Preliminary Engineering Report for Talkeetna Wastewater Treatment Facility Upgrades Talkeetna, Alaska



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LIST OF ACRONYMS

AAC - Alaska Administrative Code

ADEC/DEC - Alaska Department of Environmental Conservation

ADF&G - Alaska Department of Fish & Game
ADNR - Alaska Department of Natural Resources

ADOL&WF Alaska Department of Labor and Workforce Development ADOT&PF - Alaska Department of Transportation and Public Facilities

AFY - Acre-feet per year

AHRS - Alaska Heritage Resources Survey

AMS Anchorage Mat-Su Area

APDES Alaska Pollutant Discharge Elimination System

ARC - Alaska Railroad Corporation

ARRC - Alaska Rural Rehabilitation Corporation

BOD Biochemical Oxygen Demand

bgs - Below Ground Surface CFR - Code of Federal Regulations

CDP Community Designated Place DO Dissolved Oxygen

DMR Discharge Monitoring Report EA - Environmental Assessment

EPA/USEPA - U.S. Environmental Protection Agency

ESA Endangered Species Act
FPPA Farmland Protection Policy Act

FEMA - Federal Emergency Management Association

FC Fecal Coliform fps - feet per second

gpcd - gallons per capita per day

gpd - gallons per day gpm - gallons per minute

HDPE - High Density Polyethylene

HP Horse Power

I/I Inflow and Infiltration
ISO - Insurance Services Office

K - Thousand M - Million

MSB - Matanuska-Susitna Borough

MG Million Gallons LF - Lineal Feet

NEPA - National Environmental Policy Act NMFS National Marine Fisheries Service

NPDES National Pollution Discharge Elimination System

O&M - Operations and Maintenance
psi - Pounds per square inch
PWS - Public Water System
RUS - USDA Rural Utility Service

SCADA Supervisory Control and Data Acquisition

TSS - Total Suspended Solids

USDA - United States Department of Agriculture USFWS - United States Fish and Wildlife Service

WWTF Wastewater Treatment Facility



0.0 General

0.1 INTRODUCTION

The community of Talkeetna, Alaska is located in the Matanuska-Susitna Borough (MSB) at the confluence of the Talkeetna and Susitna Rivers. Talkeetna is roughly 115 miles north of Anchorage at the end of the Talkeetna Spur Road, which runs 14 miles north of the George Parks Highway at Milepost 98.7. Over the years, Talkeetna has grown from a sleepy stop on the Alaska Railroad to a bustling summer tourist destination. Additionally, from April to June every year, climbers use Talkeetna as a starting point for their expeditions to climb Denali, North America's highest peak.

The growth in tourism and an expanding residential population has stressed Talkeetna's wastewater system to the point that it struggles to comply with its State administered wastewater discharge permit. Correspondence from the Alaska Department of Environmental Conservation (ADEC) notes several permit compliance excursions, the most common of which are occurrences of high effluent fecal coliform (FC) counts and low effluent dissolved oxygen (DO) concentrations. Other less common excursions include inadequate percent removal of five-day biological oxygen demand (BOD $_5$), total suspended solids (TSS), and/or excessively high effluent BOD $_5$ and TSS concentrations.

In August 2016, MSB retained HDL Engineering Consultants (HDL) to prepare a preliminary engineering report (PER) and associated environmental report (ER) to identify and analyze alternatives for upgrades to the existing wastewater treatment facility (WWTF) to bring it into compliance with its current discharge permit. This report expands on a previous sewer and water assessment¹ completed for the Talkeetna wastewater system in 2014.

0.2 BACKGROUND

Talkeetna operates a wastewater collection system to convey wastewater flows from homes and businesses in Talkeetna to a WWTF located northeast of the main business and community district. The WWTF and wastewater collection system are operated by the MSB Department of Public Works and were constructed in several phases between 1988 and 1994¹. The collection system consists of 23,000 linear feet of gravity and pressure pipe with three lift stations¹. Collected wastewater flows to a lift station on G Street where it is pumped via force main to the WWTF. The WWTF provides treatment via three facultative lagoon cells which discharge to a constructed wetland for effluent polishing. The wetland discharges to a slough of the Talkeetna River via a flow measurement weir and conveyance pipeline.

In November 2015, ADEC issued a Notice of Intent to Seek Penalties for Clean Water Act Violations for failure to comply with permit effluent limits for FC and DO.



The MSB submitted a grant application to the United States Department of Agriculture (USDA) for financial assistance in a WWTF upgrade to address their compliance issues. In January 2016, MSB issued a request for proposals for preparation of a PER and ER in support of the USDA grant application. HDL was selected and awarded a contract for the work in August 2016. HDL has subcontracted with GV Jones and Associates (GVJ) to provide wastewater treatment process consulting services.

0.3 SCOPE

This report describes the current condition of the Talkeetna WWTF; identifies needs for upgrades; presents and evaluates two feasible design alternatives; recommends a design alternative selection based on life cycle cost analysis and other non-monetary factors, and ultimately presents preliminary design and phasing options for the selected alternative. This report assumes a 20-year design period. All flow and population forecasts correlate to a final design year of 2036.

Because MSB is seeking federal funding through the USDA Rural Utilities Service grant program, this report follows requirements outlined in USDA Bulletin 1780-2.

1.0 Project Planning

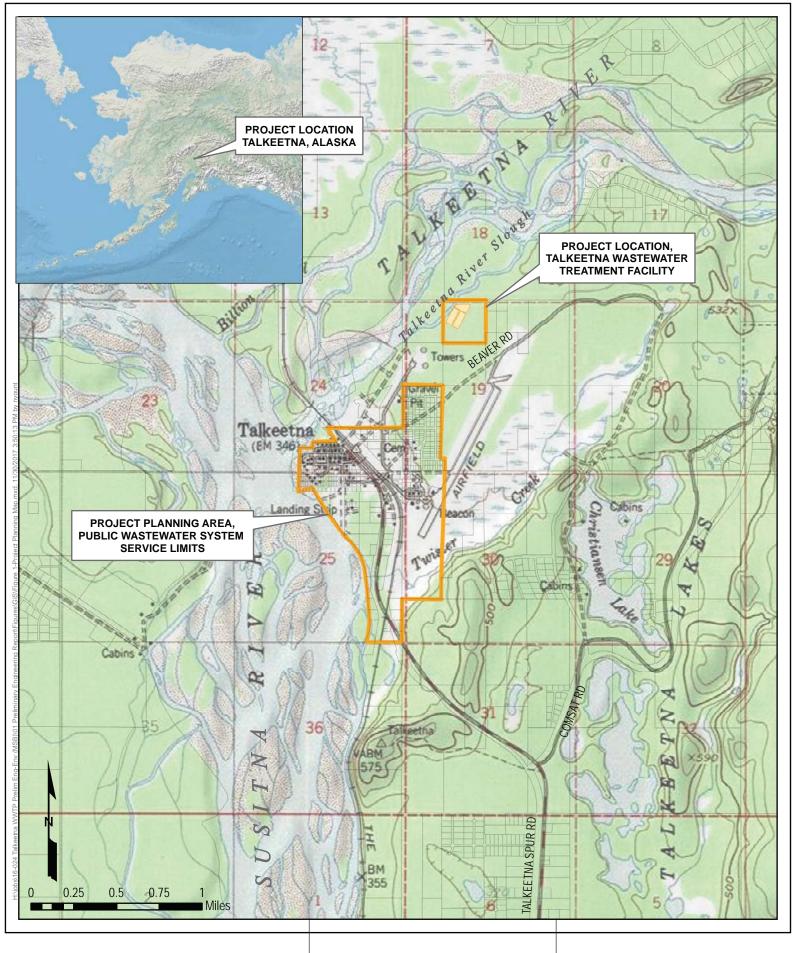
1.1 LOCATION

The Talkeetna wastewater system is located within the community of Talkeetna, Alaska. The project planning area comprises the entirety of the wastewater system and the boundaries of Talkeetna's Utility Service Area and is used for population and flow projections to size WWTF upgrades. The project location, the Talkeetna WWTF, is located outside of the project planning area on a 40-acre parcel owned by MSB. *Figure 1-1* defines the project planning area, project location, and general topography, legal, and natural boundaries of the area.

1.1.1 Legal Boundary

Per the MSB Operating Rules, Rates and Procedures for Talkeetna Sewer and Water Service Area, Public Sewer Service, the legal boundary for the Talkeetna Utility Service Area is described as those lands within that portion of the S½ of the S½ of protracted Section 24 contained within the Talkeetna Townsite, U.S. Survey No. 1260; that portion of the S½ of the S½ protracted Section 24 Easterly of the West boundary of the Alaska Railroad right-of-way; and that portion of protracted Section 25 Easterly of the East high water mark of the Susitna River, all within Township 26 North, Range 5 West, Seward Meridian; and all of the Talkeetna Heights Subdivision, Denali Subdivision, and Denali No. 2 Subdivision within protracted Section 19; and W½ of the NW¼ of protracted Section 30, Township 26 North, Range 4 West, Seward Meridian, Talkeetna Recording District, Third Judicial District, State of Alaska.





Section 19, Township 4W, Range 26N, Seward Meridian USGS: Talkeetna B-1 Talkeetna Alaska

Matanuska Susitna Borough Talkeetna Wastewater Treatment Facility November 2017

Figure 1-1 Project Planning Area and Project Location Map

1.1.2 Natural Boundaries

Talkeetna is situated near the confluence of three rivers, the Chulitna, Susitna, and Talkeetna. It is generally bounded by the Susitna and Talkeetna Rivers to the north and west, and Twister Creek to the south. The Alaska Railroad tracks split the town in a northwest-southeast alignment and the eastern edge of town is generally bound by the Talkeetna Airport.

1.2 ENVIRONMENTAL RESOURCES PRESENT

Environmental resources are summarized in this section and are provided in more detailed analysis in a separate Environmental Review.

1.2.1 Farmlands, Rangelands and Forestlands

No areas of important farmland, prime forestland, and/or prime rangeland exist in the project location as defined by The Farmland Protection Policy Act (FPPA) and USDA Departmental Regulation No. 9500-3, Land Use Policy.

1.2.2 Wetlands

A review of the MSB wetlands viewer and the National Wetlands Inventory in September 2016 indicated the existing WWTF is located within uplands. A relict glacial drainage way was identified within the project location. The project planning area contains drainage way and riverine wetlands.

1.2.3 Wildlife and Fisheries

The Talkeetna River is located approximately 0.25-mile to the west of the proposed project area which provides spawning grounds for coho salmon (Oncorhynchus kisutch) and chum salmon (O. keta) and also contains pink salmon (O.gorbuscha), chinook salmon (O. tshawyscha), and sockeye salmon (O.nerka). The Talkeetna Slough has a direct connection to the Talkeetna River and is considered anadromous water by ADF&G (ADF&G 2017a).

A review of the USFWS IPaC planning tool identified nine birds protected under the Migratory Bird Treaty Act or the Bald and Golden Eagle Protection Act (ADF&G 2017b; USFWS 2017b).

1.2.4 Endangered Species

Because no listed species under USFWS jurisdiction occur in the Anchorage and Matanuska Susitna (AMS) area, it is reasonable to conclude that the proposed project, which is confined to AMS, will have no effect on threatened and endangered species or critical habitat.

1.2.5 Historical and Archeological Sites

No historical or archeological sites have been identified in the project location. A letter of concurrence that no historical properties will be affected has been issued by the Alaska Office of History and Archaeology.



1.2.6 Flood Hazards

The Federal Emergency Management Agency (FEMA) Flood Insurance Rate Map (panel number 02170C2804E and 02170C283E) and MSB Floodplain Mapping tools were used to determine flood hazards at the existing WWTF and surrounding areas. Figure 1-2 (from MSB Permit Center)

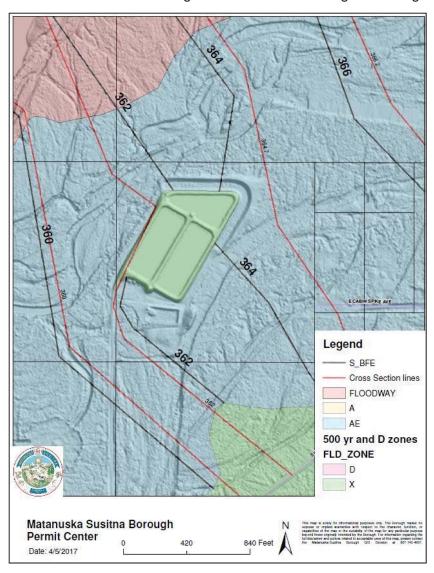


Figure 1-2: Local Flood Hazard Zones

depicts flood hazard zones base flood elevation contours. Base flood elevations are defined as the water surface elevation of the 1% (100 year or base flood) annual flood. From the figure, existina facility designated as Flood Zone X, meaning the facility is outside of the special flood hazard area but either within the 0.2% (500 year flood) annual chance flood zone or is an area protected by levees from the 1% annual chance flood. Although formal а determination from FEMA was not solicited for this project, the facility likely falls under the latter definition due to the built up nature of the site.

The surrounding area is within Zone AE, meaning base flood elevations have been determined and the area lies within the 100 year annual chance flood zone.

Base flood elevations for the area within MSB owned parcel

range between 362 and 364 feet above mean sea level. The 500-year flood elevation has been approximated at 365 feet based on FEMA guidance².

The project is located outside of the designated floodway.

1.3 POPULATION TRENDS

The local economy in the Talkeetna area is driven by tourism. During the summer months, the streets are packed as visitors come to experience the small town charm of Talkeetna. The Alaska Railroad and several cruise ship companies provide rail and bus service for tourists on their way



to or from Denali National Park, located approximately 150 driving miles to the north. A significant portion of wastewater flows to the WWTF are generated from non-residential sources. For this reason, both residential population and tourism must be considered when evaluating population growth trends. For the purposes of planning improvements, a design period of 20 years was used for population projections, with 2036 as the end of the design period.

1.3.1 Residential

The Alaska Department of Labor and Workforce Development (ADOL) has published population projections for estimated growth throughout Alaska for the years 2015 through 2045. ADOL estimates are based on historical Census population data, fertility and mortality rates, and migration. Projected populations for Alaska's main census areas are summarized in *Table 1-1*.

Table 1-1: Projected Populations for Alaska's Main Census Areas³

Area Name	July 1, 2015	July 1, 2020	July 1, 2025	July 1, 2030	July 1, 2035	July 1, 2040	July 1, 2045	Growth Rate*
Alaska (State-Wide)	737,625	771,529	802,352	829,620	854,104	877,134	899,825	0.73%
Anchorage/Mat-Su Region	399,086	423,107	445,773	466,780	486,263	504,566	522,007	1.03%
Municipality of Anchorage	298,908	309,692	318,629	325,533	330,821	335,148	339,171	0.45%
Matanuska-Susitna Borough	100,178	113,415	127,144	141,247	155,442	169,418	182,836	2.75%
Gulf Coast Region	81,111	83,703	85,819	87,404	88,516	89,298	89,920	0.36%
Interior Region	112,818	116,478	119,402	121,504	123,063	124,417	125,893	0.39%
Northern Region	27,802	28,707	29,597	30,522	31,568	32,843	34,402	0.79%
Southeast Region	74,395	75,600	76,272	76,411	76,099	75,481	74,655	0.01%
Southwest Region	42,413	43,934	45,489	46,999	48,595	50,529	52,948	0.83%

^{*}Averaged Annual



As shown, the MSB is projected to experience significant population growth over the next 20-years with an average projected growth rate of 2.75% for the study period.

For a more detailed look at MSB growth, *Table 1-2* summarizes historic census data from 2000 and 2010, and 2011-2015 American Community Survey 5-Year Estimates prepared by the U.S. Census Bureau for individual cities and towns within the MSB Region.

