RESPONSE TO COMMENTS

CITY AND BOROUGH OF SITKA WASTEWATER TREATMENT PLANT

NPDES PERMIT AK0021474

DATE: DECEMBER 5, 2024

SUMMARY

On June 7, 2023, the U.S. Environmental Protection Agency Region 10 (EPA) issued a public notice for the proposed National Pollutant Discharge Elimination System (NPDES) permit and the tentative Clean Water Act 301(h) decision for the City and Borough of Sitka Wastewater Treatment Plant (WWTP). The public comment period closed on July 24, 2023.

This document presents the EPA's response to comments received during the public comment period and changes to the final permit.

During the public comment period, the EPA received comments from:

- City and Borough of Sitka (Sitka)

CHANGES IN RESPONSE TO PUBLIC COMMENT

As a result of comments received during the comment period, the following revisions were made to the final permit from the June 2023 draft permit and the final decision document from the June 2023 tentative decision document:

- The EPA removed the section for the Pretreatment Annual Report in the Schedule of Submissions.
- The EPA corrected internal references in response to several comments.
- The EPA corrected formatting, typos, and reference errors in Table 1.
- The EPA added the sample type for ammonia concentration-based limits (24-hour composite).
- The EPA revised the language in Table 1 and Permit Part II.D.1.a to clarify the timing and frequency requirements for the toxic pollutant scan and allow the first sampling during the 1st or 2nd year of the permit.
- The EPA removed Permit Parts I.B.3 and I.B.4 for continuous temperature monitoring and clarified that weekly temperature monitoring is required.
- The EPA corrected the formatting for Permit Part I.D.
- The EPA removed the reference to metals, dissolved organic carbon, conductivity, and hardness from Permit Part I.D.9.
- The EPA removed the footnote that referred to the draft 401 certification in Table 5 of the permit.
- The EPA clarified the chemical source identification required in Permit Part II.D.1.b.

- The EPA revised Permit Part II.F.a.ii. to require treatment plant capacity management if the influent flow for any two months in a 12-month period exceeds 85% of the design flow.
- The EPA removed Permit Parts II.F.3 and II.F.4 as they were included in the draft permit by mistake.
- The EPA revised footnote 14 in Table 1 to require monitoring twice a year, with one sample occurring between May – August and the other between September – April, with at least two months between samples.
- The EPA clarified the frequency of fecal coliform and enterococcus receiving water monitoring in Table 4 – monitoring is required monthly during the months of May, June, July, and August.
- The EPA established a WET sampling holding time of 36 hours, not to exceed 72 hours.
- The EPA revised the receiving water monitoring program in Permit Part I.D.– the permittee can discontinue monitoring for bacteria if there is continued compliance with the final fecal coliform and enterococcus limits. See Permit Part I.D.9. and I.D.10.
- The EPA revised the narrative residue outfall monitoring to require monitoring while the permittee is conducting receiving water monitoring, corrected the language of the monitoring requirement to match with the language from the 2001 permit, and clarified the reporting requirements.
- The EPA clarified that the permittee is allowed to use any sufficiently sensitive method compliant with 40 CFR Part 136 for fecal coliform monitoring and removed the reference to five-tube dilution from Table 1.
- The EPA revised the final permit to require only influent or effluent flow monitoring.
- The EPA corrected the final decision document to correctly refer to the permittee as the City and Borough of Sitka in the introduction.
- The EPA updated the description of the treatment system in the final decision document.

CHANGES AS A RESULT OF FINAL 401 CERTIFICATION

The EPA made the following changes to the permit as a result of the conditions in the final 401 certification:

- The EPA corrected the minimum dissolved oxygen (DO) limit to 6.0 mg/L at the surface per the final 401 certification.
- The EPA inserted the compliance schedule timeline and details from the final 401 certification.

CHANGES AS A RESULT OF ESA CONSULTATION WITH THE NATIONAL MARINE FISHERIES SERVICE PURSUANT TO SECTION 7 OF THE ENDANGERED SPECIES ACT

On August 30, 2024, the EPA requested to initiate Endangered Species Act (ESA) Section 7 Consultation with the National Marine Fisheries Service (NMFS) on the reissuance of six (6)

301(h) modified NPDES permits for publicly owned WWTP's located in SE Alaska, including the Sitka WWTP. The EPA submitted a Biological Evaluation (BE) analyzing the effects of the discharges on threatened, endangered, and candidate species and designated critical habitats under the NMFS' jurisdiction. The analysis of effects in the BE determined that the discharges may affect, but are not likely to adversely affect (NLAA), any ESA-listed species or designated critical habitat. On October 15, 2024, NMFS concurred with the EPA's NLAA determination and provided the following conservation recommendations, which the EPA has adopted in the final permit as mitigation measures:

- The project proponent will provide NMFS with annual water temperature and water quality reports from each of the six POTWs in Southeast Alaska, including the Sitka WWTP (email information to akr.prd.records@noaa.gov).
- The project proponent will provide NMFS a report of sunflower sea star sighting and density data collected during benthic surveys around each outfall and reference site once during the 5-year permit period. This report also will include the date, water depth of each survey, and water quality.
- If it appears that a sunflower sea star has sea star wasting syndrome or if any dead sunflower sea stars are observed, pictures of the individuals will be taken, and infected individuals will be counted. The infected sunflower sea stars will not be touched or relocated. These and all sunflower sea star survey findings will be reported to NMFS, including latitude/longitude and transect line, at akr.prd.records@noaa.gov.

The EPA concurs with these conservation recommendations and has included them in the final permit as summarized below:

- Permit Part I.D.11. has been revised – in addition to the EPA and the Alaska Department of Environmental Conservation (ADEC), the surface water monitoring report must also be provided to the NMFS.
- Permit Part I.E.5. has been added, and Permit Part I.E.6 has been revised – The new Part I.E.5 requires the observation of the presence and density of sunflower sea stars as part of the benthic survey required in Permit Part I.E. Permit Part I.E.6. has been revised to require the reporting of results to NMFS in addition to the EPA and ADEC.

THE EPA HAS CORRECTED THE FOLLOWING EDITORIAL ERRORS IN THE PERMIT AND 301(H) DECISION DOCUMENT:

- The EPA corrected typos, formatting, punctuation, and added abbreviations in the permit and Final Decision Document.
- The EPA corrected internal references.
- The EPA corrected the submittal requirements for the Receiving Water Monitoring Report and Biological Monitoring Report in the Schedule of Submissions.
- The EPA clarified that the permittee must submit the NPDES and 301(h) Application Renewal in the Schedule of Submissions and Permit Part V.B.

