

Puget Sound Nutrient Briefing

July 2, 2025 – Regional Water Quality Committee

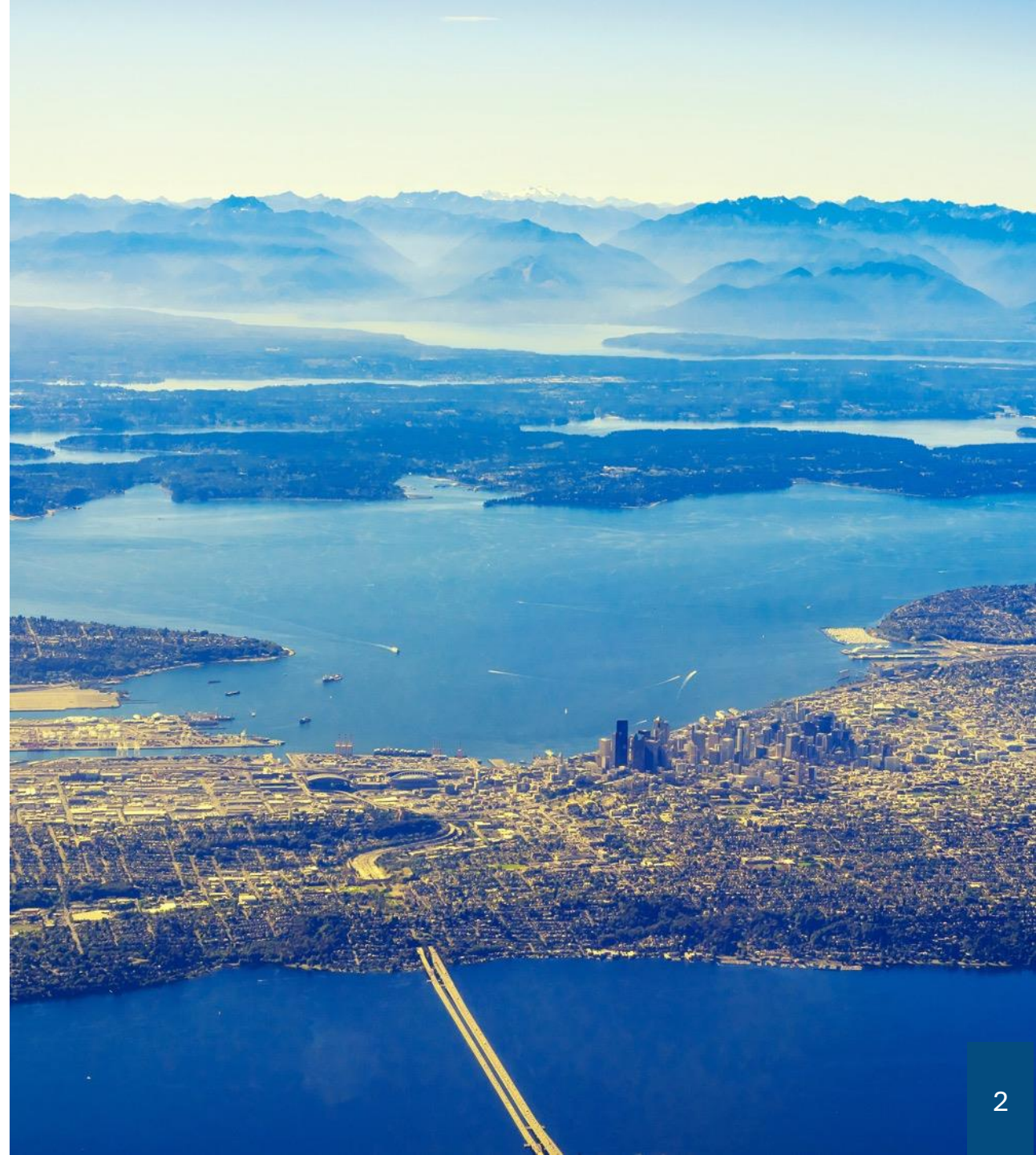
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Outline

- General Permit Invalidation
- Nutrient Operations Update
- Nutrient Policy Update
- Nutrient policy review and comment



General Permit Invalidation

- Puget Sound Nutrient General Permit (PSNGP) invalidated on Feb 28, 2025
- PSNGP remanded back to the Department of Ecology to fix the permitting legal issue
- No nutrient regulations currently in effect



“The Board concludes that the relevant statutes and regulations are not ambiguous. They do not grant Ecology authority to use general permits as a mechanism to layer new regulatory requirements on top of existing individual permits.”

