



## Metropolitan Water Pollution Abatement Advisory Committee

King Street Center, 201 South Jackson Street, MS KSC-NR-0512  
Seattle, WA 98104 206-263-6070

### MEMBERS:

*Alderwood Water and  
Wastewater District*

*City of Algona*

*City of Auburn*

*City of Bellevue*

*City of Black Diamond*

*City of Bothell*

*City of Brier*

*City of Carnation*

*Cedar River Water and Sewer District*

*Coal Creek Utility District*

*Cross Valley Water District*

*Highlands Sewer District*

*City of Issaquah*

*City of Kent*

*City of Kirkland*

*City of Lake Forest Park*

*Lakehaven Utility District*

*City of Mercer Island*

*Midway Sewer District*

*Northeast Sammamish Sewer District*

*Northshore Utility District*

*Olympic View Water and Sewer District*

*City of Pacific*

*City of Redmond*

*City of Renton*

*Ronald Wastewater District*

*Sammamish Plateau Water and  
Sewer District*

*City of Seattle*

*Skyway Water and Sewer District*

*Soos Creek Water and Sewer District*

*Southwest Suburban Sewer District*

*City of Tukwila*

*Val View Sewer District*

*Vashon Sewer District*

*Woodinville Water District*

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January 30, 2009

To: Tricia Miller, Permit Coordinator  
Washington State Department of Ecology  
Northwest Regional Office  
3190 -160th Avenue SE  
Bellevue, WA 98008-5452

SUBJECT – Draft NPDES permit No. WA-002918-1 for West Point Treatment Plant, combined sewer overflow (CSO) treatment facilities and West service area.

The Metropolitan Water Pollution Abatement Advisory Committee (MWPAAC) is a committee that advises the King County Council and King County Executive on matters related to water pollution abatement. MWPAAC was created by state law (RCW 35.58.210) and consists of representatives from cities and local sewer districts that operate sewer systems within the counties of King, Pierce and Snohomish. Thirty-four of these cities and sewer districts deliver sewage to King County for treatment and disposal. MWPAAC offers the following comments on the draft NPDES permit No. WA-002918-1 for West Point Treatment Plant, combined sewer overflow (CSO) treatment facilities and West service area.

**We urge the Department of Ecology (DOE) not to include additional permit conditions at this time.**

**MWPAAC believes King County should use the most cost effective best practices in operating its facilities. We believe the current permit, as written, does require the use of best practices.** We understand the draft permit also includes requirements for 1) modifying the disinfection system and 2) completing additional CSO control facilities, each requiring major capital expenditures, and that the draft permit also requires additional data reporting. We believe these permit requirements are reasonable and will contribute to the improvement of the treatment and conveyance systems and provide the agency and the public with important information to assure that these systems are being operated properly.

There are a number of ongoing studies and modeling (MWPAAC is aware of at least eight) to assess and help develop a comprehensive plan in restoring the health of Puget Sound. One of those studies was the recent survey of sources of pollution to the Sound in conjunction with the Puget Sound Partnership. This effort reported there are many sources of toxicants and nutrients, with stormwater perhaps being the most pressing to address. DOE should wait for the completion of these studies and the results of these studies should be evaluated before permit changes are proposed.

**It is clear to MWPAAC that there needs to be a comprehensive approach to dealing with the many challenges facing cleaning up Puget Sound. MWPAAC also believes that it is critical that sound science and information be the drivers for change. We urge DOE to take a comprehensive approach in looking at restoring the health of Puget Sound.**

With the limited public resources that are being strained by the current economic situation it becomes even more critical that public resources are invested wisely. Therefore, DOE must proceed carefully and require reductions in current discharges only after the dynamics of the Puget Sound system are better understood and it is reasonably certain that reductions will achieve environmental objectives in a cost-effective manner. **We urge DOE to not include additional permit conditions at this time. If additional permit conditions are added we request that any new pollution control efforts be targeted carefully for maximum effectiveness in improving the health of the Sound and its aquatic life.**

Sincerely,

A handwritten signature in dark ink, appearing to read "Scott Thomasson", with a long, sweeping horizontal line extending to the right.

Scott Thomasson,  
Chair

cc: MWPAAC Members  
King County's Regional Water Quality Committee Members  
Christie True, Director, Wastewater Treatment Division, King County  
Department of Natural Resources and Parks  
Pam Elardo, Manager, West Section, WTD, KCDNRP