Table 1-2: Population by MSB Region

	2000	2010	2015	Annual	Annual	Annual
Census Region	Census	Census	ACS Estimate	Growth 2000- 2010	Growth 2010- 2015	Growth 2000- 2015
Fishhook	2,030	4,679	5,323	13.0%	2.75%	10.81%
Knik Fairview	7,049	14,923	16,017	11.2%	1.47%	8.48%
Tanaina	4,993	8,197	9,640	6.4%	3.52%	6.20%
Gateway	2,952	5,552	5,610	8.8%	0.21%	6.00%
Houston	1,202	1,912	2,206	5.9%	3.08%	5.57%
Wasilla	5,469	7,831	9,284	4.3%	3.71%	4.65%
Meadow Lakes	4,819	7,570	7,424	5.7%	-0.39%	3.60%
Butte	2,561	3,246	3,854	2.7%	3.75%	3.37%
Palmer	4,533	5,937	6,788	3.1%	2.87%	3.32%
Sutton-Alpine	1,080	1,447	1,602	3.4%	2.14%	3.22%
Big Lake	2,635	3,350	3,815	2.7%	2.78%	2.99%
Lazy Mountain	1,158	1,479	1,637	2.8%	2.14%	2.76%
Willow	1,658	2,102	2,085	2.7%	-0.16%	1.72%
Farm Loop	1,067	1,028	1,081	-0.4%	1.03%	0.09%
Talkeetna	772	876	616	1.3%	-5.94%	-1.35%

From the table, the majority of population growth in the MSB has occurred in the areas surrounding and including Palmer and Wasilla. From the 5-year estimate prepared by the U.S. Census Bureau, projections for Talkeetna show a slight population decline between 2010 and 2015, however, population is expected to continue on an overall upward trend, although at a reduced rate to the MSB as a whole, similar to the rate Talkeetna experienced in the 2000's. Therefore, a growth rate of 1.5% has been used to forecast populations for the 20-year design period. *Table 1-3* gives residential population projections for Talkeetna using a 1.5% annual growth rate over the design period starting with the 2010 recorded census population.

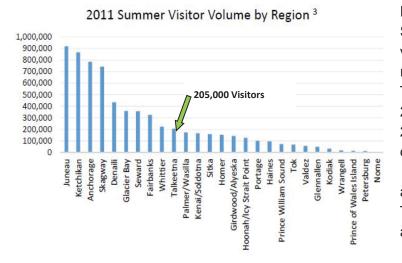
Table 1-3: Projected Talkeetna Residential Populations Assuming 1.5% Annual Growth

Year	2010	2020	2030	2036	2040
Population	876	1,007	1,139	1,218	1,270



1.3.2 Tourism

Major package tourism companies, including Princess Cruises, Holland America Line, Royal Caribbean, Norwegian Cruise Line, and the Alaska Railroad, incorporate Talkeetna as a stop on larger Alaskan tours. The Alaska Department of Commerce, Community & Economic



Development uses the Alaska Visitor Statistics Program to analyze annual visitor volume estimates. The last full report including information for the Talkeetna community was issued in 2011. From the report, an estimated 205,000 tourists visited Talkeetna during the summer of 2011⁴. *Figure 1-3* shows visitor volumes for regions and communities in Alaska. Talkeetna is within the top 10 visited areas.

Figure 1-3: 2011 Summer Visitor Volume

Over the last two decades, tourism has expanded statewide. A *Community and Tourism Plan for Talkeetna* prepared by a collaborative effort between Christopher Beck and Associates, Land Design North, The Andrews Group, Inc., and Charlier & Associates in 2002, anticipated that demand for visitation to Talkeetna would likely match the level of growth predicted for Alaska as a whole, provided no major attempts were made to accelerate or slow growth⁵.

A linear growth rate of approximately 2% can be interpolated from available tourism data from the Alaska Visitor Statistics Program from 1993 to 2015. This growth rate represents a moderate growth scenario in which the Talkeetna community does nothing to accelerate or slow growth.

However, MSB staff have indicated that available commercial land in Talkeetna is close to full build-out. Furthermore, in recent years there have been state budget cuts to tourism marketing and there has been an overall slowdown in the Alaskan economy. For these reasons, a low tourism growth model assuming 1.0% linear growth has also been analyzed.

Applying the moderate and low growth models to available visitor data for Talkeetna gives the following summer tourist population projections over the 20-year design period.

Table 1-4: Projected Talkeetna Summer Tourist Populations

	2011	2020	2030	2036	2040
Moderate Growth (2.06%)	205,000	244,747	291,327	319,274	337,906
Low Growth (1.0%)	205,000	223,860	245,385	258,300	266,910

In summary, for this report, the 1.5% annual residential population model and 1% low growth model for tourism will be used.



1.4 COMMUNITY ENGAGEMENT

MSB began community engagement concerning upgrades to the Talkeetna water and wastewater system in 2014 as part of the Utility Assessment. Volunteer response surveys, informational flyers, and invitations to a community meeting were mailed to residents. Two public meetings were held to help develop an understanding of the existing WWTF, discuss utility rates, gather comments and questions, and present the draft technical memorandum assessing Talkeetna's water and wastewater system.

For upgrades addressed in this report, MSB will continue with public involvement once an alternative is selected. Future community engagement may include a combination of informational mailers, community surveys, public meetings, and project specific website.

2.0 Existing Facilities

2.1 LOCATION MAP

An overall location map showing major system components is presented in *Figure 2-1*. The Talkeetna wastewater system consists of a buried pipe collection system, three lift stations, and a facultative lagoon WWTF. All wastewater flows to a lift station located on G Street where it is pumped via force main to the WWTF. While upstream collection infrastructure can have an impact on overall treatment quality, the scope of this report is limited to WWTF upgrades.



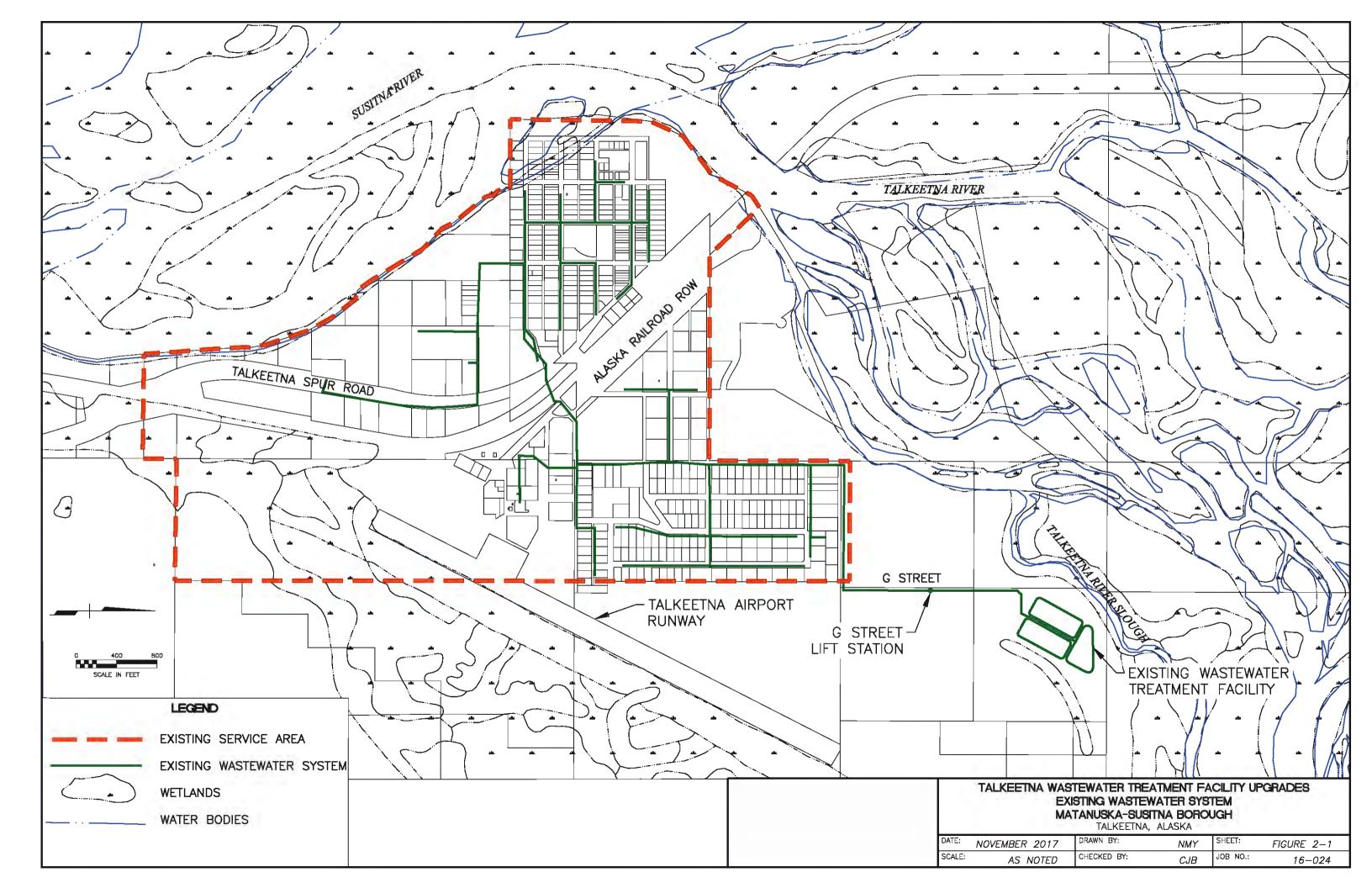


Figure 2-2 shows the general layout and schematic process for the existing WWTF.

All collected wastewater currently flows to Manhole B from the G Street Lift station. From Manhole B, wastewater is directed from Cell 2, to Cell 1, to Cell 3, and finally though the constructed wetlands. Treated effluent is discharged into a slough of the Talkeetna River.

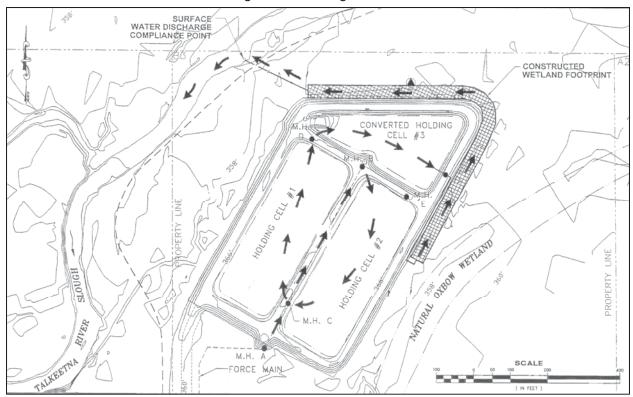


Figure 2-2: Existing WWTF Layout

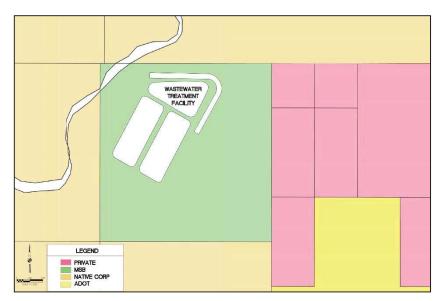


Figure 2-3: Facility Property Limits

The WWTF is located on 40-acre parcel owned by MSB. *Figure 2-3* shows adjacent property lines and property ownership. The 40-acre lot is bounded by Native Corporation land to the north, west, and south, and Private land to the east. WWTF upgrades will be designed to remain within existing MSB property limits to the greatest extent possible.

2.2 HISTORY

In October 1986, flooding from heavy rains caused the rivers in the Talkeetna area to rise, also raising the local groundwater table. Because Talkeetna is located nearly entirely in the floodplain, this caused massive flooding throughout the town, contaminating the private individual water wells. Testing done in 1986 and 1987 confirmed that fecal coliform bacteria were found in 30% (1986) and 18% (1987) of the water wells tested with most of the contamination found in the east townsite wells. After the contamination was discovered, the MSB applied for and was awarded several ADEC Village Safe Water Program grants to finance the construction of the public water and wastewater systems. In July 1988, work began to install the system in the west townsite, as it had the higher population density, and larger commercial and tourism uses. This is also when the original WWTF was constructed.

Phased construction continued for the water/wastewater distribution and collection network, and by 1994 the system was complete. In 2003, to keep pace with increased flows and to meet more stringent discharge requirements, the original WWTF was upgraded by converting the percolation cell into a facultative lagoon cell, and installing a constructed wetland for final treatment prior to direct discharge to a slough of the Talkeetna River. Since installation, several large flooding events have uprooted wetland plants. In 2014, CRW Engineering Group performed an assessment of the water and wastewater system. MSB implemented several of the recommended operational changes, helping to improve overall treatment quality. Despite these operational changes, the WWTF is still unable to consistently meet prescribed effluent quality standards and, in 2015, MSB received a notice of violation from the Alaska Department of Environmental Conservation (ADEC) for failure to comply with its discharge permit. Correspondence also included a Notice of Intent to Seek Penalties for Clean Water Act Violations. These violations are discussed in more detail in Section 3.3.

Starting in early 2016, MSB began troubleshooting Supervisory Control and Data Acquisition (SCADA) equipment to more accurately measure influent flow to the WWTF. MSB also continued making operational changes to the treatment lagoon process in an attempt to increase DO levels prior to discharge. This ultimately resulted in the installation of temporary aerators at the inlet to Cells 1 and 2 to assist with lagoon aeration.

2.3 CONDITION OF EXISTING WWTF

2.3.1 Present Condition

The WWTF is functional in its existing configuration, however, due to a variety of factors it is not able to consistently provide adequate treatment of wastewater flows. The most significant factors



are insufficient lagoon volumes and the overall functionality of the treatment wetlands. Due to several flood events damaging the constructed wetlands, vegetative cover is very low and the portions which were revegetated have not had time to fully establish themselves. During a site visit in July 2016, HDL and GVJ observed dark decomposing accumulations at the surface of the constructed wetlands, which likely deplete DO and provide a substrate and additional nutrients for fecal coliform blooms prior to effluent discharge. The photo below illustrates the inadequately performing constructed wetlands.



Figure 2-4: Talkeetna WWTF Constructed Wetlands from July 2016 Site Visit

2.3.2 Suitability/Adequacy for Continued Use

The existing WWTF discharges seasonally. For six months of the year, the lagoon ponds act as holding basins for influent raw sewage generated by the community. Effluent from the WWTF is typically discharged during the months of May through October. If river ice conditions permit, effluent may be discharged in late April as well.

Although effluent discharge flow data are limited, it is assumed that WWTF performance generally decreases as influent flow increases. Concentrations of effluent BOD₅ and, to a lesser extent, TSS are higher from early-May to August with lower concentrations before and after.

In addition to poor BOD₅ and TSS removals, effluent fecal coliform counts (FC's) and DO concentrations (DO) have been generally poor during all effluent discharge months. However, in 2016, additional equipment was deployed at the treatment WWTF to add DO to the effluent prior to release, and higher DO values were achieved.

Ultimately, the WWTF is undersized to treat flows generated during the tourism season. Furthermore, as flow continues to increase over time, the WWTF will become increasingly incapable of meeting permit requirements.



2.3.3 Conveyance, Treatment, Storage and Disposal Capabilities

According to record documents for the 2003 WWTF upgrades, the existing WWTF is designed for an inflow rate of 42,000 gallons per day (gpd) and BOD_5 loading of 70 lb/day. The total combined volume of lagoon cells is 9.4 million gallons (MG). Individual, working lagoon cell volumes are summarized in *Table 2-1*. The WWTF is permitted to discharge up to 180,000 gpd of treated effluent from April through October, although discharge typically does not begin until early May depending on river ice conditions. Towards the end of discharge months, MSB WWTF operators increase discharge rates to draw down the water level in the lagoon cells to provide adequate volume for winter storage.

Table 2-1: Existing WWTF Working Cell Volumes

	Working Volume	Surface Area
Cell 1	3.725 MG	2.20 Acres
Cell 2	3.725 MG	2.20 Acres
Cell 3	1.935 MG	1.1 Acres

2.3.4 Compliance with Federal, State, and Local Laws

Nationally, wastewater discharge is controlled through the National Pollutant Discharge Elimination System (NDPES) established under the Clean Water Act and regulated by the United States Environmental Protection Agency (EPA). The EPA granted primacy to the Alaska Department of Environmental Conservation (ADEC) resulting in ADEC assuming full authority to administer the wastewater discharge permitting and compliance program for Alaska. ADEC regulates wastewater discharge through Alaska Pollutant Discharge Elimination System (APDES) permits.

The Talkeetna WWTF has been issued a general APDES permit to discharge treated wastewater into surface waters. *Table 2-2* summarizes the permit requirements.

