Department of Environmental Conservation
DRAFT Response to Comments

For

Wastewater Discharges from Drinking Water Treatment Facilities

APDES Permit No. AKG38000

Public Noticed April 10, 2019 – May 10, 2019

PROPOSED FINAL

Alaska Department of Environmental Conservation
Wastewater Discharge Authorization Program
555 Cordova Street
Anchorage, AK 99501

1 Introduction

1.1 Summary of Permit

General Permit AKG380000, is the reissuance of *Wastewater Discharges from Drinking Water Treatment Facilities*, which was initially issued May 30, 2014. The general permit applies to backwash water and/or reject water disposal from drinking water treatment facilities that discharge to surface waters.

1.2 Opportunities for Public Participation

The Department of Environmental Conservation (DEC or the Department) proposed to reissue the Alaska Pollutant Discharge Elimination System (APDES) wastewater discharge general permit *Wastewater Discharges from Drinking Water Treatment Facilities*. To ensure public, agency, and tribal notification and opportunities for participation, the Department:

- identified the permit on the annual Permit Issuance Plan posted online at: http://www.dec.state.ak.us/water/wwdp/index.htm
- notified potentially affected tribes and local governments that the Department would be working on this permit via letter, fax and/or email
- posted a preliminary draft of the permit on-line for a 10-day applicant review on March 20, 2019 and notified tribes, local government(s) and other agencies
- formally published public notice of the draft permit on April 10, 2019 in the Anchorage Daily News, the Fairbanks Daily News-Miner, and the Juneau Empire, and posted the public notice on the Department's public notice web page
- posted the proposed final permit on-line for a 5-day applicant review on June 20, 2019 and notified other agencies
- sent email notifications via the APDES Program List Serve when the preliminary draft, draft, and proposed final permits were available for review

The Department received comments from one interested party on the draft permit and supporting documents.

This document summarizes the comment submitted and the justification for any action taken or not taken by DEC in response to the comment.

1.3 Final Permit

The final permit was adopted by the Department on **pending**. There were changes from the public noticed permit. Significant changes are identified in the response to comments and reflected in the final fact sheet for the permit.

2 Comment Summary

2.1 Permit Table 2, Page 8

The Environmental Protection Agency (EPA) commented that the General Permit does not include monitoring or an effluent limitation that would indicate and limit the level of solids present in the discharge. The comment stated that total dissolved solids is not a measure of particulate solids in the discharge and recommended DEC add monthly monitoring and limits for either total suspended solids (TSS) or settleable solids (SS) to ensure that the discharge does not cause high turbidity in the receiving water. EPA recommended that DEC adopt the TSS limits (monthly average 30 mg/L, maximum daily 45 mg/L) that the Science Applications International Corporation (SAIC) proposed as best professional judgment (BPJ) limits in a 1987 draft permit model that SAIC had drafted for EPA. EPA applied these BPJ limits in the State of Idaho's Drinking Water General Permit. Additionally, Washington's Department of Ecology has established SS limits for Washington's Water Treatment Plant General Permit which are comparable to the TSS BPJ limits proposed by SAIC.

Response

In order to make a BPJ determination for TSS or SS limits on a case-by-case basis for Alaskan drinking water facilities, DEC has determined that TSS monitoring, rather than effluent limits for this permit reissuance, would be more appropriate. Drinking water facilities authorized under the prior general permit in Alaska were not required to monitor for TSS or SS; therefore, concentrations of these parameters discharging from these facilities, are unknown. The model technology cited in the SAIC report, on which the proposed BPJ limits are based, a sedimentation lagoon, may not be feasible in Alaska at all site locations due to poor soils, permafrost, and extreme winter temperatures. DEC will evaluate the TSS monitoring results from this permit cycle and also compare technologies to ensure that best available technologically achievable and best conventional pollutant control technology align. DEC will then determine whether or not to adopt SAIC's BPJ limits or use DEC's BPJ as per 18 AAC 83.425, 18 AAC Article 5, and 18 AAC 83.010 to establish case-by-case effluent limits that will ensure that high turbidity does not occur in the receiving water.

Twice per year monitoring for TSS has been added to Permit Table 2 and Fact Sheet Table 2. Rationale for the addition has been added to Section 4.2 of the Fact Sheet.

3 Identification Signs

DEC inadvertently omitted the requirement for drinking water treatment facilities to post a sign near the discharge area. This requirement is commonly found in APDES permits and provides users of the area important information regarding the nature of the discharge and identify of the discharger. Therefore, the requirement for identification signs has been added to Permit Section 4.3.