Borough of Petersburg Wastewater Treatment Plant

Application For a Modified NPDES Permit Under Section 301(h) Of The Clean Water Act

Tentative Decision Document

August 2024

United States Environmental Protection Agency

Region 10

1200 6th Avenue

Seattle, WA 98101

REGION 10 ADMINISTRATOR

SEATTLE, WA 98101

Borough of Petersburg's
Wastewater Treatment Plant
Application for a Modified NPDES Permit Under
Section 301(h) of the Clean Water Act

Tentative Decision of the Regional Administrator
Pursuant to 40 CFR Part 125, Subpart G

I have reviewed the attached evaluation analyzing the merits of the Borough of Petersburg's request and application for a variance from secondary treatment requirements of the Clean Water Act pursuant to Section 301(h) of the Act for the Borough of Petersburg wastewater treatment plant. It is my tentative decision that the Borough of Petersburg be granted a variance pursuant to Section 301(h) of the Act for the Borough of Petersburg wastewater treatment plant in accordance with the terms, conditions, and limitations of the draft 301(h)-modified NPDES permit.

My decision is based on available information specific to the discharge from the Borough of Petersburg wastewater treatment plant. It is not intended to assess the need for secondary treatment in general, nor does it reflect on the necessity for secondary treatment by other publicly owned treatment works discharging to the marine environment.

Public notice and comment regarding this tentative decision and the accompanying draft NPDES permit is available to interested persons pursuant to 40 CFR Part 124. This tentative decision is subject to change based on information acquired during the public comment period. Following the public comment period on this tentative decision and accompanying draft NPDES permit, EPA Region 10 will issue a final decision under the procedures in 40 CFR Part 124.

/Signed/ June 6, 2024
Casey Sixkiller
Regional Administrator

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1) Introduction

The Borough of Petersburg, Alaska, ("the applicant," "Petersburg," or "the permittee") has requested a renewal of its variance (sometimes informally called a "waiver" or "modification") under Section 301(h) of the Clean Water Act (the Act or CWA) from the secondary treatment requirements contained in Section 301(b)(1)(B) of the Act, 33 USC § 1311(b)(1)(B).

The United States Environmental Protection Agency, Region 10 (EPA) approved Petersburg's most recent National Pollutant Discharge Elimination System (NPDES) permit for the Petersburg Wastewater Treatment Plant ("WWTP" or "the facility") and issued a CWA Section 301(h)-modified permit on November 20, 2001 (AK0021458) (hereafter referred to as the 2001 permit). The 2001 permit became effective on December 24, 2001, and expired on December 26, 2006. A timely and complete NPDES application for permit reissuance was submitted by the permittee on July 13, 2006. Pursuant to 40 CFR 122.6, the permit has been administratively continued and remains fully effective and enforceable.

The 301(h) variance is being sought for the Petersburg WWTP; a publicly owned treatment works (POTW). The applicant is seeking a 301(h) variance to discharge wastewater receiving less-than-secondary treatment from a single outfall into Frederick Sound. The effluent quality attainable by secondary treatment is defined in the regulations at 40 CFR Part 133 in terms of biochemical oxygen demand (BOD_5), total suspended solids (TSS), and pH. Pursuant to 40 CFR 133.102, secondary treatment requirements for TSS, BOD_5, and pH are as follows:

TSS: (1) The 30-day average concentration shall not exceed 30 mg/l;

(2) The 7-day average concentration shall not exceed 45 mg/l; and

(3) The 30-day average percent removal shall not be less than 85%.

BOD_5: (1) The 30-day average concentration shall not exceed 30 mg/l;

(2) The 7-day average concentration shall not exceed 45 mg/l; and

(3) The 30-day average percent removal shall not be less than 85%.

pH: The pH of the effluent shall be maintained within the limits of 6.0 to 9.0 pH standard units.

The permittee requested a modification for TSS, BOD_5, and pH.

This document presents EPA's tentative findings, conclusions, and recommendations as to whether the applicant's proposed 301(h)-modified discharge (proposed discharge) will comply with the criteria set forth in Sections 301(h) of the Act, as implemented by regulations at 40 CFR Part 125, Subpart G, and Alaska Water Quality Standards (Alaska WQS), as amended.

2) Decision Criteria

Under Section 301(b)(1)(B) of the Act, POTWs in existence on July 1, 1977, are required to meet effluent limits based on secondary treatment as defined by the Administrator of EPA ("the Administrator"). Secondary treatment is defined by the Administrator in terms of three parameters: TSS, BOD_5, and pH. Uniform national effluent limitations for these pollutants were promulgated and included in NPDES permits for POTWs issued under Section 402 of the CWA, POTWs were required to comply with these limitations by July 1, 1977.

Congress subsequently amended the Act, adding Section 301(h) which authorizes the Administrator, with State concurrence, to issue NPDES permits that modify the secondary treatment requirements of the Act with respect to certain discharges. P.L. 95-217, 91 Stat. 1566, as amended by P.L. 97-117, 95 Stat. 1623; and S303 of the Water Quality Act of 1987. Section 301(h) provides that:

> *[T]he Administrator, with the concurrence of the State, may issue a permit under section 402 [of the Act] which modifies the requirements of subsection (b)(1)(B) of this section [the secondary treatment requirements] with respect to the discharge of any pollutant from a publicly owned treatment works into marine waters, if the applicant demonstrates to the satisfaction of the Administrator that:*

(1) *there is an applicable water quality standard specific to the pollutant for which the modification is requested, which has been identified under section 304(a)(6) of [the CWA];*
(2) *the discharge of pollutants in accordance with such modified requirements will not interfere, alone or in combination with pollutants from other sources, with the attainment or maintenance of that water quality which assures protection of public water supplies and the protection and propagation of a balanced, indigenous population of shellfish, fish and wildlife, and allows recreational activities, in and on the water;*
(3) *the applicant has established a system for monitoring the impact of such discharge on a representative sample of aquatic biota, to the extent practicable, and the scope of the monitoring is limited to include only those scientific investigations which are necessary to study the effects of the proposed discharge;*
(4) *such modified requirements will not result in any additional requirements on any other point or nonpoint source;*
(5) *all applicable pretreatment requirements for sources introducing waste into such treatment works will be enforced;*
(6) *in the case of any treatment works serving a population of 50,000 or more, with respect to any toxic pollutant introduced into such works by an industrial discharger for which pollutant there is no applicable pretreatment requirement in effect, sources introducing waste into such works are in compliance with all applicable pretreatment requirements, the applicant has in effect a pretreatment program which, in combination with the treatment of discharges from such works, removes the same amount of such pollutant as would be removed if such works were to apply secondary treatment to discharges and if such works had no pretreatment program with respect to such pollutant;*

(7) to the extent practicable, the applicant has established a schedule of activities designed to eliminate the entrance of toxic pollutants from nonindustrial sources into such treatment works;

(8) there will be no new or substantially increased discharges from the point source of the pollutant into which the modification applies above that volume of discharge specified in the permit; and

(9) the applicant at the time such modification becomes effective will be discharging effluent which has received at least primary or equivalent treatment and which meets the criteria established under [section 304(a)(1) of the CWA] after initial mixing in the waters surrounding or adjacent to the point at which such effluent is discharged.

For the purposes of this subsection the phrase "the discharge of any pollutant into marine waters" refers to a discharge into deep waters of the territorial sea or the waters of the contiguous zone, or into saline estuarine waters where there is strong tidal movement and other hydrological and geological characteristics which the Administrator determines necessary to allow compliance with paragraph (2) of this subsection, and [section 101(a)(2) of the Act]. For the purposes of paragraph (9), "primary or equivalent treatment" means treatment by screening, sedimentation, and skimming adequate to remove at least 30 percent of the biological oxygen demanding material and of the suspended solids in the treatment works influent, and disinfection, where appropriate. A municipality which applies secondary treatment shall be eligible to receive a permit pursuant to this subsection which modifies the requirements of subsection (b)(1)(B) of this section with respect to the discharge of any pollutant from any treatment works owned by such municipality into marine waters. No permit issued under this subsection shall authorize the discharge of sewage sludge into marine waters. In order for a permit to be issued under this subsection for the discharge of a pollutant into marine waters, such marine waters must exhibit characteristics assuring that water providing dilution does not contain significant amounts of previous discharged effluent from such treatment works. No permit issued under this subsection shall authorize the discharge of any pollutant into saline estuarine waters which at the time of application do not support a balanced, indigenous population of shellfish, fish and wildlife, or allow recreation in and on the waters or which exhibit ambient water quality below applicable water quality standards adopted for the protection of public water supplies, shellfish, fish and wildlife or recreational activities or such other standards necessary to assure support and protection of such uses. The prohibition contained in the preceding sentence shall apply without regard to the presence or absence of a causal relationship between such characteristics and the applicant's current or proposed discharge. Notwithstanding any of the other provisions of this subsection, no permit may be issued under this subsection for discharge of a pollutant into the New York Bight Apex consisting of the ocean waters of the Atlantic Ocean westward of 73 degrees 30 minutes west longitude and westward of 40 degrees 10 minutes north latitude.

On August 9, 1994, EPA promulgated final regulations implementing these statutory criteria at 40 CFR Part 125, Subpart G. The regulations provide that a Section 301(h)-modified NPDES permit may not be issued in violation of 40 CFR 125.59(b) which requires, among other things, compliance with provisions of the Coastal Zone Management Act, as amended, 16 USC 1451 *et seq.*, the Endangered Species Act, as amended, 16 USC 1531 *et seq.*, Title III of the Marine Protection Research and Sanctuaries Act, as amended, 16 USC 1431 *et seq.*, the Magnuson-Stevens Fishery Conservation and Management Act, as amended, 16 USC 1801 *et seq.*, and any other applicable provisions of local, state, and federal laws or Executive Orders.

In accordance with 40 CFR 125.59(i), the decision to grant or deny a CWA Section 301(h) waiver shall be made by the Administrator [1] and shall be based on the applicant's demonstration that it has met all the requirements of 40 CFR 125.59 through 125.68, as described in this 301(h) Tentative Decision Document (301(h) TDD). EPA has reviewed all data submitted by the applicant in the context of applicable statutory and regulatory criteria and has presented its findings and conclusions in this 301(h) TDD.

3) Summary of Findings

Based upon review of the data, references, and empirical evidence furnished by the applicant and other relevant sources, EPA Region 10 makes the following tentative findings regarding the application with respect to the statutory and regulatory criteria:

1. The applicant's proposed discharge will comply with Alaska WQS for dissolved oxygen and turbidity. [CWA Section 301(h)(1), 40 CFR 125.61]
2. The applicant has demonstrated it can consistently achieve Alaska WQS and federal CWA Section 304(a)(1) water quality criteria at and beyond the zone of initial dilution (ZID). [CWA Section 301(h)(9), 40 CFR 125.62(a)]
3. The applicant's proposed discharge, alone or in combination with pollutants from other sources, will not adversely impact public water supplies or interfere with the protection and propagation of a balanced indigenous population (BIP) of shellfish, fish, and wildlife, and will allow for recreational activities in an on the water. [CWA Section 301(h)(2), 40 CFR 125.62(b), (c), (d)]
4. The applicant has a well-established and adequate program to monitor the impact of its proposed discharge on aquatic biota and has demonstrated it has adequate resources to continue the program. These monitoring requirements will remain enforceable terms of the permit. [CWA Section 301(h)(3), 40 CFR 125.63]
5. The applicant's proposed discharge will not result in any additional treatment requirements on any other point or nonpoint sources. The applicant sent a letter to the Alaska Department of Environmental Conservation (ADEC) requesting concurrence with this determination. [CWA Section 301(h)(4), 40 CFR 125.64]
6. The facility serves a population less than 50,000 people, so does not need to develop an urban area pretreatment program [CWA Section 301(h)(6), 40 CFR 125.65]

[1] The authority to make tentative (and final) decisions on the eligibility of publicly owned treatment works for variances from the secondary treatment requirements of the Clean Water Act pursuant to Section 301(h) of the CWA has been delegated to the Regional Administrators.

7. The applicant will continue to implement its nonindustrial source control program, consisting of public outreach and education designed to minimize the amount of toxic pollutants that enter the treatment system from nonindustrial sources. [CWA Section 301(h)(7), 40 CFR 125.66]
8. There will be no new or substantially increased discharges from the point source of the pollutants to which the 301(h) variance applies above those specified in the permit. [CWA Section 301(h)(8), 40 CFR 125.67]
9. The 301(h) modified permit contains the special conditions required regarding effluent limitations and mass loadings, schedules of compliance, and monitoring and reporting requirements [40 CFR 125.68]
10. The discharge is not expected to conflict with applicable provisions of State, local, or other Federal laws or Executive Orders, including compliance with the Coastal Zone Management Act of 1972, as amended, 16 USC1451 *et seq*.; the Endangered Species Act of 1973, as amended, 16 USC 1531 *et seq*.; Title III of the Marine Protection, Research and Sanctuaries Act, as amended, 16 USC 1431 *et seq*.; and the Magnuson-Stevens Fishery Conservation and Management Act, as amended, 16 USC 1801 *et seq.* [40 CFR 125.59(b)(3)]
11. The applicant has demonstrated the proposed discharge will comply with federal primary treatment requirements. [CWA Section 301(h)(9), 40 CFR 125.60]

4) Tentative Decision and Recommendation

Based on the tentative findings in Section 3, above, EPA has concluded that the applicant's proposed discharge will comply with the requirements of CWA section 301(h), and 40 CFR Part 125, Subpart G. Accordingly, EPA has tentatively decided to grant the applicant a CWA section 301(h) variance, contingent upon satisfaction of the following conditions:

1. All requirements determined necessary by ADEC as part of its final CWA Section 401 Certification to ensure that the proposed discharge will comply with applicable provisions of State law, including WQS, in accordance with Section 401 of the CWA and the regulations at 40 CFR 124.53, 124.54 and 125.61(b)(2).
2. The determination by ADEC that the proposed discharge will not result in any additional treatment requirements on any other point or nonpoint sources, in accordance with 40 CFR 125.64.
3. The determination by the National Marine Fisheries Service that issuance of a 301(h)-modified permit will not jeopardize the continued existence of any threatened or endangered species or result in the destruction of critical habitat and does not conflict with applicable provisions of the Magnuson-Stevens Fishery Conservation and Management Act, as amended.

5) Description of Treatment System

The Petersburg WWTP serves the community of Petersburg, Alaska, which has a population of approximately 3,000 people. According to the facility, the design flow is 1.2 mgd monthly average flow and 3.6 mgd maximum daily flow; with a design flow >1 mgd, the facility is considered a major POTW. In accordance with 40 CFR 125.58(c), the facility is a "small applicant" under CWA section 301(h). The collection system is a not a combined sanitary sewer system. The effluent is all domestic in origin. The existing outfall (001) discharges to Frederick Sound approximately 1,200 feet (366 meters) offshore at a depth of 60 feet (18.3 meters) below mean lower low water (MLLW). The outfall location is at the following latitude and longitude: 56.819594° N, -132.923494° W (midpoint of diffuser).

Raw sewage enters the WWTP through two primary screens and then proceeds to the grit separator where gravitational and centrifugal forces remove grit. The influent is then routed to two primary clarifiers, and chlorine is intermittently added. Primary sludge and skimmings from the clarifier are moved to the sludge storage tank. The final effluent from the primary clarifiers flow over v-notch weirs at the outlet end of the tanks and is collected in effluent launders where it then flows to the outfall pipe in Frederick Sound.

Separated solids removed from the primary screens are used as a bulking agent in the facility's composting operation. Sludge and scum are discharged to the sludge storage tank, which acts as an aerobic digester. Sludge from the storage tank is then routed to a belt filter for dewatering, through a variable speed progressive cavity pump with an added polymer, and then into a sludge mixing tank. The mixture then flows through the belt filter press and the dewatered solids are composed on site using either an aerated static or aerated turned pile method. The finished compost meets Class A biosolids requirements. See Appendix A for facility figures, area maps, and the treatment process flow diagram.

6) Description of Receiving Waters

A. General Features

The WWTP discharges into the waters of Frederick Sound, approximately 1,200 feet from the shore of Mitkof Island. Frederick Sound is connected to the Pacific Ocean via Chatham Strait to the northwest and Dry Strait/Sumner Strait to the southeast.

Surface water densities near the outfall vary due to local freshwater inputs from nearby rivers. The major freshwater input to Fredrick Sound is the Stikine River, which discharges with an annualized average flow of 55,078 cfs, with the maximum average monthly discharge of 134, 000 cfs occuring in June (USGS 2019).

According to the 2001 Fact Sheet, the original, revised, and 1990 application were based on a discharge to a saline estuary. For the 2001 permit, the applicant requested EPA re-evaluate the waters as "ocean waters," and EPA decided that either saline waters or ocean waters could be supported. The 301(h) regulations provide the following definitions of saline estuarine and ocean waters:

40 CFR 125.58(v): *Saline estuarine waters* means those semi-enclosed coastal waters which have a free connection to the territorial sea, undergo net seaward exchange with ocean waters, and have salinities

comparable to those of the ocean. Generally, these waters are near the mouth of estuaries and have cross-sectional annual mean salinities greater than twenty-five (25) parts per thousand.

40 CFR 125.58(n): *Ocean waters* means those coastal waters landward of the baseline of the territorial seas, the deep waters of the territorial seas, or the waters of the contiguous zone. The term ‘‘ocean waters’’ excludes saline estuarine waters.

Upon review of these definitions EPA has determined the Petersburg discharge is to saline estuarine waters as defined in 40 CFR 125.58(v). Frederick Sound is a semi-enclosed coastal water with a free connection to the territorial sea, undergoes net seaward exchange with ocean waters, and has an annual mean salinity greater than twenty-five parts per thousand. The discharge area is directly north of the Stikine River estuary, the largest tidal estuary in southeast Alaska. The influence of the Stikine River estuary on the discharge area can be seen in satellite imagery showing sediment plumes extending south to Wrangell and north near Petersburg. In addition, there are several smaller tidal saline estuary systems north and south of the discharge area, including Thomas Bay, Farragut Bay, Portage Bay, and LeConte Bay.