Table 2-2: APDES Permit Requirements for Talkeetna WWTF

	Damanatan	Quantity	or Loading	Quality or Concentration			
	Parameter	Average	Maximum	Minimum	Average	Maximum	
	Flow		180,000 gpd				
	Final Effluent Fecal Coliform				20 FC/100 ml	40 FC/100 ml	
	DO			7 mg/L		17 mg/L	
	Final Effluent pH			6.5		8.5	
	Monthly Final Effluent	68 lb/day			45 mg/l		
Biochemical Oxygen	Influent				Report Monthly Average		
Demand	Percent Removal			65%			
(BOD ₅₎	Weekly Average	98 lb/day			65 mg/l		
	Monthly Final Effluent	105 lb/day			70 mg/l		
Total Suspended Solids (TSS)	Influent				Report Monthly Average		
, ,	Percent Removal			65%			



To verify compliance with its discharge permit, MSB submits monthly Discharge Monitoring Reports (DMR) to ADEC. Effluent grab samples are collected at the discharge to the Talkeetna River Slough; influent grab samples are typically collected at Manhole B as shown in *Figure 2-5*. However, during fall of 2016, weekly composite samples were collected at the G Street lift station to assist with preparation of this report; specifically to determine the quality of the influent.



Figure 2-5: Grab Sample Locations

DMRs from 2014 through 2016 indicate that effluent DO and FC concentrations consistently violate permit limits. There were also a few instances where the minimum percent removal of BOD and TSS was not achieved. *Table 2-3* summarizes DMR results; instances where permit limits were not met are highlighted in yellow.

		rabie	2-3: Discharç	ge wonitoring i	Report Result	<u> </u>	
					Parameter		
			Effluent DO (mg/l)	Effluent BOD5 (mg/l)	рН	Effluent TSS (mg/l)	Effluent FC (col/100 ml)
Permit Requirements		7-17	45 Max	6.5-8.5	70 Max	40 Daily Max	
		2014	1.11	13.3	7-8	33.3	34
	MAY	2015	1.66	24.8	7.23	20.8	62
		2016	3.6	17.4	8.5	18	ND
		2014	9.68	40.6	7.5	68.6	14
	JUNE	2015	5.69	35	7.78	41	510
		2016	11.45	15.4	7.5	12.7	160
£	JULY	2014	4.25	35.2	7.94	56	70
Month		2015	5.96	43.3	7.47	50	290
		2016	8.81	35.2	8.5	ND	410
Discharge		2014	2.73	22.9	7.31	42	1,130
ch	AUGUST	2015	5.7	26.6	7.49	37.9	3,100
Öİ		2016	7.13	14.4	7.43	5.5	54
		2014	2.7	29.8	7.6	28	1,050
	SEPTEMBER	2015	11.18	26.2	7.92	41	73
		2016	ND	11.3	ND	17	27
		2014	ND	ND	ND	ND	ND
	OCTOBER	2015	8.19	14	7.68	17	128
		2016	ND	13.3	ND	7	9

Table 2-3: Discharge Monitoring Report Results

2.3.5 Analysis of Overall Current Energy Consumption

One advantage of a facultative lagoon facility is the low amount of energy required to achieve treatment. After flows are pumped from the G Street Lift Station, the Talkeetna WWTF utilizes only gravity flow.



Figure 2-6: Gasoline-Powered Pumps Used to Assist with Aeration During Summer 2016

To meet permit requirements for DO during 2016 discharge months, WWTF operators utilized gasoline-powered pumps to help aerate the treatment cells. This was achieved by spraying the water about three feet above the lagoon surface creating a fountain, which allowed oxygen to be added to the water by increasing the water surface area in contact with the air. Based on discussions with MSB, facility operators were running one 23-hp pump and four 13-hp Pumps for full 24-hour periods during the majority of the summer discharge months. Total power consumption of the gasoline-powered pumps was estimated to be approximately 1,342 kWh per day of electrical power equivalence.

At the end of September 2016, MSB installed two aerators, one each in Cells 1 and 2. The aerators utilize 3 horsepower (hp) blowers. The electrical consumption for the new aeration equipment is estimated at 161 kWh per day.

*ND= NO DATA

2.4 FINANCIAL STATUS OF EXISTING FACILITIES

Talkeetna's water and wastewater systems operate under the same budget. In 2014, HDR Alaska completed a comprehensive rate study for the Talkeetna Water and Sewer system. The study assumes that the wastewater system accounts for approximately 45% of the total budget. The following sections describe current and anticipated rate schedules, annual O&M costs, and debts and reserve accounts.

2.4.1 Current Rate Schedule

MSB charges a flat monthly sewer rate which varies depending on if the service is classified as residential or commercial. Commercial services include restaurants as well as connections that serve more than one structure. The recent and anticipated monthly sewer rate schedule is shown in *Table 2-4*.

Table 2-4: Current Rate Schedule for Talkeetna Sewer Services

Fiscal Year	2015	2016	2017	2018
Rate Increase		13.5	13.5	Neutral
Residential	\$47.34	\$53.50	\$60.46	\$60.46
Commercial	\$89.38	\$101.00	\$114.13	\$114.13

2.4.2 Annual O&M Cost

The total operations and maintenance cost for the 2016 fiscal year was \$291,369.18. *Table 2-5* summarizes total O&M costs for the Talkeetna utility system, and estimates wastewater system costs. The estimated O&M costs for the wastewater system include the collection system as well as WWTF. Based on discussions with MSB staff it has been assumed that the collection system accounts for 30% of the total wastewater O&M costs and the treatment facility accounts for 70% of the total wastewater O&M costs. Cost breakdowns between the collection system and WWTF have also been included in *Table 2-5*

Table 2-5: Talkeetna Utility 2016 Budgeted O&M Costs

Expense Description	Total Water and Sewer Expenses	Sewer (45% of Total)	Collection (30% of Sewer Budget)	WWTF (70% of Sewer Budget)
Salaries and Wages (including benefits)	\$151,114.86	\$68,001.69	\$20,400.51	\$47,601.18
Office Supplies	\$13,476.58	\$6,064.46	\$1,819.34	\$4,245.12
Utilities/Building Operations	\$33,982.36	\$15,292.06*	\$6,116.82**	\$679.65***
Professional Charges	\$6,290.44	\$2,830.70	\$849.21	\$1,981.49
Insurance and Bond	\$19,159.91	\$8,621.96	\$2,586.59	\$6,035.37
Maintenance	\$7,347.65	\$3,306.44	\$991.93	\$2,314.51
Testing/Training Contracts	\$33,853.85	\$15,234.23	\$4,570.27	\$10,663.96
Office/Maintenance Supplies	\$6,258.95	\$2,816.53	\$844.96	\$1,971.57
Fuel/Oil	\$1,438.97	\$647.54	\$194.26	\$453.28
Miscellaneous Supplies	\$6,842.18	\$3,078.98	\$923.69	\$2,155.29
Other Equipment	\$10,221.43	\$4,599.64	\$1,379.89	\$3,219.75
Loan Payment/Interest	\$1,382.00	\$621.90	\$186.57	\$435.33
Total	\$291,369.18	\$ 131,116.13	\$36,786.17	\$85,834.38

^{*}Accounts for 20% of System Cost

2.4.3 Users by Monthly Usage Categories

The Talkeetna System currently serves a total of 195 customers. The current number of residential and commercial users is shown in *Table 2-6*. Seasonal customers do not receive a discount on monthly sewer rates.

Table 2-6: Wastewater Customers by Category

	Full time	Seasonal	Total
Residential	98	15	113
Commercial	64	15	82

2.4.4 Existing Debts and Reserve Accounts

The Talkeetna water and sewer system has been operating at a deficit for a number of years. *Table 2-7* summarizes revenues, expenditures and net change in funds from 2015 to 2016. Note that the budget deficit for the last fiscal year was inflated by a one-time debt obligation of \$214,000.



^{**}Accounts for 90% of Wastewater Cost

^{***}Accounts for 10% of Wastewater Cost

Table 2-7: Utility System Debts

	2016			2015
		Budget	Actual	Actual
Revenue				
Charges for Services (Water and Sewer)	\$	262,549	\$ 225,842	\$ 222,418
Intergovernmental (PERS relief)	\$	-	\$ 1,855	\$ 12,719
Expenditures				
Public services	\$	(322,408)	\$ (289,987)	\$ (275,308)
Debt service	\$	(1,383)	\$ (1,383)	\$ (1,462)
Deficiency of Revenues over Expenditures	\$	(61,242)	\$ (63,673)	\$ (41,633)
Other Financing Uses				
Transfers out	\$	(214,000)	\$ (214,000)	\$ -
Net Change in Fund Deficit	\$	(275,242)	\$ (277,673)	\$ (41,633)
Deficit at the beginning of the fiscal year			\$ (160,644)	\$ (119,011)
Deficit at the end of the fiscal year			\$ (438,317)	\$ (160,644)

3.0 Need for the Project

3.1 HEALTH, SANITATION AND SECURITY

MSB is committed to providing safe and reliable water and wastewater service to the community of Talkeetna. As previously noted, the existing WWTF is not in compliance with its discharge permit. ADEC has issued two official Notices of Violations for failure to comply with permit conditions under 18AAC 83.405(b), as well as a Notice of Intent to Seek Penalties for Clean Water Act Violations. The first Notice of Violation related mainly to record keeping and the second Notice of Violation was in response to effluent limit violations. These notices are included in Appendix A.

Addressing compliance issues related to effluent FC and DO concentrations is considered the highest priority as they are the most common violations and were specifically mentioned in ADEC correspondence. Capacity increases to provide additional treatment to remove BOD₅ and TSS will also be considered as part of a phased upgrade plan.

3.2 AGING INFRASTRUCTURE

The original WWTF, consisting of the two facultative lagoon cells and a percolation cell, was constructed almost 30 years ago. As the Talkeetna community and tourism industry has grown, the WWTF has become undersized to manage hydraulic, solids, and organic loadings. The wetlands were installed in 2003 in an attempt to improve treatment. The system relies on facultative lagoon treatment with wetland polishing to meet permit requirements. Neither facultative lagoons nor wetlands treatment provide the opportunity to increase the DO content of the effluent or provide dependable disinfection to meet required permit levels.



Furthermore, the vertical location of the pipe outlet from Lagoon 3 hinders its ability to draw from the optimal location within the water column to support adequate DO levels. Concerns with hydraulic and treatment capacity, as well as operating deficiencies pertaining to the WWTF, are further explained in the following sections.

3.2.1 Hydraulic Loading

Inflow

The current hydraulic loading design for the WWTF is for a maximum influent flow rate of 42,000 gpd. Beginning in January 2016, MSB began monitoring flows at the G Street lift station to better quantify influent flow rates. Inflows to the WWTF for January through April 2016 ranged from approximately 20,000 gpd to 40,000 gpd (*Figure 3-1*). Beginning in May 2016, inflows significantly increased, ranging from approximately 80,000 to 110,000 gpd before tapering off in September 2016. Flows are expected to remain in the 20,000 gpd range for the remaining winter months. It is expected that this flow pattern repeats annually.

This data indicates that wastewater inflows are comprised of two sources. One source is the base inflow generated by year-round residents. The other source is the seasonal inflow generated by tourism and by inflow and infiltration (I&I) from spring melt and rain events, and groundwater entering the collection system.

Existing base flow rates, representing year-round resident contributions, are assumed to be 20,000 gpd. Seasonal flow rates, representing flows from tourism and I&I, are assumed to be 70,000 gpd with occasional peaks of approximately 90,000 gpd. Recorded inflows from January through April and September through December are within the treatment design flow range. From May to September, recorded inflows are approximately double the design flow, demonstrating that the WWTF is hydraulically overloaded for the majority of the discharge season.

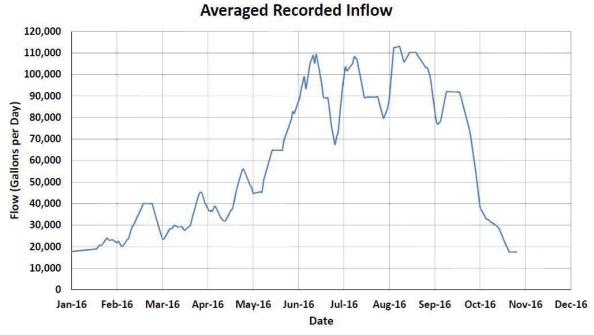


Figure 3-1: SCADA Averaged Inflows to the Talkeetna WWTF

During the spring/summer of 2017 MSB began repairing manholes that were causing significant I&I into the system. Additionally, MSB is making efforts to educate residents on water usage characteristics, namely the common practice of continually running water faucets to prevent frozen pipes. MSB also has the option to implement usage based billing for residential users if this practice continues. Due to the timing of these actions, any flow reductions were not captured in the data displayed above and in the overall design calculations. Flows will be reanalyzed during full design of the chosen alternative.

Hydraulic Retention Times and Storage

Hydraulic retention time (HRT) is the amount of time wastewater remains in the treatment system and is a function of total working volume and daily inflow. ADEC's *Lagoon Construction Guidelines* require a minimum hydraulic retention time of 240 days. The design parameters used for upgrades to the WWTF in 2003 assumed a retention time of 220 days.

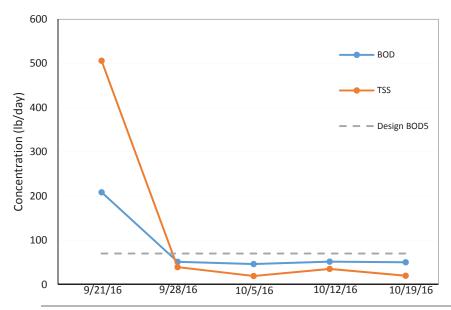
Dividing the total treatment volume for the existing facility (9.3 million gallons) by average summer inflows of 90,000 gpd, gives an operating HRT of 103 days, approximately half of the design retention time. Adding to the reduced HRT experienced during the summer, winter influent flows receive little to no facultative treatment during frozen conditions. This means that minimally treated wastewater from the winter is being prematurely flushed through the WWTF by the increased summer flow rates. Finally, due to sludge accumulation, the working volume within the treatment cells is likely less than the stated 9.4 MG, further decreasing HRT.

In order for the WWTF to operate at an appropriate HRT, additional storage for incoming wastewater flows is needed.

3.2.2 Solids/Organic Loading

In September and October 2016, MSB started data collection to better identify influent wastewater characteristics. Weekly composite samples were collected at the G Street lift station

Influent BOD₅ and TSS Concentrations



and analyzed to determine BOD₅, TSS, and Chemical Oxygen Demand (COD). Concentrations were correlated to flow data to determine a daily loading rate in pounds per day of BOD₅ and TSS. *Figure 3-2* shows calculated BOD₅ and TSS loadings using composite sample results and SCADA flow data.

Sampling occurred after the summer tourism season, thus the collected data represents the residential, i.e. base flow, characteristics. Base flow



organic loading is approximately 50 lb BOD₅/day. Although the data set includes one data point with a BOD₅ loading of 208 lb/day, which likely correlates with the end of seasonal flows, additional data collection is necessary to make any reliable conclusions regarding seasonal influent loadings.

Because full year influent flow data are unavailable, recommended values for BOD₅ and TSS loading rates from Lee Metcalf & Eddy⁶⁵ will be applied to forecasted tourism and residential populations to generate design influent loading criteria for alternative analysis.

Base Loading

A value of 0.17 lbs of BOD_5 per capita per day is commonly reported for municipal sewage and is assumed to be the BOD_5 contribution from year-round residents. Applying the loading rate to an estimated current population of 955 residents in 2016, equates to a loading of 162 lb BOD_5 /day from residential sources.

Seasonal Loading

Most visitors stay at lodges maintained by tourism companies and come into town for day-excursions to eat and shop at local businesses. Since the majority of overnight visitors stay in lodges which are outside of the wastewater service area, it has been assumed that seasonal flows will have a lower BOD₅ loading in comparison to base flows generated by year round residents. A value of 0.06 lbs of BOD₅ per capita per day is assumed to be the BOD₅ contribution from summer visitors to Talkeetna, occurring from June 1st to October 1st. This value represents approximately one third of the daily per capita contribution of residents and is suitable for representing contributions from tourists visiting Talkeetna for only a portion of the day. Applying this loading rate to the number of visitors to Talkeetna over the 2016 summer equates to a daily non-resident loading of approximately 85 lbs BOD₅/day.

