

Response to Comments.

Draft NPDES Permit for:

Municipality of Anchorage
Eagle River Wastewater Treatment Facility
NPDES No. AK-002254-3

On September 6, 2005 the Environmental Protection Agency (EPA) issued a draft National Pollutant Discharge Elimination System (NPDES) permit for the Municipality of Anchorage Eagle River Wastewater Treatment Facility. The facility provides secondary treatment prior to discharging the effluent into the Eagle River approximately 1.5 river miles west of the Glenn Highway crossing at 61° 19' 10" N and 149° 35' 30" W. The plant receives primarily domestic wastewater from local residents and commercial establishments. There are no significant industrial dischargers to the facility. The collection system has no combined sewers. The design capacity of the plant is 2.5 million gallons per day average dry weather flow. The public comment period for the draft permit extended from September 6, 2005 through October 6, 2005.

Based on internal EPA review, language was added to II.A. Operation and Maintenance Plan Review and to II.B. Quality Assurance Plan Review requiring that the permittee send EPA letters confirming the completion of the reviews and implementation of the plans. Also, Part IV.J. Reporting Anticipated Non-compliance now specifically requires written notification.

Comments were received from the City of Anchorage Water and Wastewater Utility (AWWU) in a letter dated October 3, 2005 from Mark Premo, General Manager, to Mike Gearheard of the EPA. EPA's responses immediately follow the comments.

1. Comment:

Page 5, Condition I.A.3.Table 1. The Maximum Daily limit for Fecal Coliform is noted as 200. This should be correctly noted as 200/100mL.

Response:

Comment noted. EPA has corrected the permit.

2. Comment:

Page 7, Condition I.B.1.Table 4, Footnote 2. Delete the sentence "*If the analysis shows non-detectable levels, the permittee shall report "<10" on the DMR.*" Reporting is covered in detail in I.B.3, so this incomplete reporting directive in the footnote is confusing and unnecessary.

Response:

Agreed. EPA has revised the permit accordingly.

3. Comment:

Page 7, Condition I.B.3. Recommend that the reporting requirement be simplified. If the compliance level is the Minimum Level (ML) of 100 µg/L, it is appropriate to report all values less than this as <100 µg/L. The additional requirement to report values less than the Method Detection Limit (MDL) as <10 µg/L doesn't seem appropriate if values between the MDL and the ML are "not quantifiable."

Response:

Although it would be simpler to report less than the Minimum Level, in April 2005 EPA developed a new policy that requires limits below detection to be reported as noted in the draft permit. Recently issued permits contain the new requirement. For consistency with EPA guidance and other permits in the Region, EPA has retained the draft permit condition.

4. Comment:

Page 7, Condition II.B.1., Table 4. Would prefer to have the Municipality of Anchorage's Eagle River and Girdwood permits similar in terms of metals reporting requirements. The Girdwood permit has a footnote on Table 1 for the quarterly copper monitoring which states: "*Results of analyses shall be reported with the discharge monitoring report (DMR) for the last month of the calendar quarter during which monitoring occurred (i.e., the March, June, September, and December DMRs).*" Request that this be added to Footnote 3 on Table 4.

Response:

Agreed. EPA has replaced language in the draft permit to agree with the current Girdwood permit language.

5. Comment:

Page 9, Condition I.C.13. Alaska Department of Fish and Game has been reorganized since the current permit was written. Copies of the WET tests should be submitted to:

Alaska Department of Fish and Game
Division of Sport Fish – Special Areas
333 Raspberry Road
Anchorage, AK 99518

Response:

Comment noted and appreciated. EPA corrected the address in the permit.

6. Comment:

Page 12, Condition III.A. The requirement that “*Samples and measurements must be representative of the volume and nature of the monitored discharge.*” is sufficient. The following two paragraphs should be deleted. The requirement for additional sampling is hazy; it is open to widely-differing interpretation when this extra testing must be conducted. If the permittee errs on the side of doing extra monitoring whenever the effluent might be higher in some parameter because plant processes are not perfectly optimized, then the monitoring program as a whole is no longer “representative”. When the application is submitted for a permit renewal in five years, the accumulated data will be biased on the high side and will not be representative of the average and normal range of wastewater constituents.

Response:

This provision is included in the draft permit because routine monitoring could miss permit violations and/or water quality standards exceedances that could result from bypasses, spills, or non-routine discharges. It directs the Permittee to conduct additional, targeted monitoring to quantify the effects on the final effluent discharge of these types of *unusual* occurrences. The intent is to require this additional monitoring when a bypass, spill, or non-routine discharge event would cause a reasonable person to suspect that permit or water quality standards violations are imminent. The provision is standard language in Region 10 permits, so EPA shall retain the language in the permit with the hope that this response clarified the intent of the requirement. Representative samples are required as per 40 CFR 122.41(j)(1).