Frederick Sound is classified in Alaska WQS as classes 2A(i)(ii)(iii), B(i)(ii), C and D, for use in aquaculture, seafood processing and industrial water supply, water contact and secondary recreation, growth and propagation of fish, shellfish, aquatic life and wildlife, and harvesting for consumption of raw mollusks or other raw aquatic life.

B. Currents and Flushing

Currents in the receiving water are generally reported to flow northwestward with southwestward flows during large tides. According to NOAA, the mean tide range at Petersburg is 13.56 ft, with a diurnal range of 15.99 ft, and a mean tide level of 8.00 ft above MLLW (NOAA 2019a). At the Wrangell Narrows station (station #1525) off Petersburg, the average maximum flood current is 3.2 knots with a bearing of 246° (generally southwest), the average minimum before ebb is 0.1 knots with a bearing of 334° (generally northwest), and the average maximum ebb is 2.1 knots, with a bearing of 062° (generally northeast) (NOAA 2019b).

As shown in Table 1, 2020 current data for Wrangell Narrows station at the 25-foot depth reveals that annual current velocities associated with flood tides are predicted to be generally greater across all bands than velocities associated with ebb tides, indicating a general dominance of flood tide forces in a southwesterly direction away from the outfall (NOAA 2020). The facility discharges to a saline estuarine environment where tidal currents vary in speed and direction over the course of a day. This results in the possibility that the effluent waste transported away from the zone of initial dilution (ZID) during the first half of a tidal cycle will be transported back into the ZID on the second half of the tidal cycle. However, if this were to occur, effluent would be additionally diluted in the approximate 5 hours between flood and ebb tides before re-entering the ZID.

Table 1. Current Predictions by Tide Type and Current Velocity Bands for 2020

Tide Type with Current Velocity Bands (knots)	Percent of Total
ebb	**25.65%**
0-0.5	0.28%
0.5-1	2.38%
1-1.5	6.17%
1.5-2	7.43%
2-2.5	6.13%
2.5-3	2.59%
3-3.5	0.67%
flood	**24.81%**
1-1.5	1.89%
1.5-2	5.36%
2-2.5	7.22%
2.5-3	6.76%
3-3.5	2.70%
3.5-4	0.88%
slack	**49.54%**
0-0.5	49.54%
Grand Total	**100.00%**

7) Physical Characteristics of the Discharge

A. Outfall/Diffuser Design and Initial Dilution

Pursuant to 40 CFR 125.62(a)(1), the outfall and diffuser must be located and designed to provide adequate initial dilution, dispersion, and transport of wastewater to meet all applicable WQS at and beyond the boundary of the ZID during periods of maximum stratification and during other periods when discharge characteristics, water quality, biological seasons, or oceanographic conditions indicate more critical situations may exist.

The WWTP outfall and diffuser are made of an 18-inch diameter ductile iron pipe. The outfall is 1,200 feet in length from MLLW, terminating in a diffuser 45.9 feet (14 m) in length with five 4-inch diameter ports. The effluent is discharged from only two of the five ports, with the other three closed.

Zone of Initial Dilution (ZID)

Section 301(h)(9) of the CWA and 40 CFR 125.62 require 301(h) discharges to meet state WQS and federal CWA section 304(a) criteria at the boundary of the ZID, which is the region of initial mixing surrounding or adjacent to the end of the outfall pipe or diffuser ports. The ZID may not be larger than allowed by mixing zone restrictions in applicable WQS. 40 CFR 125.58(dd). The dilution ratio achieved at the completion of initial mixing at the edge of the ZID is used to determine compliance with these requirements. Dilution is defined as the ratio of the total volume of the sample (ambient water plus effluent) to the volume of effluent in the sample. The ZID is not intended to describe the area bounding the entire mixing process or the total area impacted. Rather, the ZID, or region of *initial mixing,* is the area of rapid, turbulent mixing of the effluent and receiving water and results from the interaction between the buoyancy and momentum of the discharge and the density and momentum of the receiving water. Initial dilution is normally complete within several minutes after discharge. In guidance, EPA has operationally delimited the ZID to include the bottom area within a horizontal distance equal to the water depth from any point on the diffuser and the water column above that area (Amended 301(h) Technical Support Document; 301(h) TSD). Beyond the ZID boundary (i.e., after initial mixing is complete), the effluent is diluted further by passive diffusion processes and far-field ambient receiving water conditions. The ZID is not inclusive of this far-field mixing process.

The 2001 permit used a dilution factor for the ZID of 100:1. EPA was unable to recreate this dilution factor using available effluent and receiving water data. Thus, EPA modeled the current discharge to determine the dilution achieved at the edge of the ZID using the discharge depth of the facility and tidal predictions from near the facility, in combination with recent effluent and receiving water data. In accordance with the 301(h) TSD, EPA used data reflecting critical discharge and receiving water conditions to determine dilution under critical conditions. The dilution modeling report is included in Appendix G.

According to the model, the discharge achieves initial mixing and a dilution of 67:1 about 60 feet from the outfall at a depth of approximately 50 feet within one minute of discharge under critical discharge and receiving water conditions. EPA used 67:1 dilution as the basis for determining compliance with CWA section 301(h)(9) and 40 CFR 125.62. Consistent with the recommendations in the 301(h) TSD for setting spatial boundaries for the ZID, EPA has established the spatial dimensions of the ZID which include the entire water

column within 60 feet of any point of the 45.9-foot diffuser. The ZID was calculated to be a rectangle of 183.7 feet (56 m) long (perpendicular to shore) and 139.3 ft (42.5 m) wide centered around the diffuser. EPA has consulted with ADEC and used acute and chronic dilution factors of 7.3:1 and 56:1, respectively. These dilutions fall within the boundary of the ZID.

8) Application of Statutory and Regulatory Criteria

The sections below describe the statutory and regulatory requirements that are applicable to CWA Section 301(h) discharges and explains the basis for certain water quality effluent limits in the draft permit.

A. Compliance with Primary or Equivalent Treatment Requirements [CWA Section 301(h)(9); 40 CFR 125.60]

Under CWA section 301(h)(9) and 40 CFR 125.60, the applicant must demonstrate it will be discharging effluent that has received at least primary or equivalent treatment at the time the 301(h)-modified permit becomes effective. 40 CFR 125.58(r) defines primary or equivalent treatment as treatment by screening, sedimentation, and skimming adequate to remove at least 30 percent of the biochemical oxygen demanding material and other suspended solids in the treatment works influent, and disinfection, where appropriate. To ensure the effluent has received primary or equivalent treatment, 40 CFR 125.60 requires the applicant to perform monitoring of their influent and effluent and assess BOD_5 and TSS removal rates based on a monthly average.

Applicants for 301(h) waivers request concentration and loading (lbs/day) limits for BOD_5 and TSS based on what the facility can achieve. Therefore, the technology-based requirements for POTWs with 301(h) waivers are established on a case-by-case basis taking into consideration facility performance and the federal primary treatment standards.

1. Total Suspended Solids

EPA reviewed influent and effluent monitoring data for TSS between 2018 and 2023. A summary table and graphical representation of the data is provided below.

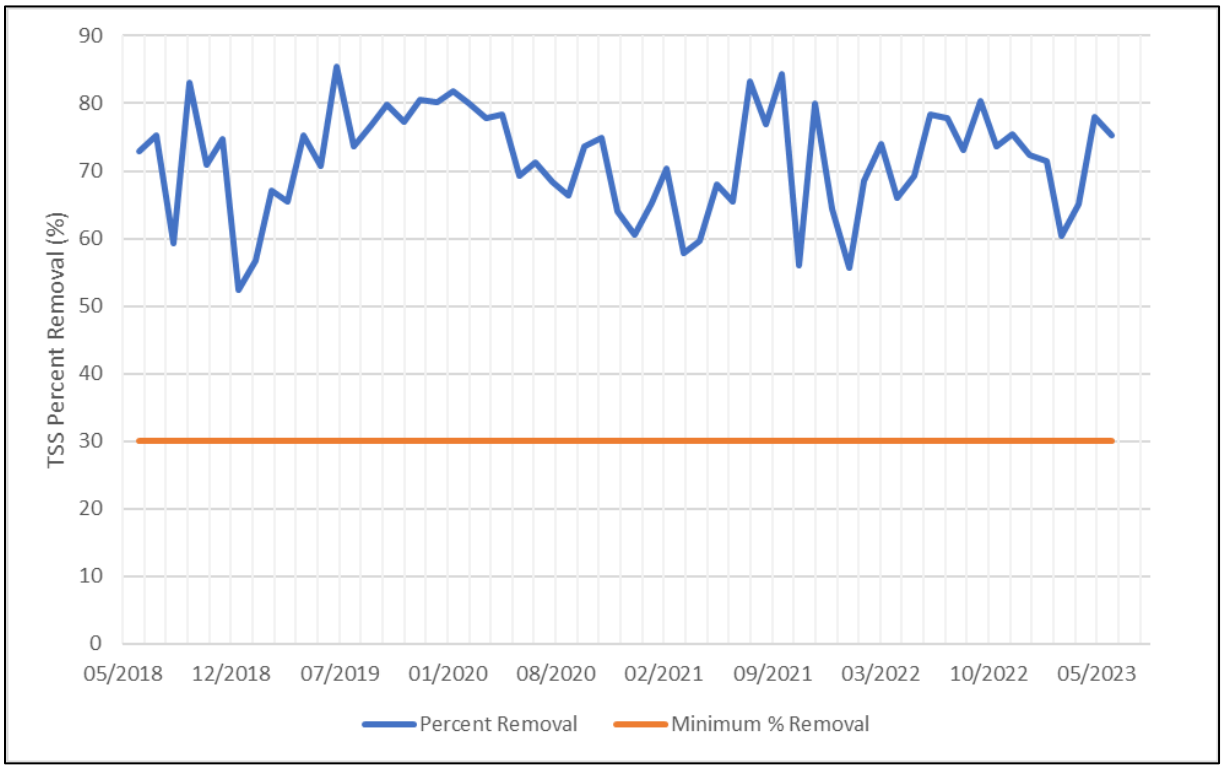

Figure 1. Minimum Monthly Percent TSS Removal (06/2018 – 05/2023)

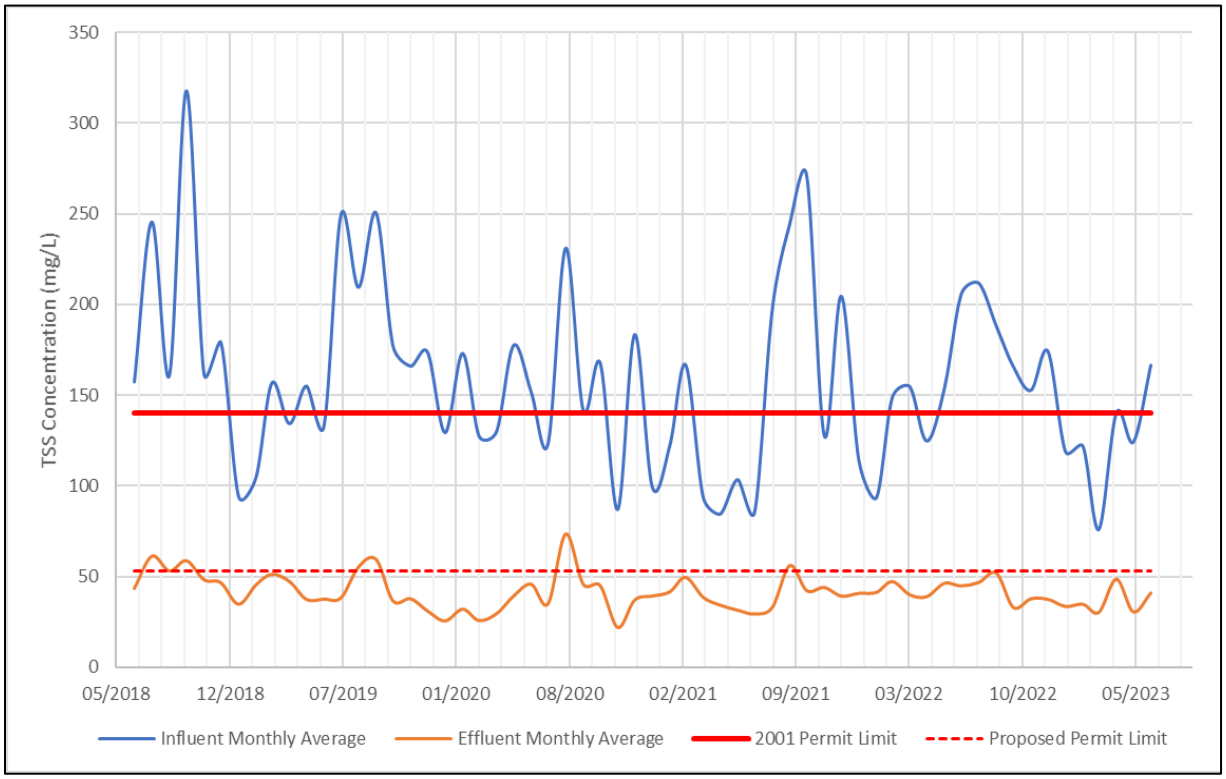

Figure 2. Average Monthly Influent and Effluent TSS Concentrations (06/2018-05/2023)

The facility achieved the minimum 30% removal requirement for TSS 100% of the time between 2018-2023, with the lowest monthly removal being 52%. Between 2018 and 2023 the facility achieved an average of nearly 72% removal of TSS, with maximum percent removal efficiencies as high as 86%.

Table 2. Influent and Effluent TSS Data (6/2018-05/2023)

Statistic	Influent, TSS, mg/L, Mo. Avg	Effluent, TSS, mg/L, Max Daily	Effluent, TSS, mg/L, Mo. Avg	Percent Removal
2001 Limit	---	200	140	≥30%
Count	60	60	60	60
Mean	158	47	41	72
Minimum	76	25	22	52
Max	318	85	73	86
STDV	50	12	10	8
CV	0.84	0.20	0.16	0.13
5th	86	29	26	56
95th	250	68	59	83

The applicant has demonstrated that it will be discharging effluent that has received at least primary treatment for TSS when the 301(h)-modified permit becomes effective. [CWA section 301(h)(9) and 40 CFR 125.60].

2. Biochemical Oxygen Demand

EPA reviewed influent and effluent data for BOD_5 between 2018 and 2023. A summary table and graphical representation of the data is provided below.

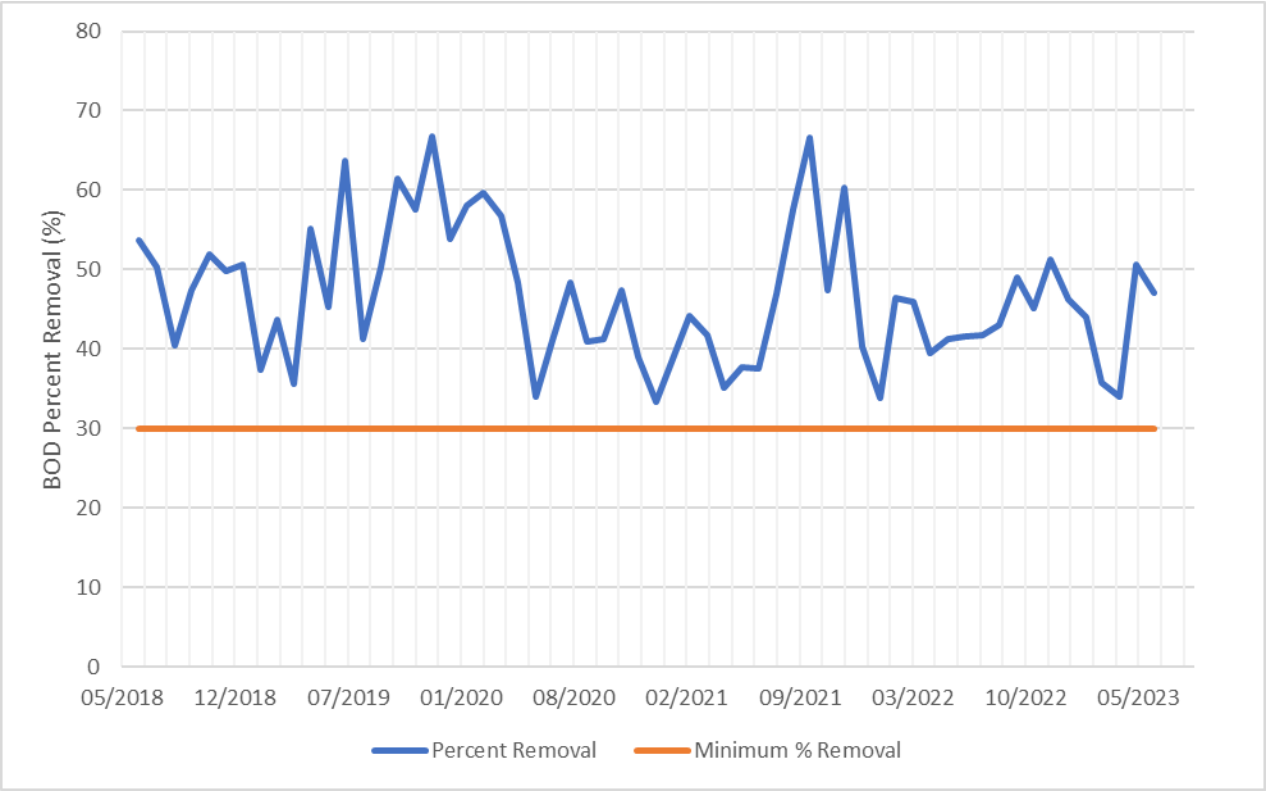

Figure 3. BOD_5 Percent Removal (6/2018-5/2023)

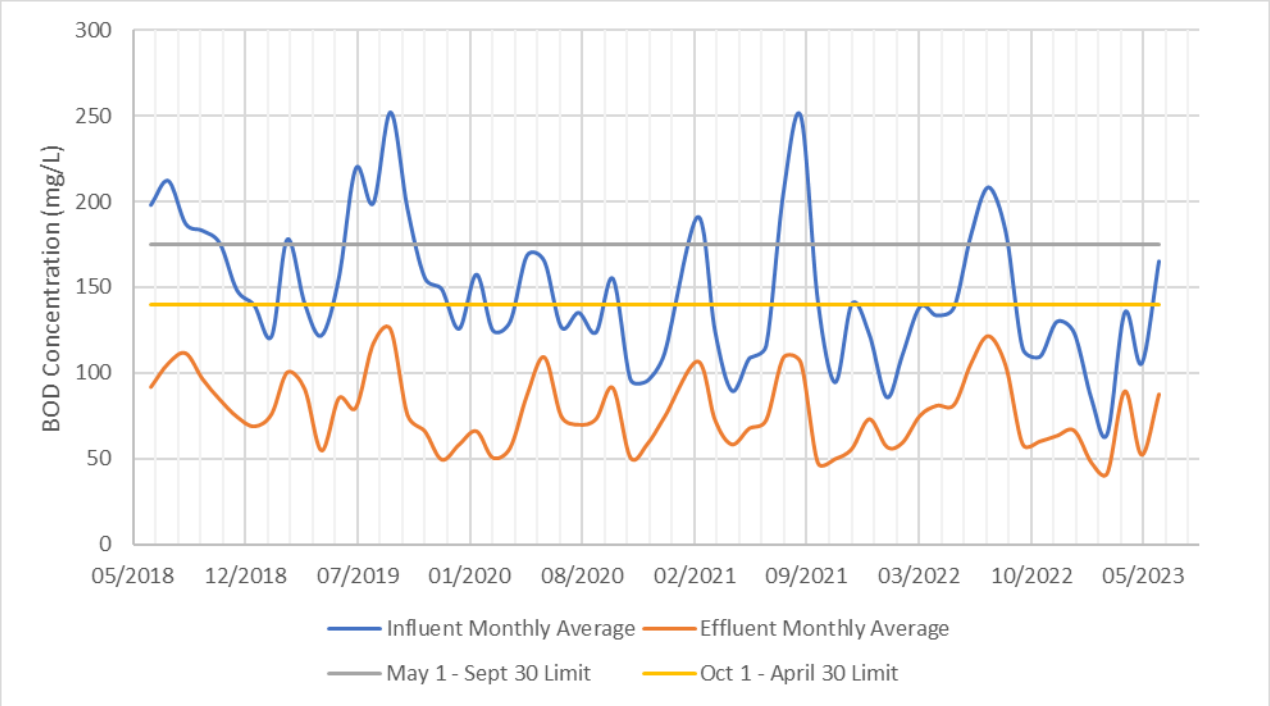

Figure 4. Monthly Influent and Effluent BOD_5 Concentrations (6/2018-5/2023)

The facility achieved the minimum 30% removal requirement for BOD_5 100% of the time between June 2018 and May 2023. Between 2018 and 2023 the facility achieved an average of 46.7% removal of BOD_5, with maximum percent removal efficiencies as high as 59%.