Loading Capacity

Design documents from WWTF upgrades in 2003 specify a design BOD loading of 70 lbs BOD₅ per day. This design loading rate is less than half of the assumed base loading rate of 162 lbs BOD₅/day, adding in seasonal tourist loading increases rates to 247 lbs BOD₅/day. Under current conditions the WWTF is overloaded; as tourism and residential populations continue to grow, the system will become increasingly overloaded. Forecasted loading rates for base and seasonal flows over the 20-year design period are discussed in Section 3.3.

3.2.3 Inefficient Designs

Constructed Wetlands

Wetland treatment for FC removal is highly variable and cannot be relied upon to consistently meet the permit limits of 20 and 40 FC/100 mL for monthly average and daily maximum values, respectively. Furthermore, wetland treatment effluents should not be relied upon to consistently produce FC concentrations less than 500 FC/100 mL⁷⁶. Even if the FC permit limits were higher, the configuration of the wetlands may not allow for effective disinfection due to the water depth.



Typically, wetlands disinfection is achieved in part by natural UV disinfection in the very surface of the water. Shallower water also allows for remaining BOD₅ to be taken up more easily by the wetlands vegetation

Location of Outlet Pipes

The layer of water closest to the surface will generally contain more DO than lower portions of the water column. Currently the outlet pipe for pond 3 is at the bottom of the column, likely resulting in reduced DO prior to water entering the treatment wetlands than if it were in the upper levels of the water column.

The weir on the wetland discharge results in discharge at the top of the water column, with the highest DO concentrations. However, the treatment wetlands do not provide a mechanism for increasing the DO concentration of the water.

3.2.4 Treatment Limitations of Facultative Lagoons

While there are certain advantages to facultative lagoon treatment, there are also many drawbacks, namely the effluent quality that can be achieved. Under proper hydraulic loading and corresponding detention times, facultative lagoons are capable of meeting Talkeetna's stipulated limits for TSS and BOD₅ as evidenced by effluent DMRs during lower flow months. However, facultative lagoons are less consistent in removing FC and supporting adequate DO levels. As previously discussed, past DMR data from the Talkeenta WWTF indicates effluent concentrations for DO and fecal coliform are frequently outside permit limits. FC reduction is typically achieved by capture in the lagoons and long detention times in the wetlands.

3.3 REASONABLE GROWTH

Base Flow

Based on projections from Section 1.3.1, residential populations are expected to grow from 955 to 1,218, reflecting a 28% increase over the design period. Applying the same 28% increase to observed base flows of approximately 20,000 gpd yields a 20-year design base flow rate of 25,600 gpd.

As a check on base flow estimates, a brief survey of additional available collection capacity was conducted to determine if growth estimates are within the realm of feasibility. Because MSB requires that new facilities within the existing service area be connected to the water and wastewater system, a full system buildout can be inferred by analyzing the number of vacant lots adjacent to an existing sewer main. Note there are currently no plans to expand the collection system or service area. At full buildout, the system would have an additional 140 sewer connections; an approximate 55% increase from current conditions. Applying a 55% increase to the current base flow of 20,000 gpd yields a future base flow of approximately 31,000 gpd at maximum buildout.



At maximum buildout, the estimated flows are larger than flows based on population projections established in Section 1.3.1. Talkeetna is not expected to reach maximum buildout by the end of the design period, therefore, the lower projected base flow of 25,600 gpd will be used.

Seasonal Flow

As discussed in Section 1.3.2 of this report, tourism in Talkeetna is expected to continue to grow. By the end of the 20-year design period, 258,300 visitors per year can be expected. This is approximately 20% more than current conditions. Applying that 20% increase to existing seasonal flows results in a maximum daily seasonal flow rate of 108,000 gpd at the end of the 20-year design period. Projecting seasonal flows using this method also assumes that contributions from infiltration and inflow (I&I) continue to increase. If efforts are made to mitigate I&I, seasonal flow rates will not rise as fast. However, increases in nutrient loading (BOD₅/TSS) from increased tourism will remain unchanged.

20-Year Design Flows

Table 3-1 summarizes current flows and anticipated flows at the end of the 20-year design period. Ultimately, upgrades to WWTF should be capable of accepting inflows of 133,600 gpd.

Table 3-1: Design Flows

U				
	Current Year	20-Year Design (2036)	% change over 20-year design period	
Base Flow (Residential)	20,000 gpd	25,600 gpd	28%	
Seasonal Flows (Tourism and I/I)	90,000 gpd	108,000 gpd	20%	
Base Flow + Seasonal	110,000 gpd	133,600 gpd	21%	

While the existing WWTF is stressed from hydraulic loading in excess of its current design, the issue will continue to be exacerbated as residential populations and tourism continue to increase in Talkeetna. Additionally, even if the MSB can achieve reduced inflows by addressing I&I issues and through user education techniques, biological and nutrient loadings will remain unchanged and a significant reduction in lagoon volumes may not be achieved.

4.0 ALTERNATIVES CONSIDERED

The *Talkeetna WWTF Upgrades Alternative Memorandum* (Appendix C) presented five design alternatives capable of bringing the Talkeetna WWTF into regulatory compliance under current permit conditions through a 20-year design period. MSB staff selected two of the five alternatives for further evaluation in this report. The alternatives not selected are briefly discussed later in 4.1.3.

Table 4-1 summarizes the design parameters at the end of the 20-year design period.

Table 4-1: Main Design Criteria

Current Year	Design Year	Max Inflow	Average Daily Inflow	Max BOD
2016	2036	133,600 gpd	63,162 gpd	309 lb/day

In general, when developing initial design alternatives, the following site constraints and design objectives were also considered:

- ✓ Occupy a footprint small enough to fit on the parcel of land on which the treatment WWTF is currently located (approximately 40 acres);
- ✓ Provide adequate separation distance between the WWTF and nearby neighbors;
- ✓ Meet regulatory requirements for vertical separation between treatment structures and high groundwater for the area;
- ✓ Have the capability to withstand flood events without loss of functionality;
- ✓ Meet the regulatory stipulations outlined in the existing WWTF APDES discharge permit;
- ✓ Discharge seasonally into the slough April through October, weather permitting;
- ✓ Provide scalability of treatment for 20-year design flows;
- ✓ Be configured as needed to secure ADEC approval for construction.
- ✓ Not require an increase in current operator level.

4.1 DESCRIPTION OF FEASIBLE ALTERNATIVES

Two feasible design alternatives are presented and analyzed in the following section. Design parameters, layout, environmental impact, land requirements, potential construction problems, sustainability considerations, and cost are described for each feasible alternative.

4.1.1 Alternative 1 - Expand Facultative Lagoon Per Canadian Guidelines Description

Alternative 1 expands the existing facultative lagoon treatment system using a configuration and operation which complies with established standards for the Canadian Province of Alberta. Design components for this alternative include the addition of two anaerobic primary treatment lagoon cells, a storage cell, as well as a new reaeration basin and a chlorination/dechlorination disinfection system. This alternative utilizes the existing facultative lagoons and includes removal of the existing constructed wetlands.



Influent wastewater first flows through two 13.5-foot deep anaerobic cells, where large solids are settled out of the influent waste stream. From the anaerobic cells, wastewater flows through the existing facultative lagoon system to a new storage cell, where further settlement and BOD5 removal takes place. Baffles will be integrated into the existing Cell 3 and the new storage cell to mitigate hydraulic short circuiting. From the storage cell, treated water is directed to a new reaeration basin for DO permit compliance. From the reaeration basin, treated water is directed to a new disinfection building where chlorine is introduced to deactivate fecal coliform and other pathogens. Prior to discharge into the Talkeetna River slough, the effluent is dechlorinated to comply with surface water discharge requirements. *Figure 4-1* shows a conceptual layout and flow process for Alternative 1.

Design Parameters

Any upgrades to the Talkeetna WWTF must go through a plan review process with ADEC to ensure compliance with wastewater regulations. To ensure consistency with lagoon construction reviews, ADEC has issued Lagoon Construction Guidelines. While the guidelines are not necessarily regulatory, if a design uses alternative methods, a thorough explanation including supporting data is required for plan approval. Based on a meeting with Oran Wooley from ADEC Engineering Plan Approval, ADEC is open to this alternative sizing method.

Since 1982, the Canadian Province of Alberta has been proactive in its research of lagoon performance for 190 facultative lagoons operating in climatic environments not dissimilar to that of Talkeetna. The Province's Ministry of Environment and Parks is the agency which maintains and updates design and operational standards for facultative lagoon treatment systems.



While this alternative does not follow ADEC guidelines for sizing of facultative lagoons, based on published data from the University of Alberta, Edmonton, lagoon systems configured and operated according to provincial standards are capable of meeting Talkeetna's permit limits for BOD₅ and TSS. The addition of a reaeration basin and disinfection building allow the design to meet DO and fecal coliform requirements.

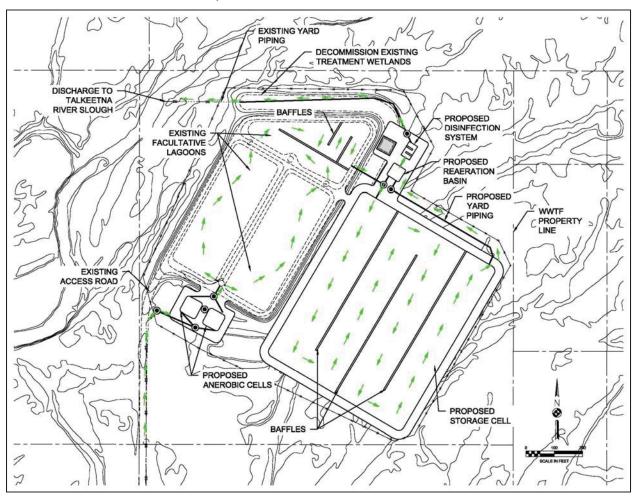


Figure 4-1: Alternative 1 Conceptual Site Layout

Environmental Impacts

Floodplains

WWTF expansion will require construction within the floodplain. To satisfy required depths and flow rates through each treatment cell, berms with 3:1 horizontal to vertical side slopes will be constructed. Berm design and construction will account for flood hazards associated with construction in the floodplain. During a flood event, the WWTF must remain operational and more importantly, ensure wastewater does not breach the lagoon and contaminate surface waters. Therefore, construction of lagoon berms must be of a sufficient height to protect the facility from the 500-year (0.2%) annual chance flood to satisfy USDA requirements.



HDL met with the MSB's floodplain coordinator, Taunnie Boothby, on July 20, 2017 to discuss the overall WWTF expansion project and requirements for construction within the floodplain. It was ultimately determined that the project is permittable provided that FEMA's two-step approval process for a Conditional Letter of Map Revision (CLOMR) and Letter of Map Revision (LOMR) are followed. With adequate protection berm heights, the CLOMR/LOMR process would either remove the proposed WWTF footprint or show that it is protected from the 500-year flood. Additionally, an MSB flood zone permit will be required to ensure that the addition of fill within the flood zone does not induce a net rise in flood elevation.

Wetlands

This alternative removes the previously constructed engineered wetlands. The construction of the additional storage cell and aeration basin will also impact the existing relict wetlands to the east of the existing treatment WWTF.

Other Land Resources

Treated effluent from the WWTF will continue to be discharged into a slough of the Talkeetna River. Ultimately, this alternative will improve effluent quality from the WWTF reducing impacts to nearby surface waters.

Endangered Species

Alternative 1 has no anticipated impact on endangered species.

Historical and Archeological Properties

Alternative 1 has no anticipated impact on cultural resources.

Generation and Management of Residuals and Wastes

Periodic solids removal for the storage cell and existing facultative treatment cells will be required every 5-10 years. Solids removal for the two anaerobic treatment cells will be required every 1-2 years. Typically, sludge removal is accomplished with floating dredges discharging sludge into either a mechanical dewatering process or a geotube. Sludge will need to be disposed of at a site or facility holding an ADEC permit for that type of disposal per 18 AAC 72.055.

Land Requirements

This alternative expands the WWTF footprint by as much as 11 acres, assuming the reuse of the existing infrastructure. The expanded footprint is within the existing property owned by MSB; however, separation distances between the WWTF and existing residential and commercial properties will be greatly reduced.



Potential Construction Problems

- High water table and addition of deep anaerobic settling cells;
- Retrofitting existing piping configurations for gravity flow between existing facultative lagoon cells and facility improvements;
- Amount of earthwork required to build up berms around storage cell and reaeration basin;
- Construction of a disinfection building in the floodplain or the need to build up site above flood elevations.

Sustainability Considerations

Energy Efficiency

This alternative introduces a reaeration basin and disinfection system. The reaeration basin will require blowers, and the disinfection system will require chemical injection pumps and likely SCADA monitoring equipment to regulate chlorine and dechlorination agent dosing.

Alternative 1 will be designed to use gravity flow between lagoon basins and will not require additional pumps.

Energy demand for Alternative 1 design components is relatively low in comparison to other alternatives which require 3-phase power.

Green Infrastructure

This project will improve the overall effluent quality of wastewater discharged to the Talkeetna Slough. Further, efforts will be made to maximize energy efficiency of building and mechanical systems to the greatest degree practicable.

Operational Simplicity

Alternative 1 does not introduce additional operational challenges. Current MSB staff will be capable of properly maintaining the system without higher level operator training or additional time. The system changes the existing process slightly with the addition of aeration and disinfection equipment that will need to be checked routinely. A contractor may need to be hired to assist with the periodic dredging of the lagoon and cleaning of anaerobic cells.

Cost Estimate

A preliminary cost estimate analyzing construction, non-construction, and operations and maintenance (O&M) costs for Alternative 1 was prepared.

Construction costs include major anticipated construction components such as yard piping, treatment equipment, and earthwork. Unit costs from recently bid projects in the region were utilized as much as possible. The preliminary estimate also assumes no inflation between now and the time of construction, a single-season construction period, and a competitive bidding environment. A detailed cost estimate with breakdowns of work items and corresponding unit prices is included in Appendix B.



Non-construction costs include engineering services for design and construction, MSB administration, and a 20% construction contingency. Engineering services include development of plans, specifications, and estimate; permitting; and construction administration, inspection, and testing. For the preliminary estimate, it was assumed that design phases services will be about 10% of the construction cost and construction phase services will be about 10% of the construction cost. MSB administration was assumed to account for 3% of the construction cost.

Combining construction and non-construction costs results in a total capital cost of \$7,800,000 for Alternative 1, as shown in *Table 4-2*.

Table 4-2: Alternative 1 Capital Cost

Item	Amount
Construction	
Civil Site Preparation	\$ 4,492,800
Treatment	\$ 446,000
Process Equipment and Building	\$ 265,000
Electrical/Controls	\$ 236,000
Non Construction	
Project Contingency (20% of Total Construction Cost)	\$ 1,088,000
Design Phase Services (12% of Total Construction Cost)	\$ 544,000
Construction Phase Services (10% of Total Construction Cost)	\$ 544,000
MSB Administration (3% of Total Construction Cost)	\$ 163,200
Total Capital Cost (Rounded)	\$ 7,800,000

O&M costs include all anticipated costs needed to properly maintain and operate the WWTF annually. Appendix B includes a more detailed cost estimate breakdown. O&M costs have been summarized based on required materials, labor and energy usages and are summarized in *Table 4-3*. We estimate the annual O&M cost for Alternative 1 will be \$119,500.

Table 4-3: Alternative 1 Annual O&M Cost

Description		Amount
Personnel	770 man-hours/season @ \$68/hr*	\$ 52,360
Administrative Costs	80 man-hours/year @ \$51/hr*	\$ 4,080
Energy Costs	50,000 kWh/season @ \$0.01/kWh	\$ 5,000
Sodium Hypochlorite for disinfection	3,150 gal/season @ \$3.50/gal	\$ 11,025
Sodium Bisulfate dechlorination	4,680 lb/season @ \$6/lb	\$ 28,080
Monitoring & Testing	6 tests/season @ \$250/test	\$ 1,500
Short Lived Asset		\$ 2,000
Maintenance/Replacement	6 tests/season @ \$250/test	\$ 2,500
Professional Services	\$50,000 every 5 years	\$ 10,000
Lagoon Sludge Disposal	\$2,500 /Season	\$ 2,500
Anaerobic Cell Sludge Disposal		
Annual Total (Rounded)		\$ 119,500

^{*}includes wages plus benefits

4.1.2 Alternative 2 - Convert WWTF to Partially Mixed Aerated Lagoon Description

Alternative 2 converts the existing WWTF to a partially mixed aerated lagoon treatment system. Alternative 2 includes the construction of four additional aerated lagoon cells adjacent to the



existing lagoon cells, as well as a disinfection building for chlorination and dechlorination prior to final discharge.

