

August 23, 2000

Response To Comments

Draft NPDES Permit for:

Municipality of Anchorage, Alaska
Girdwood Wastewater Treatment Facility
NPDES No.: AK-004785-6

On June 30, 2000, the Environmental Protection Agency (EPA) issued a draft National Pollutant Discharge Elimination System (NPDES) permit for the Girdwood wastewater treatment facility which is owned and operated by the Anchorage Water and Wastewater Utility. The facility handles the domestic wastes from the Alyeska Ski Resort, the small community of Girdwood, and nearby subdivisions and developments. The treated effluent from the facility is discharged into Glacier Creek. The public comment period for the draft permit extended from June 30, 2000 to July 31, 2000.

EPA received comments from the Municipality of Anchorage in a letter to Robert Robichaud of the EPA, from Brian Crewdson, Assistant to the General Manager of the Anchorage Water and Wastewater Utility (AWWU), dated July 28, 2000. No other comments were received.

This document represents EPA's response to comments received during the comment period. The comments are summarized below followed by EPA's response.

Comment 1: Testing and Reporting Requirements for Metals. The AWWU commented that Table 1 of the permit requires "total" metals while the footnote refers to "total recoverable" metals. The comment referenced 40 CFR 136 which includes two different digestion methods for metals dependant on the determination of either total or total recoverable. The permittee request clarification in the permit of which method is required and suggests that total recoverable is appropriate for the Girdwood facility. The permittee also request consistency throughout the permit with regards to metals determination.

Response: EPA agrees that the permit should be consistent with regards to specifying metals testing and reporting requirements and that total recoverable is appropriate in this case. All references to metals testing in Section I of the permit will be revised to specify the total recoverable requirement.

Comment 2: Copper Limits Calculated with Incomplete Information. The AWWU commented that EPA used the lowest hardness value available for Glacier Creek when determining the

copper criteria and not the 5th percentile which is EPA Region 10 policy. AWWU recently received the entire Glacier Creek data set from U.S. Geological Survey (USGS) and found that there are 23 data points for hardness rather than the 13 data points submitted in the NPDES application. A new hardness value and copper criteria were calculated based on this new information. New effluent limits for copper were calculated based on the hardness value.

Response: EPA reviewed the hardness data submitted by AWWU from USGS (See AWWU comment letter). It is appropriate to include this additional information in characterizing the hardness value for Glacier Creek. The revised 5th percentile hardness value for Glacier Creek is 30 mg/L. This results in a revised copper water quality criteria of 5.74 Fg/L acute, and 4.25 Fg/L chronic. Recalculating the effluent limits with these criteria, while keeping all other variables unchanged, results in the following effluent limitations: maximum daily limit (MDL) of 57 Fg/L and 0.29 lbs/day, and average monthly limit (AML) of 42 Fg/L and 0.21 lbs/day. These revised copper limitations will be included in the final permit.

Comment 3: Monitoring Frequency for Copper. The AWWU request a change in frequency from monthly to quarterly monitoring for copper. The AWWU also operates a similar, but larger, wastewater treatment facility in Eagle River. The Eagle River permit was very recently reissued with quarterly monitoring for metals with permit limitations. AWWU wishes to standardize the requirements between the facilities in order to make testing as efficient and cost effective as possible.

Response. EPA Region 10 typically includes monthly or more frequent metals monitoring in NPDES permits. For the Girdwood permit, however, EPA will allow quarterly monitoring since the Eagle River permit was recently reissued with quarterly metals monitoring and EPA recognizes the benefits to AWWU of standardizing the testing requirements between these two facilities. The permit will be modified to reflect the quarterly frequency for copper monitoring.

Comment 4: Clarification to WET Test Frequency. The AWWU requests clarification to the frequency of the WET test required in year 4 of the permit.

Response. The WET test is required to be conducted only once during year 4 of the permit. The permit will be modified so as to be specific to test frequency.

Comment 5: Requirements Under the “Representative Sampling” Section. The AWWU noted that boilerplate language under the Representative Sampling Section of the permit differed from recently issued permits to Eagle River and John M. Asplund facility, both operated by AWWU. AWWU request that the language in the Girdwood permit be consistent with the other two recently issued permits.

Response. In order to be consistent among the three permits issued to the Municipality of Anchorage EPA will revise this section of the Girdwood permit. The language in the final

permit will match the language required by EPA regulation for representative sampling. EPA, however, intends to include the expanded language as boilerplate in future permits.

Comment 6: Incorrect References in Part II.H and Part IV.B. The AWWU found typographical errors in these two sections which will be corrected in the final permit.