- The EPA revised the Permit Part II.C.5, Table 4, and removed Permit Part III.K, to clarify the Permittee has 14 days after the schedule date for each task in the compliance schedule to submit required annual Reports of Progress.
- The EPA revised Table 4 to clarify that the secchi disk measurements should be taken at a sample depth as required by the method.
- The EPA added Permit Part I.C.5.e. to clarify that the salinity of whole effluent toxicity (WET) samples must match the salinity of the water test organisms were cultured in.

RESPONSE TO COMMENTS ON NPDES PERMIT AND 301(H) DECISION DOCUMENT

Comment 1. *Page 2, Schedule of Submissions, Pretreatment Annual Report.* In the column Item, Pretreatment Annual Report does not include a reference section in the Due Date column like the other items such as (see Permit Part ##). *Request:* Include an appropriate reference to a Permit Part.

Response. There is no pretreatment annual report required in the permit. The section for the Pretreatment Annual Report was incorrectly included in the Schedule of Submissions. The EPA removed the reference to the Pretreatment Annual Report in the Schedule of Submissions in the final permit.

Comment 2. *Page 2, Schedule of Submissions, Nonindustrial Source Control Program.* In the column Item, Nonindustrial Source Control Program appears to have an incorrect reference to see Permit Part II.F.3. *Request:* Revise the appropriate reference, which appears to be, see Permit Part II.D.3.

Response. The correct reference for the Nonindustrial Source Control Program in the Schedule of Submissions is Permit Part II.D.3. The EPA has revised the submittal date to January 31st of each year and has revised the Schedule of Submissions and Permit Part II.D.3 in the final permit to correct the reference.

Comment 3. *Page 2, Schedule of Submissions, Twenty-Four Hour Notice of Noncompliance Reporting.* In the column Item, Twenty-Four Hour Notice of Noncompliance Reporting appears to have an incorrect reference to see Permit Parts III.G and I.B.3. *Request:* Revise the appropriate reference, which appears to be, see Permit Parts III.G and I.B.5.

Response. The correct reference for the Twenty-Four Hour Notice of Noncompliance Reporting is Permit Parts III.G and I.B.5. The EPA revised the Schedule of Submissions in the final permit accordingly.

Comment 4. *Page 2, Schedule of Submissions, Emergency Response and Public Notification Plan.* In the column Item, Emergency Response and Public Notification Plan appears to have an incorrect reference to see Permit Part II.I. *Request:* Revise the appropriate reference, which appears to be, see Permit Parts II.G.

Response. The correct reference for the Emergency Response and Public Notification Plan is Permit Part II.G. The EPA revised the Schedule of Submissions in the final permit accordingly.

Comment 5. *Page 6 through 8, Table 1.* Table 1 has formatting issues including the Sample Type is blank for total ammonia as N, the columns effluent limitation after DO do not align with the table headers, and footnotes 3, 6, 7 and 12 have errors. *Request:* Correct Table 1 formatting. For footnote 3, revise the appropriate reference, which appears to be, see Permit Parts I.B.5 and III.G (not I.B.. and III.G). For footnote 6 the equation should be either (100x200x300)^(1/3)=181.7 or (100x200x300)1/3 {superscript}=181.7. For footnote 7, revise the appropriate reference, which appears to be Permit Part I.D (not I.C). For footnote 12, revise the appropriate reference, which appears to be Permit Part I.B.7 (not I.B.5).

Response. In response to this comment, the EPA has made the following changes:

- The EPA corrected the formatting of Table 1.
- The EPA revised the reference in footnote 3 to Permit Parts I.B.3. and III.G
- The EPA revised the reference in footnote to 7 to Permit Part I.D
- The EPA corrected the sample type of "Total ammonia as N" to 24-hour composite for the concentration-based limits.
- The EPA corrected the formatting of the equation in footnote 6 to (100x200x300)^(1/3)=181.7.

The EPA did not make the requested change to footnote 12 because the reference to Permit Part I.B.5 is correct.

Comment 6. *Page 8, Table 1, Footnote 13.* The language in footnote 13 "Testing must occur in the 2nd year of the permit term and must be repeated every two years thereafter while the permit is in effect" does not align with the language in Permit Part II.D.1.a "Effluent must be analyzed twice every five years while the permit remains in effect". Every two years is not the same as twice every five years. *Request:* Correct the text in footnote 13 to "…must be repeated twice every five years thereafter while the permit is in effect".

Response. The EPA agrees that the language should match in Table 1 and Permit Part II.D.1. The EPA has revised the language in Table 1 and Permit Part II.D.1.a to clarify that testing is required twice every five years. In response to comment #27, the EPA is also allowing the Permittee to conduct the first pollutant scan in the 1st or 2nd year of the permit. Therefore, the EPA revised the permit to require the toxic scan "twice every five years, once during the wet weather season and once during the dry weather season, with one instance of testing occurring during the 1st or 2nd year after the effective date of the permit and another instance during the 4th year after the effective date of the permit."

Comment 7. *Page 7, Table 1 and Page 8, I.B.3.* For temperature, the Sample Frequency and Sample Type do not align with the language in Permit Part I.B.3. *Request*: Correct Table 1,

for temperature, the Sample Frequency should be 1/hour and Sample Type should be recorded.

Response. The intent of the permit is to require weekly grab samples for temperature monitoring. Therefore, the EPA removed Permit Parts I.B.3 and I.B.4 which referenced requirements for continuous temperature monitoring.

Comment 8. *Pages 16 and 17, I.D.1 and I.D.2.* The text is incomplete, and the formatting is incorrect. *Request:* Correct the text and formatting. I.D.1 appears to be "The following parameters identified in Table 4 shall be measured at the locations and frequencies specified." The content for I.D.2 is unknown.

Response. The EPA corrected the formatting for Permit Parts I.D.1 and I.D.2. As the permittee describes, Permit Part I.D.1 reads "The following parameters identified in Table 4 shall be measured at the locations and frequencies specified," and Permit Part I.D.2 reads, "Monitoring stations must be established in Sitka Sound at the following locations:".

Comment 9. *Page 18, Table 4.* Under Parameter, See Permit Part I.D.7 is incorrect. *Request:* Revise the appropriate reference, which appears to be, see Permit Parts I.E.

Response. The EPA agrees that the correct reference in Table 4 for "Biological Monitoring for Benthic Infauna and Sediment Analysis" is Permit Part I.E. The EPA revised Table 4 in the final permit accordingly.