From Manhole B, wastewater flows into the existing facultative cells, where solids settle out of the water column. In winter months, these existing facultative cells will also serve as storage cells. From the existing facultative cells, wastewater is directed in series to a sequence of 13-foot deep aerated lagoon cells. The aerated lagoons supply the required oxygen to metabolizing microorganisms and provide mixing so that the microorganisms come into contact with dissolved and suspended organic matter for increased BOD₅ removal.

From the partially mixed aerated lagoons, wastewater is directed to a new disinfection building for chlorine disinfection. As with Alternative 1, de-chlorination is required prior to final discharge. *Figure 4-2* shows a conceptual layout and flow process for Alternative 2.

Design Parameters

Partially mixed aerated lagoon treatment systems are used by a number of municipal wastewater facilities throughout Alaska. These types of facilities are able to routinely achieve effluent qualities stipulated in the current Talkeetna APDES Permit.

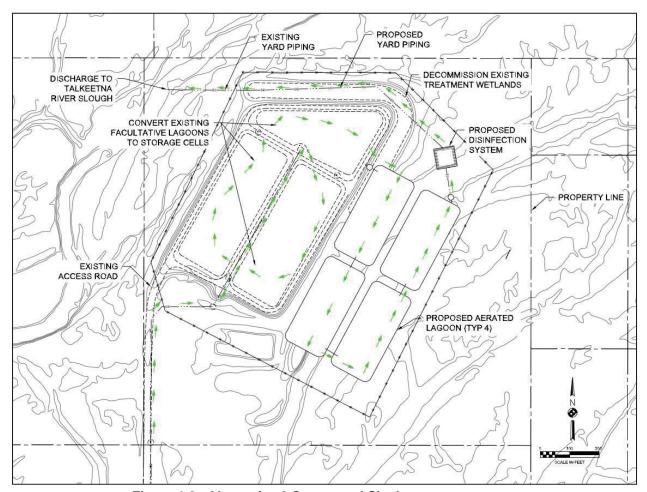


Figure 4-2: Alternative 2 Conceptual Site Layout



Environmental Impacts

Floodplains

As with Alternative 1, Alternative 2 will require construction in the floodplain. To satisfy required depths and flow rates through the aerated lagoons in addition to 2-feet of freeboard, 13-ft tall berms with 3:1 horizontal to vertical side slopes will be constructed. Berm design and construction will account for flood hazards associated with construction in the floodplain.

During a flood event, the WWTF must remain operational and more importantly, ensure wastewater does not breach the lagoons and contaminate surface waters. The disinfection building will also be constructed within the floodplain.

As with Alternative 1, the CLOMR/LOMR process would be followed to remove the WWTF from the flood zone or show that it is adequately protected from the 500-year flood and an MSB flood zone permit will be required to ensure that the addition of fill within the flood zone does not induce a net rise in flood elevation.

Wetlands

This alternative also removes the existing engineered wetlands. The construction of the four partially aerated lagoons will impact the relict wetlands to the east of the existing treatment WWTF.

Other Land Resources

Treated effluent from the WWTF will continue to be discharged into a slough of the Talkeetna River. Ultimately, this alternative will improve effluent quality from the WWTF, reducing impacts on nearby surface waters.

Endangered Species

Alternative 2 has no anticipated impact on endangered species.

Historical and Archeological Properties

Alternative 2 has no anticipated impact on cultural resources.

Generation and Management of Residuals and Wastes

Periodic dredging (every 5-10 years) will be required. The multiple aerated lagoon cell configuration would allow for cells to be drained for sludge excavation one at a time, while leaving the other cells operational. Sludge will need to be disposed of at a site or facility holding an ADEC permit for that type of disposal per 18 AAC 72.055. Aeration equipment must be removed from the basins during dredging to avoid damage.



Land Requirements

This alternative expands the WWTF footprint by approximately 6 acres. The footprint expansion is within the existing property owned by MSB.

Potential Construction Problems

- High water table and addition of deep treatment cells;
- Amount of earthwork required to build up berms around treatment cells;
- Construction of a disinfection building in the floodplain and the need to build up site above flood elevations.

Sustainability Considerations

Energy Efficiency

Alternative 2 requires the addition of 3-phase power to the site for a pair of duty/redundant 30 Hp blowers with variable frequency drive motor control equipment. As with Alternative 1, the disinfection system will require chemical injection pumps and SCADA monitoring equipment to regulate chlorine and de-chlorination agent dosing. Compared to Alternative 1, Alternative 2 requires more energy usage.

Green Infrastructure

This project will improve the overall effluent quality of wastewater discharged to the Talkeetna Slough. Further, efforts will be made to maximize energy efficiency of building and mechanical systems to the greatest degree practicable

Operational Simplicity

Additional staff will not be required to properly operate the system; however, equipment checks and cleaning must be performed on a regular basis. As previously mentioned, the lagoons must be periodically dredged (every five to ten years).

Cost Estimate

A preliminary cost estimate analyzing construction, non-construction, and operations and maintenance (O&M) costs for Alternative 2 was prepared.

Construction costs include major anticipated construction components such as yard piping, treatment equipment, and earthwork. For purposes of the preliminary estimate unit costs from recently bid projects in the region were utilized. The preliminary estimate also assumes no inflation between now and the time of construction, a single-season construction period, and a competitive bidding environment. A detailed cost estimate with breakdowns of work items and corresponding unit prices is included in Appendix B

Non-construction costs include engineering services for design and construction, MSB administration, and a 20% construction contingency. Engineering services include development of plans, specifications, and estimate; permitting; and construction administration, inspection and



testing. support during construction. For the preliminary estimate, it was assumed that design phases services will be about 10% of the construction cost and construction phase services will be about 10% of the construction cost. MSB administration was assumed to account for 3% of the construction cost.

Combining construction and non-construction costs results in a total capital cost of \$12,170,000 for Alternative 2, as shown in *Table 4-4*.

Table 4-4: Alternative 2 Capital Cost

Item	Amount
Construction	
Civil Site Prep	\$ 5,182,700
Treatment	\$ 2,378,600
Electrical/Controls	\$ 948,200
Non Construction	
Project Contingency (20% of Total Construction Cost)	\$ 1,702,000
Design Phase Services (10% of Total Construction Cost)	\$ 851,000
Construction Phase Services (10% of Total Construction Cost)	\$ 851,000
MSB Administration (3% of Total Construction Cost)	\$ 255,300
Total Capital Cost (Rounded)	\$ 12,170,000

O&M costs include all anticipated costs needed to properly maintain and run the treatment WWTF on a yearly basis. Appendix B includes a more detailed cost estimate breakdown. O&M costs have been summarized based on required materials, labor and energy usages and are summarized in Table 4-5. We estimate the annual O&M cost for Alternative 2 will be \$142,000.

Table 4-5: Alternative 2 Annual O&M Cost

Description		Amount
Personnel	790 man-hours/season @ \$68/hr*	\$ 53,720
Administrative Costs	80 man-hours/year @ \$51/hr*	\$ 4,080
Energy Costs	120,000 kWh/season @ \$0.10/kWh	\$ 12,000
Sodium Hypochlorite for disinfection	3,150 gal/season @ \$3.50/gal	\$ 11,025
Sodium Bisulfate dechlorination	4,680 lb/season @ \$6/lb	\$ 28,080
Monitoring & Testing	6 tests/season @ \$250/test	\$ 1,500
Short Lived Asset Maintenance/Replacement		\$ 5,000
Professional Services		\$ 2,500
Sludge Disposal	\$50,000 every 5 years	\$ 10,000
Annual Total (Rounded)		\$ 142,000

^{*}Includes wages plus benefits

4.1.3 Other Alternatives Considered but Not Deemed Feasible or Practical

A variety of alternatives were considered as possible solutions for achieving regulatory compliance of the WWTF. These alternatives are briefly discussed below, including explanations as to why they were determined to be not feasible or practical. The *Talkeetna WWTF Upgrades Alternative Memorandum* is included as Appendix C to this report. Note that cost estimates were not provided for these alternatives as USDA Bulletin 1780-2 only requires full analysis for alternatives deemed "Technically Feasible".



Do Nothing

The do nothing alternative is not considered as an option since it does not meet current state and federal standards for discharge into surface waters.

Build New WWTF in Different Location

This alternative would have constructed a separate WWTF to decentralize treatment and reduce loading on the existing system. The logical place to construct this new WWTF is on the west side of Talkeetna as the railroad tracks split the town roughly in half.

This alternative was not considered for further development because it would require additional land on the west side of town, which is severely limited and primarily consists of residential development. Because of the small land area, a mechanical treatment plant would also likely be required (see additional discussion below) and additional collection and conveyance piping would be needed resulting in a much more expensive project compared to development at the existing site.

Expand Facultative Lagoons per ADEC Guidelines

The ADEC Lagoon Construction Guidelines require that lagoons be sized for an HRT of 240 to 365 days. In addition, rain and snow falling on the ponds must be factored into the size of the ponds.

Further, the ponds themselves must be sized according to the anticipated organic loading to the WWTF. Organic loading to the WWTF is often estimated using suggested table values and can misrepresent actual conditions. In order to comply with the ADEC guidelines for the 20-year design period, the WWTF would need to be expanded to 24 acres. This alternative was classified as not practical due to the required footprint and cost compared to the similar alternative to construct a facultative lagoon system in accordance with Canadian guidelines.

Convert to Extended Aeration Activated Sludge Lagoon Treatment

For this alternative, the WWTF would be converted to an activated sludge lagoon treatment system by converting one of the cells to a biological treatment reactor basin and constructing a process building housing a clarifier and disinfection equipment. The existing lagoon cells would remain in place and be used to capture and store influent wastewater. This alternative was deemed not practical based on capital costs and O&M requirements necessary to keep the WWTF in working order. The Talkeetna WWTF currently operates at a deficit and significantly increasing yearly O&M costs is not a financial option. Additionally, this alternative would likely increase the required operator level for the plant. Talkeetna has experienced operator turnover in the past and it can be very difficult to find qualified personnel for the Talkeetna system.

Mechanical Treatment Plant

This alternative explored constructing a membrane bioreactor (MBR) mechanical treatment plant with disinfection. Existing treatment cells would remain in place and be used for wastewater storage during non-discharge months. As with the previous alternative, this alternative was



deemed as not practical based on capital costs, intensive O&M requirements and resulting increases to yearly O&M costs, and a likely increase in required operator level for the plant..

5.0 SELECTION OF AN ALTERNATIVE

5.1 LIFE CYCLE COST ANALYSIS

A present worth life cycle cost analysis was performed based on cost estimates for total capital cost and annual O&M costs. Total capital cost includes project construction cost and non-construction costs, such as engineering services, permitting, and construction contingencies. The analysis examined a 20-year design period and assigned a real discount rate of 0.5% as designated by the Office of Management and Budget to determine a present worth factor of 18.98.

The present worth factor is used to bring annual O&M costs to a present day value and is calculated using the following equation:

Present Worth Factor =
$$\frac{(1+i)^n - 1}{i(1+i)^n}$$

The present worth factor was then applied to the annual O&M cost developed in the previous section. The salvage value for both alternatives was assumed to be negligible at the end of the analysis period. *Table 5-1* summarizes total capital costs and annual costs used to determine present worth for each alternative. The present worth cost for each alternative is governed by the following equation:

 $Present\ Worth\ Cost = Capital\ Cost + (O\&M\ Cost\ x\ Present\ Worth\ Factor)$

Table 5-1: Alternative Cost Comparisons

Discount Rate (i) =	0.5%			
Planning Period = 2	20 years	5		
	Alt	ernative 1	Alte	ernative 2
Capital Cost	\$	7,800,000	\$	12,170,000
Annual O&M	\$	119,500	\$	141,400

Based the present worth analysis, Alternative 1, which upgrades the existing WWTF using Canadian lagoon constructing guidelines, is the less expensive alternative.

Net Present Worth \$ 10,069,000 \$ 14,855,000

5.2 NON-MONETARY FACTORS

A variety of non-monetary factors need to be considered in the selection of an alternative. These factors include reuse of existing facilities, adaptability for phased construction, adaptability for future regulatory requirements, overall footprint, and overall operability.



Reuse of Existing Facilities

To minimize cost and maximize the functionality of the existing WWTF, it is preferred that any upgrades to the WWTF utilize existing infrastructure. Alternative 1 continues to use the existing cells for facultative treatment and Alternative 2 converts the existing cells to winter storage. Because both alternative reuse the existing treatment infrastructure, there is no advantage between the two alternatives.

Adaptability for Phased Construction

Depending on available project funding, construction may need to be completed in phases. It is preferred that the selected alternative be adaptable to allow for cost effective construction phasing while still providing functional treatment.

Alternative 1 and 2 both achieve disinfection by utilizing a chlorination/dechlorination system. Alternatives 1 and 2 differ in means of achieving DO levels with Alternative 1 utilizing a reaeration basin and Alternative 2 depending on equipment installed in the aerated lagoons. Alternative 2 is more difficult to phase because to achieve proper DO levels, aeration equipment requires 3-phase power extensions, and additional lagoon construction.

Adaptability for Future Regulatory Requirements

The Talkeetna Slough is an anadromous stream, which may trigger future regulatory requirements on effluent ammonia levels. If future regulations establish ammonia limits, the WWTF may need to include nitrification in the treatment process. Nitrification is the process in which ammonia is converted to nitrate and is influenced by dissolved oxygen, pH, and temperature. Alternative 2 is better suited for future nitrogen removal based on the amount of oxygen and partial mixing within the aerated lagoons. Depending on actual regulatory limits, both alternatives may require additional biological filters.

Overall Footprint

The current WWTF footprint does not meet ADEC recommended separation distances to private property. A smaller footprint is preferred to minimize impacts and keep a positive relationship with surrounding private property owners. Based on preliminary conceptual layouts, Alternative 1 expands the WWTF by approximately 11 acres and Alternative 2 expands the WWTF by approximately 6 acres. Further, Alternative 1 shows a separation distance of 70 feet between edge of WWTF expansion and nearest private property line while Alternative 2 shows a separation distance of 240 feet between the edge of WWTF expansion and nearest private property line. Alternative 2 has a significantly smaller footprint.

Overall Operability/Operator Certification Level

MSB has indicated that there are not sufficient funds to hire additional personnel to assist with WWTF operation and maintenance. It is preferred that the selected alternative not require



additional staff, or additional operator certifications, for successful operation. Currently, the Talkeetna WWTF is classified as a Class 1 treatment system; it is preferred that the selected alternative allow the facility to remain classified as such. ADEC assigns classifications for treatment facilities using a point rating system outlined in 18 AAC 74. *Table 5-2* summarizes anticipated scores for each alternative. As a guideline, a score ranging between 1 and 30 points represents a Class I System Type and a score ranging from 31-55 represents a Class 2 System. Higher point ranges correlate to Class 3 and Class 4 systems.

Table 5-2 ADEC Facility Classification Rating

	Alternative	Alternative
Criteria	1	2
Size		
100,001 to 500,000 GPD	9	9
Pretreatment		
Influent Pumping	2	2
Flow equalization basin		1
Secondary Treatment		
Stabilization Pond without aeration	5	
Aerated Lagoon		8
Solids Disposal		
Off-site disposal	1	1
Disinfection		
Liquid and powdered hypochlorite	3	3
Dechlorination with chemical dechlorination agents other than gas	3	3
Effluent Discharge		
Effluent Aeration	2	
TOTAL	25	27

Based on the anticipated rating assigned in *Table 5-2*, Alternative 1 and Alternative 2 both fall within Type 1 Classification.