Table 3. Influent and Effluent BOD Data (6/2018-5/2023)

Statistic	Influent, BOD_5, mg/L, Mo. Avg	Effluent, BOD_5, mg/L, Max Daily[1]	Effluent, BOD_5, mg/L, Mo. Avg[1]	Percent Removal
2001 Limit (5/1-9/30)	---	200	175	≥30%
2001 Limit (10/1-4/30)	---	200	140	≥30%
Count	59	59	59	20
Mean	147	87	77	47
Min	65	42	42	36
Max	252	147	125	59
STDV	41	25	21	7
CV	0.69	0.42	0.36	0.36
5th	86	52	48	36
95th	219	130	117	59

The applicant has demonstrated that it will be discharging effluent that has received at least primary treatment for BOD_5 when the 301(h)-modified permit becomes effective. [CWA section 301(h)(9) and 40 CFR 125.60].

B. Attainment of Water Quality Standards Related to TSS and BOD_5 [CWA 301(h)(1); 40 CFR 125.61]

Under 40 CFR 125.61, which implements CWA section 301(h)(1), there must be water quality standards applicable to the pollutants for which the modification is requested, and the applicant must demonstrate that the proposed discharge will comply with these standards. The applicant has requested modified secondary treatment requirements for BOD_5, which affects dissolved oxygen (DO), TSS, which affects the color or turbidity in the receiving water, and pH. The State of Alaska has water quality standards for DO, turbidity, and pH.

1. Turbidity and Light Transmittance/Attenuation

Alaska WQS applicable to the open waters of Frederick Sound provide that turbidity shall not exceed 25 nephelometric turbidity units (NTU), may not interfere with disinfection, may not cause detrimental effect on established levels of water supply treatment, and may not reduce the depth of the compensation point for photosynthetic activity by more than 10%. In addition, turbidity may not reduce the maximum secchi disc depth by more than 10%. Alaska WQS for turbidity can be found in Appendix D.

The applicant provided receiving water data for turbidity and secchi depth. Sampling was conducted in January 2002, August 2003, January 2004, and August 2005 at the four sites, two sites adjacent to the

boundary of the ZID, and two reference sites. Sites 1 and 2 are ZID boundary sites and sites 3 and 4 are reference sites. Monitoring results are presented in Table 4, Table 5, and Table 6 below.

Secchi depths ranged from 4.0 feet in August 2003 to 8.8 feet in January 2002. The average of reference sites 3 and 4 was 5.7 m, while the average for the ZID boundary sites was 6.3 m, approximately 10% lower.

Table 4. Secchi Depth Monitoring

Site	Secchi Depth (m)						
	Jan 2002	Aug 2003	Jan 2004	Aug 2005	Avg	Max	Min
Site 1: ZID Boundary	8.8	4.1	6.8	7.0	6.7	8.8	4.1
Site 2: ZID Boundary	7.9	4.0	5.1	6.9	6.0	7.9	4.0
Site 3: Reference	6.0	4.5	5.0	5.0	5.1	6.0	4.5
Site 4: Reference	7.9	4.1	5.0	8.4	6.4	8.4	4.1

The applicant provided 36 readings for turbidity in the receiving water at surface, mid, and bottom depths (bottom depth of 60 feet). Turbidity results were not provided for the January 2002 sampling event, and the facility reported that the probe used to measure turbidity was malfunctioning. Average receiving water turbidity values at ZID boundary sites 1 and 2 were 4.9, 4.3, and 3.5 NTU for surface, mid, and bottom monitoring, respectively. Average values for reference sites 3 and 4 were 7.1, 7.9, 24.5 NTU for surface, mid, and bottom monitoring, respectively. The maximum turbidity values measured at a ZID boundary site of 9.7 NTU was observed in a surface sample taken during August. The maximum turbidity value measured at a reference site of 130 NTU was observed in a bottom sample taken during September and is likely the result of substantial sediment inputs from the nearby Stikine River estuary to the south. Given that the turbidity measured in all samples taken at the ZID boundary are below Alaska's water quality criteria for turbidity of 25 NTU, and measured turbidity at the ZID boundary is generally lower than the values at reference sites, it is not expected that the discharge will result in an excursion above Alaska WQS for turbidity.

Table 5. ZID Boundary Turbidity Monitoring (NTU)

Year	Site	Surface	Mid	Bottom
Aug 2003	Site 1	9.7	3.1	3.4
	Site 2	2	3.3	3.2
Feb 2004	Site 1	3.4	7.8	6.6
	Site 2	4.5	2.8	2.9
Sept 2005	Site 1	8.3	7.8	3
	Site 2	1.5	1.1	2
Max	-	9.7	7.8	6.6
Min	-	1.5	1.1	2
Average	-	4.9	4.3	3.5

Table 6. Reference Site Turbidity Monitoring (NTU)

Year	Site	Surface	Mid	Bottom
Aug 2003	Site 3	2	2	1.8
	Site 4	0.6	2.4	3.2
Feb 2004	Site 3	5.4	4.7	1.2
	Site 4	2.4	5	6.8
Sept 2005	Site 3	27.3	26.1	130
	Site 4	4.8	7.3	4
Max	-	27.3	26.1	130
Min	-	0.6	2	1.2
Average	-	7.1	7.9	24.5

The change in suspended solids in the water column is indirectly related to turbidity measurements. To further assess the potential for the discharge to cause or contribute to an excursion above Alaska WQS for turbidity and light transmittance, EPA determined the maximum change in suspended solids concentration of TSS in the discharge at the edge of the ZID using formula B-32 from the 301(h) TSD. The results show a 1.2 mg/L increase in suspended solids in the receiving water after initial dilution, or 1.5%.

As discussed in the 301(h) TSD, an increase in TSS of less than 10% after initial dilution is not expected to have a substantial impact on water quality.

Based on the above analyses, the proposed discharge is expected to comply with AK WQS for turbidity and light transmittance/attenuation. See Appendix E for the full equations.

2. Dissolved Oxygen

The effect of the effluent on ambient DO can occur in the nearshore and far-field as effluent mixes with the receiving water and the oxygen demand of the effluent BOD_5 load is exerted. Pursuant to 40 CFR 125.61(b)(1) and 125.62(a)(1), the applicant must demonstrate that the proposed discharge will comply with WQS for DO and that the outfall and diffuser are located and designed to provide adequate initial dilution, dispersion, and transport of wastewater such that the discharge does not exceed WQS at and beyond the ZID. In the previous permit issuance, ADEC determined that the receiving waters classified as both coastal and estuarine must meet the standards for both (i.e., DO may not be less than 5.0 mg/L at any time or depth). Therefore, Alaska WQS for DO applicable to Frederick Sound provide that DO may not be less than 5.0 mg/L except where natural conditions cause this value to be depressed, and in no case may DO levels exceed 17 mg/L [18 AAC 70.15(a)(i)]. Alaska WQS for DO are shown in Appendix D.

In accordance with EPA's 301(h) TSD, EPA assessed attainment of the WQS for DO based on review of effluent (June 2018 - May 2023) and receiving water monitoring data (2002-2005).

The 301(h) TSD (USEPA 1994) provides several procedures for assessing whether a proposed discharge will meet WQS for DO at the edge of the ZID. Methods include calculating the final DO concentration of the effluent at the edge of the ZID using discharge and receiving water data and assessing the accumulation of suspended solids around the outfall.

DO Concentration at the Edge of the ZID

EPA calculated the DO concentration at the ZID boundary using receiving water data provided by the applicant and the procedures described in Equation B-5 of the 301(h) TSD.

The discharge results in a maximum near field DO depletion at the ZID of 0.14 mg/L (2.0%) reduction from ambient concentrations (Appendix E of this TDD). The minimum DO concentration of the receiving water immediately following initial dilution is between 5.48 mg/L and 7.06 mg/L and varies by water depth and location (reference or outfall), with a minimum DO concentration of 6.82 mg/L on the surface, and a maximum DO concentration on the edge of the ZID of 7.06 mg/L. These values meet Alaska WQS as described in Appendix D.

Far Field DO Impacts

To assess the potential for far field impacts to DO, the final BOD_5 concentration after initial mixing was determined using the simplified procedures described in Appendix B of the 301(h) TSD and outlined in Appendix E of this 301(h) TDD. The calculation resulted in a final BOD_5 concentration of 2.72 mg/L after initial mixing, a concentration that is not anticipated to cause or contribute to any measurable far field DO impacts beyond the ZID.

Suspended Solids Accumulation

Impacts to DO concentrations resulting from the discharge of wastewater can also be assessed by examining the accumulation of suspended solids. 40 CFR 125.62 states that wastewater and particulates must be adequately dispersed following initial dilution so as not to adversely affect water use areas. The accumulation of suspended solids may lower DO in near-bottom waters and cause changes in the benthic communities. Accumulation of suspended solids in the vicinity of a discharge is influenced by the amount of solids discharged, the settling velocity distribution of the particles in the discharge, the plume height-of-rise, and current velocities. Hence, sedimentation of suspended solids is generally of little concern for small discharges into well-flushed receiving waters.

The applicant provided a certification on September 7, 2023, stating that there are no known water quality issues associated with the accumulation of suspended solids from the discharge in accordance with 40 CFR 125.66(d)(2).

To evaluate the potential impact of solids sedimentation, a simplified approach for small dischargers that are not likely to have sediment accumulation problems can be found in Figure B-2 of the 301(h) TSD. To use Figure B-2 of the 301(h) TSD to evaluate whether steady state solids accumulation will result in excess sediment accumulation to cause a 0.2 mg/L oxygen depression, the TSS mass emissions rate is needed, as well as plume height-of-rise. The mass emission or loading rate was calculated using the TSS concentration limit, facility design flow, and a conversion factor (Loading (lbs/day)) = 78 mg/L X 1.2 mgd X 8.34 = 781 lbs/day, or 1722 kg/day). Plume height-of-rise was calculated to be 72 feet (22 meters) using the approach on page B-5 in the 301(h) TSD, which involves multiplying the water depth at the point of discharge (60 feet at MLLW) by the design flow of 1.2 mgd. When a height-of-rise of 22 meters and a loading rate of 1,722 kg/day are input in Figure B-1, and the figure is extrapolated for a height-of-rise of 22 meters, steady state accumulation is below

the line at which greater than 0.2 mg/L oxygen depression is expected. Per the 301(h) TSD, no further analysis is needed to demonstrate that accumulating solids will not result in unacceptable DO depressions.

Based on the above analyses of DO depletion and suspended solids accumulation, the proposed discharge is expected to comply with AK WQS for DO. For the complete equations used in this analysis refer to Appendix E.

C. Attainment of Other Water Quality Standards and Impact of the Discharge on Shellfish, Fish And Wildlife; Public Water Supplies; And Recreation [CWA Section 301(h)(2), 40 CFR 125.62]

CWA section 301(h)(2) requires that the proposed discharge not interfere, either alone or in combination with other sources, with the attainment or maintenance of that water quality which assures protection of public water supplies and protection and propagation of a balanced, indigenous population of shellfish, fish, and wildlife, and allows recreational activities in and on the water. Pursuant to 40 CFR 125.62(a), the applicant's outfall and diffuser must be located and designed to provide adequate initial dilution, dispersion, and transport of wastewater such that the discharge does not exceed, at and beyond the ZID, all applicable EPA-approved state WQS and, where no such standards exist, EPA's CWA section 304(a)(1) aquatic life criteria for acute and chronic toxicity and human health criteria for carcinogens and noncarcinogens, after initial mixing in the waters surrounding or adjacent to the outfall. In addition, 40 CFR 125.59(b)(1) prohibits issuance of a 301(h)-modified permit that would not assure compliance with all applicable NPDES requirements of 40 CFR Part 122; under these requirements a permit must ensure compliance with all applicable WQS[2].

Attainment of WQS for DO and turbidity was previously discussed. In accordance with 40 CFR 125.62(a), the applicant must also demonstrate that the proposed discharge will attain other WQS, including those for pH, temperature, toxic pollutants, and bacteria.

EPA used Alaska WQS and the processes described in the 301(h) TSD and the 1991 *Technical Support Document for Water Quality-based Toxics Control* to determine whether the proposed discharge has the reasonable potential to cause or contribute to an excursion above Alaska WQS, to calculate WQBELs, and to assess compliance with CWA section 301(h)(2) and 40 CFR 125.62.

To determine reasonable potential, EPA compares the maximum projected receiving water concentration after mixing to the WQS for that pollutant. If the projected receiving water concentration exceeds the WQS, there is reasonable potential for that pollutant to cause or contribute to an excursion above Alaska WQS, and a WQBEL must be included in the permit. If a permittee is unable to meet their WQBEL, it would fail to satisfy CWA section 301(h)(9) and 40 CFR 125.62 and would be ineligible for a CWA section 301(h) modification.

Pursuant to 40 CFR 125.62(a)(1)(iv), EPA's evaluation of compliance with WQS must be based upon conditions reflecting periods of maximum stratification and during other periods when discharge characteristics, water

[2] Based on ADEC's review of the preliminary draft permit, EPA expects ADEC to authorize acute and chronic dilution of 11:1 and 19:1, respectively, in its 401 certification. These dilutions are based on meeting ADEC's mixing zone guidance. To meet Alaska WQS, EPA is using the chronic dilution factor to calculate pollutant effluent limits. Since these dilutions fall within the boundary of the ZID, these effluent limits also comply with CWA Section 301(h)(9) and 40 CFR 125.62.

quality, biological seasons, or oceanographic conditions indicate more critical situations may exist, commonly referred to as critical conditions.

1. pH

The applicant requested a CWA section 301(h) modification for pH to 6.5 to 8.0 s.u. The applicant's request for a 301(h) modification for pH does not apply since the request is more stringent than the secondary treatment TBELs for pH. The proposed discharge must still meet the WQS for pH. Alaska's WQS provide that pH may not be less than 6.5 or greater than 8.5 and may not vary more than 0.2 pH unit outside of the naturally occurring range.

The effect of pH on the receiving water following initial dilution was estimated using Table 1 in the 301(h) TSD (*Estimated pH Values After Initial Dilution).*

EPA reviewed DMR data for pH between 2018 and 2023. The facility met the pH limits in the 2001 permit 100% of the time. The effluent pH ranged from 6.6 to 7.9, meeting the Alaska WQS for pH at the point of discharge (end of pipe). By utilizing the minimum measured effluent pH value of 6.6 (choosing a value of 6.5 from the table), an effluent alkalinity of 0.5 meq/L (suggested as reasonable for primary effluents with small industrial components on page 65 of the 301(h) TSD), a seawater temperature of 15^{o}C (95th percentile of trapping depth temperature was 8.2^{o}C), and an initial dilution of 67, the expected resulting pH range after initial dilution is 6.95 to 8.49 over an assumed seawater pH range of 7.00 to 8.50. This is within the range of 6.5 to 8.5, and does not vary more than 0.2 pH units outside the naturally occuring range, and therefore meets the Alaska WQS for pH.

The proposed discharge is expected to comply with Alaska WQS for pH after initial mixing at the edge of the ZID.

2. Temperature

Alaska's WQS for temperature provide that the discharge may not cause the temperature of the receiving water to exceed 15°C and the discharge may not cause the weekly average temperature to increase more than 1°C. The maximum rate of change may not exceed 0.5°C per hour. Normal daily temperature cycles may not be altered in amplitude or frequency.

EPA reviewed surface water and DMR data from the facility to assess whether the modified discharge will comply with Alaska WQS for temperature. The maximum ocean temperature recorded at the trapping depth (mid-level depth) of the discharge during receiving water monitoring from 2002 to 2005 was 8.2°C, and the maximum recorded effluent temperature between 2018 and 2023 was 15.1°C. EPA conducted a mass balance analysis using these values and calculated a final receiving water temperature of 8.3°C after initial dilution. Based upon the above analysis the proposed discharge is expected to comply with Alaska WQS for temperature at the edge of the ZID.

