

RESPONSE TO COMMENTS

City and Borough of Juneau, Alaska

Juneau-Douglas Wastewater Treatment Plant

NPDES Permit No.: AK-002321-3

Public Comment Period: August 27, 2001 - September 26, 2001

During the public comment period specified above, only the City and Borough of Juneau (CBJ) submitted comments. This document summarizes the comments and the EPA responses to the comments.

1. Comment: A comma should be inserted between “. . .screenings” and “grit” in Part I.A.4.

Response: The permit has been revised to include the comma.
2. Comment: Part I.B.1 of the permit (“Whole Effluent Toxicity”) requires that *Crassostrea gigas* be used for the whole effluent toxicity (WET) test. The laboratory that we have used in the past for WET tests has had some difficulty securing this species. For this reason, we have previously obtained permission from EPA to use *Mytulis galloprovincialis*. We request that the permit be revised to include the choice of either of these organisms.

Response: The *Mytulis galloprovincialis* is an acceptable substitute for *Crassostrea gigas* (the Pacific oyster). The permit has been revised to include a choice of either the Pacific oyster or the *M. galloprovincialis*.
3. Comment: Table I.C.1, “Receiving Water Monitoring,” contains a typographical error under 1. It should read “See paragraphs 5a and 5b below for monitoring frequency.”

Response: The permit has been revised to correct the typographical error.
4. Comment: Part I.C.3 of the permit requires that receiving water monitoring summary reports be submitted annually by September 15, but no annual period is specified. We recommend that the period be July 1 - June 30.

Response: EPA agrees and has revised the permit to include the reporting period of July 1 - June 30.
5. Comment: Part I.C.6 refers to receiving water monitoring station 1 and indicates it is shown on Appendix A. Appendix A is a map showing the out fall and

mixing zone but does not depict the sampling station. In addition, the samples are to be collected one hour after slack tide. Our practice has been to collect at approximately low tide. We request that this procedure be continued.

Response: The Alaska Department of Environmental Conservation (ADEC) has supplied a new map showing the location of the monitoring station. Also, ADEC has removed the requirement that samples be collected one hour after slack tide. The permit has been revised to show these changes.

6. Comment: Part I.C.8.d of the permit requires that dilution be calculated daily and that the minimum dilution be reported each month. This marine discharge does not lend itself to calculating dilution. We request that this provision be deleted.

Response: EPA agrees and has removed the requirement to calculate dilution.

7. Comment: Table I.D.1 contains an error in the location of Diversion Structure N11.2. The location of this diversion structure is the intersection of Marine Way and South Seward Street. It is called the "Sealaska Diversion" because it is near the Sealaska Building. The discharge from this structure is to Gastineau Channel near Marine Park. The location description in the draft permit should be corrected to reflect this information.

Response: The permit has been revised to include this information.

8. Comment: Part I.D.1.h. refers to "Tables I.D.1 and I.D.2 above." Since there is no Table I.D.2, we believe the reference should be to Table I.D.3 which is below and should be re-numbered I.D.2.

Response: The permit has been revised to correct the typographical error, by re-numbering Table I.D.3 as Table I.D.2.

9. Comment: Part I.D.1.i. requires annual reports detailing information concerning CSOs should be submitted beginning one year after the effective date of the permit. We recommend that the report be submitted for each calendar year, and that it be submitted no later than February 1 of the following year, with the first annual report being submitted on or before February 1, 2003.

- Response: EPA agrees and has revised the permit to require the first submittal of the CSO annual report by February 1, 2003.
10. Comment: Table I.D.3 requires that the total lbs/day of loading of BOD₅ and TSS for each CSO opening be submitted. In reviewing the information that has been previously submitted, it appears that this requirement may have been misunderstood since the information submitted was total number of pounds discharged during the CSO opening. If the opening was more than 24 hours, then the lbs/day reported was too high. In the future, we will report lbs/day per opening, unless the opening is less than 24 hours. In that case, we will report total number of pounds discharged.
- Response: The comment is noted. EPA agrees that if the opening is less than 24 hours, then the total number of pounds should be reported. As discussed in the Comment No. 8, Table I.D.3 has been re-numbered as Table I.D.2.
11. Comment: Line 3 of Part I.H.8 should be revised by deleting the word “precipitation” from the phrase “high tide precipitation events.”
- Response: EPA agrees and has removed the word “precipitation.”
12. Comment: Part II.A.3 should be revised to read “Influent samples shall be . . .”
- Response: The permit has been so revised.
13. Comment: Strip charts are not used at the Juneau-Douglas Treatment Plant, but circular charts are. The word “strip” in line 3 of Part II.F. should be deleted in order to allow for the circular charts used at Juneau-Douglas Treatment Plant.
- Response: The permit has been so revised.
14. Comment: The letter “a” in the second sentence of Part III.H.2 should be capitalized.
- Response: EPA agrees and has revised the permit.
15. Comment: If Part IV.A. “Notice of Introduction of New Pollutants” only applies to publicly owned treatment works (POTWs) with approved pretreatment programs, then this provision should be deleted since the Juneau-Douglas Treatment Plant does not have a pretreatment program.

Response: Part IV.A. is required of all POTWs, whether or not they have a pretreatment program, under 40 CFR § 122.42(b). This provision has not been removed from the permit.

16. Comment: In Part IV.H.3, two places in the first sentence “IV.J.2.” should be revised to read “IV.H.2.”

Response: The permit has been revised to correct this typographical error.

ADEC Final Certification

In addition to the changes above, ADEC, in a letter dated November 2, 2001, supplied a final certification of the permit. As part of its certification, ADEC required the following which have been incorporated into the final permit.

- Effluent limits for dissolved oxygen
- Effluent flow limits
- Mixing zone and monitoring requirements for fecal coliform bacteria
- Zone of initial dilution and minimum allowable dilution for all water quality standards except for fecal coliform bacteria
- Placement of signs near outfall line

ADEC also requested that a limit on fecal coliform also be placed at the edge of the mixing zone. The permit has not been revised to include that request. EPA enforces limits at the end of pipe, based on any allowable dilution. The mixing zone granted by the State should ensure that the discharge meets the water quality standards at the edge of the mixing zone. Monitoring conducted at the edge of the mixing zone should supply the information needed to determine if the mixing zone size should be changed.