Comment 10. *Page 18, Table 4.* Under Location, See Permit Part I.D.2.a.,b,c,d sections do not exist. *Request:* Correct the see permit part references.

Response. As described in response to comment #8, the formatting for Permit Part I.D.2 was incorrect. The EPA corrected the formatting in Permit Part I.D.2.

Comment 11. *Pages 18 through 21, I.D.3.* The formatting is incorrect. *Request.* Correct the formatting.

Response. The EPA corrected the formatting of Permit Part I.D.3 in the final permit.

Comment 12. *Page 21, I.D.9.* Sampling in Table 4 does not require metals, dissolved organic carbon, conductivity or hardness making this item irrelevant. *Request:* Delete I.D.9.

Response. The EPA agrees that Permit Part I.D.9 is irrelevant since receiving water monitoring requirements in Table 4 do not require sampling of metals, dissolved organic carbon, conductivity, or hardness. The EPA has deleted Permit Part I.D.9 in the final permit.

Comment 13. *Page 25, Table 5.* The footnote asterisk does not appear in Table 5. *Request:* Include the asterisk within Table 5 intended for the referenced footnote.

Response. The footnote asterisk in Table 5 explained that the EPA anticipated that the compliance schedule table would be a condition of ADEC's CWA Section 401 Certification. The EPA received the final 401 certification from ADEC before issuance of the final permit and therefore removed the asterisk footnote from the final permit.

Comment 14. *Pages 25 and 26, II.D.1.b* This part is vague and incomplete. Define the analysis. Include the provision for 40 CFR 125.66(a)(2) that states "Unless required by the State, this requirement shall not apply to any small section 301(h) applicant which certifies that there are no known or suspected sources of toxic pollutants or pesticides and documents the certification with an industrial user survey as described by 40 CFR 403.8(f)(2)." *Request:* Revise II.D.1.b to the following. The Permittee may certify that there are no known or suspected sources of toxic pollutants or pesticides. For toxic substances and pesticides identified in the sampling as pollutants of concern, a source identification will be initiated to investigate potential sources.

Response. The EPA did not include the language suggested by the commentor from 40 CFR 125.66(a)(2). This provision requires the applicant to certify that there are no known or suspected sources of toxic pollutants or pesticides at the time of application. *See* 40 CFR 125.66(a)(1). The discharge from the Kimsham Landfill contains known or suspected sources of toxic pollutants, therefore, 40 CFR 125.66(a)(2) does not apply to Sitka.

To clarify the required analysis, EPA added the following language to the Permit Part II.D.1.b, "The analysis shall to the extent practicable categorize the sources according to industrial and nonindustrial types."

Comment 15. *Permit Page 32, II.F.2.a.ii. and Fact Sheet V.H.* The language in these two sections does not appear to align. The permit language should follow the fact sheet language. *Request:* Change Permit II.F.2.a.ii to "When the influent flow for any two months in a 12-month period exceeds 85% of the design flow listed in the Table above, the Permittee must develop a new or updated plan and schedule for continuing to maintain capacity and maintain compliance with effluent limits."

Response. The EPA agrees the permit language should match the fact sheet language. The EPA has changed Permit Part II.F.2.a.ii in the final permit to state "When the influent flow for any two months in a 12-month period exceeds 85% of the design flow listed in the Table above, the Permittee must develop a new or updated plan and schedule for continuing to maintain capacity and maintain compliance with effluent limits."

Comment 16. *Page 33, II.F.3. and II.F.4.* This text appears out of place and unnecessary. *Request***:** Delete II.F.3 and II.F.4.

Response. The EPA agrees that Permit Parts II.F.3 and II.F.4 was included by mistake. The EPA has deleted these sections in the final permit.

Comment 17. *Page 7 Table 1 and Footnote 14.* In Table 1 for PFAS it shows a frequency of sampling as 2/year. This is confusing as footnote 14 states that sampling needs to be completed on a quarterly basis for two years. *Request:* Change the frequency in the table to say quarterly and add footnote 14 in the same cell rather in the parameter name for both influent and effluent/sludge.

Response. The intent of the per- and polyfluoroalkyl substances (PFAS) monitoring as described in the fact sheet was to require twice yearly monitoring. Therefore, the EPA has corrected footnote 14 to require monitoring 2/year and has relocated the reference for the footnote for clarity. The EPA has also clarified that one of these samples should occur between May – August and the other between September – April, with at least two months between samples.

Comment 18. *Table of Contents.* The Table of Contents does not match up with the page numbers that sections are actually on. For example, Part III.B. Reporting of Monitoring Results in Table of Contents says page 32, but is actually on page 34. *Request:* Update Table of Contents to show correct page numbers for each heading.

Response. The EPA agrees the Table of Contents in the draft permit included incorrect page numbers. The EPA has updated the page numbers in the final permit.

Comment 19. *Page 10 I.B.11.* The permit states that, "the permittee may use any sufficiently sensitive approved analytical method". It is undetermined what "sufficiently sensitive" means in this case. Does the MDL need to be 2 ng/L as the proposed drinking water limits are 4 ng/L? *Request***:** Clarify the level of the MDL for PFAS.

Response. Note that the permit states that "the permittee may use any sufficiently sensitive *approved* analytical method" (emphasis added). Thus, this statement only applies to analytes for which the EPA has approved analytical methods under 40 CFR Part 136 or required analytical methods under 40 CFR Chapter I, Subchapter N or O. See also 40 CFR 122.44(i)(1)(iv)(A). For pollutants for which there are no approved analytical methods, monitoring shall be conducted according to a test procedure specified in the permit (40 CFR 122.44(i)(1)(iv)(B)). Since there are no approved analytical methods for PFAS, the draft and final permit require the permittee to use Method 1633 to monitor for PFAS, which was finalized on January 31, 2024. Thus, the requirement to use any sufficiently sensitive approved analytical method does not apply to PFAS. No changes were made to the final permit as result of this comment.

Comment 20. *Page 19. I.D.3.b.* Table 4 should not be labeled as b. It should be a part of a. *Request:* Move Table 4 to be a part of the sentence of I.D.3.a, and move I.D.3.c to be I.D.3.b.

Response. Table 4 should be part of Permit Part I.D.1. The EPA has corrected the formatting and moved the table to this permit section accordingly.

