

**Department of Environmental Conservation
Response to Comments**

For

Mendenhall Wastewater Treatment Plant

APDES Permit No. AK0022951

Public Noticed March 24, 2020 – April 22, 2020

April 28, 2020



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

1 Introduction

1.1 Summary of Facility / Permit

The City and Borough of Juneau (CBJ) owns, operates, and maintains the Mendenhall Wastewater Treatment Plant (WWTP) located in Juneau, Alaska. The sequential batch reactor (SBR) secondary treatment plant discharges treated municipal wastewater to the Mendenhall River through a submerged multi-port diffuser located approximately 5,800 feet downriver of the Brotherhood Bridge, and 1.4 miles upstream of Gastineau Channel.

The design flow of the Mendenhall WWTP is 4.9 million gallons per day and is the largest of three wastewater treatment facilities in the Juneau area. The plant services a residential population of approximately 20,000 and supports commercial businesses. Juneau is a summer season destination area, therefore, the actual population is higher during the summer months. The Mendenhall WWTP only receives wastewater from the domestic wastewater collection system. Storm water is conveyed through a separate sewer collection system.

The Mendenhall WWTP was originally permitted under NPDES Permit Number AK0022951 in 2006 by EPA. The 2006 permit expired in 2011, but was administratively extended until August 1, 2014 when DEC issued an APDES permit. The APDES permit expired on July 31, 2019. Under the Administrative Procedures Act and state regulations at 18 AAC 83.155(c), an APDES permit may be administratively extended (i.e., continues in force and effect) provided that the permittee submits a timely and complete application for a new permit prior to the expiration of the current permit. A timely and complete application for a new permit was submitted by CBJ in February 2019; therefore, the 2014 permit is administratively extended until such time a new permit is reissued.

1.2 Opportunities for Public Participation

DEC proposed to issue an APDES wastewater discharge permit for the Mendenhall WWTP discharge. To ensure public, agency, local governments 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 local governments and potentially affected tribes 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 January 8, 2020 and notified tribes and other agencies

- formally published public notice of the draft permit on March 24, 2020 in the *Juneau Empire* newspaper and posted the public notice announcing a 30-day public comment period on the Department's public notice web page
- 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 CBJ. This document summarizes CBJ's comments and the justification for any action taken or not taken by DEC in response to them.

1.3 Final Permit

CBJ waived the 5-day applicant review period on April 24, 2020. The final permit was adopted by the Department on April 28, 2020. There were not any changes to the publicly-noticed permit. Based on CBJ's comments, DEC updated the fact sheet as indicated below. Minor typographical corrections are not reflected.

2 Facility Information

2.1 Comment Summary

Fact Sheet Section 2.1.

CBJ suggested revisions to the treatment process description that reflect recent headworks, odor control, and sludge handling upgrades.

Response:

DEC updated Fact Sheet Section 2.1 with CBJ's suggested language.

3 Low Flow Conditions

3.1 Comment Summary

Fact Sheet Section 5.3

CBJ shared information in regards to Fact Sheet Section 5.3, whereby DEC recommends that CBJ obtain updated Mendenhall River low flow data for use in the next permit. CBJ consulted with the United States Geological Survey who stated that using data from the Mendenhall River gage, which is located at the outlet of Mendenhall Lake, along with data from 2012 and earlier from the Montana Creek gage, which is no longer recording discharge flow, provides the best alternative. The hydrology of the Montana Creek system has not significantly changed; therefore data from 2012 and earlier provides a reasonable estimate of the current stream flow.

Response:

DEC appreciates CBJ's early investigation into the recommendation at Fact Sheet 5.3 and will take CBJ's comments into consideration during the next permit reissuance.

There have been no changes to the permit or fact sheet based on these comments.

4 pH Limits

4.1 Comment Summary

CBJ shared their concern, that because the permit contains more stringent pH limits (6.5 SU), they may experience additional violations while operating under the same conditions. Changes to the pH limits were not requested.

Response:

The prior permit required that pH between July 1 and October 31, be at least 6.3 SU. As indicated in Fact Sheet Section A.4.1.2, DEC reviewed the Mendenhall's WWTP effluent monitoring results from September 2014-June 2019. The results indicated that CBJ consistently met a minimum pH water quality criterion of 6.5 SU. Therefore, DEC determined that pH would no longer be included in the mixing zone and that CBJ must meet pH water quality at the point of discharge from the facility.

There have been no changes to the permit or fact sheet based on this comment.