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City of Gustavus
Attn: City Administrator, Kathy Leary
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Wednesday, March 12, 2025

Dear Ms. Leary:

The City and Borough of Juneau Alaska (CBJ) Utility has recently been contacted by the consulting firm HDR (Anchorage, AK) regarding the transport and discharge of wastewaters and wastewater sludge from Gustavus, AK to Juneau, AK via a commercial waste hauler. My office (CBJ Utility Environmental Permitting and Compliance Coordinator) was not formally aware of this previously unreported activity until this time.

In our discussion with HDR regarding this matter, it has come to our attention that the acceptance of this waste stream into the CBJ Utility sewer and treatment systems *may* not currently comply with Title 75 (Utilities), Sections 75.02.080 (a) and (c) and 75.02.090 (7) and (8) of the Juneau Municipal code.

75.02.080 Use of public sewers; regulations.

(a) No persons shall discharge or cause to be discharged to any public sewer any harmful waters or wastes, whether liquid, solid or gas, capable of causing obstruction to the flow in the sewers, damage or hazard to structures, equipment and personnel of the sewage works, or other interference with the proper operation of the sewage works.

(c) The admission into the public sewers of any waters or wastes having (i) a five-day biochemical oxygen demand greater than 300 parts per million by weight, or (ii) containing more than 350 parts per million by weight of suspended solids, or (iii) containing any quantity of substances having the characteristics described in section 75.02.090, or (iv) having an average daily flow greater than two percent of the average daily sewage flow of the City and Borough, shall be subject to the review and approval of the director of public works. Where necessary in the opinion of the director of public works, the owner shall provide, at the owner's expense, such preliminary treatment as may be necessary to (i) reduce the biochemical oxygen demand to 300 parts per million and the suspended solids to 350 parts per million by weight, or (ii) reduce objectionable characteristics or constituents to within the maximum limits provided for in section 75.02.090, or (iii) control the quantities and rates of discharge of such waters or wastes. Plans, specifications, and any other pertinent information relating to proposed preliminary treatment facilities shall be submitted for the approval of the director of public works and of the commissioner of the state department of health and welfare, and no construction of such facilities shall be commenced until the approvals are obtained in writing.

75.02.090 - Prohibited discharges*.

Except as provided in this chapter, no person shall cause to be discharged or allowed to be discharged into its sewer line or system any of the following described waters or wastes:

(7) Any waters or wastes containing a toxic or poisonous substance in sufficient quantity to injure or interfere with any sewage treatment process, constitute a hazard to humans or animals, or create any hazard in the receiving waters of the sewage treatment plant;

(8) Any waters or wastes containing suspended solids of such character and quality that unusual attention or expense is required

to handle such materials at the sewage treatment plant;

**CBJ Municipal code provision 75.02.090 (7) is consistent with State and Federal permit requirements for permitted operation of CBJ collections and treatment facilities as per the Clean Water Act (33 U.S.C. §§ 1251 et seq.).*

Since waste shipments from Gustavus were not formally reported to the CBJ Utility Compliance Coordinator, we were also then lacking information regarding the type/character of wastewaters and wastewater sludge that were discharged into our system. For us to accept wastewaters and waste sludge from Gustavus, the Utility requires regular sampling and analyses of the materials to determine their strength and composition prior to discharge into our collections system. This is necessary to determine compliance with the aforementioned code regulations and to properly operate our treatment facilities.

Further, through discussion with HDR, it was brought to our attention that the waste materials from Gustavus that were previously discharged into our sewer system potentially violated CBJ Municipal code 75.02.090 (7), given that they *may* have been contaminated with PFAS and/or other restricted substances.

Therefore, in the absence of certified characterization of the wastes relevant for assessment by the CBJ Utility of compliance with Municipal code 75.02.080 (a) and (c) and 75.02.090 (7), and with updated information provided by HDR of potential PFAS contamination of Gustavus's waste stream, effective immediately the CBJ Utility cannot accept wastewater and wastewater sludge shipments from Gustavus, AK.

However, the CBJ *may* reconsider acceptance of Gustavus wastewater transfers once the following conditions are met:

- 1.) the wastewaters to be transferred for treatment and disposal through the CBJ Utility are certified through CBJ-specified sampling and analysis to be below local discharge limits and in compliance with State and Federal regulations for Pollutants of Concern (PoCs), including PFAS and,
- 2.) a contract is established between Gustavus and the CBJ Utility that assures compliance with item 1 and provides compensation to the CBJ equivalent to the cost of processing and disposal of the additional waste stream.

Please let me know if you would like to engage in additional discussion regarding this matter. The CBJ Utility is eager to assist neighboring SE AK communities with wastewater processing and management.

Sincerely,

Chad Gubala, Ph.D.

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