Comment 21. *Page 20 I.D.5.* There is an unformatted sentence after I.D.5. that discusses measuring flow rate. It looks as though it should be a part of I.D.6 along with the words "Table 4, above". *Request:* Correct the formatting so that the entire sentence is listed under I.D.6.

Response. The sentence after Permit Part I.D.5 that discusses flow rate and the words, "Table 4, above" belong in Permit Part I.D.5. The EPA has corrected the formatting of Permit Parts I.D.5 and I.D.6 accordingly.

Comment 22. *Page 18 Table 4 Fecal Coliform and Enterococcus.* The frequency states "Monthly during summer" for both fecal coliform and enterococcus. Clarify what months "summer" is referring to, preferably July or August to align with the frequency of the other parameters. *Request:* Change frequency to be once per summer in July or August at the ZID boundary only.

Response. The EPA has clarified that fecal and enterococcus monitoring is to be done once a month during the summer from May through August. The EPA has revised the final permit to reflect this clarification.

Comment 23. *Page 18 Table 4 Fecal Coliform and Enterococcus.* It is not clear why fecal coliform and enterococcus are required to be tested in the receiving waterbody due to the new requirement from ADEC for the end of pipe limits for fecal coliform to be 200, 400, 800 and is no longer dictating the size of the mixing zone nor is a mixing zone is required. The benefit to this sampling becomes unclear including the addition of the additional sites to sample. Also, the diffuser is located off the end of the runway of the Sitka airport requiring specific access to the area. There is unlikely to be recreational use in the area. Sitka requests reduced frequency and locations due to the risks to employees on a chartered boat collecting samples from marine environments. Additionally, the wastewater treatment plant has been collecting fecal coliform data as required by previous permit cycles and an established monitoring process is established. *Request:* Remove enterococcus as a parameter and continue with fecal coliform sampling. By sampling the ZID boundary it can be determined if there is an issue or not.

Response. The EPA acknowledges that the permittee has been collecting fecal coliform data as required by previous permit cycles. Receiving water monitoring is required for 301(h) permittees for all "significant variables" as described in Question II.B.6.a of the 301(h) Questionnaire. Receiving water monitoring allows the EPA to evaluate compliance with Clean Water Act section 301(h)(9) and 40 CFR 125.62(a), which require compliance with Alaska water quality standards (WQS), including numeric criteria, at the boundary of the ZID. Fecal coliform and enterococcus are considered significant variables in the discharge until disinfection technology is implemented and the final limits are attained. Receiving water monitoring data will allow the EPA to monitor the presence of bacteria to evaluate compliance with the permit limits. In addition, the response to comment #24 describes the

basis for enterococcus limits in the permit. The EPA has included the additional monitoring sites to provide more detailed information about the dilution of the effluent at the center and boundaries of the zone of initial dilution (ZID).

However, the EPA has determined that once the facility is able to consistently achieve compliance with the final fecal coliform and enterococcus limits in the permit, and has demonstrated ongoing compliance with Alaska WQS at the boundary of the ZID, continued sampling for bacteria in the receiving water is no longer warranted to satisfy the requirements of 40 CFR 125.62(a). By achieving compliance with the final fecal coliform and enterococcus limits the EPA expects that the facility will be able to meet Alaska's WQS for fecal coliform and enterococcus at the edge of the ZID after initial mixing.

As a result, the EPA has revised the receiving water monitoring requirement in the final permit to allow the permittee to discontinue monitoring for fecal coliform and enterococcus if the permittee achieves 12 consecutive months of compliance with the final fecal coliform and final enterococcus limits and the following summer's receiving water sampling results demonstrate full compliance with Alaska's water quality standards for fecal coliform and enterococcus at all ZID Boundary (Permit Part I.D.2.b.) and Nearshore Sites (Permit Part I.D.2.d.). If the permittee violates the final fecal coliform or enterococcus limits, the permittee is required to restart the receiving water monitoring until 12 continuous months of effluent samples that meet the final limits are achieved.

Comment 24. *Page 18 Table 4 Fecal Coliform and Enterococcus.* The City and Borough of Sitka is aware that ADEC adopted a rule for recreational criteria for bacteria which includes both fecal coliform and enterococci and with this rule comes potential requirements of discharge permittees. However, Sitka does have some concerns about enterococci being an indicator of human health risk as enterococci is not necessarily an indicator of a fecal source being present. Research has shown that enterococci can show up in high densities in the absence of obvious fecal sources and that environmental reservoirs of this bacteria are important sources and sinks that have the potential impact water quality (Byappanahalli MN, Nevers MB, Korajkic A, Staley ZR, Harwood VJ. Enterococci in the environment. Microbiol Mol Biol Rev. 2012 Dec; 76(4):685-706. doi: 10.1128/MMBR.00023-12. PMID: 23204362; PMCID: PMC3510518). To use this new parameter in a discharge permit to determine impacts from the discharge of wastewater does not take this possibility into account and could potentially cause the utility to violate the permit requirements due to a naturally occurring source. *Request:* Remove enterococcus as a parameter and continue with fecal coliform sampling. By sampling the ZID boundary it can be determined if there is an issue or not.

Response. As explained on page 26 of the fact sheet, Section 301(b)(1)(c) of the CWA requires the development of limitations in permits necessary to meet WQS of affected states. Discharges to state or Tribal waters must also comply with conditions imposed by the state or Tribe as part of the CWA 401 certification of the permit. ADEC adopted water quality standards for enterococcus, which the EPA approved in 2017. ADEC has included the final enterococcus limits as a condition of the 401 certification. Therefore, pursuant to

CWA section 401(d), the EPA must include the enterococcus limits in the permit. No changes were made to the final permit as a result of this comment.

Comment 25. *Pages 7, 8, 10, and 11.* Currently there are no regulations pertaining to PFAS for wastewater discharge. The only proposed regulation pertains to drinking water set at 4 ng/L. Therefore, the City and Borough of Sitka's objects to the wastewater discharge permit that sampling will be required on a quarterly basis for two years and furthermore seeks relief from this monitoring based on the following rationale.

First, the currently proposed regulations are for drinking water which typically come from freshwater sources. The communities that are renewing the 301(h) wastewater discharge permits are all discharging to the marine environment. Therefore, there is no impact to potential drinking water sources for any of these communities.

Second, a presence/absence study of PFAS in wastewater discharge for small communities that have little to no industrial activity calls into question if the requirement even makes sense for the City and Borough of Sitka. This puts all of the burden of cost (dollars, labor availability and time, risks, etc.), on very small utilities whose budgets are already strapped. With the new disinfection requirement in the draft permit, communities are already wondering where the money is going to come from to design, build, and implement disinfection. To require expensive tests for research purposes of the EPA causes additional burden for something that does not even have a regulation in place.

