

Alaska Department of Environmental Conservation (DEC) Response to Comments for the Draft Certificate of Reasonable Assurance for the City of Ketchikan Charcoal Wastewater Treatment Plant (WWTP) National Pollutant Discharge Elimination System (NPDES) Permit No. AK0021440

Summary

The Environmental Protection Agency and DEC jointly public noticed NPDES Permit AK0021440 and DEC's Draft Certificate of Reasonable Assurance for the City of Ketchikan (Ketchikan) Charcoal Point WWTP between April 15, 2025, and May 30, 2025. DEC received comments pertaining to the Draft Certificate of Reasonable Assurance from the City of Ketchikan. This document summarizes the comments and the justification for any action taken or not taken by DEC in response to the comments.

1. Fecal Coliform (FC) and Enterococcus Bacteria Mixing Zone

Comments Summary

Ketchikan states that the mixing zone proposed in the Draft Certificate of Assurance does not include the continuation of the existing FC bacteria mixing zone, that it does not align with the interim FC limits in the NPDES Permit, and that it does not provide sufficient dilution for the discharge to meet FC and enterococcus bacteria water quality criteria. Ketchikan requested that DEC revise the Draft Certificate of Reasonable Assurance to include the existing FC bacteria mixing zone until such time that the new wastewater disinfection system is operational at the end of the compliance schedule. Ketchikan also states that it is reasonable to assume that enterococcus bacteria will need to be included in the FC bacteria mixing zone to meet water quality criteria; therefore, they requested that DEC add it to the existing FC bacteria mixing zone.

DEC Response

The prior FC bacteria mixing zone (3,200 meters long by 250 meters wide centered over the diffuser) that DEC authorized in the 2000 Reasonable Certificate of Reasonable Assurance does not meet regulatory criteria at 18 AAC 70.240; therefore, it cannot be approved. The Draft NPDES Ketchikan Charcoal Point WWTP Permit contains a Compliance Schedule for FC and enterococcus bacteria. Until compliance with the final FC and enterococcus effluent limits have been met, the permit contains interim FC bacteria limits (810,000 FC/100 mL monthly average, 1,150,000 FC/100 mL weekly average, and 1,200,000 FC/100 mL daily maximum).