There are other advantages and disadvantages to both alternatives when considering overall operability. Both alternatives will require periodic sludge removal every 5-10 years, and Alternative 1 will require annual or bi-annual sludge removal within the two anaerobic cells and a large storage pond that will require periodic skimming. Alternative 2 utilizes more mechanical equipment requiring routine maintenance. Ultimately, current staff should be capable of maintaining either alternative.

5.3 DECISION MATRIX

A scoring and weighting matrix was developed to assist MSB with ranking of the two alternatives. The matrix includes monetary and nonmonetary factors previously described above, and assigns a score ranging from 1-10, indicating how well each alternative meets the criteria.

MSB has assigned an importance factor for each criteria to differentiate between criteria with high importance and those with less importance. To establish importance factors, a total of 100 points were distributed between each of the criteria. High point values indicate high importance and lower point values indicate relatively minor or insignificant importance to MSB. Additionally, some



scoring criteria such as environmental impacts and permitability were left off of the final scoring matrix because there was either no difference in scores or it was not deemed a useful criteria.

The weighted scores for each criteria were obtained by multiplying the importance factor by the corresponding score. The total score for each alternative is the sum of the weighted scores. The alternative with the highest score is the preferred alternative.

MSB staff and members of the consultant team independently scored each alternative using the developed matrix. Appendix D of this report includes the spreadsheet used to compile individual scores.

Table 5-3 includes average scores for each criterion for each alternative, and applies importance factors as assigned by MSB. After scores from members of MSB and the preliminary engineering team were tallied, Alternative 1 was shown to be the preferred alternative.



Table 5-3: Criteria Scoring and Weighting Matrix

	Importance Factor	Alternative 1 - Facultative Lag Canadian Sta	oons Per	Alternative 2 - Partially Mixe Lagoo	ed Aerated
Criteria	Total Points =100	Average Score 1= Least Desirable 10= Most Desirable	Rounded Weighted Score	Average Score 1= Least Desirable 10= Most Desirable	Rounded Weighted Score
Capital Cost	18	7.3	132	3.3	60
Annual O&M	22	6.9	152	5.7	104
Reuse of Existing Facilities	5	6.4	33	5.6	28
Adaptability for Phased Construction	15	6.9	104	5.6	84
Adaptability for Future	20	4.3	87	7.3	150
Overall Footprint	5	4.4	23	7.4	38
Overall Operability	15	6.2	94	7.0	105
TOTAL			622		564

6.0 PROPOSED PROJECT

6.1 PRELIMINARY PROJECT DESIGN

As discussed previously, the selected alternative expands the existing facultative lagoon treatment system using a configuration and operation which complies with established standards for the Canadian Province of Alberta. This alternative will allow the Talkeetna WWTF to consistently meet APDES permit requirements for projected 20-year wastewater flows previously established in *Table 4-1*.

Design components include the addition of two anaerobic primary treatment lagoon cells, a storage cell, a reaeration basin, and a chlorination/dechlorination disinfection system, as well as associated yard piping. This design utilizes the existing facultative lagoons, which currently



receive influent wastewater from the existing force main. Major system components are described in further detail below and are ordered according to their place in the overall treatment process:

Anaerobic Cells

Two new anaerobic cells will be constructed to handle incoming settleable solids. By placing these new cells at the head end of the overall treatment process, research has shown that 20-30 percent of incoming BOD5 can be removed before it makes its way into the facultative treatment lagoons.

The anaerobic cells are designed to operate in series to maximize the amount of settleable material removed and stored. The cells will be a minimum of 11.5 feet deep with 2 feet of additional freeboard above the standard water level for a 2-day detention time at peak flows. Periodic solids removal will be required for maximum operational efficiency. The proposed design places these cells before the existing Manhole A requiring portions of the existing force main and other conveyance piping be reconstructed to direct incoming flows through the anaerobic cells and further on to the existing facultative lagoons. To accommodate wastewater flows during sludge removal, bypass yard piping will be installed to allow for either cell to operate as the first in the series.

Existing 3-Cell Facultative Lagoon

After leaving the anaerobic cells, wastewater will flow to the existing facultative lagoon cells for further treatment to remove BOD5 and TSS. Existing yard piping will need to be reconfigured to allow for gravity drainage between the anaerobic cells and existing lagoons. Facultative treatment processes will require approximately 60 days of detention time to achieve adequate BOD5 and TSS removal per the Canadian Design Guidelines.

Storage Cell

From the final facultative cell, treated wastewater will be directed to a new 10.2 acre, 12-foot deep, storage cell for further BOD5 and TSS removal. The storage cell is sized to achieve a minimum retention time of 365 days and will provide the additional hydraulic capacity that the facility currently lacks.



Reaeration Basin

From the storage cell, treated wastewater will be directed to the reaeration basin to establish dissolved oxygen levels required in the APDES permit. The basin will be approximately 8 feet deep with an approximate volume of 75,000 gallons.

Air will be forced into the basin via submerged fine bubble diffusers. The diffusers will be suspended from floating aeration headers to allow for easy removal during dredging. A single low pressure air blower will be used to supply air to the submerged diffusers. Based on a maximum permitted discharge of 180,000 gpd, a 7.5 hp blower should be capable of maintaining adequate DO levels. Furthermore, to conserve energy, the blower can be installed with variable speed motor controls to maintain a set dissolved oxygen level based on SCADA equipment installed in the basin.

Disinfection System

From the reaeration basin, treated wastewater will be pumped through a disinfection system for removal of fecal coliforms and other pathogens. The disinfection system will consist of a small disinfection building for chemical storage, a chlorine contact basin, and chemical metering pumps for the addition of chlorination and de-chlorination chemicals. From the disinfection building, effluent piping will connect to a buried discharge pipe and treated effluent will be released into the Talkeetna River Slough, as currently permitted.

Table 6-1 Below summarizes preliminary dimensions for the major design components.

Table 6-1: Major Design Components **Total Depth (Including 2** Surface Quantity ft of freeboard) Area **Anaerobic Cell** 2 13.5 4,624 SF **Existing Lagoons** 1 7 5.5 Acres **Storage Cell** 10.2 Acres 1 12 1,000 SF **Reaeration Basin** 1 10 **Disinfection System** 1 NA NA

6.2 PROJECT SCHEDULE/PROJECT PHASING

Talkeetna primarily struggles with meeting its permit limits for DO and FC. Of secondary, yet still significant concern, are periodic violations of effluent BOD_5 and TSS, primarily owing to the need for additional treatment and storage capacity to meet ever increasing flows. To meet these needs in a manner that solves the most pressing issues first, the selected alternative has been broken into phases.

MSB has expressed a desire to address their DO and FC violations as soon as possible, to meet those needs, Phase 1 of the overall project will install the anaerobic cells, disinfection system, and reaeration basin. This will allow the existing facultative lagoons to treat lower strength



wastewater due to the removal of primary settleable solids within the anaerobic cells; and directly treat lagoon effluent to remove FC and introduce additional DO prior to discharge.

Phase 2 would construct the new storage cell, and reconfigure yard piping accordingly to meet the anticipated 20-year design flows.

The advantage of this phasing schedule is that Phase 2 can be constructed at any date after Phase 1 is finished, depending on the need for additional treatment capacity. All Phase 1 improvements would be adequately sized to handle future anticipate flows, or will include adequate space so that larger pumps, blowers, and other equipment could be easily swapped in during the subsequent Phase 2 expansions. *Figure 6-1* shows the preliminary layout, treatment process schematic, and proposed phasing for the selected alternative.

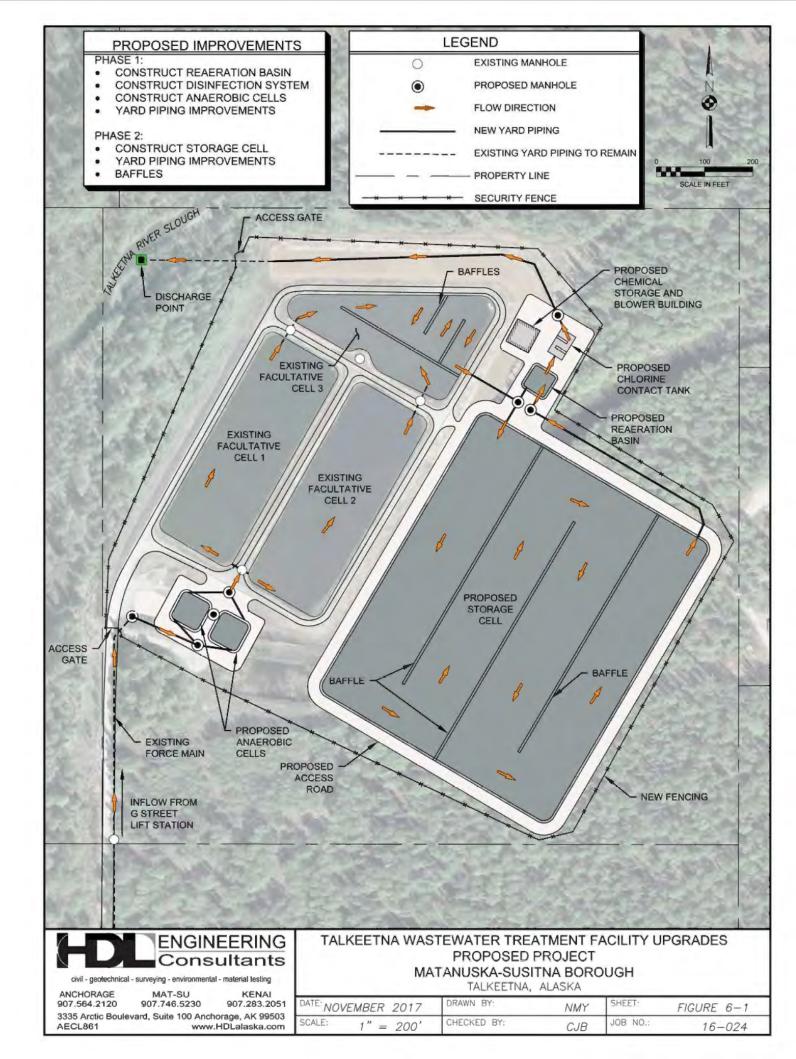
Table 6-2 presents proposed dates for major design and construction components to facilitate the completion of the proposed project. Note that land and easement acquisition has not been included since the proposed project is located entirely on MSB owned land.

Table 6-2: Project Schedule

Task	Proposed Start Date**	Proposed Completion Date**
USDA Review/Approval of PER	December 1, 2017	January 15, 2018
Phase 1		
Design/Permitting	March 2018	May 2018
Bidding	June 2018	June 2018
Construction	July 2018	June 2019
Initiate Operation/Substantial Completion		July 2019
Final Completion		September 2019
Phase 2		

As Needed to Meet Future Flows

^{*}All project schedules presented are dependent on approvals by USDA, MSB Assembly, and availability of matching grant funds.



6.3 PERMIT REQUIREMENTS

The proposed project does not change the discharge point or treatment methods, and will not affect the current APDES permit for discharge into surface waters. Based on discussions between MSB and ADEC, the Talkeetna WWTF discharge permit is not expected to be significantly modified during the next permit cycle in 2018. The proposed design for WWTF modifications must be approved by ADEC through an engineering plan review process that grants Approval to Construct the system.

Additionally, to meet USDA requirements that critical facilities are constructed outside of the 500-year floodplain, a FEMA CLOMR/LOMR permit will be required to remove the WWTF from the floodplain maps. Finally, an MSB Floodplain Development Permit is needed to show that construction within the floodplain results in no net rise of flooding elevations.

Additional permits for wetlands, cultural resources, fish and wildlife, etc. are identified in the Environmental Review document prepared along with this PER.

6.4 TOTAL PROJECT COST ESTIMATE

Preliminary cost estimates for construction phases have been developed based on anticipated construction costs and non-construction costs, including engineering design, construction program management, MSB administration, and construction contingency. The proposed project is on MSB owned land and is not anticipated to require additional land acquisition or easements. *Table 6-3* summarizes preliminary cost estimates for completion of Phases 1 and 2. Note that costs differ slightly from what is presented in Section 5 because of the increased cost of phasing work. Complete, itemized phased construction cost estimates can be found in Appendix E. MSB is seeking a grant through USDA Rural Development Program to fund 75 percent of the Total Capital Project Cost, with the remaining 25 percent to be matched by MSB.

Item	Phase 1	Phase 2	Total
Construction	\$ 2,270,000	\$ 3,140,000	\$ 3,170,000
Non Construction			
Project Contingency (20% of Total Construction Cost)	\$ 454,000	\$ 628,000	\$ 634,000
Design Phase Services (10% of Total Construction Cost)	\$ 227,000	\$ 376,800	\$ 317,000
Construction Phase Services (10% of Total Construction Cost)	\$ 227,000	\$ 314,000	\$ 317,000
MSB Administration (3% of Total Construction Cost)	\$ 68,100	\$ 94,200	\$ 95,100
Phased Project Cost (rounded)	\$ 3,200,000	\$ 4,600,000	\$ 4,500,000
Project Funding			
USDA Grant (75% of Project Cost)	\$ 2,400,000	\$ 3,450,000	\$ 3,375,000
MSB Match (25% of Project Cost)	\$ 800,000	\$ 1,150,000	\$ 1,125,000



6.5 ANNUAL OPERATING BUDGET

6.5.1 Income

Currently, all income is generated from utility service charges. To supplement service charges, MSB has started discussions to implement a sales tax in Talkeetna to help fund water and sewer operations.

MSB is currently working on a study to assess the revenue brought in by the tourism industry as well as an appropriate sales tax. These studies were not completed at the time of this report.

Table 6-4 summarizes system users for the current year (2016), and the design year (2036). Total users at the end of the design period were estimated by applying growth rates established in *Table 3-1* of this report. As previously stated, MSB has no plans of extending the collection system, but requires service connections for new developments adjacent to the existing system. Large agricultural or large commercial users are not anticipated to connect to the system.

Table 6-4 also applies the rate schedule previously presented in Table 2-4 and assumes annual rate increases along with increased users through the 20-year design period to estimate annual revenues.

Table 6-4: Sewer Rate Income

Year	Rate increase	Residential Sewer Rate	Commercial Sewer Rates	Existing Residential Customers	Projected Residential Customers	Existing Commercial Customers	Projected Commercial Customers	Existing Customer Total Revenue	Projected Customer Total Revenue
2016	13.5%	\$ 53.50	\$ 101.00	113	113	82	82	\$ 14,327.50	\$ 14,327.50
2017	13.5%	\$ 60.46	\$ 114.13	113	114	82	83	\$ 16,261.71	\$ 16,646.99
2018	2.5%	\$ 61.06	\$ 115.27	113	116	82	84	\$ 16,668.26	\$ 17,087.58
2019	2.5%	\$ 61.67	\$ 116.42	113	117	82	85	\$ 17,084.96	\$ 17,733.71
2020	2.5%	\$ 62.29	\$ 117.59	113	119	82	86	\$ 17,512.09	\$ 18,404.27
2021	2.5%	\$ 62.91	\$ 118.76	113	120	82	87	\$ 17,949.89	\$ 19,100.19
2022	2.5%	\$ 63.54	\$ 119.95	113	122	82	88	\$ 18,398.64	\$ 19,822.42
2023	2.5%	\$ 64.17	\$ 121.15	113	123	82	89	\$ 18,858.60	\$ 20,571.97
2024	2.5%	\$ 64.82	\$ 122.36	113	125	82	91	\$ 19,330.07	\$ 21,349.85
2025	2.5%	\$ 65.46	\$ 123.59	113	126	82	92	\$ 19,813.32	\$ 22,157.15
2026	2.5%	\$ 66.12	\$ 124.82	113	128	82	93	\$ 20,308.65	\$ 22,994.98
2027	2.5%	\$ 66.78	\$ 126.07	113	129	82	94	\$ 20,816.37	\$ 23,864.49
2028	2.5%	\$ 67.45	\$ 127.33	113	131	82	95	\$ 21,336.78	\$ 24,766.87
2029	2.5%	\$ 68.12	\$ 128.60	113	133	82	96	\$ 21,870.20	\$ 25,703.38
2030	2.5%	\$ 68.80	\$ 129.89	113	134	82	98	\$ 22,416.95	\$ 26,675.30
2031	2.5%	\$ 69.49	\$ 131.19	113	136	82	99	\$ 22,977.37	\$ 27,683.97
2032	2.5%	\$ 70.19	\$ 132.50	113	138	82	100	\$ 23,551.81	\$ 28,730.78
2033	2.5%	\$ 70.89	\$ 133.83	113	139	82	101	\$ 24,140.60	\$ 29,817.18
2034	2.5%	\$ 71.60	\$ 135.16	113	141	82	103	\$ 24,744.12	\$ 30,944.65
2035	2.5%	\$ 72.31	\$ 136.52	113	143	82	104	\$ 25,362.72	\$ 32,114.76
2036	2.5%	\$ 73.04	\$ 137.88	113	145	82	105	\$ 25,996.79	\$ 33,329.11

6.5.2 Annual O&M Costs

Table 6-5 summarizes annual operating costs for the complete facility upgrade. MSB can expect an annual O&M cost of \$119,500.