The 1633 methodology is not yet approved by EPA, but its use is being required in the draft permit. Additionally, the method detection limit for this methodology is extremely low and has communities concerned about what the ramifications are if PFAS is detected at all. With no regulatory requirements being in place at this time, consequences could potentially come back to the communities in the form of requirements of treatment which is extremely expensive and which these small communities cannot afford.

The PFAS sampling requirement also includes the sampling of influent, effluent, and sludge. Three samples that may not be necessary. Knowing that these facilities are primary treatment, if PFAS concentrations are entering the facility, then they are likely also leaving the facility. Again, these communities do not have the money for sampling for research purposes.

Instead, a common-sense stepwise approach should be employed. First, conduct an industrial user survey to determine if there is a likelihood of PFAS being present in the community at levels higher than the proposed drinking water standard. If the survey indicates that there is a possibility, then require sampling at the cost to the potential polluter, not the utility. The City and Borough of Sitka believes that this requirement is being required too early in the process and requests that this requirement be delayed until EPA is further in the process of drafting regulations and determining what would be required if PFAS is detected in these facilities.

Request. Delete the monitoring requirements for PFAS on Pages 7, 8, 10 and 11 of the permit, and update the fact sheet.

Response. The EPA is not limited in requiring monitoring only for pollutants that have established water quality standards. Under Clean Water Act section 308, the EPA has broad authority to prescribe the collection of data and reporting requirements in NPDES permits. See also 40 CFR 122.44(i) (permittees must supply monitoring data and other measurements as appropriate).

As discussed in the June 2023 fact sheet, the purpose of these monitoring and reporting requirements is to better understand potential discharges of PFAS from this facility and to inform future permitting decisions, including the potential development of water quality-based effluent limits. In December 2022, the EPA released a guidance memo[1] to the EPA Regions and states for addressing PFAS in NPDES permitting. The memo recommends PFAS monitoring for all POTW permits since they are known contributors of PFAS into the aquatic environment through a variety of industrial, commercial, and consumer sources. The permit conditions reflect the recommendations in the memo as well as the EPA's commitments in the PFAS Strategic Roadmap, which directs the Office of Water to leverage NPDES permits to reduce PFAS discharges to waterways "at the source and obtain more comprehensive information through monitoring on the sources of PFAS and quantity of PFAS discharged by these sources."

PFAS regulations currently in development as part of the Strategic Roadmap include efforts to develop a primary drinking water regulation and ambient water quality criteria for the protection of aquatic life and human health. Aquatic life criteria are designed to protect aquatic life from toxics exposure and typically include both a freshwater and marine component. The draft aquatic life criteria for PFAS, released for public comment in April of 2022, includes benchmarks for marine waters. Human health criteria are designed to protect people from exposure to toxics resulting from the consumption of water and/or fish or other aquatic organisms. While direct exposure to PFAS through the consumption of water influenced by the permitted discharge is not likely since the discharge is to open ocean, the consumption of fish and other aquatic organisms within the receiving waters could be a potential exposure pathway since PFAS chemicals have been shown to bioaccumulate and bio-magnify within the aquatic environment.

The EPA agrees with the commenter that any PFAS chemicals entering the facility are likely to be exiting the facility. The revised draft permit already required the permittee to conduct an industrial user survey and assess which users may be potential sources of PFAS chemicals Sampling the influent, effluent, and sludge will provide necessary data to determine PFAS

[1] Addressing PFAS Discharges in NPDES Permits and Through the Pretreatment Program and Monitoring Programs, Office of Water, USPEA, Dec 2022.

levels at each of these three points in the treatment process for use in future permitting decisions. Influent data shows how much PFAS is entering the facility, effluent data will provide data on how much is being discharged and removed through the primary treatment process, and sludge data will show how much PFAS is partitioned within the sludge. The EPA notes Sitka does have industrial sources that the EPA believes could have the potential to discharge PFAS into the treatment plant. Influent monitoring will assist in determining whether the industrial source does introduce PFAS to the facility. For these reasons, the EPA did not make changes to the PFAS monitoring requirements as requested by the commentor.

As stated in the June 2023 fact sheet, the EPA acknowledges there is currently no approved analytical method for PFAS in 40 CFR Part 136. However, the EPA is requiring the use of the Method 1633 for PFAS. See the response to comment #19 for further details.

No changes were made to the permit in response to this comment.

Comment 26. *Pages 8 and 9 I.3 and I.4.* Table 1 Effluent Limitations and Monitoring Requirements and Table 4 Receiving Water Monitoring Requirements state the sample type for temperature of "Grab". Sections I.3 and I.4 describe using thermistors. Thermistors are unnecessary for grab samples making this text unnecessary and irrelevant. Grab samples will provide sufficient temperature information for an ocean discharge without the cost and maintenance of thermistors. The City and Borough of Sitka prefers to continue conducting temperature monitoring as currently done. *Request.* Delete I.3 and I.4.

Response. As described in response to comment #7, the EPA is requiring the permittee to conduct weekly grab samples for temperature monitoring. Therefore, the EPA removed Permit Parts I.B.3 and I.B.4, referencing requirements for continuous temperature monitoring, from the final permit.

Comment 27. *Pages 26 through 31 II.D.2 and TDD Page 10.* The Industrial Pretreatment Program Requirements are premature for Sitka and should be removed. The City and Borough of Sitka proposes performing an industrial user inventory to understand the volume and pollutants in nonresidential connections to the sewer collection system. The permit and fact sheet do not appear to align on this topic. The permit mentions an inventory required by Part II.E.3.g yet this part does not exist. The fact sheet mentions to inventory the industrial users (IUs) of the treatment works, to identify IUs of the POTW. The inventory should be completed first before determining if there is a necessary basis for requiring Sitka to develop a program. The City and Borough of Sitka is currently aware of only one industrial connection. As stated in the fact sheet "the Kimsham Landfill in the City and Borough of Sitka is a closed Class II municipal landfill that served as the primary solid waste repository for CBS for approximately 50 years, closing in 2009". The City and Borough of Sitka has historically and is currently monitoring this source. If the inventory reveals the landfill is the only industrial source, The City and Borough of Sitka prefers not to develop a program for one source and rather continue monitoring the landfall separately. *Request:*

Delete II.D.2. Update the permit and fact sheet to align with requirements only for conducting an industrial user inventory during this permit cycle.