3. Toxics

Alaska WQS for toxics for marine uses can be found in 18 AAC 70.020(b)(23) and the *Alaska Water Quality Criteria Manual for Toxics* (ADEC, 2022).

To assess whether the proposed discharge will comply with Alaska WQS for toxics after initial mixing, EPA reviewed DMR data collected between 2018 and 2023 and the results of two priority pollutant scans submitted with the 2006 permit application.

Several pollutants were reported above their respective detection limits. Using this data, EPA performed reasonable potential analyses using the numeric criteria in the *Alaska Water Quality Criteria Manual for Toxics* (ADEC 2022) and the processes outlined in the *Technical Support Document for Water Quality-based Toxics Control* (USEPA 1991). No pollutants have the reasonable potential to cause or contribute to an excursion above the Alaska WQS at the edge of the ZID.

4. Bacteria

Alaska's WQS for bacteria are found at 18 AAC 17.020(b)(14).

Fecal Coliform

Alaska's most restrictive marine criterion for fecal coliform bacteria concentrations is in areas protected for the harvesting and use of raw mollusks and other aquatic life. The WQS specifies that the geometric mean of samples shall not exceed 14 MPN/100 mL, and that not more than 10 percent of the samples shall exceed:

- 43 MPN/100 mL for a five-tube decimal dilution test;
- 49 MPN/100 mL for a three-tube decimal dilution test;
- 28 MPN/100 mL for a twelve-tube single dilution test;
- 31 CFU/100 mL for a membrane filtration test.

This standard must be met at the edge of the ZID.

On January 22, 1996, ADEC provided a CWA Section 401 Certificate of Reasonable Assurance (401 Certification) that included a mixing zone defined as an arc of a circle with a 1600-meter radius, centered on the outfall going from one shoreline to the other extending on either side of the outfall line and over the diffuser, and extending from the marine bottom to the surface. ADEC reauthorized this mixing zone in 2001. In the 2001 permit, the number of fecal coliform bacteria in the primary treated effluent was not to exceed a 30-day average of 1.0 million FC per 100 mL and a daily limit of 1.5 million FC per 100 mL of sample. Outside this mixing zone, the fecal coliform concentrations were not to exceed a maximum of 14 FC/100 mL for a monthly average and 43 FC/100 mL for a daily maximum.

Petersburg WWTP DMR data from the past 5 years shows monthly geometric mean fecal coliform values ranges from 90,000—995,830 FC/100mL, with a 95th percentile of 925,140 FC/100mL. Summary statistics of DMR data are provided in Table 7 below.

Table 7. Fecal Coliform DMR Summary Data (6/2018-5/2023)

Fecal Coliform (FC/100/mL)	# of samples	Min	Max	95th Percentile	Average	Geomean
Daily Max	60	110,000	1,183,300	1,063,330	623,230	562,660
Monthly Geometric Mean	60	90,000	995,830	925,140	501,760	445,230

The 2001 permit required the facility to conduct fecal coliform sampling twice annually (once during the wet and once during the dry season), at five receiving water locations in the vicinity of the discharge and ADEC-authorized mixing zone.

The results of the facility's available fecal coliform sampling results are presented in Table 8 below and in Appendix B.2 of the Fact Sheet.

Table 8. Fecal Coliform Statistic by Station (2002-2006)

	# of Samples	Min (FC/100mL)	Max (FC/100mL)	Average (FC/100mL)	Median (FC/100mL)	Geomean (FC/100mL)
Station 1	9	1.0	30.0	12.6	8.0	6.3
Station 2	9	1.0	30.0	9.0	2.0	3.9
Station 3	9	1.0	113.0	16.3	1.0	3.3
Station 4	9	1.0	30.0	5.4	1.0	2.3
Station 5	9	1.0	23.0	3.4	1.0	1.4

Station 1: Shoreline area closest to discharge point/diffuser.
Station 2: Shoreline area just outside of the farthest east point of where the mixing zone touches the shoreline.
Station 3: Shoreline area just outside of the farthest west point of where the mixing zone touches the shoreline.
Station 4: Just outside of the down current edge of the 1600-meter mixing zone.
Station 5: Just outside of the open ocean edge of the 1600-meter mixing zone.

The maximum fecal coliform result of 113 FC/100mL occurred at Station 3 at the shoreline east of the diffuser at the east edge of the mixing zone. CWA section 301(h)(9) requires 301(h) discharges to meet WQS and federal CWA section 304(a) criteria at the edge of the ZID. The current 1,600 m mixing zone for fecal coliform is inconsistent with the statutory or regulatory definition of a ZID: *the region of initial mixing surrounding or adjacent to the outfall.* ADEC does not intend on reauthorizing the 1,600 m mixing zone for fecal coliform and the point of compliance for all bacteria limits is now the edge of the ZID.

Consistent with CWA section 301(h)(9) and 40 CFR 125.62, EPA used the 67:1 dilution achieved at the edge of the ZID to evaluate reasonable potential and assess compliance with CWA section 301(h)(9) and 40 CFR 125.62.

Using effluent data from 2018 to 2023 and the same process and equations as those used for toxics, EPA conducted a reasonable potential analysis and determined fecal coliform has the reasonable potential to cause or contribute to an excursion above the Alaska WQS at the point of discharge. EPA expects ADEC to require limits in the final 401 certification that are more stringent than the WQBELs EPA developed using the ZID dilution factor. For more information on the effluent limits for fecal coliform, refer to Section IV.A.3 of the Fact Sheet.

The effluent limits developed for fecal coliform will be protective of Alaska WQS after initial mixing at the edge of the ZID and will satisfy the requirements of CWA section 301(h)(9) and 40 CFR 125.63(a).

Enterococcus Bacteria

Enterococci bacteria are indicator organisms of harmful pathogens recommended by EPA to protect primary contact recreation for marine waters. In October 2000, Congress amended the Clean Water Act with the Beaches Environmental Assessment and Coastal Health Act (BEACH Act, 33 U.S.C. 1313 et seq.). The amendment required EPA to develop new or revised CWA criteria for pathogens and pathogen indicators. States and territories with coastal recreation waters were then required to adopt enterococci bacteria criteria into their WQS. EPA approved Alaska's WQS for enterococcus in 2017. The WQS at 18 AAC 70.020(b)(14)(B)(i) for contact recreation specifies that the enterococci bacteria concentration shall not exceed 35 enterococci CFU/100mL, and not more than 10% of the samples may exceed a concentration of 130 enterococci CFU/100mL.

The 2001 permit does not contain an effluent limitation for enterococcus bacteria because there were no applicable enterococcus WQS in effect when the permit was issued in November 2001.

40 CFR 122.44(d)(1) requires EPA to account for existing controls on discharges when determining whether a discharge has the reasonable potential to cause or contribute to an excursion of state WQS. The WWTP does not currently disinfect its effluent, resulting in the high bacterial loads observed in the available fecal coliform data. The 2001 permit did not require enterococcus monitoring, but it reasons that the high fecal coliform loads observed are also indicative of high loads of other pathogens commonly found in WWTP effluents, including enterococcus. With the available fecal coliform data and lack of disinfection capacity at the facility, EPA has determined there is reasonable potential for the discharge to cause or contribute to an excursion above Alaska WQS for enterococcus.

The effluent limit developed for enterococcus will be protective of Alaska WQS after initial mixing at the edge of the ZID and will satisfy the requirements of CWA section 301(h)(9) and 40 CFR 125.63(a).

D. Impact of the Discharge on Public Water Supplies [40 CFR 125.62(b)]

40 CFR 125.62(b) requires that the applicant's proposed discharge must allow for the attainment or maintenance of water quality that assures protection of public water supplies and must not interfere with the use of planned or existing public water supplies. According to the 2006 permit application, there are no existing or planned public water supply intakes in the vicinity of the discharge. Therefore, EPA concludes that the applicant's proposed discharge will have no effect on the protection of public water supplies and will not interfere with the use of planned or existing public water supplies.

E. Biological Impact of Discharge [40 CFR 125.62(c)]

40 CFR 125.62(c) requires that in addition to complying with applicable WQS, the proposed discharge must allow for the attainment or maintenance of water quality that assures the protection and propagation of a balanced indigenous population (BIP) of shellfish, fish, and wildlife. A BIP of shellfish, fish, and wildlife must exist immediately beyond the ZID and in all other areas beyond the ZID where marine life is actually or potentially affected by the applicant's discharge. In addition, conditions within or beyond the ZID must not cause or contribute to extreme adverse biological impacts, including, but not limited to, the destruction of distinctive habitats of limited distribution, the presence of disease epicenter, or the simulation of

phytoplankton blooms which have adverse effects beyond the ZID, interfere with estuarine migratory pathways within the ZID, or result in the accumulation of toxic pollutants or pesticides at levels which exert adverse effects on the biota within the ZID.

In accordance with the guidance for small dischargers in the 301(h) TSD, EPA has considered the following characteristics of the Petersburg WWTP discharge as indicators that there is a low potential for impact on the biota in the vicinity of the discharge: the location of the discharge is greater than 10m, the steady-state accumulation of suspended solids is less than 25 g/m^2, there is a low potential for impact on local fisheries, and less than 0.1% of the flow is from industrial users. Toxic conditions are not expected because the effluent achieves rapid mixing within minutes of discharge, minimizing the potential exposure area. There is no evidence that the ZID is a disease epicenter, interfering with estuarine migratory pathways, or resulting in the accumulation of toxics at levels exerting adverse effects on biota within the ZID.

The 2001 permit required the facility to implement a biological monitoring program in order to monitor for discharge-related ecosystem impacts, evaluate whether the discharge changes the amount of organic material in seafloor sediment, determine whether the discharge changes the benthic community, and generate data that allows the EPA to evaluate BIP-related permit conditions. Under the program, the facility was required to sample for total volatile solids (TVS) and benthic fauna in August of the fourth year of the permit within the ZID, beyond the ZID boundary, and at a reference station. Because kelp beds are important habitat for fish and invertebrates, kelp bed monitoring was also required under the 2001 permit in August of the second and fourth year to ensure that the discharge does not adversely impact such habitat.

As directed, the facility conducted biological monitoring in August 2005 and kelp bed monitoring in August of 2003 and 2005. For biological monitoring, the following stations were established: 1) Station #1: a reference station 1.25 miles NW of the outfall near Kupreanof Island; 2) Station #2: within the ZID; and 3) Station #3: 20 meters beyond the ZID at an equivalent depth to the outfall.

The following observations were provided by the applicant in their submitted Biological Monitoring Report (City of Petersburg, 2005) for the three stations:

Station 1: Reference Station

Sediment was characterized by large gravel and pebbles with small cobbles. Algal turf was observed on the cobble surfaces, which per the report indicates low disturbance. *Crutose corraline* algae, encrusting bryozoans, and sponges were also observed on cobbles and gravel. Benthic macroinvertebrate abundance and diversity appeared to be high. TVS analysis of finer sediments indicated that the organic content of the surface sediments was 1.4% by weight. See Table 9 for TVS data.

Station 2: Within the ZID

Sediments were observed to be similar to those at the reference station, as was habitat composition and species diversity and abundance. Several fish species were also observed. Significant organic accumulation was not observed within the ZID. TVS concentrations in the ZID are approximately twice those at the reference site (average of 3% by weight).

Station 3: Beyond the ZID Boundary

Sediments were observed to be similar to those at the reference station, as was habitat composition and species diversity and abundance. Several fish species were also observed. Significant organic accumulation was not observed beyond the ZID boundary, with TVS average concentrations of 1.8% by weight, slightly higher than the reference station.

Table 9. Total Volatile Solids and Total Solids Results

Sample Location	Date and Time	Method	Total Volatile Solids (TVS), % Dry Basis	Method	Total Solids (%)
Station 1 Replicate 1	8/25/2005	EPA 160.4	1.4	EPA160.3	82.5
Station 1 Replicate 2	8/25/2005	EPA 160.4	1.4	EPA160.3	82.7
Station 1 Replicate 3	8/25/2005	EPA 160.4	1.4	EPA160.3	80.9
Station 2 Replicate 1	8/25/2005	EPA 160.4	1.8	EPA160.3	80.1
Station 2 Replicate 2	8/25/2005	EPA 160.4	3.5	EPA160.3	65.4
Station 2 Replicate 3	8/25/2005	EPA 160.4	3.8	EPA160.3	64.9
Station 3 Replicate 1	8/25/2005	EPA 160.4	1.1	EPA160.3	88.2
Station 3 Replicate 2	8/25/2005	EPA 160.4	1.6	EPA160.3	84.5
Station 3 Replicate 3	8/25/2005	EPA 160.4	2.6	EPA160.3	74.7

As seen in Table 9, TVS concentrations within the ZID are greater than those at Sites 1 and 2, indicating organic loading that may be attributable to the discharge. However, at all three sites, the ratio of TVS to Total Solids is low, indicating low organics contributions from the facility (or other sources) that may adversely affect the benthic community. The Biological Monitoring Report concludes that no visible layer of fine silt/floc was observed at any of the stations, that strong tidal forces limit organic accumulation in the area, all three sites were characterized by abundant and diverse macro invertebrate assemblages (see Table 10), and that the discharge does not appear to result in significant changes to the benthic community in the vicinity of the outfall.

In the applicant's 2006 Questionnaire, they refer to their 1990 Questionnaire concerning biological conditions in the vicinity of the discharge. The facility reported that numerous Bull Kelp beds are found in the vicinity of the outfall, nearshore, and extending to the 60-foot depth contour. Aerial photographs of the surface of the water to capture kelp beds were provided in the Kelp Bed Monitoring Report (City of Petersburg 2005a) included with the application. The aerial photographs captured general kelp bed status along the entire coastline. To provide more specific information about the impact of the discharge on kelp beds within the ZID, the new permit is requiring an underwater kelp survey and underwater photographs in place of the aerial photographs.

The applicant also noted in their 2006 Questionnaire that due to strong currents in the area, distinctive habitats of limited distribution are not likely to be adversely impacted by the modified discharge.

For these reasons, it is reasonable to conclude that the facility's discharge is not causing significant changes in the benthic community structure. The Biological Monitoring Program from the 2001 permit is being retained in the draft permit, with the substitution of an underwater kelp survey and photographs in place of the aerial photographs.

Table 10. Species Observed during 2005 Biological Monitoring

Table 3, Species Observe, City of Petersburg Biological Monitoring - August 2005

Taxon	Group	Scientic Name	Common Name	Station 1 (reference)		Station 2 (Within ZID)		Station 3 (Outside ZID)	
				Observed	Abundance	Observed	Abundance	Observed	Abundance
Rhodophyta	Red Aglae	numerous species	Algal Turf	Y	C	Y	R	Y	R
		Lithothamnium sp.	Coralline Algae (Crustose)	Y	C	Y	C	Y	C
		Palmaria sp.	Red Algae (frilly)	Y	R	Y	A	Y	R
		Constantinea sp.	Cup and Saucer Algae	Y	C	N		N	
Porifera	Demospongiae	*Halichondria panicea*	Orange Encrusting Sponge	Y	R	Y	C	Y	C
Cnidaria	Anthozoa	*Ptilosarcus gurneyi*	Sea Pen	N		Y	C	Y	R
		Pachycerianthus fimbriatus	Tube Dwelling Anemone	N		N		Y	R
Annelida	Polychaeta	*Schizobranchia insignis*	Feather Duster Worm	Y	R	N		N	
		Spirorbis sp.	Tube Worm	Y	R	Y	C	Y	C
Mollusca	Gastropoda	*Neptunea lyrata*	Lyre Whelk	N		N		Y	R
		Amphissa columbiana	Wrinkled Amphissa	N		Y	R	N	
	Polyplacophora	*Tonicella lineata*	Lined Chiton	N		N		Y	R
		Hiatella arctica	Clam	Y	C	Y	C	Y	C
		Macoma sp.	Clam	Y	R	Y	R	Y	R
Arthropoda	Decapoda	*Eualus sp.*	Shrimp (clear w/white stripes/black rostrum)	Y	R	Y	A	Y	C
		Elassochirus sp.	Hermit Crab	Y	R	N		N	
		Pagurus sp.	Hermit Crab	Y	R	N		N	
		Hyas lyratus	Lyre Crab	Y	R	Y	A	N	
Brachiopoda	Brachiopod	*Terebratulina unguicula*	Lamp Shell	Y	R	N		Y	C
Bryozoa	Ectoprocts	*Eucratea loricata*	Bryozoan (branched)	N		Y	R	Y	C
		Membranipora sp.	Bryozoan (encrusting)	Y	C	Y	C	Y	C
Echinodermata	Echinoidea	*Strongylocentrotus droebachiensis*	Green Sea Urchin	Y	C	Y	R	N	
	Astroidea	*Henricia leviuscula*	Blood Star	Y	C	N		Y	R
		Evasterias troschelii	False Ochre Star	Y	C	Y	R	Y	R
		Pycnopodia helianthoides	Sunflower Star	Y	R	Y	R	Y	C
	Ophiuroidea	*Ophiura sp.*	Brittle Star	Y	C	Y	C	Y	C
Osteichthyes	Pleuronectidae	*Pleuronectes bilineatus*	Rock Sole	N		Y	R	Y	C
	Cottidae	unidentified	Sculpin Orange w/ Black Fins	N		Y	C	Y	R

Y = Species observed at this station N = Species not observed at this station R = Species relative abundance low (rare) C = Species common A = Species relative abundance high (abundant)

Additionally, there have been no known cases of mass mortalities of fish or invertebrates, no increased incidence of disease in marine organisms, and no other known cases of adverse biological impacts. The small volume of the discharge, the small area of the ZID relative to the width of Frederick Sound, and the results of the biological monitoring indicate that the discharge will have not cause or contribute to significant biological impacts.

Considering the above evidence, EPA has concluded that the discharge allows for the attainment or maintenance of water quality that assures the protection and propagation of a BIP of shellfish, fish, and wildlife, and will not cause or contribute to adverse biological impacts.