Table 6-5: Proposed Project Annual O&M Cost

Description		Amount
Personnel	770 man-hours/season @ \$68/hr*	\$ 52,360
Administrative Costs	80 man-hours/year @ \$51/hr*	\$ 4,080
Energy Costs	50 kWh/season @ \$0.10/kWh	\$ 5,000
Sodium Hypochlorite for disinfection	3,150 gal/season @ \$3.50/gal	\$ 11,025
Sodium Bisulfate dechlorination	4,680 lb/season @ \$6/lb	\$ 28,080
Monitoring & Testing	6 tests/season @ \$250/test	\$ 1,500
Short Lived Asset Maintenance/Replacement	1,300\$/Year	\$ 1,300
Miscellaneous Consumables	700\$/Year	\$700
Professional Services		\$ 2,500
Lagoon Sludge Disposal	\$50,000 every 5 years	\$ 10,000
Anaerobic Cell Sludge Disposal	2,500/season	\$ 2,500
Annual Total (Rounded)		\$ 119,500

^{*}Includes wages plus benefits

6.5.3 Debt Repayments

As previously discussed, the Talkeetna Water and Sewer System has been operating at a deficit for a number of years. For the 2016 fiscal year, the total deficit for the Water and Sewer System was \$438,317, roughly half of which was from the system taking on additional, one-time debt. Based on discussions with MSB, debt repayment will be through a combination of utility service charges, future sales tax, and fund transfers from MSB reserve accounts.

To fund the 25% match of the capital cost for upgrades to the facility, MSB will use available funds from their Capital Budget for Federal Grant Program Matches and likely supplement those funds with an Alaska Clean Water Fund loan through the State of Alaska Revolving Loan Program.

6.5.4 Reserves

Table 6-6 summarizes anticipated short lived assets, expected replacement periods, and estimated replacement costs.



Table 6-6: Short Lived Assets and Recommended Annual Reserve

Short Lived Assets	Replacement Period (Years)	Quantity/ Period		Cost/ Each	Т	otal Cost
Five Year Replacement Assets						
Aeration blowers						
Air Filter	1	5	\$	200.00	\$	1,000.00
Lubricant	1	5	\$	130.00	\$	650.00
Aeration diffusers and nozzles						
Complete Replacement	2	2.5	\$	500.00	\$	1,250.00
Lift Station Submersible Pumps						
Lift Station 1	5	1	\$	4,500.00	\$	4,500.00
Lift Station 2	5	1	\$	4,500.00	\$	4,500.00
G-Street Lift Station	5	1	\$	4,500.00	\$	4,500.00
Miscellaneous						
Computer & Software	5	1	\$	5,000.00	\$	5,000.00
Total Five Year Replacement Budge	et				\$	21,400.00
Annual Contribution	(Total/5)				\$	4,280.00
Ten Year Replacement Assets						
Chemical Feed Pumps						
Bleed valve Assembly	10	1	\$	150.00	\$	150.00
Injection Valve	10	1	\$	200.00	\$	200.00
Polyethylene discharge tubing	10	1	\$	4.00	\$	4.00
Strainer Assembly	10	1	\$	115.00	\$	115.00
SCADA System						
SCADA upgrades	10	1	\$	2,000.00	\$	2,000.00
Flow meters						
Complete Replacement	10	1	\$	2,000.00	\$	2,000.00
Security Devices and Fencing						
General Maintenance	10	1	\$	1,000.00	\$	1,000.00
General						
Sewer Utility Work Truck	10	1	\$	45,000.00	\$	45,000.00
Total Ten Year Replacement Budge	t				\$	59,369.00
Annual Contribution	(Total/10)				\$	5,936.90
Fifteen Year Replacement Assets						
Chemical Feed Pumps						
Complete Replacement	15	1	\$	1,500.00	\$	1,500.00
Pump Controls						
Complete Replacement	15	1	\$	1,000.00	\$	1,000.00
Security devices and fencing						
General maintenance	10	2	\$	1,000.00	\$	2,000.00
Total Fifteen Year Replacement Bu	dget				\$	4,500.00
Annual Contribution	(Total/15)				\$	300.00
		Recomme	ended Ar	nnual Reserve	\$	10,519.90



From *Table 6-6*, an annual deposit of \$10,519.90 is recommended for short lived asset replacement costs across the entire sewer system. Note that costs reflected in *Table 6-5* for the O&M cost estimate are for the proposed project only.

7.0 CONCLUSIONS AND RECOMMENDATIONS

Based on the engineering analysis presented in this report we recommend the following:

- Construct Alternative 1-Expand Facultative Lagoon Per Canadian Standards.
- ➤ Construct the proposed project in phases starting with Phase 1-Install Reaeration Basin and Disinfection Building. Phase 1 can be further broken into Phase 1a, which procures treatment equipment and installs temporary polyethylene tanks for interim operation while Phase 1b is designed. Phase 1b installs the permanent reaeration basin and disinfection systems and associated buildings and yard piping to address DO and FC concerns.
- Collect weekly influent composite samples during summer 2018 to aid in design of the full treatment system.
- Correct disconnect between SCADA flow readings at the water treatment facility and G-Street lift station to allow for accurate assessment of I&I contributions.
- Implement a sales tax to help fund annual O&M costs, balance the current deficit, and provide debt and equipment reserve accounts.
- Apply for a loan from the State Clean Water Fund Revolving Loan Program.



REFERENCES



¹ Talkeetna Sewer & Water Assessment, Sewer System Technical Memorandum, Prepared by CRW Engineering Group, LLC for Matanuska-Susitna Borough, August 2014.

² FEMA Technical Fact Sheet No. 1.6, *Designing for Flood Levels Above the BFE, December 2010.*

³ Alaska Population Projections 2015-2045, Alaska Department of Labor and Workforce Development, April 2016.

⁴ Alaska Visitor Statistics Program VI-Summer 2011

⁵ Talkeetna Community/Tourism Plan, March 2002

⁶ Lee Metcalf & Eddy, revised by G. Tchobanoglous, F. Burton, D. Stensel, *Wastewater Engineering Treatment and Reuse*, *4*th *Edition, New York:* McGraw-Hill Companies, Inc. 2003.

⁷ Kadlec, Robert H., and Robert L. Knight. "Pathogens." Treatment Wetlands. Boca Raton: Lewis, 1996. 537-40.

APPENDIX A ADEC CORRESPONDENCE



Department of Environmental Conservation

DIVISION OF WATER Compliance Program

555 Cordova Street, 3rd Floor Anchorage, Alaska 99501 Main: 907.269.6285 Fax: 907.269.3487 www.dec.alaska.gov

9/9/2015

NOTICE OF VIOLATION

Failure to Comply with Permit Conditions under 18 AAC 83.405(b) – Alaska Pollutant Discharge Elimination System Authorization Number AKG573033

Matanuska Susitna Borough Attn: Terry Dolan, Director of Public Works 1420 S. Industrial Way Palmer, AK 99645

Enforcement Tracking No: 15-R0495-40-0002

The Department alleges that on or around May 2014 through September 2014, and on or about May 2015 through July 2015, the Talkeetna Lagoon did unlawfully fail to comply with the conditions of the Alaska Pollutant Discharge Elimination System (APDES) General Permit for Domestic Wastewater Treatment Lagoons Discharging to Surface Water, Authorization Number AKG573033. Such noncompliance is in violation of 18 AAC 83.405(b) Duty to Comply and AS 46.03.710.

On September 1, 2015 Alaska Department of Environmental Conservation (ADEC) staff conducted a review of Discharge Monitoring Report (DMR) data from the Talkeetna Lagoon for compliance with permit effluent limits. Table 4 of the permit states the effluent limits that apply to the Talkeetna Lagoon. The following summary of permit effluent violations were identified during the DMR review:

- July 2015: effluent violation(s): dissolved oxygen daily minimum, and fecal coliform monthly mean and daily maximum.
- June 2015: effluent violations(s): dissolved oxygen daily minimum, chlorine monthly average, fecal
 coliform monthly mean and daily maximum.
- May 2015: effluent violations(s): dissolved oxygen daily minimum, fecal coliform monthly mean and daily maximum.
- September 2014: effluent violations(s): dissolved oxygen daily minimum, fecal coliform monthly mean and daily maximum.
- August 2014: effluent violations(s): dissolved oxygen daily minimum, fecal coliform monthly mean and daily maximum.
- July 2014 effluent violations(s): dissolved oxygen daily minimum, fecal coliform monthly mean and daily maximum.

- June 2014 effluent violation(s): pH instantaneous maximum, chlorine monthly average, and suspended solids minimum percent removal.
- May 2014 effluent violation(s): dissolved oxygen daily minimum, chlorine monthly average, fecal coliform monthly mean.

To address the violation described above, the Department requires that you do the following:

- a. Submit a written plan to ADEC that outlines the Boroughs actions it will take to come into compliance with the permit effluent limits. This plan should address future improvements both to the lagoon itself and to the operation and maintenance of the lagoon, and should specify the anticipated dates of the improvements.
- b. As a reminder, continue to submit DMR forms are complete in their entirety and are postmarked by the 15th of the following month. DMRs are also required for periods of no discharge.

Please respond to this request by no later than 10/15/2015. Deliverables can be submitted via mail, email, or fax:

Attention: Kara Kusche 555 Cordova Street Anchorage, AK 99501 Kara.kusche@alaska.gov

Fax: 907.296.4604

Penalties for violation of State statutes and regulations can be quite serious. In a civil action, a person who violates or causes or permits to be violated a provision of this regulation may be liable to the State for Substantial monetary damages under AS 46.03.760. Depending on the nature of the violation, you may also be liable for the State's response costs under AS 46.03.822, for spill penalties under AS 46.03.758-759, for administrative penalties under AS 46.03.761, or for other kinds of damages or penalties under other statutes.

In a criminal violation, a person who acts with criminal negligence may be guilty of a Class A misdemeanor. AS 46.03.790. Upon conviction, a defendant who is not an organization may be sentenced to pay a fine not exceeding \$10,000.00 and/or sentenced to a definite term of imprisonment of not more than one year. Upon conviction, a defendant that is an organization may be sentenced to pay a fine not exceeding the greater of \$500,000.00 or an amount which is three times the pecuniary damage or loss caused by the defendant to another or property of another. AS 12.55.035; each day of violation may be considered a separate violation. Alaska laws allow the State to pursue both civil and criminal actions concurrently.

Nothing in this notice shall be construed as a waiver of the State's authority or as an agreement on the part of the State to forego judicial or administrative enforcement of the above-described violation(s) or to seek recovery of damages, cost and penalties as prescribed by law. In addition, nothing herein shall be construed as a waiver of enforcement for past, present, or future violations not specifically set forth herein.

If you have questions, I may be contacted at (907) 269-7557, or via e-mail: kara.kusche@alaska.gov.

Kara Kusche, Enforcement Officer

Check One:

() Personally Served

Credential No. R-0440

(X) Sent by Certified Mail 7012 3460 0002 9326 8739

on the 9 day of September, 2015

cc: Amber Bennett, Environmental Program Specialist, ADEC Mike Soltet, Program Manager, ADEC Rick Cool, EPA



Department of Environmental

Conservation
DIVISION OF WATER
Compliance Program

5 Cordova Street, 3rd Floor Anchorage, Alaska 99501 Main: 907.269.6285 Fax: 907.269.3487 www.dec.alaska.gov

O&M Division

5/28/2015

NOTICE OF VIOLATION

Failure to Comply with Permit Conditions under 18 AAC 83.405(b) – Alaska Pollutant Discharge Elimination System Authorization Number AKG573033

Matanuska Susitna Borough Attn: Terry Dolan, Director of Public Works 1420 S. Industrial Way Palmer, AK 99645

Enforcement Tracking No: 15-R0495-40-0001

The Department alleges that on or around May 5, 2015 the Talkeetna Lagoon did unlawfully fail to comply with the conditions of the Alaska Pollutant Discharge Elimination System (APDES) General Permit Number AKG573000, Authorization Number AKG573033. Such noncompliance is in violation of 18 AAC 83.405(b) Duty to Comply and AS 46.03.710.

On May 5, 2015 Alaska Department of Environmental Conservation (ADEC) staff conducted an inspection of the Talkeetna Lagoon for compliance with their APDES permit. The following list of permit violations were identified during the facility inspection:

- 1) The facility does not have a written Lagoon Maintenance Program Plan.
 - Permit part 3.2 states that "the permittee shall develop and implement a Lagoon Maintenance Program Plan" and lists out what the plan must include.
- 2) The facility did have a copy of the Generic ADEC QAPP, but this QAPP did not contain any facility specific updates or information.
 - Permit part 5.0 discusses the requirements of the QAPP and the minimum facility specific elements of the QAPP.
- 3) Sampling chain of custody forms were not present onsite.
 - Permit Standard Conditions part 1.11.2.6 states that "the permittee shall retain records... of all monitoring information" which includes "quality assurance chain of custody forms."
- 4) Self-reported discharge monitoring report (DMR) data was reviewed and showed many non-receipt violations from failing to turn in DMRs or from turning in incomplete DMRs. Appendix 2 of the inspection report itemizes these violations.

- Permit Standard Conditions part 3.2.1 states that monitoring results shall be summarized
 each month on the DMR. The permittee must submit reports monthly postmarked by the
 15th day of the following month.
- 5) Self-reported discharge monitoring report (DMR) data was reviewed and dissolved oxygen and fecal coliform effluent violations were present in 2014. Appendix 2 of the inspection report itemizes these violations.
 - Permit part 2.3, Table 4 outlines the effluent limits for Class C lagoons.
- 6) DMRs are being signed by the wastewater operator and not by a principal executive officer or ranking elected official. Delegation of Authority documentation was absent.
 - Permit Standard Conditions part 1.12.2.3 states that reports must be signed by "either a
 principal executive officer or ranking elected official" or a "duly authorized representative
 of that person... if the authorization is made in writing."
- 7) Weekly lagoon inspections have been completed by the wastewater operator and documented in a log for 2014 and 2015. The log does not contain the name of the person conducting the inspections. 2013 records of weekly lagoon inspections were not able to be located onsite.
 - Permit part 3.3 states that "the permittee shall inspect the lagoon on a weekly bases" and that records "must include the...name of the person conducting the inspection."

To address the violation described above, the Department requires that you do the following:

- a. Develop a Lagoon Maintenance Program Plan and submit a copy to ADEC.
- b. Add facility specific permit-required information to the QAPP and submit a copy to ADEC.
- Ensure that all records related to monitoring are maintained onsite. This includes chain of custody forms.
- d. Ensure that DMR forms are completed in their entirety and are postmarked by the 15th of the following month. As a reminder, DMRs are required for periods of no discharge. Submit or re-submit DMRs for months that show up as non-receipt violations in the Violations Report as seen in Appendix 2 of the inspection report. Ensure that DMRs are signed by a principal executive officer, ranking elected official, or their written authorized representative.
- e. Moving forward, update the Weekly Lagoon Inspection documentation to also include the name of the person conducting the inspection. Submit completed Weekly Lagoon Inspection documentation for June 2015 to ADEC

Please respond to this request by no later than 7/31/2015. Deliverables can be submitted via mail, email, or fax:

Attention: Kara Kusche 555 Cordova Street Anchorage, AK 99501 Kara.kusche@alaska.gov Fax: 907.296.4604 Penalties for violation of State statutes and regulations can be quite serious. In a civil action, a person who violates or causes or permits to be violated a provision of this regulation may be liable to the State for Substantial monetary damages under AS 46.03.760. Depending on the nature of the violation, you may also be liable for the State's response costs under AS 46.03.822, for spill penalties under AS 46.03.758-759, for administrative penalties under AS 46.03.761, or for other kinds of damages or penalties under other statutes.

