

**Department of Environmental Conservation
Response to Comments**

For

**Anchorage Water & Wastewater Utility
Eagle River Wastewater Treatment Facility
APDES Permit No. AK0022543**

Public Noticed October 8, 2025 – November 10, 2025

December 3, 2025



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

1 Introduction

1.1 Summary of Facility / Permit

The Anchorage Water & Wastewater Utility (AWWU) operates the Eagle River Wastewater Treatment Facility (ER WWTF) in the community of Eagle River, Alaska, part of the Municipality of Anchorage, having a population of approximately 19,500 people. The ER WWTF is a Publicly-Owned Treatment Works (POTW); an activated sludge secondary treatment plant with effluent filtration and ultraviolet disinfection. The design rate for the facility is 2.5 million gallons per day. The ER WWTF discharges secondary treated domestic wastewater to Eagle River at 61.321667 North latitude and 149.591944 West longitude. Separate mixing zones for the summer season (June 1 – September 30) and winter season (October 1 – May 31) will be authorized. Pollutants in the mixing zones are total nitrate/nitrite, zinc, copper, lead, dissolved oxygen, total dissolved solids, temperature, and Whole Effluent Toxicity

1.2 Opportunities for Public Participation

The Department of Environmental Conservation proposed to reissue an Alaska Pollutant Discharge Elimination System (APDES) wastewater discharge permit to the Anchorage Water & Wastewater Utility for the ER WWTF. 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: <https://dec.alaska.gov/water/wastewater/pip/>
- notified potentially affected tribes and local governments that the Department would be working on this permit via letter, fax and/or email on October 10, 2024.
- posted a preliminary draft of the permit on-line for a 10-day applicant review on August 26, 2025, and notified tribes, local governments, and other agencies
- formally posted public notice of the draft permit on October 8, 2025, on the Department's public notice web page
- sent email notifications via the APDES Program List Serve when the preliminary draft and draft permits were available for review

The Department received comments from one organization, Chickaloon Village Traditional Council (CVTC). 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 Permit

The final permit was adopted by the Department on December 3, 2025. There were no significant changes made to the publicly noticed permit or fact sheet.

2 Comment Summary

CVTC commented that Eagle River is an anadromous water body with all five species of salmon of all freshwater life stages (including eggs, juveniles, and adults) found in the lower seven miles of Eagle River where the Eagle River WWTF mixing zone occurs. Warm temperatures, low oxygen, and some dissolved metals including copper can cause barriers that cold-water fish are reluctant to cross. Additionally, copper in trace amounts can disorient salmon cause them to become easy prey.

2.1 Response

The DEC continues to have the Eagle River WWTF monitor for metals, including copper which are sampled and evaluated through monthly discharge monitoring reports and during each reissuance of the individual permit. The Eagle River WWTF continues to meet their copper limits without any exceedances this past permit cycle. Additionally, there was a segment of the Eagle River which was classed as a Total Maximum Daily Load (TMDL) by EPA, starting in 1995, however the DEC determined that the Eagle River segment classified as a TMDL was back in attainment, effective June, 2020 for copper, lead, silver, ammonia, and total residual chlorine (TRC).

No changes were made to the permit or fact sheet based on this comment.

3 Comment Summary

CVTC commented that the proposed lengthening of the chronic winter mixing zone implies that the Eagle River WWTF winter mixing zone did not meet water quality standards at the 790-foot boundary in their prior permit cycle. CVTC requested that the DEC focus should be on what treatment will allow the discharge to meet water quality criteria (WQC) and the end of pipe instead of calculating how far the discharge has to go in order to meet WQC.

4 Response

As per 18 AAC 70.240, the Department may authorize a mixing zone in a permit. Determination of the mixing zones requires an evaluation of critical conditions of the flow regimes of the receiving waterbody, effluent characterization and concentration projections, and discharges rates. A full evaluation was done during this permit reissuance and the DEC determined that the winter mixing zone is as small as practicable and protective of all uses as explained in Fact Sheet, Section 4.6.

No changes were made to the permit or fact sheet based on this comment.

5 Comment Summary

CVTC expressed concerns over the validity of the effluent water quality samples as well as commented that there was no information provided to identify whether the effluent samples were taken prior to discharge or at the outfall into the river. Additionally, the CVTC provided suggestions for future effluent sampling requirements and independent inspections for quality control checks, as well as the implementation of data loggers for temperature and dissolved oxygen tracking sensors to

gather more data for future use. CVTC would also like the DEC to require the Eagle River WWTF to do a seasonal flow study.

5.1 Response

The Eagle River WWTF is required to take all effluent samples at the end of pipe prior to discharge into the Eagle River and has done so consistently and successfully for both summer and winter seasons for several permit cycles. The Eagle River WWTF also maintains the facility Quality Assurance Project Plan (QAPP) and Operations and Maintenance Plan (O&M) for effluent and receiving water quality concerns as explained in their detailed description requirements in Permit Section 2.0. The Eagle River WWTF has the option of installing additional data loggers and performing an updated flow study, but it is not a requirement of this permit.

No changes were made to the permit or fact sheet based on this comment.

6 Comment Summary

CVTC requested more detailed explanations as it pertains to the model visualization and ambient river quality data in the Fact Sheet that could include at what point downstream of the outfall does each pollutant of concern reach WQC, ambient stream water concentrations, and how often do they change based on the changing flows of the river. The pollutants of concern specifically mentioned were for zinc and copper.

6.1 Response

The DEC welcomes this detailed request and feedback and will consider adding additional information in future issuances and reissuances for pollutants of concern.

No changes were made to the permit or fact sheet based on this comment.

7 Comment Summary

CVTC commented that they would like an update on the Eagle River WWTF proposed upgrades which were scheduled for completion in 2025 and suggested that the permit should require a forward-looking plan for effluent to meet water quality criteria at the end of pipe

7.1 Response

The Eagle River WWTF upgrades for both the UV and Washwater were not done and had to go back out to bid. The ERWWTF is still moving forward with the project and expects the work to commence and be completed in 2026. All of this is very much dependent upon material lead times and contractor scheduling. Despite not having the upgrades in place, the Eagle River WWTF continues to produce high quality effluent and no plan will be implemented in this permit reissuance.

The fact sheet under section 2.1 and 2.2 have been updated and there were no changes made to the permit based on this comment.