F. Impact of Discharge on Recreational Activities [40 CFR 125.62(d)]

Under 40 CFR 125.62(d), the applicant's discharge must allow for the attainment or maintenance of water quality that allows for recreational activities beyond the ZID, including, without limitation, swimming, diving, boating, fishing, picnicking, and sports activities along shorelines and beaches. There must be no federal, state, or local restrictions on recreational activities within the vicinity of the applicant's outfall unless such restrictions are routinely imposed around sewage outfalls. The 2006 permit application stated that no impacts on recreational activities were expected due to the proposed discharge. Due to cold water temperatures, swimming is not expected to be common in Frederick Sound.

The Technical Review Report prepared for the 2001 permit stated that there is a large recreational fishery in the Petersburg area beyond the ZID. The report describes many species that are fished for in the area, including chinook salmon (*Oncorhynchus tshawytscha*), pink salmon (*Oncorhynchu gorbuscha*), coho salmon (*Oncorhynchu kisutch*), Dolly Varden (*Salvelinus malma*), cutthroat trout (*Salmo clarki*), halibut (*Hippoglossus stenolepis*), herring (*Clupea pallasii*), pink shrimp (*Pandalus borealis*), sidestripe shrimp (*Pandalopsis dispar*), spot shrimp (Pandalus platyceros), red king crab (*Paraliithodes camtschatica*), brown king crab (*Lithodes aequispina*), tanner crab (*Chionoecetes bairdi*), and Dungeness crab (*Cancer magister*). No adverse effects to fishing have been reported. Clams are harvested primarily in the winter due to the possibility of paralytic shellfish poisoning (PSP) during the summer. Restrictions on shellfish harvesting due to PSP were also noted in the 1985 Technical Review Report and are not thought to be due to the discharge.

The 2001 permit required signs to be placed on the shoreline near the 1600-meter fecal coliform mixing zone and the outfall line that state primary treated domestic wastewater is being discharged, mixing zones exist, and certain activities such as the harvesting of shellfish for raw consumption and bathing should not take place within the mixing zone. EPA has retained the requirement to place these signs on the shoreline and outfall line in the draft permit until the final fecal coliform and enterococcus limits are maintained.

The applicant has demonstrated that the proposed discharge meets the requirements to allow for the attainment or maintenance of water quality which allows for recreational activities beyond the ZID.

G. Establishment of Monitoring Programs [CWA 301(h)(3), 40 CFR 125.63]

Under 40 CFR 125.63, which implements Section 301(h)(3) of the Act, the applicant must have a monitoring program designed to provide data to evaluate the impact of the proposed discharge on the marine biota, demonstrate compliance with applicable WQS, and measure toxic substances in the discharge. The applicant must demonstrate the capability to implement these programs upon issuance of a 301(h)-modified NPDES permit. In accordance with 40 CFR 125.63(a)(2), the applicant's monitoring programs are subject to revision as may be required by EPA.

1. Influent/Effluent Monitoring Program [40 CFR 125.63(d)]

40 CFR 125.63(d) requires an effluent monitoring program and the applicant proposes continuation of the current monitoring program. In addition to the 301(h) specific monitoring requirements, Section 308 of the CWA and 40 CFR 122.44(i) require monitoring in permits to determine compliance with effluent limitations. Monitoring may also be required to gather effluent and surface water data to determine if additional effluent limitations are required and/or to monitor effluent impacts on receiving water quality. Throughout the previous permit term (and the administratively continued period), the applicant submitted effluent monitoring data as required by the 2001 permit.

Summary statistics of the effluent data submitted by the permittee between 2018 and 2023 is presented in Appendix C.

The draft permit retains largely the same effluent and influent monitoring requirements and includes the new requirement to monitor the effluent for enterococcus, per-and polyfluoroalkyl substances (PFAS), arsenic, chlorine, copper, cyanide, and zinc; increases monitoring frequency for BOD_5, fecal coliform, and WET; and removes the requirement to monitor settleable solids. Consistent with 40 CFR 125.66, the draft permit also includes a requirement for the permittee to perform an analysis of their effluent for all toxics and pesticides, identified in 40 CFR 401.15, twice every five years, once during the wet season and once during the dry season.

2. Receiving Water Quality Monitoring Program [40 CFR 125.63(c)]

40 CFR 125.63(c) requires that the receiving water quality monitoring program must provide data adequate to evaluate compliance with applicable WQS. The applicant proposes continuation of the current receiving water monitoring program. As is the case of effluent monitoring, NPDES permits include receiving water monitoring requirements to allow for compliance assessment, and to determine if additional effluent limitations and/or monitoring requirements are necessary in future permitting actions.

EPA is retaining most of the receiving water monitoring program from the 2001 permit in the draft permit. Changes to the receiving water monitoring program include the addition of enterococcus to the suite of parameters analyzed and the movement of the ZID boundary sites from the edge of the 2001 mixing zone at 1600 meters to the edge of the ZID in the draft permit. Sampling at the edge of the 1600-meter mixing zone is no longer required because the 1600-meter mixing zone is not being reauthorized by ADEC and the point of compliance for all parameters is now the edge of the ZID, which is 60 feet from the outfall.

3. Biological Monitoring Program [40 CFR 125.63(b)]

40 CFR 125.63(b) requires a permittee to implement a biological monitoring program that provides data adequate to evaluate the impact of the applicant's discharge on the marine biota. Such a program should, at a minimum, allow for evaluation of any ecosystems impacts; any changes in the amount of organic material in the seafloor sediment; any changes to benthic communities; and the effectiveness/bases for permit conditions.

The Biological Monitoring Program in the 2001 permit consisted of a benthic survey, sediment analysis for total volatile solids (TVS), and kelp bed monitoring within the ZID, at a reference location, and within 20 m beyond the ZID at an equivalent depth as the outfall. Based on the results of the TVS analysis of sediment, it does not appear that excess organic sediment is accumulating around the outfall as compared to stations at the ZID boundary and reference sites. Based on visual observations of the benthic infauna collected in sediment samples, it does not appear that the Petersburg outfall discharge is causing significant changes in the benthic community structure. Based on the results of the kelp bed monitoring, it does not appear the discharge is causing significant changes in the kelp beds. The Biological Monitoring Program from the 2001 permit is being retained in the draft permit.

H. Effect of Discharge on Other Point and Nonpoint Sources [CWA 301(h)(4), 40 CFR 125.64]

Under 40 CFR 125.64, which implements Section 301(h)(4) of the Act, the applicant's proposed discharge must not result in the imposition of additional treatment requirements on any other point or nonpoint source. The applicant reports that the proposed discharge would not place any additional treatment requirements on point or nonpoint sources. Pursuant to 40 CFR 125.64(b), the applicant is required to submit a determination signed by the State of Alaska indicating whether the applicant's discharge will result in an additional treatment pollution control, or other requirement on any other point or nonpoint sources. The State determination must include a discussion of the basis for its conclusion. EPA cannot take final action on the 301(h)-modified permit until it receives this determination. EPA expects that this determination will be included with ADEC's 401 certification.

I. Urban Area Pretreatment Program [CWA 301(h)(6), 40 CFR 125.65]

Under 40 CFR 125.65, dischargers serving a population greater than 50,000 are required to have a pretreatment program. As previously discussed, the Petersburg WWTP serves a population of approximately 3,000 people, so this provision is not applicable to this analysis.

J. Industrial and Nonindustrial Sources and Toxics Control [CWA 301(h)(7), 40 CFR 125.66]

1. Chemical Analysis and Toxic Pollutant Source Identification [40 CFR 125.66(a) and (b)]

Under 40 125.66(a) and (b), applicants are required to perform chemical testing for toxic pollutants and pesticides and identify the source of any parameters detected.

The 2001 permit required two toxic pollutant scans to be submitted with the permit reapplication. As previously discussed, the permittee conducted two toxic pollutant scans, and EPA used the results in the development of the draft permit.

2. Industrial Pretreatment Program [40 CFR 125.66(c)]

40 CFR 125.66(c) requires that applicants that have known or suspected industrial sources of toxic pollutants shall have an approved pretreatment program in accordance with the requirements of 40 CFR Part 403 (Pretreatment Regulations).

The facility has one industrial user, the Petersburg Baler Facility. The Petersburg WWTP receives the discharge from the baler via a main that connects to the sewer collection system. The baler meets the definition of an industrial source under 40 CFR 125.58(j). Therefore, the permit requires the Borough of Petersburg to develop a pretreatment program in accordance with 40 CFR 403. Further details of the pretreatment program are discussed in the Fact Sheet and draft permit. After the Borough of Petersburg develops, and EPA approves, the pretreatment program, EPA will modify the permit to incorporate the pretreatment program.

3. Nonindustrial Source Control Program [40 CFR 125.66(d)]

40 CFR 125.66(d), which implements Section 301(h)(6) of the Act, requires the applicant to submit a proposed public education program designed to minimize the entrance of non-industrial toxic pollutants and pesticides into its POTW. The applicant must also develop and implement additional nonindustrial source control programs on the earliest possible schedule. The requirement to develop and implement additional nonindustrial source control programs does not apply to a small Section 301(h) applicant that certifies there are no known or suspected water quality, sediment accumulation, or biological problems related to toxic pollutants or pesticides in its discharge.

The applicant provided this certification to EPA on April 8, 2022, as well as documentation that a public education program meeting the requirements of 40 CFR 125.66(d)(1) has been developed and implemented. In June 2002, the applicant published a letter in the Petersburg weekly newspaper (the Petersburg Pilot) intended to educate wastewater customers about the Borough of Petersburg WWTP, toxic and hazardous substances found in households, and how to control nonindustrial toxic pollutants and pesticides in the Borough's collection system. Therefore, EPA concludes that Petersburg has satisfied the requirements for nonindustrial source control.

K. Effluent Volume and Amount of Pollutants Discharged [40 CFR 125.67]

Under 40 CFR 125.67, which implements Section 301(h)(7) of the Act, the applicant's proposed discharge may not result in any new or substantially increased discharges of the pollutant to which the modification applies above the discharge specified in the 301(h)-modified permit. The applicant has applied on the basis of the current discharge and does not propose any new or substantially increased discharges of TSS, BOD_5, and pH the parameters for which the facility has requested a waiver.

L. Compliance with other Applicable Laws [40 CFR 125.59]

Under 40 CFR 125.59(b)(3), a 301(h)-modified permit may not be issued if such issuance would conflict with applicable provisions of state, local, or other federal laws or executive orders. As part of the application renewal, the applicant must demonstrate compliance with all applicable Alaska and federal laws and regulations, and executive orders, including the Coastal Zone Management Act, Marine Protection Research and Sanctuaries Act, the Endangered Species Act, and the Magnuson-Stevens Fishery Conservation and Management Act.

1. Coastal Zone Management Act

Alaska withdrew from the voluntary National Coastal Zone Management Program on July 1, 2011 (NOAA 2019c). Without State participation in the Coastal Zone Management Program Act, there is no consistency analysis to perform, and EPA has fulfilled the requirements.

2. Marine Protection, Research, and Sanctuaries Act

Under 40 CFR 125.59(b)(3), no section 301(h) modified permit shall be issued if such issuance would conflict with Title III of the Marine Protection, Research, and Sanctuaries Act (MPRSA), 16 USC 1431 *et seq.*, which authorizes the Secretary of Commerce (i.e., NOAA) to designate and protect areas of the marine environment with special national significance due to their conservation, recreational, ecological, historical, scientific, cultural, archeological, educational or esthetic qualities as national marine sanctuaries. In the U.S., there are 14 national marine sanctuaries and two marine national monuments, none of which are in Alaska (NOAA 2019d).

The draft permit is therefore expected to comply with Title III of the MPRSA.

3. Endangered Species Act

Under 40 CFR 125.59(b)(3), no section 301(h) modified permit shall be issued if such issuance would conflict with the Endangered Species Act (ESA), 16 USC 1531 *et seq.* The ESA requires federal agencies to consult with the National Marine Fisheries Service (NMFS) and/or the U.S. Fish and Wildlife Service (USFWS) (collectively, "the Services") if any activity proposed to be permitted, funded, or undertaken could beneficially or adversely affect any threatened or endangered species (ESA-listed species) or such species designated critical habitat.

EPA has prepared a biological evaluation that identified the following species and/or critical habitat in the vicinity of the discharge using the following web-based applications. All lists will be verified with the Services.

- NOAA's Alaska Protected Resource Division Species Distribution Mapper: (https://alaskafisheries.noaa.gov/portal/apps/webappviewer/index.html?id=0c4a81f75310491d9010c17b6c081c81)
    - Western Distinct Population Segment (Western DPS or WDPS) Steller sea lions
    - Mexico DPS humpback whales
- USFWS' Information for Planning and Consultation (IPaC): https://ecos.fws.gov/ipac/
    - None

EPA has determined the draft permit is not likely to adversely affect these ESA-listed species and/or their critical habitats and, pursuant to Section 7 of the ESA, will consult with the NMFS prior to taking final action.

4. Magnuson-Stevens Fishery Conservation and Management Act

Under 40 CFR 125.59(b)(3), no section 301(h) modified permit shall be issued if such issuance would conflict with the Magnuson-Stevens Fishery Conservation and Management Act (MSFCMA), 16 USC 1801 *et seq*., which protects against adverse impacts to Essential Fish Habitat (EFH). The MSFCMA requires federal agencies to consult with NMFS when any activity proposed to be permitted, funded, or undertaken by a federal agency may have an adverse effect on designated EFH as defined by the MSFCMA. The EFH regulations define an *adverse effect* as any impact that reduces quality and/or quantity of EFH and may include direct (e.g. contamination or physical disruption), indirect (e.g. loss of prey, reduction in species' fecundity), site-specific, or habitat-wide impacts, including individual, cumulative, or synergistic consequences of actions.

EPA has prepared a EFH assessment to assess the impacts of the discharge on EFH. Based upon the analysis and conclusions of the EFH assessment, the reissuance of the 301(h)-modified NPDES permit to Petersburg will not adversely affect EFH.

M. State Determination and Concurrence [40 CFR 125.61(b)(2); 40 CFR 125.64(d)]

Under 40 CFR 125.61(b)(2), the applicant must provide a determination signed by the state or interstate agency(s) authorized to provide certification under 40 CFR 124.53 and 124.54 that the proposed discharge will comply with applicable provisions of state law, including WQS. This determination must include a discussion of the basis for the conclusion reached. Furthermore, pursuant to 40 CFR 124.53 and 124.54, the state must either grant a certification pursuant to Section 401(a)(1) of the CWA or waive this certification before EPA may issue a 301(h)-modified permit. The applicant did not provide this certification at the time of application or the determination required by 40 CFR 125.61(b)(2). EPA will request 401-certification from ADEC during the public notice period of the draft permit, and request the certification include the determination required under 125.61(b)(2).

40 CFR 125.64(d) requires applicants to provide a determination from the state or interstate agency(s) having authority to establish wasteload allocations indicating whether the applicant's discharge will result in an additional treatment pollution control, or other requirement on any other point or nonpoint sources. The state determination shall include a discussion of the basis for its conclusion. The applicant did not submit this determination with their application. EPA will request that this determination be included in ADEC's 401-certification of the permit.

9) References

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Alaska Coastal Management Program Withdrawal from the National Coastal Management Program Under the Coastal Zone Management Act (CZMA). 76 FR 39857. 39857-39858. Published July 7, 2011. https://www.federalregister.gov/documents/2011/07/07/2011-16987/alaska-coastal-management-program-withdrawal-from-the-national-coastal-management-program-under-the

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NOAA. 2019a. High and Low Water Predictions West Coast of North and South America Including the Hawaiian Islands. Retrieved at https://tidesandcurrents.noaa.gov/tide_predictions.html

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NOAA. 2019d. *National Marine Sanctuaries*. Web. https://sanctuaries.noaa.gov/.