Pollution Control Hearings Board No 21-082c



WTD Current Nitrogen Operations

- Continuing with all PSNGP required monitoring and monthly reporting
- Continuing with nutrient reduction evaluation – planning for future nutrient wastewater upgrades

Fixing the PSNGP

- In April 2025, Ecology announced options to fix the legal issues with the nutrient permit:
 - **Voluntary Nutrient General Permit** – permit would be binding if accepted
 - **Modifying NPDES permits** – to include nutrient requirements
 - **Administrative Order** – stopgap action to insert monitoring and planning requirements

PSNGP Requirements

Key requirements:

- **Action Levels** – hold nitrogen (total inorganic nitrogen or TIN) loadings steady
- **Optimization** – minor changes to plant operations to reduce nitrogen
- **Monitoring & Reporting** – monitor & report nitrogen in influent and effluent
- **Corrective Actions** – graduated compliance process if exceed Action Level
- **Nutrient Reduction Evaluation** – Planning to meet future nitrogen limits

Draft Voluntary PSNGP

- The Department of Ecology published the draft voluntary Nutrient General Permit on their website and in the Washington State Register on June 18, 2025
- **Taking comments until July 25, 2025**
- Largely conforms with the previous PSNGP requirements
- Shorter duration ~ 2 years
- Target issuance date ~ Oct 2025
- Pushes out deadline for the Nutrient Reduction Evaluation plan 6 months
 - Dec 31, 2025 → June 30, 2026



Puget Sound Nutrient Reduction Plan

Draft water quality improvement plan for addressing Puget Sound dissolved oxygen

- Completed as an Advanced Restoration Plan (as alternative to a Total Maximum Daily Load plan)
- Includes nitrogen load targets for **non-point and wastewater facilities** aggregated across sub-basins within Puget Sound

Puget Sound Nutrient Reduction Plan



Proposed Wastewater Actions

- **No effluent or loading limits**, instead **aggregate load target** for wastewater facilities in each sub-basin of Puget Sound
- The load targets for WTD's wastewater facilities assumes nitrogen treatment that is close to the 3 mg/L planning target in the NRE
- Wastewater facility **effluent limits will be established in 2031**
- Wastewater **upgrades will be completed by 2050**



Puget Sound Nutrient Reduction Plan



Proposed Non-Point Actions

- **Non-point reduction target assumes 60% reduction in nitrogen** from non-point actions
- Ecology will complete **watershed nutrient management plans for two Puget Sound river basins by 2027**
- Could include nitrogen reduction requirements in non-point permits such as municipal stormwater and confined-animal feedlot operations



Salish Sea Modeling Optimization Phase 2 Report

Technical report that summarizes:

- Additional model validation
- Modeled wastewater and non-point reduction scenarios
- Opt2_8 scenario was used to develop the target load reductions in the draft Puget Sound Nutrient Reduction Plan

