

**Department of Environmental Conservation
Response to Comments**

For

**City of Fairbanks and Golden Heart Utilities, Inc.
Wastewater Treatment Facility**

APDES Permit No. AK0023415

Public Noticed July 7, 2021 – August 6, 2021

September 13, 2021



**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 of Fairbanks (COF) owns and leases the Fairbanks Wastewater Treatment Facility (WWTF) to Golden Heart Utilities (GHU) and as such, the COF and GHU are co-permittees for the Alaska Pollutant Discharge Elimination System (APDES) wastewater discharge permit. The WWTF treats domestic and industrial wastewater from the greater Fairbanks area, College, and Ft. Wainwright, and with a maximum daily design flow rate of 11.2 million gallons per day (mgd) the WWTF is designated a major facility because it has a design flow rate of 1.0 mgd or greater and because the COF and GHU have an approved industrial pretreatment program (IPP). Under the IPP, the COF and GHU regulate flow from six significant industrial users (SIU), one of which, Aurora Energy, a steam electric-generating plant, is also classified as a categorical industrial user. The other five SIUs include: the University of Alaska Fairbanks Power Plant, Fairbanks Memorial Hospital, Fort Wainwright, the Fairbanks North Star Borough Landfill, and the Ruth Burnett Sport Fish Hatchery. The permittees have a multijurisdictional agreement with College Utilities Corporation (CUC) whereby CUC administers their own IPP supervised by GHU personnel.

The prior permit, issued in May 2016 expired on April 30, 2021. 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 application for a new permit was submitted by the COF and GHU on October 29, 2020; therefore, the 2016 permit is administratively extended until such time a new permit is reissued.

1.2 Opportunities for Public Participation

The Alaska Department of Environmental Conservation (DEC or the Department) proposed to issue an Alaska Pollutant Discharge Elimination System (APDES) wastewater discharge permit for the COF and GHU WWTF. 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 April 12, 2021 and notified tribes and other agencies

- formally published public notice of the draft permit on July 7, 2021 in the *Fairbanks Daily News-Miner* newspaper and posted the public notice announcing a 30-day public comment period on the Department's public notice web page
- posted the proposed final permit on-line for a five-day applicant review on September 2, 2021.
- 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 GHU. This document summarizes the comments from GHU and the justification for any action taken or not taken by DEC in response to the comments.

1.3 Final Permit

The final permit was adopted by the Department on September 13, 2021. There were not any changes from the public noticed permit.

2 Total Residual Chlorine (TRC)

2.1 Comment Summary

Permit Section 1.2.4

GHU states that the dechlorination equipment that they installed in 2021 was designed to meet the final TRC limits of the previous permit (chronic 0.26 mg/L, acute 0.34 mg/L) and that the equipment cannot consistently measure down to the lower 0.1 mg/L TRC compliance evaluation concentration that the reissued permit will require. GHU states that the technology that they installed has not allowed them to achieve the compliance level of 0.1 mg/L on a consistent basis as the levels consistently spike. They suspect that the 0.1 mg/L concentration may be reaching past the equipment's operational parameters. GHU also states that this has been substantiated by a comparison of operator sample results taken manually. GHU would like DEC to adopt the final TRC limits of the prior permit for which they say the dechlorination system was designed. Doing so would allow for accurate measurement and reduce the amount of pollutants discharged into the Tanana River.

Response:

Since GHU submitted their comments on the preliminary draft permit as summarized above, they have identified a circuit board issue as the cause of the TRC spikes. As such, upon completion of repairs, they are confident that that the chlorine residual analyzer will no longer consistently spike and record false positives.

The issue that GHU based their comments on has been resolved; therefore, there are no changes to the draft permit.