10) Appendices

A. Facility and Outfall Locations

Figure 5. Facility Location Satellite

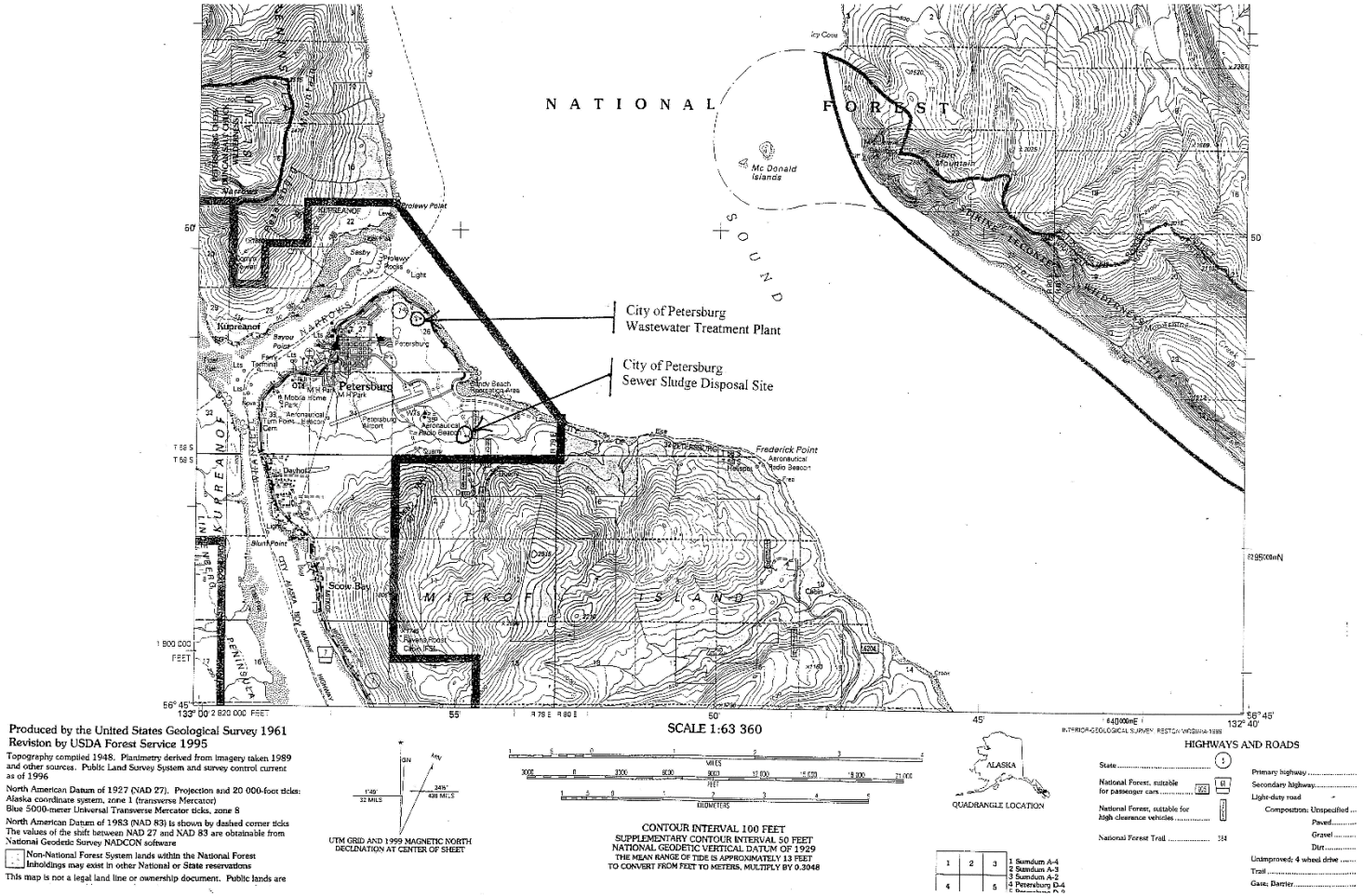


Figure 6. Facility Location Small Scale

B. Facility Figures and Process Flow Diagram

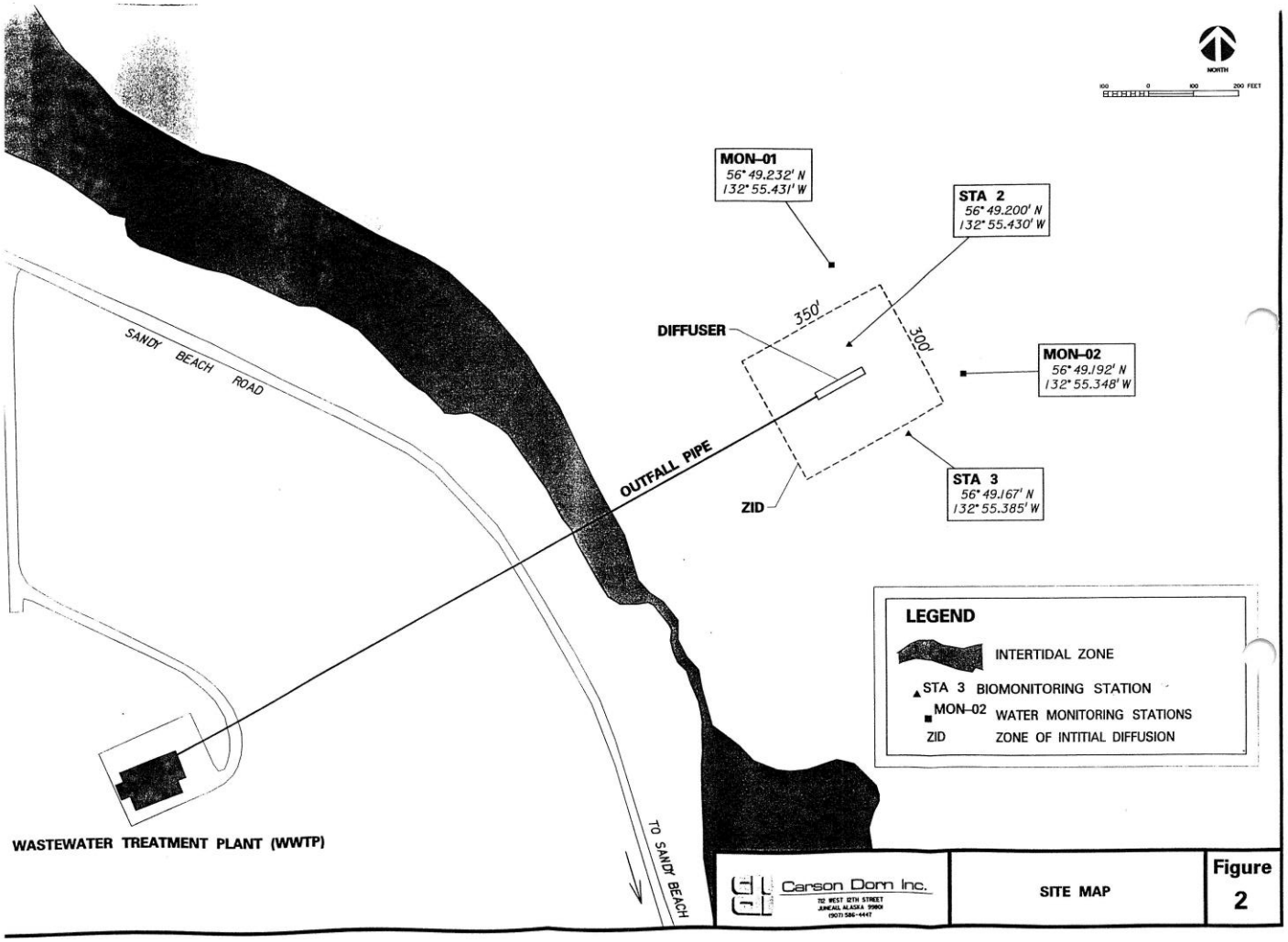


Figure 7. Petersburg WWTP Map

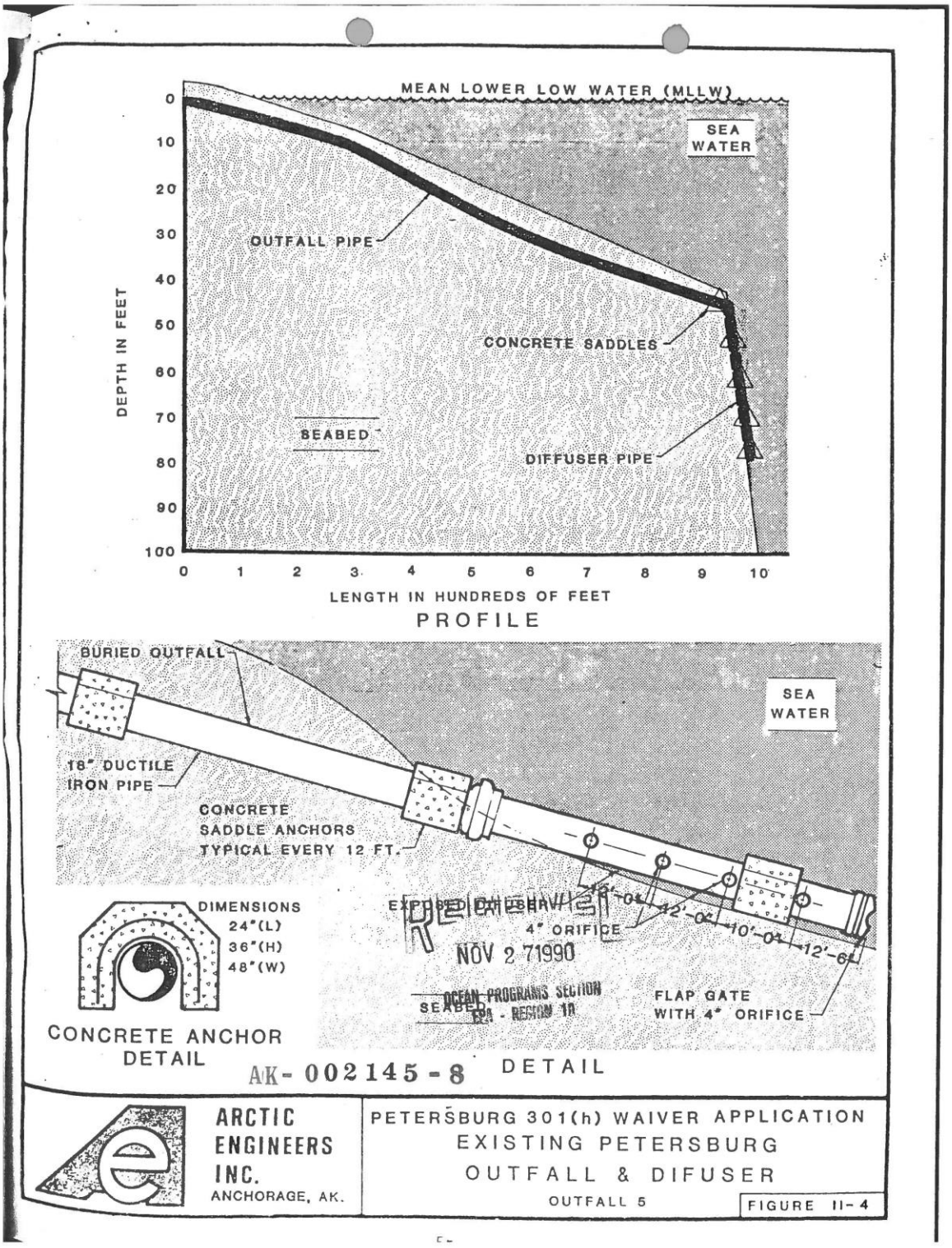


Figure 8. Petersburg Borough Sewer Outfall Plan View and Cross Section

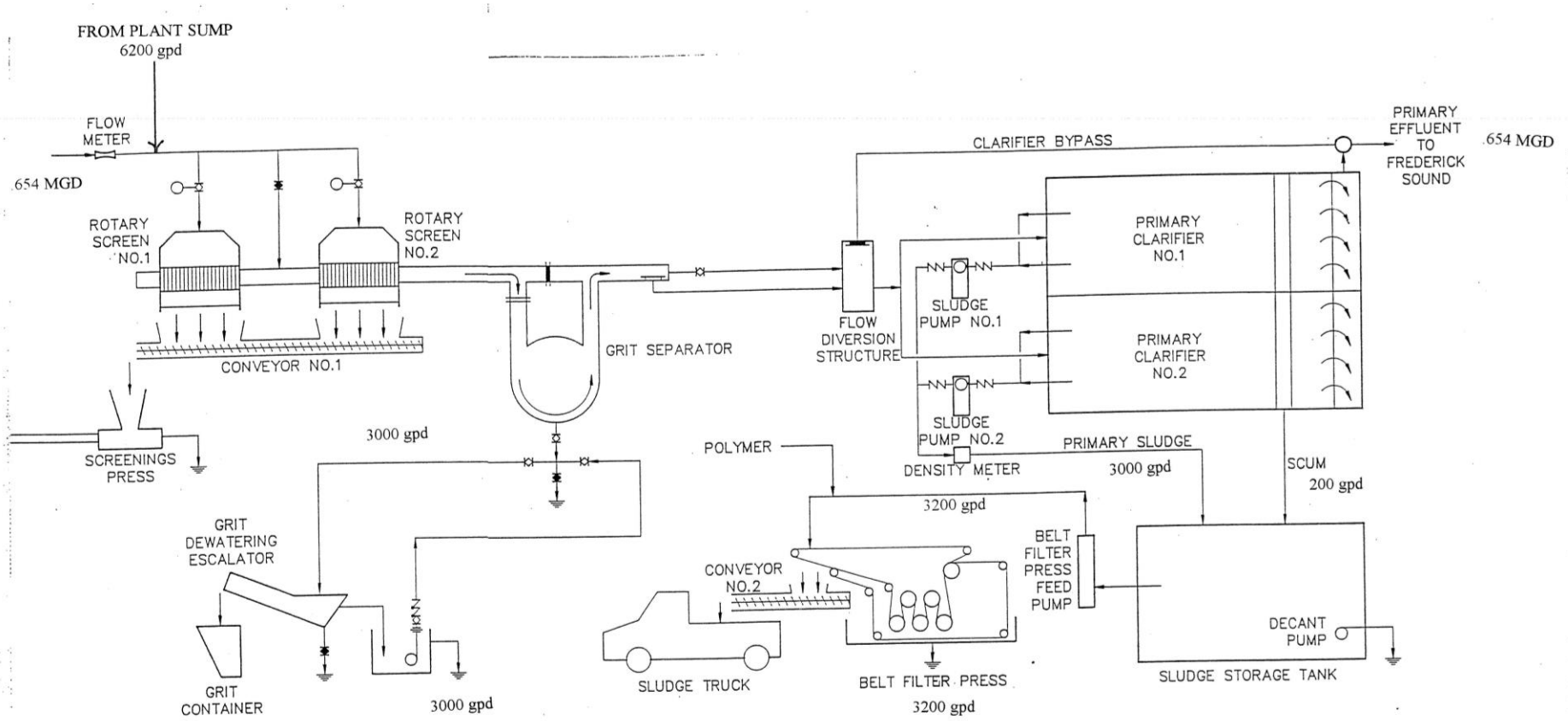
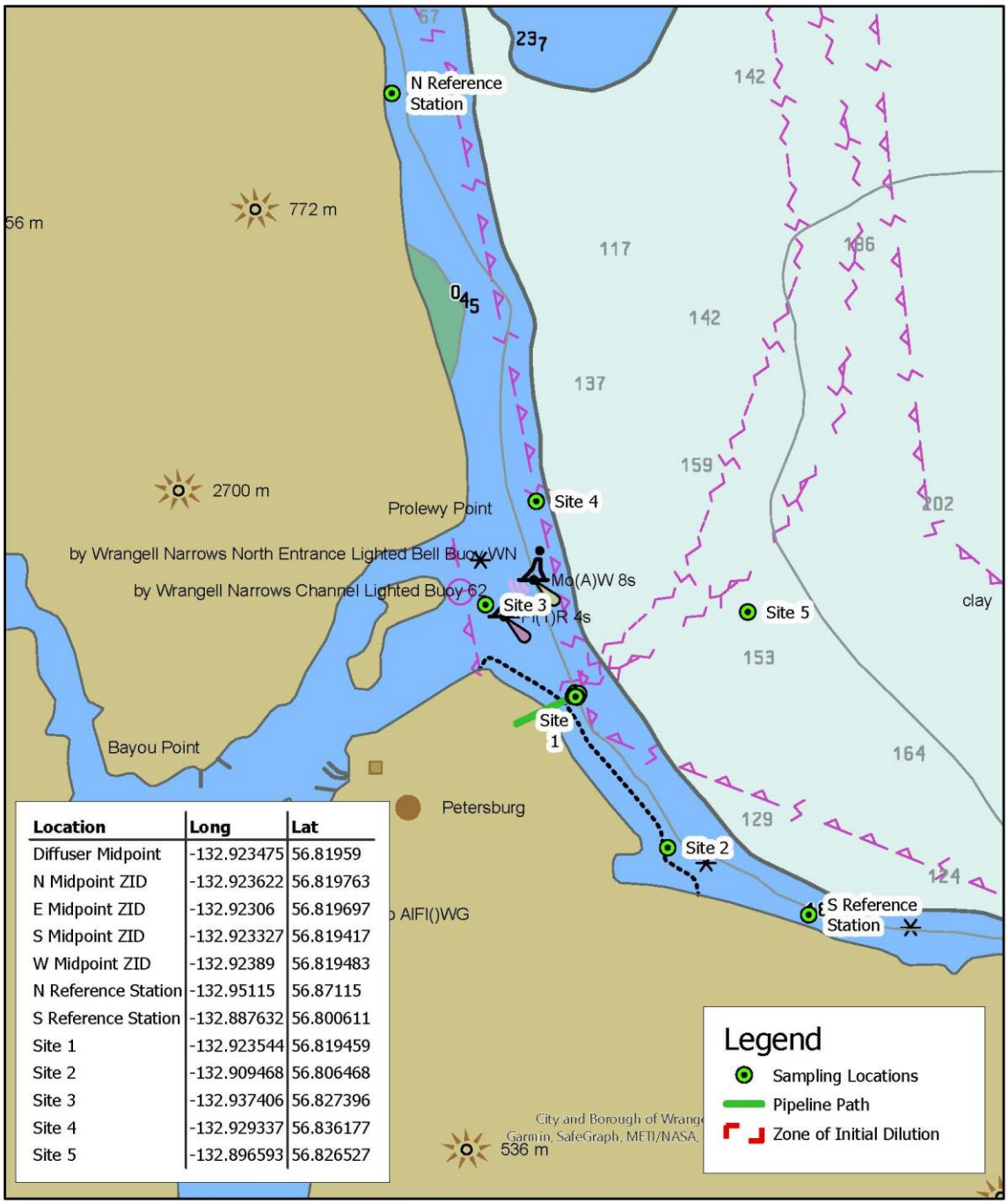


Figure 9. Process Schematic



Location	Long	Lat
Diffuser Midpoint	-132.923475	56.81959
N Midpoint ZID	-132.923622	56.819763
E Midpoint ZID	-132.92306	56.819697
S Midpoint ZID	-132.923327	56.819417
W Midpoint ZID	-132.92389	56.819483
N Reference Station	-132.95115	56.87115
S Reference Station	-132.887632	56.800611
Site 1	-132.923544	56.819459
Site 2	-132.909468	56.806468
Site 3	-132.937406	56.827396
Site 4	-132.929337	56.836177
Site 5	-132.896593	56.826527

Figure 2. Receiving Water Sampling Locations. City of Petersburg Wastewater Treatment Plant. NPDES Permit No. AK0021458.

