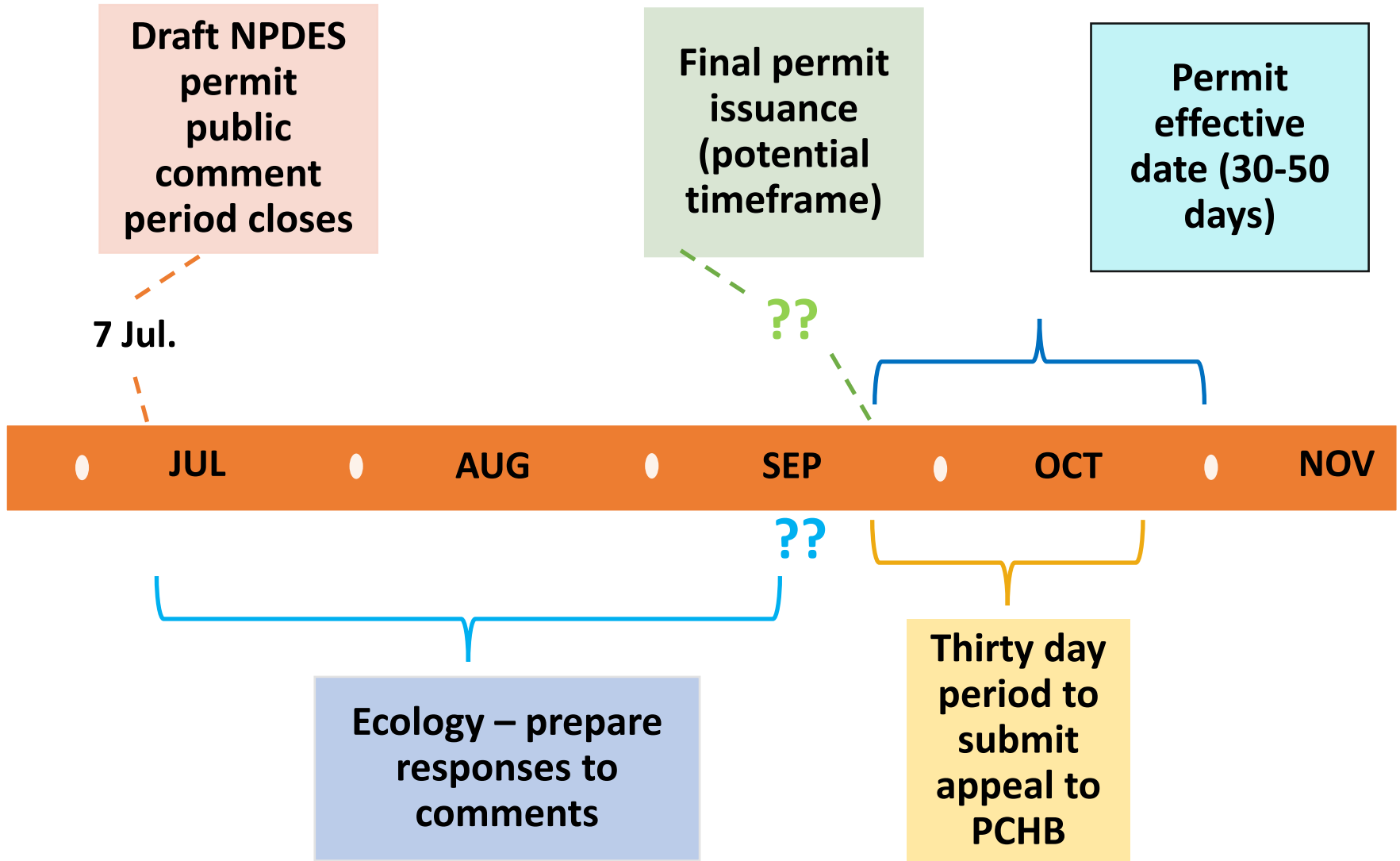
Responses to  
Comments

and

Issuance of  
Final Permit

- **Responses to comments:**
  - **Address “significant” comments**
- **Final permit issuance:**
  - **Modifications to permit requirements**
  - **Permit review considerations**
- **Timeline:**
  - **Final permit issuance ETA**

# Permit Renewal Timeline



## Comment Letters –

## Overview of Scope/Scale

### **Public Comments (12 letters submitted)**

\*\* Public agencies: seven letters  
(incl. County)

\*\* Tribes: two letters

\*\* Organizations: three letters

### **Comment Characteristics**

\*\* Issues raised on all facets of permit  
– procedural; content/approach;  
compliance-enforcement

\*\* Actions requested of Ecology

\*\* Assessment of County performance

# Public Comments – Issue Summary

## Effluent Limits

Nutrients – include requirements given Puget Sound Nutrient General Permit issues

Procedures – Reasonable Potential Analysis, data-assumptions

AKART analysis and technology assessments

Mixing Zones

Other parameters (PCBs, PBDEs, 6-PPD)

Narrative water quality standards

# Public Comments – Issue Summary

## Monitoring / Reporting

Additional parameters (including emerging chemicals) - effluent and Combined Sewer Overflow (CSO) outfalls

Sediments – CSO outfalls

Reporting – more availability of data and reports

PFAS – add effluent and biosolids

# Public Comments – Issue Summary

## Special Conditions

PFAS industrial source survey: expand customers, add schedule

CSO program: support/expand source control

Compliance time schedules

- CSO program completion
- Elliott West project schedule
- Agreements (Suquamish settlement)

Infiltration/inflow program: expand requirements, add schedule

Capacity planning/expansion: bypass prevention, AKART

New recommendations: include analysis for Environmental Justice, funding/finance



# Next Steps

and

Q&A

## Next Steps

- Await final NPDES permit issuance
  - Review changes
- Planning for implementation of new effluent limits, monitoring, and reporting requirements

## Questions?

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