Response. The EPA mistakenly included the reference to Permit Part II.E.3.g within the PFAS requirements in Permit Part I.B.10. The EPA corrected the final permit to clarify that the permittee is required to identify industrial users that are potential sources of PFAS and sample the discharges of these users at least once as described in Permit Part I.B.10. Permit Part II.D.2.g. requires the Permittee to prepare and maintain a list of industrial users with the pretreatment program submission.

As discussed on pages 47 and 48 of the fact sheet, 40 CFR 125.66(c) require applicants with known or suspected industrial sources of toxic pollutants to develop and implement an approved pretreatment program in accordance with 40 CFR Part 403. The Kimsham Street Landfill discharges to the Sitka Wastewater Treatment Plant. Landfills are an industrial category regulated under Clean Water Act section 307(b) and (c). Thus, the landfill meets the definition of an "industrial source" pursuant to 40 CFR 125.58(j). As a result, as required under the Clean Water Act Section 301(h) regulations, Sitka is required to develop a pretreatment program.

In addition, to allow Sitka to use the results of the toxic pollutant scan in the development of the pretreatment program submittal, the EPA has revised Table 1 and Permit Part II.D.1 to allow the Permittee to conduct the first toxic pollutant scan during the 1st or 2nd year of the permit.

Comment 28. *Page 8. Table 1 Footnote 11 and I.C and Fact Sheet Page 44.* WET testing has been conducted by the City and Borough of Sitka on the schedule required by the previous permit cycle and continued during the administrative extension with little to no toxicity. The most recent WET test being conducted in 2022. With the City and Borough of Sitka completing the WET testing as prescribed in the original permit and continuing throughout the administrative extension and with little to no toxicity in the results, it should not be penalized and be required to conduct WET testing on a quarterly basis. Additionally, WET testing is difficult to complete due to hold times and shipping. These tests come at great expense due to having to ship out multiple samples hoping that they make it to the lab to meet the hold time requirements. Therefore, with the City and Borough of Sitka having continued WET testing, with results well below the threshold, the city should not be required to conduct quarterly sampling. Also, in the fact sheet it is stated that the 2017 WET test results were 125 TUc. However, looking at the results there was little to no toxicity as results (<30.3 TUc to 30.3 TUc) and it is not understood where this information has originated from and is believed to be in error. Table 17 on page 72 of the fact sheet shows the correct results. *Request:* Change quarterly WET testing to annually. Update the fact sheet with the correct test results from 2017 WET testing.

Response. The EPA agrees that 125 TUc for the 2017 WET test is incorrect; the correct value is 122 TUc. As explained on pages 44-46 of the fact sheet, in the 2017 WET test there was a

statistically significant difference in sea urchin fertilization observed at the 1.6% effluent concentration compared with the control, corresponding to a lowest observed effect concentration (LOEC) of 1.6% effluent and a no observed effect concentration (NOEC) of 0.8% effluent. TUc is defined as 100/NOEC; a NOEC of 0.8% effluent is equivalent to 122 TUc. However, as discussed on page 45 of the fact sheet, the EPA did not use this result in the reasonable potential analysis for WET due to the interrupted dose response curve and small percent effect (0.5%) observed at the LOEC compared with the mean.

As discussed in the fact sheet, an increase in the frequency of WET monitoring is necessary given the designation of the facility as a major facility discharging more than 1 million gallons per day, the inconclusive results from the 2017 WET test, and the contribution of landfill leachate to the treatment system by the Kimsham Street Landfill, an industrial source of toxic pollutants.

Also, the EPA appreciates the commenter's concern regarding the logistical challenges of meeting hold time requirements for samples, including for WET and bacteria, in remote locations such as Alaska. Samples collected for use in the NPDES permitting program are subject to the holding time requirements outlined in 40 CFR Part 136.

The final permit has been revised to establish a WET sampling holding time of 36 hours, not to exceed 72 hours. The permittee must document in the DMR for the month following sample collection the conditions that resulted in the need for the holding time exceeding 36 hours and the potential effect on the sampling results (see Permit Part I.C.5.c.v.).

Comment 29. *Page 8, Part I.B.2 Narrative limitations***.** The narrative residue limit has been carried forward from the previous permit with the addition of a written log of the observations. The outfall discharges at a depth of 85 ft roughly 0.75 miles from the facility. The nearest point to observe the discharge is the end of the City and Borough of Sitka Airport runway inside of a secured area. Additionally, the facility discharges into open ocean with a rocky shore and significant wave action; naturally occurring sea foam, logs, sticks, seaweed, and litter from as far away as Asia is a regular occurrence. Compliance with the residue standards based on visual observation at a distance is not possible.

The fact sheet does not provide a basis for the addition of the monitoring log. And the permit does not prescribe a frequency at which the monitoring must occur.

Request: Maintain the residue standard as it was stated in the previous NPDES permit and remove the requirement for regular observation of the discharge.

Response. The EPA acknowledges that the visual observation of residue from the outfall is difficult from shore. The EPA has revised Permit Part I.B.2. in the final permit to require the permittee to observe the surface of the receiving water during the receiving water monitoring while the permittee is in the vicinity of the outfall. Observations must include the date, time, observer, and whether there was presence of floating solids, visible foam or

oily wastes which produce a sheen on the surface of the receiving water. Observations must be included in the annual Receiving Water Monitoring Report required in Permit Part I.D.

The EPA has removed the draft narrative limitations in Permit Part I.B. from the final permit because they were included in error. Specifically, the limitations came from an Idaho WQS narrative provision. The narrative limitation from the 2001 permit is being retained in the renewed permit. The final permit requires that there shall be no discharge of floating solids, visible foam or oily wastes which produce a sheen on the surface of the receiving water.

Comment 30. *Page 35, Part III.G.1.d.* Incorrect reference "any violation of a maximum daily discharge limitation for applicable pollutants identified by Permit Part I.B.3." *Request:* Permit Part I.B.3 is a requirement for the installation and use of a thermistor for effluent temperature monitoring. The correct reference should be Permit part I.B.5.

Response. The EPA agrees that the correct reference in the permit should have been Permit Part I.B.5. The EPA deleted Permit Parts I.B.3 and I.B.4 in the final permit as discussed in the response to comments #7 and #26, thus the permit numbering changed in the final permit. As such, the correct reference in the final permit is Permit Part I.B.3 and the EPA did not make any changes to the final permit as a result of this comment.