Figure 10. Receiving Water Sampling Locations Small Scale

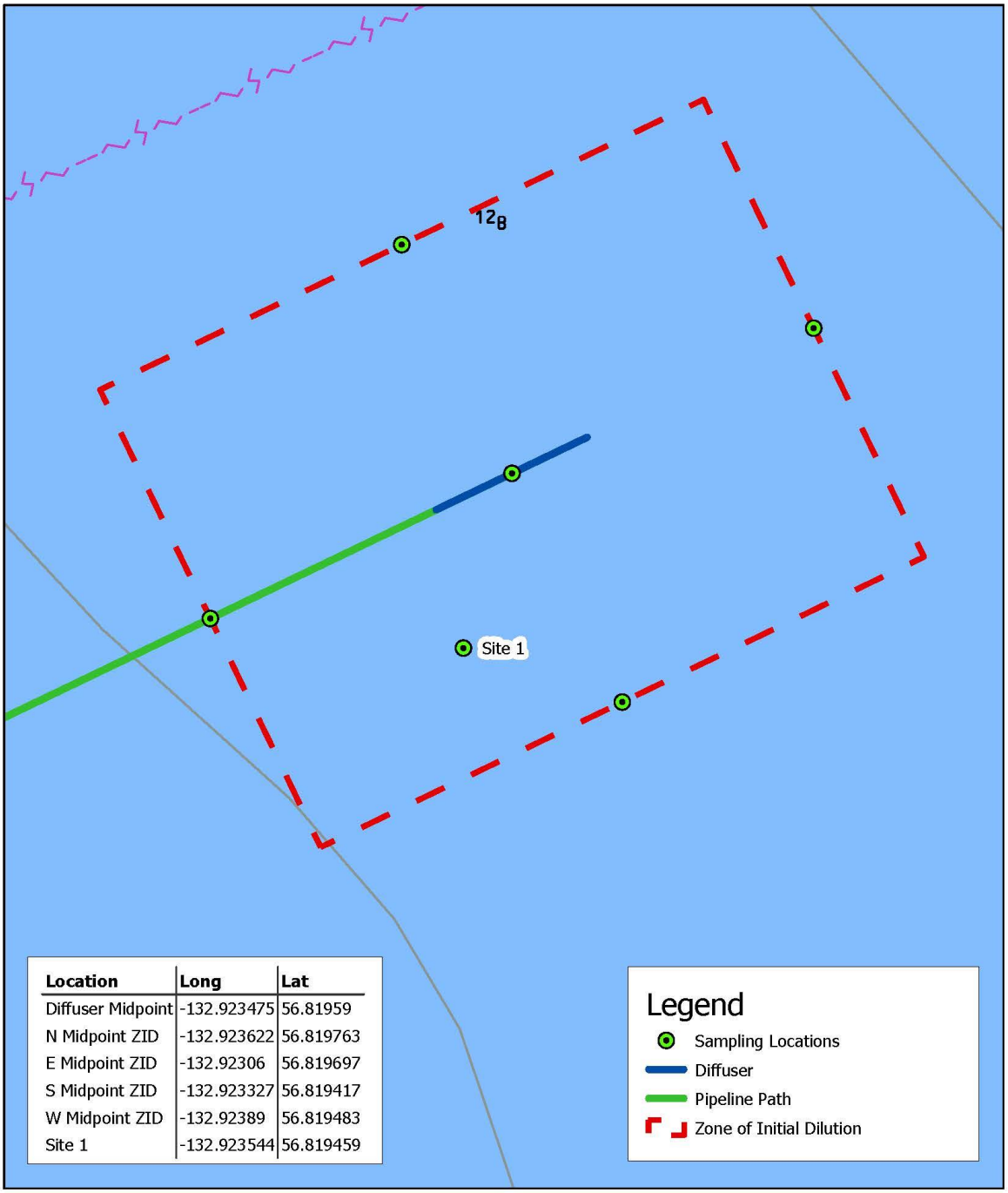


Figure 1. Receiving Water Sampling Locations. City of Petersburg Wastewater Treatment Plant. NPDES Permit No. AK0021458.

Figure 11. Receiving Water Sampling Locations Large Scale

C. Discharge Monitoring Data (2018-2023)

Table 11. Discharge Monitoring Data (2018-2023)

Parameter	Effluent Flow		BOD, 5-day, 20 deg. C, Influent		BOD, 5-day, 20 deg. C, Effluent					Total Suspended Solids, Influent		Total Suspended Solids, Effluent				
Row Labels	DAILY MX (MGD)	MO AVG (MGD)	MO AVG (mg/L)	MO AVG (lbs/day)	DAILY MX (mg/L)	MO AVG (mg/L)	DAILY MX (lbs/day)	MO AVG (lbs/day)	% Removal	MO AVG (mg/L)	MO AVG (lbs/day)	DAILY MX (mg/L)	MO AVG (mg/L)	DAILY MX (lbs/day)	MO AVG (lbs/day)	% Removal
06/30/2018	0.504	0.328	198.0	495.2	117.3	91.7	255.3	228.9	54.7	157.3	430.5	53.0	43.4	130.0	116.7	72.9
07/31/2018	0.639	0.329	212.0	513.6	112.0	105.5	267.1	254.9		245.4	595.0	77.7	61.2	185.3	147.5	75.2
08/31/2018	0.705	0.359	187.0	627.3	132.7	111.4	529.2	404.0		161.0	527.3	54.7	53.0	321.6	214.7	59.3
09/30/2018	0.824	0.379	183.0	633.2	114.7	96.4	363.0	316.2	45.2	317.7	1266.0	65.0	58.7	302.5	214.1	83.1
10/31/2018	1.136	0.476	175.5	925.6	92.0	84.3	602.3	413.5		161.7	704.9	55.0	48.2	276.2	205.3	70.9
11/30/2018	0.865	0.506	148.5	695.1	83.0	74.5	346.8	334.0		179.0	856.5	52.0	46.5	273.2	215.9	74.8
12/31/2018	1.091	0.452	139.5	406.9	70.5	68.8	244.2	204.4	52.3	94.4	335.8	37.3	34.7	233.0	160.0	52.3
01/31/2019	1.294	0.484	121.5	375.5	76.5	76.0	237.4	234.8		104.7	326.0	55.7	45.4	175.1	140.7	56.8
02/28/2019	0.355	0.279	178.0	378.8	110.5	100.3	244.2	214.8		156.7	333.5	58.0	51.2	128.2	109.7	67.1
03/31/2019	1.074	0.400	140.5	452.0	122.5	90.5	344.9	297.1	38.3	134.3	488.2	56.7	47.2	222.3	168.8	65.4
04/30/2019	0.810	0.431	122.0	524.9	57.3	54.7	325.0	239.9		155.0	607.4	40.0	37.4	226.8	150.6	75.2
05/31/2019	0.516	0.323	155.7	394.1	91.6	85.3	219.3	215.0		133.0	344.4	42.0	37.5	122.6	100.8	70.7
06/30/2019	1.075	0.396	219.4	696.0	90.1	79.7	260.1	243.5	54.9	249.3	794.1	45.3	38.2	116.3	115.2	85.5
07/31/2019	0.417	0.299	198.9	464.1	125.7	116.9	284.6	272.3		209.4	446.0	57.0	55.2	117.9	117.2	73.7
08/31/2019	1.114	0.434	252.0	628.9	129.9	125.3	326.2	310.4		250.4	629.2	67.0	59.4	152.0	145.8	76.8
09/30/2019	1.611	0.537	195.8	602.2	78.1	75.5	241.0	231.9	51.2	177.0	544.3	44.0	36.5	135.8	109.2	79.9
10/31/2019	1.270	0.501	155.5	468.0	67.3	66.0	203.2	198.4		166.0	499.5	47.7	37.7	142.8	113.2	77.3
11/30/2019	1.111	0.615	149.0	977.5	62.7	49.4	359.2	346.4		173.7	1145.0	36.7	31.0	234.4	222.3	80.6
12/31/2019	0.861	0.490	125.9	464.8	61.4	58.2	231.5	215.0	58.6	129.4	477.5	29.0	25.5	109.3	94.4	80.2
01/31/2020	1.005	0.476	157.5	446.2	76.0	66.0	187.3	180.5		173.0	500.9	33.3	32.0	111.4	90.8	81.9
02/29/2020	1.009	0.542	125.0	545.9	52.0	50.5	219.8	219.2		127.4	557.2	27.7	25.7	116.4	111.5	80.0
03/31/2020	0.802	0.430	130.1	536.2	62.4	56.3	288.3	226.7	59.0	130.0	537.9	33.3	29.5	153.9	119.3	77.8
04/30/2020	0.844	0.422	168.5	414.7	110.0	87.0	257.8	211.1		177.4	438.4	49.7	39.2	116.5	95.1	78.3
05/31/2020	0.561	0.329	165.2	423.3	114.9	109.1	311.9	285.3		151.9	386.1	50.0	45.7	124.7	118.6	69.3
06/30/2020	0.784	0.450	126.9	556.3	78.7	74.7	396.4	327.6	40.9	123.5	530.4	35.3	35.0	174.8	152.0	71.3
07/31/2020	0.951	0.432	135.2	783.2	77.9	69.8	488.6	392.1		231.0	1248.8	85.0	73.4	674.2	407.1	68.3
08/31/2020	0.924	0.557	123.8	578.3	85.3	73.1	368.6	335.1		141.7	664.3	48.7	45.7	295.3	223.1	66.4
09/30/2020	1.090	0.395	155.1	459.2	117.5	91.2	288.1	264.2	44.8	167.7	521.7	47.0	45.0	159.2	137.2	73.7
10/31/2020	1.061	0.437	96.6	350.9	53.7	50.8	224.4	188.3		87.0	314.5	24.7	21.9	79.4	79.0	74.9
11/30/2020	1.923	0.528	95.5	397.5	66.3	58.3	255.8	239.6		183.4	155.7	38.0	37.0	183.4	155.7	64.1
12/31/2020	1.817	0.582	111.6	491.3	89.5	74.3	370.0	327.6	39.8	99.5	449.2	44.0	39.2	215.1	177.6	60.5
01/31/2021	1.049	0.473								122.2	623.0	42.7	41.5	264.2	216.0	65.3
02/28/2021	0.758	0.352	191.0	427.3	118.2	106.7	241.5	238.1		166.7	369.3	58.0	49.5	118.5	109.9	70.3
03/31/2021	0.770	0.488	124.5	486.0	81.5	72.5	298.2	272.8	44.1	93.7	351.3	39.3	38.5	177.3	148.3	57.8
04/30/2021	0.783	0.414	89.8	405.7	58.9	58.3	268.5	263.2		84.5	383.0	35.0	34.2	162.9	154.3	59.7
05/31/2021	0.530	0.351	108.6	351.3	74.2	67.6	254.5	224.4		103.5	331.6	31.7	31.4	129.5	106.3	68.0
06/30/2021	0.871	0.400	116.0	398.0	97.4	72.4	264.8	249.2	36.2	85.8	300.7	37.0	29.3	107.0	103.8	65.5
07/31/2021	0.500	0.302	205.5	467.6	110.9	109.0	258.0	248.3		197.0	448.6	35.0	32.9	81.4	74.9	83.3
08/31/2021	1.047	0.430	249.5	737.6	118.6	105.8	363.0	312.8		244.4	715.8	57.3	56.0	175.4	165.0	76.9
09/30/2021	1.202	0.604	142.3	1038.6	50.7	47.6	361.9	350.9	56.9	270.7	1957.5	58.7	42.2	419.1	307.9	84.3
10/31/2021	1.538	0.526	94.7	625.6	57.9	49.8	533.6	354.0		127.7	891.3	53.0	43.9	679.8	392.1	56.0
11/30/2021	0.984	0.438	140.5	526.6	63.6	55.8	216.9	216.7		204.5	747.5	49.7	39.2	169.1	149.5	80.0
12/31/2021	0.631	0.339	122.4	393.9	88.3	73.0	284.3	234.8	47.6	114.0	367.0	42.7	40.7	137.5	131.0	64.3
01/31/2022	1.527	0.623	86.0	342.2	64.0	56.9	257.8	226.1		93.5	385.7	42.7	41.2	221.5	171.0	55.7
02/28/2022	1.031	0.551	110.8	642.3	71.2	59.3	489.3	339.3		148.7	911.9	67.7	47.2	465.2	286.1	68.6
03/31/2022	0.699	0.424	138.7	342.7	82.0	75.0	210.0	186.2	46.4	154.7	381.6	48.0	39.9	122.9	99.4	74.0
04/30/2022	0.499	0.301	133.6	348.4	98.2	80.9	240.3	221.7		124.7	326.1	42.0	38.9	134.9	110.9	66.0
05/31/2022	0.715	0.327	138.5	338.6	86.1	81.4	204.7	200.4		153.5	374.9	49.7	46.2	132.6	114.9	69.3
06/30/2022	0.515	0.302	180.6	366.4	112.6	105.4	222.5	215.0	39.5	205.7	417.7	52.3	44.8	96.4	90.5	78.3
07/31/2022	0.697	0.356	208.3	532.3	146.7	121.5	351.1	310.5		211.7	540.4	54.0	46.7	129.3	119.7	77.9
08/31/2022	1.016	0.422	182.3	483.4	107.6	104.0	294.4	275.6		188.0	496.7	67.0	51.9	159.8	133.8	73.1
09/30/2022	0.968	0.467	114.5	422.8	75.7	58.4	233.0	219.0	44.3	165.7	530.4	33.0	32.9	106.9	104.2	80.3
10/31/2022	1.196	0.635	109.6	349.7	81.3	60.1	197.3	192.3		152.7	479.0	46.0	37.7	141.0	126.3	73.6
11/30/2022	1.313	0.464	130.0	379.1	71.5	63.3	219.3	194.3		174.2	483.6	37.7	37.4	150.3	119.0	75.4
12/31/2022	0.642	0.338	123.3	377.0	82.2	66.3	209.1	202.5	46.7	118.9	371.9	40.3	33.5	103.8	103.1	72.3
01/31/2023	0.987	0.473	84.6	278.6	56.0	47.4	159.1	155.7		121.8	310.7	34.7	34.7	94.3	88.8	71.4
02/28/2023	0.793	0.460	64.8	329.5	42.0	41.6	216.8	211.7		76.0	386.5	31.0	30.2	160.0	153.4	60.3
03/31/2023	0.657	0.345	135.4	312.0	107.6	89.3	260.2	207.1	37.8	140.3	322.7	60.7	48.5	146.8	112.8	65.1
04/30/2023	0.723	0.424	105.6	443.9	58.7	52.2	275.0	215.8		124.2	536.4	39.3	30.5	130.8	117.9	78.0
05/31/2023	0.622	0.318	165.2	385.9	108.8	87.5	236.8	204.5		166.5	398.2	47.7	40.9	103.8	96.2	75.3
Count	**60**	**60**	**59**	**59**	**59**	**59**	**59**	**59**	**20**	**60**	**60**	**60**	**60**	**60**	**60**	**60**
Average	**0.922**	**0.432**	**146.5**	**495.6**	**87.3**	**77.0**	**290.9**	**256.2**	**47.0**	**158.1**	**546.6**	**47.1**	**41.3**	**187.2**	**148.9**	**71.5**
Min	**0.355**	**0.279**	**64.8**	**278.6**	**42.0**	**41.6**	**159.1**	**155.7**	**36.2**	**76.0**	**155.7**	**24.7**	**21.9**	**79.4**	**74.9**	**52.3**
Max	**1.923**	**0.635**	**252.0**	**1038.6**	**146.7**	**125.3**	**602.3**	**413.5**	**59.0**	**317.7**	**1957.5**	**85.0**	**73.4**	**679.8**	**407.1**	**85.5**
5th percentile	**0.499**	**0.301**	**86.0**	**329.5**	**52.0**	**47.6**	**197.3**	**186.2**	**36.3**	**85.9**	**310.9**	**29.1**	**25.9**	**94.4**	**88.9**	**56.0**
95th percentile	**1.607**	**0.614**	**219.4**	**925.6**	**129.9**	**116.9**	**529.2**	**392.1**	**59.0**	**250.3**	**1243.6**	**67.7**	**59.4**	**462.9**	**306.8**	**83.3**

