

**Department of Environmental Conservation  
Response to Comments**

**For**

**BP Central Water Treatment Facility**

**APDES Permit No. AKG380011**

**Public Noticed June 12, 2018 – July 11, 2018**

**July 12, 2018**



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

## **1 Introduction**

### **1.1 Summary of Facility / Authorization**

Authorization AKG380011, authorizes the discharge of nanofiltration concentrate from the BP Central Water Treatment Facility to an unnamed pond located at Prudhoe Bay (70.2946° North latitude, 148.7003° West longitude). Discharge of the nanofiltration concentrate shall occur at an estimated maximum daily discharge rate of 20,496 gallons per day. A mixing zone is proposed for total dissolved solids and is defined as the area measuring 32 meters long by 41 meters wide centered over the end of the pipe.

### **1.2 Opportunities for Public Participation**

The Department of Environmental Conservation (DEC or the Department) proposed to issue an Alaska Pollutant Discharge Elimination System (APDES) wastewater discharge authorization, *BP Central Water Treatment Facility*. To ensure public, agency, and tribal notification and opportunities for participation the Department:

- posted the public notice on the Department's public notice web page
- sent email notifications via the APDES Program List Serve

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

### **1.3 Final Authorization**

The final permit was adopted by the Department on July 12, 2018.

## **2 Specific Limitations and Monitoring Requirements:**

### **2.1 Comment Summary**

#### **Authorization Section 3.**

BP requests the removal of the total residual chlorine (TRC) limits citing that there is no chlorine residual in the nanofiltration concentrate. The rinse water from the sand filters is shipped to the wastewater treatment plant, and the small amount of chlorine residual that may remain in the filters will be gone after the rinse to waste cycle is done. Alternatively, BP requests that DEC correct the TRC limits in the authorization. The maximum daily limit of 0.011 milligrams per liter (mg/L) should be the average monthly limit.

**Response:**

DEC concurs with the comment. Since TRC is not present in the nanofiltration concentrate, the associated effluent limits are not necessary, and have therefore been removed from the authorization.

**2.2 Comment Summary****Authorization Section 3.**

BP requests that the total dissolved solids limits (TDS) be changed from a maximum daily limit of 2,770 mg/L to an average monthly limit, and that the maximum daily limit be replaced with a reporting requirement citing that the maximum expected effluent concentration (5,557 mg/L) had been predicted to be much higher during the reasonable potential analysis.

**Response:**

Upon further review, DEC identified an error in the reasonable potential analysis. Corrections resulted in an average monthly limit of 5,640 mg/L. The maximum daily limit has been revised to a reporting requirement.

**2.3 Comment Summary****Authorization Section 4.**

BP requests that the mixing zone sampling frequency be changed from once per month to July and September during the open water period citing that the lake to which they discharge is frozen October through June. They also state that the change would align better with the mixing zone monitoring requirements in their domestic wastewater treatment authorization.

**Response:**

DEC concurs with the comment. Since collecting samples will not be possible, or safely possible, when the receiving waterbody is frozen, DEC has revised the mixing zone sampling frequency from once per month to twice per year. Twice per year shall consist of one sample taken during April 1- June 30 and one sample taken during July 1-September 30. When sampling is not possible during the stated time period, twice per year shall be one sample in the summer and the other just prior to freeze up.

**3 Reapplication Requirements****3.1 Comment Summary**

BP states that the requirement to reapply for permit reissuance on or before January 1, 2019, less than six months after receiving their authorization is duplicative and requests that the Notice of Intent (NOI) and the request for a mixing zone that they submitted on May 22, 2018 be utilized for the reapplication process.

**Response:**

If discharge conditions remain unchanged from the discharge conditions that are reflected in the May 22, 2018 NOI, the NOI submitted on May 22, 2018 may be utilized for the reapplication process. BP must submit a letter to DEC 180 days prior to the expiration of AKG380000 that states that nothing has changed from the NOI submittal of May 22, 2018. The statement should be signed by the responsible party for the BP CWTF. Any changes to the nature of the discharge, mixing zone, or contact information will require the submittal of an updated NOI 180 days prior to the expiration of AKG380000. The duty to reapply for a permit 180 days before the existing permit expires may be found at 18 Alaska Administrative Code 83.105(b). This requirement will remain in the authorization.