

Draft Response to Comments

AK-002146-6

On September 6, 2001, EPA, Region 10 proposed issuance of a permit for the City of Wrangell. The comment period ended October 9, 2001.

EPA received written comments from the City of Wrangell, the Alaska Department of Environmental Conservation and the U.S. Fish and Wildlife Service.

EPA received a letter, dated May 22, 2001, from the National Marine Fisheries Service (NMFS) regarding Endangered Species and Essential Fish Habitat (EFH). NMFS stated that no endangered marine mammals are expected to occur in the vicinity and no critical habitat has been identified. NMFS has concurred with the EFH evaluation that EPA provided in the Fact Sheet for the draft permit and feels that additional EFH consultation is not necessary at this time.

In a letter dated November 21, 2001, the Alaska Division of Governmental Coordination (ADGC) found this project to be consistent with the Alaska Coastal Management Program (ACMP).

In a letter dated November 21, 2001, the Alaska Department of Environmental Conservation (ADEC) provided a Certificate of Reasonable Assurance that the permit will comply with the applicable provisions of Section 401 of the Clean Water Act.

1. Comment: One commentor suggests eliminating the fecal coliform bacteria effluent limitation from the permit or in the alternative, increase the monthly average limitation from 1 million to 1.5 million colonies/100mL. Another commentor recommends decreasing effluent fecal coliform bacteria monitoring to once per month because of limited testing facilities as well as decreased jet transport capabilities.

Response: Fecal coliform bacteria is a pollutant of concern in discharges from municipal wastewater treatment plants with the potential to violate water quality standards. The limitations will not be eliminated. ADEC, in its draft 401 Certification and again in its

comments on this permit, has included the limitations for fecal coliform bacteria based on the authorized mixing zone. The limitations will not change unless ADEC were to include new limitations in its final certification based on new mixing zone information. Because of the logistics concerns raised in the comments, the effluent fecal monitoring will be reduced to once per month.

2. Comment: A commentor requests a modification in the sampling frequency of BOD and TSS from weekly throughout the life of the permit to weekly for the first year of the permit and monthly thereafter if the first year's values indicate compliance. Another commentor requests that the monitoring for these parameters be decreased to twice per month for the six months of operation of the new treatment system and then decreased to monthly thereafter if the values during the six months fall within permitted limits.

Response: The sampling frequency for BOD will be weekly until the new treatment plant has achieved 12 consecutive months of full compliance with BOD and then the sampling frequency will revert to monthly.

The sampling frequency for TSS will be weekly until the new treatment plant has achieved 12 consecutive months of full compliance with TSS and then the sampling frequency will revert to monthly.

3. Comment: A commentor suggests that the sample frequency for total ammonia be monthly for the first year and, if after that first year, the effluent values are less than 43 mg/L (this level was obtained from the Ketchikan permit) then monitoring can be discontinued for the remainder of the permit term. Another commentor suggests that quarterly monitoring would be adequate.

Response: The Response to Comments for the Ketchikan permit explains that calculating a trigger value for ammonia is a site-specific

process depending on pH, salinity and temperature of the receiving water. So it is likely that 43mg/L is not the appropriate value for the City of Wrangell. EPA has no data for ammonia and would like to gather information necessary for the next permit issuance to assess whether ammonia is a pollutant of concern. If data for ammonia is collected quarterly, a sufficient number of samples should be collected (along with pertinent site-specific ambient data) to make this determination.

4. Comment: A commentor requests that shoreline monitoring for fecal coliform bacteria be eliminated from the permit or in the alternative, consider monitoring further from shore, for example 25 meters. There is a concern that pet and animal excretions on the beach may produce high fecal counts in samples taken 1.5 meters from shore.

Response: Since the mixing zone granted by ADEC forms a 1600 meter radius around the outfall and this mixing zone touches the shoreline in the areas where shoreline monitoring is required, the level of fecal coliform bacteria in these areas needs to be known.

In their comments, ADEC reiterates that it is necessary to gather information regarding bacterial counts on the shoreline especially considering Wrangell's shellfish collection area. If high counts are found on the shoreline, the City should investigate and identify all possible sources of fecal coliform contamination. In addition if bacterial counts rise, the City should make an effort in education their community regarding the hazards of consuming shellfish from an area that is found to be contaminated and also identify ways to decrease the contamination.

5. Comment: A request has been made to modify the ambient monitoring schedule to allow discontinuation after the first two years if the results indicate that the discharge has not caused water quality standards to be exceeded. Another commentor recommends that ambient monitoring be conducted only during the first and fourth year

Response: The goal of the ambient monitoring program is to provide adequate data for evaluating compliance with the water quality standards. Since there is no previous ambient monitoring for the current outfall location and a new treatment plant is being constructed, the EPA would like to see more data than what is being requested by the commentor before determining that the monitoring is not necessary. This issue will be revisited during the next reissuance of the permit.

6. Comment: One commentor suggests that ambient fecal coliform monitoring be performed four times per year during the first two years of the permit then, upon no violations of the 14FC/100mL standard, the monitoring be decreased to one more sampling suite performed on the same day as water quality monitoring during the fourth year of the permit.

Response: The ambient monitoring for fecal coliform bacteria was proposed to be for the first two years with the opportunity for stopping if compliance were achieved. With the suggestion of additional monitoring, EPA has reevaluated the ambient fecal coliform bacteria monitoring program. The permit will require that fecal coliform bacteria monitoring be included in the ambient monitoring program after two years of compliance. Monitoring would be done based on the scheduled annual monitoring program. The shoreline monitoring program will continue providing information throughout the life of the permit.

7. Comment: A commentor notes that the wrong address was given in Permit Part II.C. The city should be Juneau not Fairbanks.

Response: This error has been corrected in the final permit.

State Certification Issues:

EPA incorporated most of the stipulations included in the final 401 Certification provided by ADEC. There are several that EPA did not include and

the following provides EPA's reasons for not including them:

Stipulation 2 called for an increase in the Biochemical Oxygen Demand (BOD₅) average monthly effluent limitation from 120 to 150 mg/L. Section 402(O)(1) states that "a permit may not be renewed, reissued, or modified to contain effluent limitations which are less stringent than the comparable effluent limitations in the previous permit except in compliance with section 303(d)(4)."

Stipulations 9 and 10 call for water quality limitations at points in the receiving water. Since the NPDES program is a point source program, effluent limitations may only be set at the end of the pipe. This does not mean that ADEC will not be evaluating the monitoring results to assure compliance with their Water Quality Standards (WQS).

Stipulation 11 of the 401 certification describes how ADEC may respond to exceedances of the fecal coliform bacteria limitations of the permit. Based upon a certain level of performance, as described in the certification, ADEC may require the facility to disinfect the wastewater. Since this stipulation describes how the State may respond to fecal exceedances, it was not necessary to include as a provision of the federal NPDES permit. Permit Part III describes the permittee's compliance responsibilities to all conditions of the permit.

One provision under Stipulation 10, however, was included in the final permit. At some point during the permit term the facility could be required by ADEC to partially disinfect the wastewater. If chlorination is selected as the disinfection method, a chlorine limitation would be necessary for the permit in order to meet WQS. A requirement was added to the limitations section of the permit which establishes a total residual chlorine limit and monitoring frequency should the facility install chlorine disinfection. The limitation was taken directly from the state certification.

