



Puget Sound Nutrient General Permit

Presented to MWPAAC Engineering and Planning
Subcommittee

January 6, 2022

Final Puget Sound Nutrient General Permit

- Optimization strategy due July 1 instead of May 1
- If no viable optimization options exist, permittee must proceed to corrective action
- New 'moderate' category of discharger
- Seasonal (vs. annual) nitrogen limit *may* be less expensive to implement

Motions for appeal and stay

- Several appeals were filed (King County, Tacoma, Pierce County and others)
- King County also filed a motion to stay the permit going into effect
- Pollution Control Hearings Board has jurisdiction and appeals likely will be consolidated
- Appeals state that Puget Sound Nutrients General Permit (PSNGP):
 - Conflicts with federal law and state regulations
 - Conflicts with existing NPDES permits
 - Requirements are uncertain since PSNGP does not set final limits nor provide guidance on applying AKART (all known, available and reasonable methods of prevention, control and treatment)
 - Requirements are overly onerous, costly and without a sufficient link to water quality

Cost impact estimates

Initial compliance costs (next 2 years)

- Operations ~ \$1M per year
- Staffing ~ \$2M per year
- Consultants ~ \$5M/plant

Concern that investments/expenditures may have only short-term benefits since Department of Ecology has not set final nitrogen limits and AKART process is uncertain



For more information, please contact

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