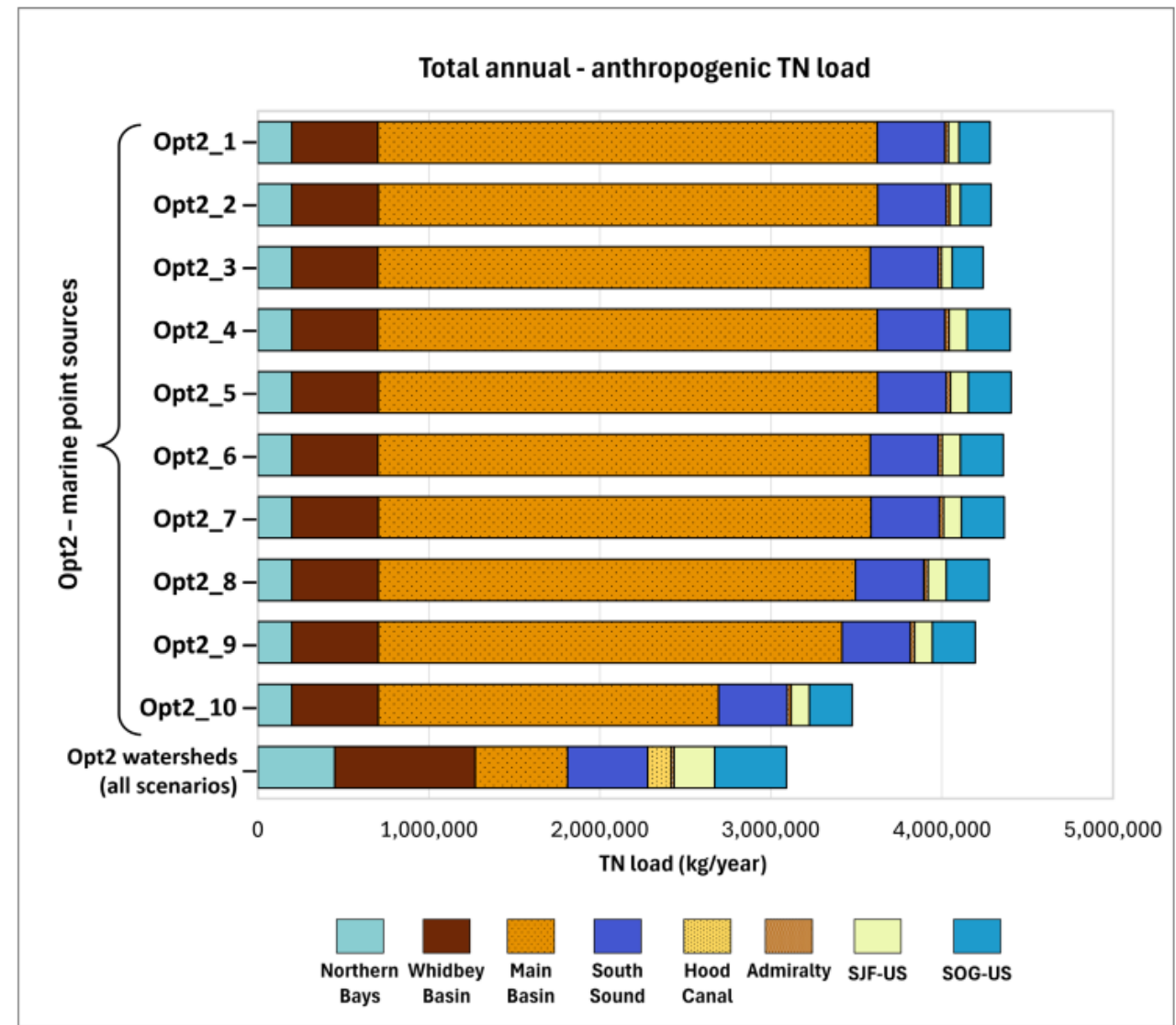


Figure ES-1. Annual anthropogenic total nitrogen (TN) watershed and marine point source loads entering different basins for each refined Opt2 scenario.

Watershed loads are the same across all scenarios and therefore represented by a single bar.

Figure from: Figueroa-Kaminsky et al, 2025

Review and Comment Schedule

Draft PSNGP

Information Session/Hearing:

July 1, 2025, 10 AM

July 22, 2025, 5:30 PM

Comment Deadline:

July 25th, 2025

Puget Sound Nutrient Reduction Plan

**Salish Sea Model Optimization
Scenarios, Phase 2 Report**

Comment Deadline:

August 27th, 2025



Next Steps

- Reviewing the draft permit, the nutrient reduction plan, and modeling report to develop robust comments
- Update MWPAAC on analysis and opportunities for comment coordination
- Coordinating with peer utilities on assessment and common issues

Thank you

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