

**Department of Environmental Conservation  
Response to Comments**

**For**

**Municipality of Anchorage  
and  
Alaska Department of Transportation and Public Facilities  
Municipal Separate Storm Sewer System**

**APDES Permit No. AKS-052558**

**Public Noticed May 5, 2015 – June 5, 2015**

**June 26, 2015**



**Alaska Department of Environmental Conservation  
Wastewater Discharge Authorization Program  
555 Cordova Street  
Anchorage, AK 99501**

## **1 Introduction**

### **1.1 Summary of Facility / Permit**

The Municipality of Anchorage (MOA) MS4 permit addresses storm water discharges within the MOA. There are multiple outfalls that divert municipal storm water into many receiving waters located with the MOA. The permit addresses construction activities, post construction activities, monitoring for illicit discharges, snow disposal practices, street sweeping requirements and practicing pollution prevention techniques.

### **1.2 Opportunities for Public Participation**

The Department of Environmental Conservation proposed to issue an Alaska Pollutant Discharge Elimination System (APDES) wastewater discharge permit to the Municipality of Anchorage and the Alaska Department of Transportation and Public Facilities. To ensure public, agency, and tribal and local government notification and opportunities for participation, the Department:

- identified the permit on the annual Permit Issuance Plan posted online at: <http://dec.alaska.gov/water/wwdp/index.htm>
- notified potentially affected tribes and local government(s) that the Department would be working on this permit via letter, fax and/or email
- posted a preliminary draft of the permit on-line for a 10-day applicant review April 3, 2015 and notified tribes, local government(s) and other agencies
- formally published public notice of the draft permit on May 5, 2015 in the Alaska Dispatch News and posted the public notice on the Department's public notice web page
- posted the proposed final permit on-line for a 5-day applicant review
- sent email notifications via the APDES Program List Serve when the preliminary draft, draft, and proposed final permits were available for review

The Department received comments from one interested party on the draft permit and supporting documents. The Department also requested comment from the Departments of Natural Resources and Fish and Game, the National Marine Fisheries Service, the U.S. Fish and Wildlife Service, and the Environmental Protection Agency. The Department received a comment from the U.S. Fish and Wildlife Service.

This document summarizes the comments submitted and the justification for any action taken or not taken by DEC in response to the comments.

### **1.3 Final Permit**

The final permit was adopted by the Department on June 26, 2015. There were changes from the public noticed permit. Significant changes are identified in the response to comments and reflected in the final fact sheet and permit.

## **2 Comments on Monitoring Requirements**

### **2.1 Comment Summary**

The U.S. Fish and Wildlife Service recommended that the MOA should test water in storm water conveyance and treatment structures that discharge to natural water bodies for metals. They specifically commented on the biological effects of copper, a metal potentially present in municipal storm water.

#### **Response:**

In response to this comment, Table 5 Outfall Monitoring Requirements in the permit was amended to include total copper in the wet weather monitoring program in years three and four. Permit Part 4.1.4 requires the analytical methods for sample collection, preservation, and analysis to be conducted according to test procedures approved under 40 CFR Part 136, unless otherwise approved by DEC prior to use.

## **Comments Received During the Five-Day Applicant Review Period**

The proposed final permit was posted for five-day applicant review on June 17, 2015 through June 24, 2015.

### **3.1 Comment Summary**

In Table 5 on page 39 of the permit, the applicant recommended requiring dissolved copper instead of total copper, as it better represents the bioavailability of the metal.

#### **Response**

Table 5 was revised to require sampling for dissolved copper. The Fact Sheet was revised to reflect the change.

### **3.2 Comment Summary**

The U.S. Fish and Wildlife Service recommended that DEC require a detection limit of 1 micrograms per liter and require testing for a full suite of metals.

#### **Response**

DEC uses the method detection limit for the EPA-approved test method for copper for the water quality standards per 40 CFR 136. While the EPA test method includes additional metals besides copper, the metal of interest is copper per the cited U.S. Fish and Wildlife Service comment.