Comment 31. *Page 8 Footnote #4, Fact Sheet Page 21 Footnote #4 and Page 35 and TDD Page 23 and 24.* The permit, fact sheet, and tentative decision document (TDD) do not align between the information cited from See 18 AAC 70.020(b)(14)(D).

AAC 70.020(b)(14)(D) amended November 13, 2002 (EPA link page 27 18 AAC 70 Water Quality Standards (epa.gov)) includes the 4 bullets in the TDD. AAC 70.020(b)(14)(D) amended June 26, 2003 (DEC link page 16 18-aac-70-wqs-june26-2003mas.pdf) includes only the 43 CFU/100 mL for a five-tube decimal dilution test as cited in the permit and fact sheet. Table 8 in the fact sheet has 43 CFU/100 mL, although there is a typographic error of CRU instead of CFU. The TDD appears to include outdated information.

The footnote should include more than just the AAC criteria but also include a citation for the required test method such as Method 1681, Standard Methods for Examination of Water and Wastewater or other.

The City and Borough of Sitka has understood 18 AAC 70.020(b)(14)(D) allows the use of five-tube, three-tube, twelve-tube decimal dilutions as well as membrane filtration. The City and Borough of Sitka analyzes fecal coliform bacteria using membrane filtration. This would change the instantaneous maximum WQBEL from 43 MPN/100 mL to 31 CFU/100 mL. The adjusted WQBEL derived in the Fecal coliform section of the fact sheet (page 36) would be 2356 CFU/100 mL. The 800 CFU/100 mL daily maximum required by the ADEC 401 certification would still be the most stringent limit.

Request: Update and provide consistent information regarding 18 AAC 70.020(b)(14)(D) in the permit, fact sheet, and TDD. Correct the typographical error in the fact sheet. Update the TDD to the current standard. Include both the criteria and method in the footnote.

Response. The current version of the Alaska water quality standards was amended November 13, 2022, and includes bacteria standards for five-tube, three-tube, twelve-tube, and membrane filtration. As a result, the information in the fact sheet is outdated. However, the EPA Region 10 does not revise fact sheets after the public notice period and instead corrects information and provides any additional explanation in the response to comments document. As the commenter described, the limits in the draft permit are not affected by the reference to the incorrect version of the standards described above. Therefore, the EPA did not make any changes to the fecal coliform limits in the final permit. The standard in the TDD is correct and EPA did not make any changes to the final decision document.

For fecal coliform sampling, the permittee is allowed to use any sufficiently sensitive method compliant with 40 CFR Part 136 to analyze fecal coliform bacteria. The EPA has removed footnote #4 in Table 1 referencing the five-tube dilution test from the final permit.

Comment 32. *Page 6 Table 1.* Draft permit requires monitoring influent and effluent flow but the fact sheet requires monitoring influent *or* effluent flow. *Request***:** Remove requirement to monitor influent and effluent flow. Require the monitoring of either the influent *or* the effluent flow.

Response. The EPA agrees that the permit should require monitoring influent or effluent flow and this change has been made in the final permit.

Comment 33. *TDD Page 5 Introduction.* The City and Bureau of Sitka should be changed to The City and Borough of Sitka. *Request:* Change to City and Borough of Sitka

Response. The EPA agrees that the correct name is the City and Borough of Sitka and has corrected this in the Final Decision Document.

RESPONSE TO COMMENTS ON NPDES FACT SHEET

Comment 34. *Page 9, Table 1 and Page 10, II.A* The coordinates for the facility location are incorrect and should be the facility outfall coordinates to match those shown in the draft permit. *Request***:** Replace the facility location coordinates with 57.047262°N,135.355679°W and replace the facility outfall coordinates with 57.038776°N, 135.345059°W.

Response. The EPA acknowledges that the coordinates for the facility location and outfall were incorrect in the fact sheet. The correct coordinates for the facility are 57.047262°N,135.355679°W and the correct coordinates for the facility outfall are 57.038776°N, 135.345059°W. The EPA Region 10 does not revise fact sheets after the public notice period and instead corrects information, provides any additional explanation in the

response to comments document, and, if necessary, revises the final permit in response to comments received. The draft permit contained the correct coordinates for the outfall, therefore, no change to the final permit was made in response to this comment.

Comment 35. *Page 12, Table 2***.** Footnote is missing leading 1. *Request:* Add 1 before "Discharge monthly reports (DMR) from 11/30/2106 – 09/30/21."

Response. The EPA acknowledges that the footnote in Table 2 in the fact sheet is missing a leading 1. The EPA Region 10 does not revise fact sheets after the public notice period and instead corrects information and provides any additional explanation in the response to comments document. This comment does not affect the conditions in the permit; therefore, no changes were made to the final permit as a result of this comment.

Comment 36. *Page 28, Paragraph under Table 7.* The cited table appears incorrect. *Request***:** Change to the following "The reasonable potential analysis and WQBEL calculations were based on the dilution factors shown in Table 7."

Response. The EPA agrees that the correct reference is Table 7. The EPA Region 10 does not revise fact sheets after the public notice period and instead corrects information and provides any additional explanation in the response to comments document. This comment does not affect the conditions in the permit; therefore, no changes were made to the final permit as a result of this comment.

Comment 37. *Page 39, PFAS.* The permit and elsewhere in the fact sheet state monitoring is twice yearly and not per quarter. *Request:* Change to the following "…the permit is requiring the facility monitor PFAS twice yearly in its effluent."

Response. The EPA agrees the correct monitoring frequency is twice yearly. The draft permit included the correct frequency, therefore no change to the final permit was made as a result of this comment.

Comment 38. *Page 24, Table 5 Schedule of Compliance***.** Five years is not enough time to secure funding, complete the disinfection study, design, and construction of a disinfection system. Adding effluent disinfection will likely cost the City and Borough of Sitka ~$7-12M. This will put a significant burden onto the rate payers. Extending the compliance schedule will allow the City and Borough of Sitka to seek grant opportunities and/or alternative funding.

