Department of Environmental Conservation
Response to Comments
For

Wastewater Discharges from Drinking Water Treatment Facilities

APDES Permit No. AKG380000

Public Noticed June 27, 2024 – July 29, 2024

Pending, 2024

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

1 Introduction

1.1 Summary of Facility / Permit

General Permit AKG380000, is the reissuance of Wastewater Discharges from Drinking Water Treatment Facilities, which was previously issued July 1, 2019. 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 proposed to issue an 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 https://dec.alaska.gov/water/wastewater/pip/
- notified local governments and potentially affected tribes that the Department would be workingon this permit via letter, fax and/or email
- posted a preliminary draft of the permit on-line for a 10-day applicant review May 9, 2024, and notified tribes and other agencies
- posted the draft of the permit online for a 30-day public comment period on June 27, 2024.
- posted the proposed final permit on-line for a five-day applicant review on August 1, 2024
- 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 individual. 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 Pending, 2024. There were changes from the public noticed permit. Significant changes are identified in the response to comments and reflected in the final permit and fact sheet.

2 Specific Limitations and Monitoring Requirements

2.1 Comment Summary

A comment was received that Appendix D identifies the approved mixing zones, but does not contain facility specific limits, therefore they requested that Permit Section 2.1.2 language be modified to clarify that facilities with an authorized mixing zone will have facility specific effluent limits that will supersede Tables 2, 3, or 4 listed in the General Permit.

Response:
The DEC has updated Permit Section 2.1.2 language as follows:

The permittee must limit discharges as specified in Table 2, 3, and 4 as applicable. The effluent limits must be met at the end of the treatment process, or for those facilities with modified limits, at the boundary of an authorized mixing zone. If a facility is authorized a mixing zone, the effluent limits in Tables 2, 3, or 4 for which a mixing zone is authorized, are superseded by the corresponding modified effluent limits in the individual authorization to discharge. Appendix D, Table A of this permit lists previously authorized facility mixing zones. DEC will notify the permittee of any modified effluent limits when issued an authorization to discharge under this general permit.

2.2 Comment Summary

A comment was received that that the word "limit" was inadvertently left off the end of the last sentence of permit section 2.2.7.

A comment was received that identified that section number 3.2.4.1 was repeated

Response:
The DEC has corrected the permit sections 2.2.7 and 3.2.4.1

3 Appendix A Section 3.4.3.3

3.1 Comment Summary

A comment was received that requested concurrence that per Appendix A Section 3.4.3.3, since no daily maximum permit limits are listed within the permit as requiring 24-hour reporting, that an exceedance of a daily maximum permit limit will not require 24-hour reporting. The only noncompliance events that will require 24-hour reporting are those in Appendix A Section 3.4.3.1 and Appendix A Section 3.4.3.2.

Response:
Individual authorizations issued under the general permit contain the pollutants with daily maximum permit limits; therefore, the Standard Conditions, Appendix A Section 3.4.3.3 requirements are still in effect and enforceable. The Department does not comment on, nor predetermine, enforcement mechanisms through the Permitting process.

No changes were made to the permit based on the comment.

4 Fact Sheet Section 4.3.6

4.1 Comment Summary

A comment was received that stated that the water quality standard references and associated criteria discussed within Fact Sheet Section 4.3.6 are incorrect pertaining to Manganese and the

DEC decision and explanation to implement the most stringent water quality criteria for fresh water.

Response:

The DEC has updated Fact Sheet section 4.3.6 as follows:

In accordance with Alaska WQS 18 AAC 70.020, 18 AAC 70.040 and 18 AAC 70.050**,** all waters are protected for all uses and if a waterbody is protected for more than one use class the most stringent water quality criteria for all the included use classes will apply**.** Alaska WQS at 18 AAC 70.020(b)(11) lists the water quality standard criteria for Toxic and Other Deleterious Organic and Inorganic Substances for Fresh Water Uses and references the *Alaska Water Quality Criteria Manual.* The most recent amendment included a repeal of the human health criterion of 50 µg/L for drinking water and consumption of aquatic organisms and replaced it with a drinking water criterion of 300 µg/L. Therefore, the most stringent, not to be exceeded freshwater criterion for manganese is the irrigation value of 200 µg/L. Alaska WQS at 18 AAC 70.020(b)(23) for marine water states that the concentration of substances in water may not exceed the numeric criteria for aquatic life for marine water shown in the *Alaska Water Quality Criteria Manual*. The human health for consumption of aquatic organisms concentration may not exceed 100 µg/L.