Parameter	pH, Eff. (s.u.)		Fecal Coliform, Eff., CFU/100 mL		Ammonia-N, Eff. (mg/L)	DO, Eff.(mg/L)		Settleable Solids, Eff. (mg/L)	Temp, Eff., (deg C)
Row Labels	Max	Min	DAILY MX	MO GEO	DAILY MX	Max	Min	MO AVG	MO AVG
06/30/2018	7.0	6.9	983333	672778	15.0	4.7	3.5	0.2	11.1
07/31/2018	7.0	7.0	1183333	927778	24.0	4.6	3.2	0.1	13.5
08/31/2018	7.1	7.0	1133333	872222	30.0	7.6	3.1	0.1	12.8
09/30/2018	7.2	7.0	911111	702222	18.0	4.5	3.4	0.1	12.0
10/31/2018	7.0	7.0	816667	709445	15.0	8.2	3.6	0.1	9.4
11/30/2018	7.1	7.0	529167	354945	13.0	7.8	4.8	0.1	8.4
12/31/2018	7.1	7.0	225000	157500	18.0	9.6	4.8	0.1	7.5
01/31/2019	7.3	7.0	557778	505139	14.0	8.4	5.9	0.1	6.6
02/28/2019	7.2	7.0	883333	747000	19.0	6.9	4.2	0.1	6.4
03/31/2019	7.0	7.0	575000	343500	22.0	9.6	4.0	0.1	5.5
04/30/2019	7.3	7.0	711111	500556	25.0	9.9	4.4	0.1	6.2
05/31/2019	7.1	7.0	650000	587500	21.0	4.2	3.0	0.1	10.8
06/30/2019	7.1	7.0	638889	511945	20.0	5.2	3.1	0.1	12.4
07/31/2019	7.1	6.9	966667	963889	26.0	3.5	3.0	0.1	14.3
08/31/2019	7.0	6.9	1066667	995834	23.0	8.0	2.8	0.1	13.6
09/30/2019	7.2	7.0	766667	761112	17.0	7.4	3.5	0.1	12.0
10/31/2019	7.2	7.0	844444	631389	15.0	9.4	3.4	0.1	9.7
11/30/2019	7.1	6.9	430833	400000	10.0	9.7	3.3	0.1	6.0
12/31/2019	7.4	7.1	833333	610555	9.5	7.5	6.4	0.1	7.6
01/31/2020	7.4	7.1	1000000	835834	20.0	11.0	3.7	0.1	5.7
02/29/2020	7.4	7.1	783333	605417	5.6	11.2	9.2	0.1	5.2
03/31/2020	7.2	7.0	474167	447500	9.6	8.9	4.1	0.1	5.6
04/30/2020	7.2	7.0	877778	658056	16.8	9.9	2.6	0.1	6.0
05/31/2020	7.2	6.7	694444	611389	19.0	6.2	3.4	0.1	8.3
06/30/2020	7.1	7.0	426667	333334	10.0	7.9	5.1	0.1	10.3
07/31/2020	7.2	6.9	975000	808334	28.0	8.2	3.1	0.1	12.0
08/31/2020	7.1	6.8	783333	652917	10.0	7.3	5.2	0.1	13.4
09/30/2020	7.0	6.9	825000	776389	12.0	4.5	3.0	0.1	13.0
10/31/2020	7.0	6.8	210000	156000	12.0	6.3	4.5	0.1	11.0
11/30/2020	7.1	6.9	110000	90000	16.0	7.9	3.8	0.1	8.3
12/31/2020	7.1	6.9	465000	325500	7.8	10.1	4.9	0.1	6.6
01/31/2021	7.3	6.9	433333	336667	13.0	10.5	4.7	0.1	6.1
02/28/2021	7.2	7.1	550000	477084	23.6	8.2	4.3	0.1	6.6
03/31/2021	7.4	7.0	491667	423056	11.0	10.6	7.0	0.1	4.5
04/30/2021	7.1	6.8	512500	426250	9.8	9.3	3.1	0.1	6.2
05/31/2021	7.1	6.9	283111	187556	10.7	7.7	3.4	0.1	8.8
06/30/2021	7.0	6.9	794444	604306	0.3	8.1	3.1	0.1	11.2
07/31/2021	7.1	6.9	811111	689722	28.0	5.1	3.2	0.1	13.7
08/31/2021	7.0	6.8	325000	196500	19.1	4.2	2.8	0.1	14.9
09/30/2021	6.8	6.6	794445	573473	6.6	8.7	5.0	0.1	12.6
10/31/2021	7.0	6.6	240000	225000	4.4	9.7	5.2	0.1	9.9
11/30/2021	6.9	6.7	405000	305000	13.0	9.2	4.8	0.1	8.2
12/31/2021	6.9	6.6	413333	395000	12.0	6.6	3.1	0.1	6.2
01/31/2022	7.4	6.8	552000	426000	15.0	11.5	7.6	0.1	3.6
02/28/2022	7.4	7.3	716000	413000	13.0	11.6	5.6	0.1	4.3
03/31/2022	7.3	7.2	523333	450000	18.0	8.9	5.1	0.1	5.1
04/30/2022	7.2	7.0	788889	544445	13.0	7.1	3.3	0.1	6.8
05/31/2022	7.2	7.1	638889	543611	24.0	3.6	2.9	0.1	9.8
06/30/2022	7.2	7.0	950000	875000	22.0	3.1	2.9	0.1	12.5
07/31/2022	7.3	7.0	966667	630000	32.0	4.0	2.9	0.1	14.5
08/31/2022	7.5	7.1	537778	513889	25.0	4.5	2.9	0.1	15.1
09/30/2022	7.2	7.1	421667	361250	15.0	8.5	2.8	0.1	14.3
10/31/2022	7.1	6.9	383333	223667	17.0	8.5	3.2	0.1	12.8
11/30/2022	7.1	7.0	300000	205000	17.0	9.1	3.3	0.1	9.4
12/31/2022	7.0	6.9	417500	348750	19.0	5.6	3.4	0.1	7.4
01/31/2023	7.3	7.1	417500	346250	18.0	10.3	4.3	0.1	6.2
02/28/2023	7.1	6.9	240000	144250	9.3	9.6	5.2	0.1	5.6
03/31/2023	7.2	6.9	400000	374167	21.0	10.1	3.9	0.1	5.6
04/30/2023	7.5	7.0	363333	229667	8.4	9.5	4.7	0.1	5.7
05/31/2023	7.9	6.6	391667	381250	18.0	4.2	3.0	0.1	9.5
Count	**60**	**60**	**60**	**60**	**60**	**60**	**60**	**60**	**60**
Average	**7.2**	**6.9**	**623231**	**501763**	**16.3**	**7.7**	**4.0**	**0.1**	**9.1**
Min	**6.8**	**6.6**	**110000**	**90000**	**0.3**	**3.1**	**2.6**	**0.1**	**3.6**
Max	**7.9**	**7.3**	**1183333**	**995834**	**32.0**	**11.6**	**9.2**	**0.2**	**15.1**
5th percentile	**6.9**	**6.6**	**225750**	**156075**	**5.7**	**3.6**	**2.8**	**0.1**	**4.5**
95th percentile	**7.5**	**7.1**	**1063334**	**925139**	**28.0**	**11.2**	**7.0**	**0.1**	**14.5**

D. Alaska WQS

Table 12. Alaska WQS for Turbidity for Marine Uses

Water Quality Standards for Designated Uses	
POLLUTANT & WATER USE	CRITERIA
(24) TURBIDITY, FOR MARINE WATER USES	
(A) Water Supply (i) aquaculture	May not exceed 25 nephelometric turbidity units (NTU).
(A) Water Supply (ii) seafood processing	May not interfere with disinfection.
(A) Water Supply (iii) industrial	May not cause detrimental effects on established levels of water supply treatment.
(B) Water Recreation (i) contact recreation	Same as (24)(A)(i).
(B) Water Recreation (ii) secondary recreation	Same as (24)(A)(i).
(C) Growth and Propagation of Fish, Shellfish, Other Aquatic Life, and Wildlife	May not reduce the depth of the compensation pointfor photosynthetic activity by more than 10%. May not reduce the maximum secchi disk depth by more than 10%.
(D) Harvesting for Consumption of Raw Mollusks or Other Raw Aquatic Life	Same as (24)(C).

Table 13. Alaska WQS for Dissolved Gas for Marine Uses

Water Quality Standards for Designated Uses	
POLLUTANT & WATER USE	CRITERIA
(15) DISSOLVED GAS, FOR MARINE WATER USES	
(B) Water Supply (i) aquaculture	Surface dissolved oxygen (D.O.) concentration in coastal water may not be less than 6.0 mg/l for a depth of one meter except when natural conditions cause this value to be depressed. D.O. may not be reduced below 4 mg/l at any point beneath the surface. D.O. concentrations in estuaries and tidal tributaries may not be less than 5.0 mg/l except where natural conditions cause this value to be depressed. In no case may D.O. levels exceed 17 mg/l. The concentration of total dissolved gas may not exceed 110% of saturation at any point of sample collection.
(A) Water Supply (ii) seafood processing	Not applicable.
(A) Water Supply (iii) industrial	Not applicable.
(C) Water Recreation (i) contact recreation	Same as (15)(A)(i).
(B) Water Recreation (ii) secondary recreation	Same as (15)(A)(i).
(C) Growth and Propagation of Fish, Shellfish, Other Aquatic Life, and Wildlife	Same as (15)(A)(i).
(D) Harvesting for Consumption of Raw Mollusks or Other Raw Aquatic Life	Same as (15)(A)(i).

Table 14. Alaska WQS for pH for Marine Uses

Water Quality Standards for Designated Uses	
POLLUTANT & WATER USE	CRITERIA
(18) pH, for marine water uses (variation of pH for waters naturally outside the specified range must be toward the range)	
(A) Water Supply (i) Aquaculture	May not be less than 6.5 or greater than 8.5, and may not vary more than 0.2 pH unit outside of the naturally occurring range.
(A) Water Supply (ii) seafood processing	May not be less than 6.0 or greater than 8.5.
(A) Water Supply (iii) industrial	May not be less than 5.0 or greater than 9.0
(D) Water Recreation (i) contact recreation	May not be less than 6.0 or greater than 8.5. If the natural pH condition is outside this range, substances may not be added that cause any increase in buffering capacity of the water.
(B) Water Recreation (ii) secondary recreation	Same as (18)(A)(iii).
(C) Growth and Propagation of Fish, Shellfish, Other Aquatic Life, and Wildlife	Same as (18)(A)(i).
(D) Harvesting for Consumption of Raw Mollusks or Other Raw Aquatic Life	Same as (18)(A)(ii).

Table 15. Alaska WQS for Temperature for Marine Uses

Water Quality Standards for Designated Uses	
POLLUTANT & WATER USE	CRITERIA
(22) TEMPERATURE, FOR MARINE WATER USES	
(C) Water Supply (i) aquaculture	May not cause the weekly average temperature to increase more than 1° C. The maximum rate of change may not exceed 0.5° C per hour. Normal daily temperature cycles may not be altered inamplitude or frequency.
(A) Water Supply (ii) seafood processing	May not exceed 15° C.
(A) Water Supply (iii) industrial	May not exceed 25° C.
(E) Water Recreation (i) contact recreation	Not applicable.
(B) Water Recreation (ii) secondary recreation	Not applicable.
(C) Growth and Propagation of Fish, Shellfish, Other Aquatic Life, and Wildlife	Same as (22)(A)(i).
(D) Harvesting for Consumption of Raw Mollusks or Other Raw Aquatic Life	Same as (22)(A)(i).

Table 16. Alaska WQS for Toxics for Marine Uses

Water Quality Standards for Designated Uses	
POLLUTANT & WATER USE	CRITERIA
(23) TOXIC AND OTHER DELETERIOUS ORGANIC AND INORGANIC SUBSTANCES, FOR MARINE WATER USES	
(D) Water Supply (i) aquaculture	Same as (23)(C).
(A) Water Supply (ii) seafood processing	The concentration of substances in water may not exceed the numeric criteria for aquatic life for marinewater shown in the *Alaska Water Quality Criteria Manual* (see note 5). Substances may not be introduced that cause, or can reasonably be expected to cause, either singly or in combination, odor, taste, or other adverse effects on the use.
(A) Water Supply (iii) industrial	Concentrations of substances that pose hazards to worker contact may not be present.
(F) Water Recreation (i) contact recreation	There may be no concentrations of substances in water, that alone or in combination with other substances, make the water unfit or unsafe for the use.
(B) Water Recreation (ii) secondary recreation	Concentrations of substances that pose hazards to incidental human contact may not be present.
(C) Growth and Propagation of Fish, Shellfish, Other Aquatic Life, and Wildlife	The concentration of substances in water may not exceed the numeric criteria for aquatic life for marine water and human health for consumption of aquatic organisms only shown in the *Alaska Water Quality Criteria Manual* (see note 5), or any chronic and acute criteria established in this chapter, for a toxic pollutant of concern, to protect sensitive and biologically important life stages of resident species of this state. There may be no concentrations of toxic substances in water or in shoreline or bottom sediments, that, singly or in combination, cause, or reasonably can be expected to cause, adverse effects onaquatic life or produce undesirable or nuisance aquatic life, except as authorized by this chapter. Substances may not be present in concentrations that individually or in combination impart undesirable odor or taste to fish or other aquatic organisms, as determined by either bioassay or organoleptic tests.

(D) Harvesting for Consumption of Raw Mollusks or Other Raw Aquatic Life	Same as (23)(C).

Table 17. Alaska WQS for Bacteria for Marine Uses

Water Quality Standards for Designated Uses	
POLLUTANT & WATER USE	CRITERIA
(14) BACTERIA, FOR MARINE WATER USES	
(A) Water Supply (i) aquaculture	For products normally cooked, the geometric mean of samples taken in a 30-day period may not exceed 200 fecal coliform/100 ml, and not more than 10% of the samples may exceed 400 fecal coliform/100 ml. For products not normally cooked, the geometric mean of samples taken in a 30-day period may not exceed 20 fecal coliform/100 ml, and not more than 10% of the samples may exceed 40 fecal coliform/100 ml.
(A) Water Supply (ii) seafood processing	In a 30-day period, the geometric mean of samples may not exceed 20 fecal coliform/100 ml, and not more than 10% of the samples may exceed 40 fecal coliform/100 ml.
(A) Water Supply (iii) industrial	Where worker contact is present, the geometric meanof samples taken in a 30-day period may not exceed 200 fecal coliform/100 ml, and not more than 10% of the samples may exceed 400 fecal coliform/100 ml.
(B) Water Recreation (i) contact recreation	In a 30-day period, the geometric mean of samples may not exceed 35 enterococci CFU/100 ml, and notmore than 10% of the samples may exceed a statistical threshold value (STV) of 130 enterococci CFU/100 ml.
(B) Water Recreation (ii) secondary recreation	In a 30-day period, the geometric mean of samples may not exceed 200 fecal coliform/100ml, and not more than 10% of the samples may exceed 400 fecal coliform/100ml.
(C) Growth and Propagation of Fish, Shellfish, Other Aquatic Life, and Wildlife	Not applicable.
(D) Harvesting for Consumptionof Raw Mollusks or Other Raw Aquatic Life	The geometric mean of samples may not exceed 14 fecal coliform/100 ml; and not more than 10% of test samples may exceed; - 43 MPN per 100 ml for a five-tube decimal dilution test; - 49 MPN per 100 ml for a three-tube decimal dilution test; - 28 MPN per 100 ml for a twelve-tube single dilution test; - 31 CFU per 100 ml for a membrane filtration test (see note 14).

E. Equations and Analysis

1. Section 8.B.1: Attainment of TSS Standard

EPA calculated the maximum change in the concentration of TSS at the edge of the ZID using formula B-32 from the 301(h) TSD. The average weekly TSS limitation of 78 mg/L and the modeled critical initial dilution of 67:1 were used in the equation. The results show a 1.2 mg/L increase in suspended solids in the receiving water after initial dilution, or 1.5%.

Formula B-32

$SS = SS_e/S_a$

where,

SS = change in suspended solids concentration following initial dilution

SS_e = effluent suspended solids concentration (78 mg/L)

S_a = critical initial dilution (67:1)

78/67 = 1.16 mg/L

2. Section 8.B.2: Attainment of DO Standard

EPA calculated the final concentration of DO at the boundary of the ZID using equation B-5 from the 301(h) TSD. The analysis is presented in Table 18 below.

Table 18. Dissolved Oxygen Analysis

Dissolved Oxygen in mg/L	Surface	Mid	Bottom	Notes
Ambient DO concentration (DO_a) = (reference sites)	7.0	6.2	5.6	minimum observed at two reference sites
Ambient DO concentration (DO_a) = (ZID boundary sites)	7.2	6.5	5.7	minimum observed at two outfall sites
Effluent DO concentration (DO_e) =	2.8	2.8	2.8	5th Percentile of minimum
Immediate DO demand (IDOD) =	5.0	5.0	5.0	Table B-3 301(h) TSD[1]
Initial dilution (S_a) =	67	67	67	Dilution modeling results
Final DO at ZID boundary using reference site ambient DO $DO_f = DO_a + (DO_e - IDOD - DO_a)/S_a$ = (using reference site ambient DO)	6.86	6.07	5.48	Equation B-5 from 301(h) TSD, using reference site ambient DO and 100:1 ZID dilution
Final DO at ZID boundary assuming 0 mg/L effluent (worst-case) $DO_f = DO_a + (DO_e - IDOD – DO_a)/S_a$ =	>6.82	>6.03	>5.44	Worst-Case
FINAL DO at ZID Boundary using outfall site ambient DO $DO_f = DO_a + (DO_e + IDOD – DO_a)/S_a$ = (using ZID boundary ambient DO)	7.06	6.37	5.58	Equation B-5 from 301(h) TSD, using outfall site ambient DO and 100:1 ZID dilution
Depletion at Refence Sites (Reference Site DO – Final DO at ZID using reference site ambient DO)	-0.14 (2.0%)	-0.13 (2.0%)	-0.12 (2.1%)	
Depletion at ZID Boundary Sites (Outfall site DO – Final DO at ZID boundary using outfall site ambient DO)	-0.14 (1.9%)	-0.13 (2.0%)	-0.12 (2.1%)	
[1] Primary facility, effluent BOD_5 150-200 mg/L, travel time 0-100 minutes.				

The final BOD_5 after initial dilution was also calculated to assess the potential for far field DO using a simplified procedure from Appendix B of the 301(h) TSD. The maximum reported average monthly BOD_5 value is first converted to ultimate BOD_5 by multiplying it by the constant 1.46. The ultimate BOD_5 is then divided by the initial dilution factor (100) to determine the final BOD_5 after initial dilution.

Max BOD_5: 125 mg/L

Ultimate BOD_5: 125 mg/L x 1.46 = 183 mg/L

Final BOD_5: 183 mg/L ÷ 67 = 2.72 mg/L BOD_5

A final BOD_5 concentration of 2.72 mg/L after initial dilution is not expected to cause or contribute to any measurable far field DO impacts.

3. Section 8.C.3. Toxics Analysis

The following mass-balance equation was used to determine whether the discharge has reasonable potential to cause or contribute to an excursion above Alaska WQS:

$$Cd = \frac{Ce + [\, Cu\, (\, Sa - 1\,)\,]}{Sa} \quad \text{where}$$

Cd = Resultant magnitude or predicted concentration at edge of mixing zone, µg/L

Ce = Maximum projected effluent concentration, µg/L

Cu = Background receiving water concentration, µg/L

Sa = dilution factor

The maximum projected effluent concentration (Ce) in the mass balance equation is represented by the highest reported concentration measured in the effluent multiplied by a reasonable potential multiplier. The reasonable potential multiplier accounts for uncertainty in the data. The multiplier decreases as the number of data points increases and variability of the data decreases. Variability is measured by the coefficient of variation (CV) of the data. When there is not enough data to reliably determine a CV (n<10), the TSD recommends using 0.6 as a default value. A partial listing of reasonable potential multipliers can be found in Table 3-1 of the TSD.

The resulting maximum projected effluent concentration is then divided by the minimum critical dilution. This product represents the maximum effluent concentration at the edge of the ZID. The maximum effluent concentration at the edge of the ZID is then added to the background concentration, Cu, which is represented by the 95th percentile value from the background data set (the 5th percentile value is used for DO). The sum Cd represents the projected maximum receiving water concentration at the edge of the ZID. This concentration is compared to the water quality criterion to determine whether a water-quality based effluent limitation is needed.

If the receiving water concentration at the edge of the ZID exceeds the water-quality criteria a water-quality based effluent limitation is developed. If a permittee is unable to meet their WQBEL they would fail to satisfy CWA 301(h)(9) and 40 CFR 125.62 and would be ineligible for a 301(h)-modified permit.

No pollutants have reasonable potential at the edge of the ZID. A summary of the reasonable potential analyses used to develop WQBELs is located in Appendix D of the Fact Sheet.

F. Dilution Modeling Report

The dilution model is available on our website with the other permit documents: https://www.epa.gov/npdes-permits/npdes-permit-petersburg-wastewater-treatment-plant-alaska