Request: Extend compliance schedule to ten years. Facility Planning Deliverable: The permittee must provide written notice to EPA and ADEC no later than two years and 14 days after the effective date… Final Design Deliverable: The permittee must provide written notice to EPA and ADEC no later than four years and 14 days after the effective date… Funding and Contractor Selection Deliverable: The permittee must provide written notice to EPA and ADEC no later than six years and 14 days after the effective date… Construction

Begins Deliverable: The permittee must send EPA and ADEC written notification that construction has begun, no later than seven years and 14 days after the effective date… Meet Effluent Limits for Fecal Coliform and Enterococcus Deliverable: The permittee must provide written notice to the EPA and ADEC no later than 10 years and 14 days after the effective date…

Response. Under the State's regulations, ADEC is responsible for issuing the compliance schedule as part of their 401 certification. The permittee also submitted this comment to ADEC during the public comment period for the 401 certification. ADEC's notice of review, responses to comments, and final 401 certification were provided to the permittee on January 17, 2024, and are available with the final permit on the website at https://www.epa.gov/npdes-permits/npdes-permit-sitka-wastewater-treatment-facility-alaska. Pursuant to CWA section 401(d), the EPA has included the compliance schedule in the permit.

The EPA has established November 1, 2025, as the effective date of the final permit. Since the schedule of compliance for bacteria begins at the effective date of the permit, this will provide additional time for the permittee to secure funding, complete a disinfection study, and design and construct a disinfection system. Establishing a later effective date is consistent with the EPA's regulations at 40 CFR 124.15(b)(1).

Comment 39. *Fact Sheet Page 10 Facility Information A. Treatment Plant Description, and Page 10 TDD.* Treatment plant description is outdated *Request:* Updated treatment plant description: The collection system is a separate sanitary sewer system consisting of approximately 50 kilometers (31 miles) of mains and interceptors and 59 lift stations (27 are residential lift stations). Treatment consists of comminution of 90% of the sewage entering the treatment plant (Japonski, Alice and Charcoal Island wastewater and enters the force mains beyond the comminutor), manually cleaned bar rack, grit removal and primary clarification (with scum skimming and sludge removal). Sludge from the clarifiers is thickened and dewatered. Thickener supernatant is returned to the treatment system prior to the clarifiers. Sludge is buried in a local biosolids landfill.

Response. The EPA agrees the included treatment plant description was outdated and agrees with the provided description. Although the EPA included an incorrect description, the EPA considered the current treatment process in the development of the draft permit and decision document; therefore, the updated description does not affect any limits or conditions in the permit. The EPA Region 10 does not revise fact sheets after the public notice period and the corrected description does not affect the final permit. The EPA corrected the description in the final decision document. No changes were made to the final permit as a result of this comment.

Comment 40. *Fact Sheet, Appendix H, DEC Draft Certificate of Reasonable Assurance***.** DEC authorizes mixing zones and states the calculated acute and chronic dilutions. DEC does not provide the basis or supporting documentation to explain how these values were

determined. *Request:* DEC include in Appendix H appropriate citation(s) and/or reference(s) to the supporting technical reports, calculations, and/or materials that support the presented mixing zone dilutions and distances.

Response. ADEC is responsible for authorizing mixing zones as part of their 401 certification. The permittee also submitted this comment to ADEC during the public comment period for the 401 certification. ADEC's notice of review, responses to comments, and final 401 certification were provided to the permittee on January 17, 2024, and are available with the final permit on the website at https://www.epa.gov/npdes-permits/npdes-permit-sitka-wastewater-treatment-facility-alaska. No changes were made to the final permit as a result of this comment.

OTHER CHANGES

- The EPA corrected Table 1 to include mass-based limits for total ammonia of an average monthly limit of 1547 lbs/day and a maximum daily limit of 2343 lbs/day, with a sample type of "Calculation." 40 CFR 122.45(f) requires that effluent limits be expressed in terms of mass, except under certain conditions.
- The EPA corrected Table 1 to include mass-based limits for total recoverable copper of an average monthly limit of 4.9 lbs/day and a maximum daily limit of 10.7 lbs/day, with a sample type of "Calculation."40 CFR 122.45(f) requires that effluent limits be expressed in terms of mass, except under certain conditions.
- The EPA corrected Table 1 to include average monthly limits for total residual chlorine of 0.26 mg/L and 11.5 lbs/day. 40 CFR 122.45(d) requires average monthly limits unless impracticable.
- The EPA added copper, ammonia, and chlorine to the list of parameters the permittee must report within 24 hours of any violation of the maximum daily limits (see Permit Part I.B.3.).
- The EPA removed the requirement from Permit Part I.E to store and maintain benthic and TVS samples.
- The EPA has removed the requirement for the permittee to conduct a sediment analysis for total volatile solids (TVS) from the Biological Monitoring requirements in Permit Part I.E.

  The 301(h) regulations at 40 CFR 125.63(b)(2) provide that small 301(h) applicants are not subject to sediment analysis requirements if they discharge at depths greater than 10 meters and can demonstrate through a suspended solids deposition analysis that there will be negligible seabed accumulation in the vicinity of the modified discharge. The Sitka WWTP discharges at depths greater than 10 meters and the suspended solids deposition analysis provided below demonstrates there will be negligible seabed accumulation in the vicinity of the discharge.

Figure B-2 in Appendix B of the 1994 Amended Section 301(h) Technical Support Document provides a simplified graphical method for small estuarine dischargers to assess the potential for suspended solids deposition around their outfall using the reported daily solids mass emission rate (y-axis in Fig. B-2) and the height-of-rise of the discharge (x-axis in Fig. B-2). For the discharge height-of-rise, also known as the plume trapping depth, the height-of-rise from dilution modeling should be used, or 0.6 times the water depth, whichever is larger. With a discharge depth of ~26 meters (~85 feet) and a trapping depth of ~10 meters (~32 feet), the height-of-rise of the Sitka discharge is approximately 15 meters (~50 feet); 15.6 meters (~51 feet) was selected for the x-axis in Figure B-2 (0.6 x 26m=15.6m).

The guidance recommends calculating the suspended solids daily mass emission rate using the average flow rate and an average suspended solids concentration. The reported monthly average flow rate from the Sitka WWTP between 2016 and 2021 was approximately 1.6 million gallons per day and the monthly average TSS concentration was 35.4 mg/L. To determine the daily loading of solids the monthly average concentration of TSS was multiplied by the reported average monthly flow and the loading conversion factor of 8.34 (see Footnote 1 in Table 1 of the final permit for more information on mass loading calculations).

35.4 mg/L X 1.6 million gallons per day X 8.34 = 472.4 lbs/day (~214kg/day).

Using this loading rate along the y-axis and 15.6 meters along the x-axis in Figure B-2, the projected steady state sediment accumulation is expected to be well below 25g/m2. The EPA considers this to be a negligible accumulation of sediment.

Therefore, the applicant has satisfied the requirement of 40 CFR 125.63(b)(2) and the requirement to conduct sediment TVS analysis has been removed from the final permit.