In a criminal violation, a person who acts with criminal negligence may be guilty of a Class A misdemeanor. AS 46.03.790. Upon conviction, a defendant who is not an organization may be sentenced to pay a fine not exceeding \$10,000.00 and/or sentenced to a definite term of imprisonment of not more than one year. Upon conviction, a defendant that is an organization may be sentenced to pay a fine not exceeding the greater of \$500,000.00 or an amount which is three times the pecuniary damage or loss caused by the defendant to another or property of another. AS 12.55.035; each day of violation may be considered a separate violation. Alaska laws allow the State to pursue both civil and criminal actions concurrently.

Nothing in this notice shall be construed as a waiver of the State's authority or as an agreement on the part of the State to forego judicial or administrative enforcement of the above-described violation(s) or to seek recovery of damages, cost and penalties as prescribed by law. In addition, nothing herein shall be construed as a waiver of enforcement for past, present, or future violations not specifically set forth herein.

If you have questions, I may be contacted at (907) 269-7557, or via e-mail: kara.kusche@alaska.gov.

Kara Kusche, Enforcement Officer

Credential No. R-0440

Kan Kove

Check One:

() Personally Served(X) Sent by Certified Mail7012 3460 0002 9326 5608

on the 28 day of May, 2015

cc: Amber Bennett, Environmental Program Specialist, ADEC Mike Solter, Program Manager, ADEC Rick Cool, EPA



APDES INSPECTION REPORT

Alaska Department of Environmental Conservation Division of Water 555 Cordova Street, Anchorage, AK 99501

Permit Number	Announced / Unannounced	Receiving Waters	Inspection Date
Number: AKG573033			Date: 5/5/2015
Effective: 9/1/2013	Announced	Announced Talkeetna River Slough	Entry Time: 8:30am
Expiration: 8/31/2018			Exit Time: 3:30pm
	Sect	ion 2: Facility Data	

On-Site Representative/Physical Address: Responsible Party/Mailing Address:

Name: Kathryn Childs Name: Terry Dolan

Title: Water and Wastewater Operator Title: Director of Public Works

Address: 1420 S. Industrial Way, Palmer, AK 99645 Address: Talkeetna, AK

Phone: 907-861-7756 Phone: 907-745-9818

Email: Kathryn.childs@matsugov.us Email: terry.dolan@matsugov.us Latitude/Longitude at the outfall: 62.3333 N, -150.1 W

Additional Inspection Participants: For internal use only: SEV: BOR41

James Jenson- Operations and Maintenance Division Manager SEV: AOS12 Catherine Beatty- ADEC SEV: E0012

Section 3: Findings

Background/Regulatory Status/Compliance History

The Talkeetna Lagoon is a domestic wastewater treatment facility with a design flow of .042 million gallons per day. It discharges to the Talkeetna River Sough April through October and is covered under the general permit for lagoons discharging to surface water. Facility treatment consists of 3 lagoon cells followed by a constructed wetlands. There are approximately 187 connections to the facility, some of which are seasonal.

The facility was last inspected by the ADEC Division of Water on 10/9/2013. The 10/9/2013 inspection did not note any violations.

This inspection covers the time period of 10/2013 through 5/2015 only.

Field Inspection

Upon arrival at the Matanuska Susitna Borough Public Works Office, introductions were exchanged and inspector credentials were presented. Following a records review at the office, a site tour was conducted of the Talkeetna Lagoon.

The following information was provided verbally by onsite representatives:

- Issues with oil and grease have caused line clogs and wastewater back-ups into crawlspaces.
- Summer 2014 had unusually stronger odors from the lagoon.

Talkeetna Lagoon May 28, 2015

• Upcoming planned maintenance activities include: cleaning out the duck weed, cutting back the brush around the lagoon berms to increase wind flow, checking the wastewater main with a camera, and replanting the wetlands with native vegetation.

- The Borough is working with a contractor to evaluate and recommend improvements to the facility.
- The facility is going to increase internal sampling at various points in the treatment process to determine how much treatment is occurring at each step.
- A dye test will be completed to establish retention time. Current retention time is estimated to be 2-3
 months.
- Influent samples are collected from manhole B, located immediately prior to entering cells 1 and 2.
- Effluent samples are collected from the weir, located immediately prior to the discharge pipe.
- The wetland plants are unevenly distributed due to strong winds shortly after wetland construction.
- The collection system has three total lift stations: two in town and one near the lagoon.
- The lagoon cells and wetlands are lined and the liner is believed to be in good condition.
- Mat Su Test Labs collects samples and analyzes for dissolved oxygen and pH. The wastewater operator
 also collects pH readings. SGS Laboratory performs sample analysis for fecal coliforms, total suspended
 solids, and biological oxygen demand. Meeting holding times has not been an issue.
- Flow data is collected with a hand-held flow meter at the weir. This is done by the wastewater operator.
- There are no chemical additives used in the treatment process.
- The lagoon is set up to perform a draw-down, but there has not been a need to do one.
- Some storm water does enter the lagoon via man holes, but little storm water flows directly into the lagoon due to the raised banks.
- Brush removal from the lagoon banks is typically done every other year, but the facility is going to try and do brush and weed removal yearly.
- The lagoons are approximately 6.5 feet deep. The constructed wetlands are approximately 1-2 feet deep.
- If needed, a vacuum truck is used to clean out grit, solids, etc. These solids are ultimately landfilled.
- Many businesses seasonally disconnect from the system during winter months. Otherwise, without heat to the business, pipes can freeze and break and flood the business.
- There have been no intentional bypasses of the facility. There is a possibility of an unintentional bypass related to the piping that is currently being looked into, but it is unclear whether or not that was part of the lagoons original intended design.
- Back-ups are uncommon, but can be fixed by the operators or a contractor.
- The G Street lift station has a back-up generator.
- The ground water table in the area is not very deep.
- The overflow pipe between ponds 1 and 2 is present to help balance water should one of the ponds get too full.
- Peak flow is approximately 175,000 gallons per day.
- The facility uses pH test strips instead of an electronic pH meter.

The following observations were made by ADEC inspectors:

- Influent and effluent sampling locations appear to be representative.
- The area around the lagoon and wetland is fenced and locked. The fencing was upright and functional.
- Several warning signs were posted along the fencing around the lagoon and at the main gate.
- Signage was posted on the slough bank near the discharge pipe outfall location.
- Small and medium sized vegetation were intermittently growing along the lagoon berms.
- The water levels in ponds 1 and 2 were below the overflow pipe, thus the overflow pipe between ponds 1 and 2 was not in use.

Talkeetna Lagoon May 28, 2015

- Duck weed was floating in some areas of wastewater surface.
- The constructed wetland did not have vegetation present in large sections.
- There was a mild sewage odor present at the facility.
- The effluent flowing across the weir prior to discharge was clear in color. The discharge location and was free of any sheen, unusual color, scum, or solids.
- · The outfall pipe was visible through the slough waters, but was fully submerged.
- Both the lagoon and outfall area was free of trash and debris.

Sampling	YES	NO	×
Sampling was not performed as part of this inspection.			
<u></u>			
Records Review			

The following records were reviewed as part of the inspection and are considered complete:

- Operation and Maintenance records are being maintained. These include logs of water usage, logs of meter reads, and records of major activities and projects.
- Mat Su Test Labs Field Sampling Procedures.
- A copy of the general permit is onsite.

The following records were reviewed as part of the inspection and are considered incomplete:

- The facility did have a copy of the Generic DEC QAPP, but this QAPP did not contain any facility specific updates or information.
- DMRs are being maintained onsite. However some DMRs are missing, and most present DMRs contain incomplete data.
- Weekly lagoon inspections have been completed by the wastewater operator and are documented on a log for 2014 and 2015. The log does not contain the name of the person conducting the inspections.

The following records were not available during the inspection:

- The facility does not have a written Lagoon Maintenance Program Plan.
- Sampling chain of custody forms.
- 2013 records of weekly lagoon inspections were not able to be located onsite.

Self-reported discharge monitoring report (DMR) data was reviewed and identified many non-receipt violations from failing to turn in DMRs or from turning in incomplete DMRs. Several effluent violations were also present. See appendix 2 of this report for a full listing of non-receipt and effluent violations. Facility representatives stated that they were unaware that no-discharge months required a DMR, and were unaware until recently that they had been using an incomplete DMR reporting form.

DMRs are being signed by the wastewater operator and not by a principal executive officer or ranking elected official. Delegation of Authority documentation was absent.

Section 4: Compliance

Violations

- 1) The facility does not have a written Lagoon Maintenance Program Plan.
 - a) Permit part 3.2 states that "the permittee shall develop and implement a Lagoon Maintenance Program Plan" and lists out what the plan must include.
 - b) Regulatory Citation: 18 AAC 83.405(b) Duty to Comply

Talkeema Lagoon May 28, 2015

2) The facility did have a copy of the Generic ADEC QAPP, but this QAPP did not contain any facility specific updates or information.

- a) Permit part 5.0 discusses the requirements of the QAPP and the minimum facility specific elements of the QAPP.
- b) Regulatory Citation: 18 AAC 83.405(b)
- c) Reference Documents: Generic ADEC QAPP (on file)
- 3) Sampling chain of custody forms were not present onsite.
 - a) Permit Standard Conditions part 1.11.2.6 states that "the permittee shall retain records... of all monitoring information" which includes "quality assurance chain of custody forms."
 - b) Regulatory Citation: 18 AAC 83.405(b)
- 4) Self-reported discharge monitoring report (DMR) data was looked at and identified many non-receipt violations from failing to turn in DMRs or from turning in incomplete DMRs.
 - a) Permit Standard Conditions part 3.2.1 states that monitoring results shall be summarized each month on the DMR. The permittee must submit reports monthly postmarked by the 15th day of the following month.
 - b) Regulatory Citation: 18 AAC 83.405(b)
 - c) Reference Documents: Violations Report, Appendix 2 of this report
- 5) Self-reported discharge monitoring report (DMR) data was looked at and dissolved oxygen and fecal coliform effluent violations were present in 2014.
 - a) Permit part 2.3, Table 4 outlines the effluent limits for Class C lagoons.
 - b) Regulatory Citation: 18 AAC 83.405(b)
 - c) Reference Documents: Violations Report, Appendix 2 of this report
- 6) DMRs are being signed by Kathryn Childs (Operator) and not by a principal executive officer or ranking elected official. Delegation of Authority documentation was absent.
 - a) Permit Standard Conditions part 1.12.2.3 states that reports must be signed by "either a principal executive officer or ranking elected official" or a "duly authorized representative of that person... if the authorization is made in writing."
 - b) Regulatory Citation: 18 AAC 83.405(b)
 - c) Reference Documents: DMRs on file at ADEC
- 7) Weekly lagoon inspections have been completed by Kathryn Childs and are documented on a log for 2014 and 2015. The log does not contain the name of the person conducting the inspections. 2013 records of weekly lagoon inspections were not able to be located onsite.
 - a) Permit part 3.3 states that "the permittee shall inspect the lagoon on a weekly bases" and that records "must include the...name of the person conducting the inspection."
 - b) Regulatory Citation: 18 AAC 83.405(b)
 - c) Reference Documents: Photo 22

Section 5: Appendixes

- 1. Photo Addendum
- 2. Violations Report from ICIS

Signature

Name – Kara Kusche

Credential Number: R-0440

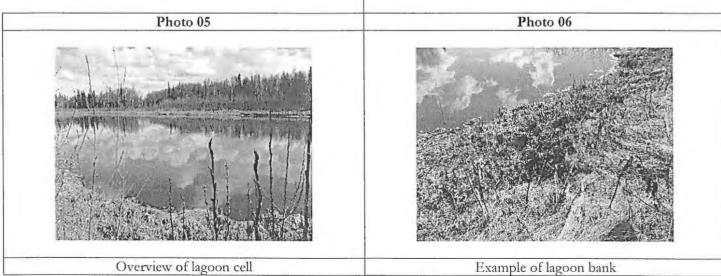
Phone: (907)269-7556

E-mail: kara.kusche@alaska.gov

x Kara Kushe

Date: 5/28/2015

Talkeetna Lagoon May 28, 2015 Photo Addendum Photo 01 Photo 02 Signage posted at the lagoon gate fencing Signage posted at the lagoon gate fencing Photo 04 Photo 03 O TRESPASSING MATANUSKA SUSITNA BOROUGH Signage posted at the lagoon gate fencing Overview of lagoon cell Photo 05 Photo 06



Talkeetna Lagoon May 28, 2015

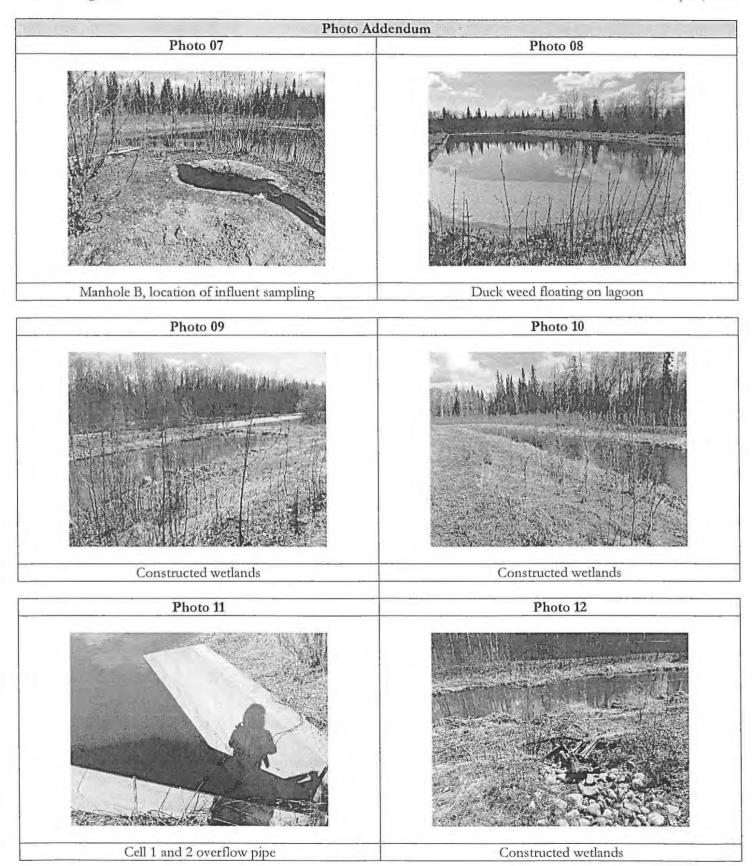
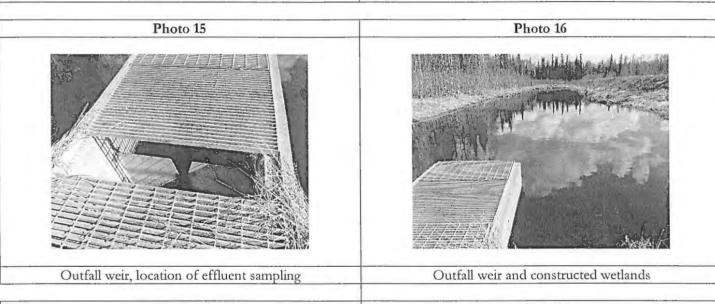
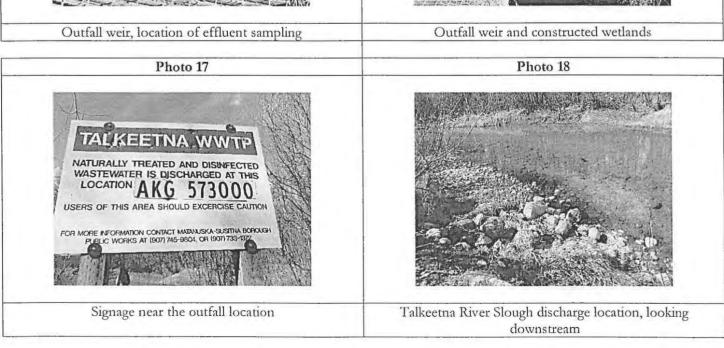
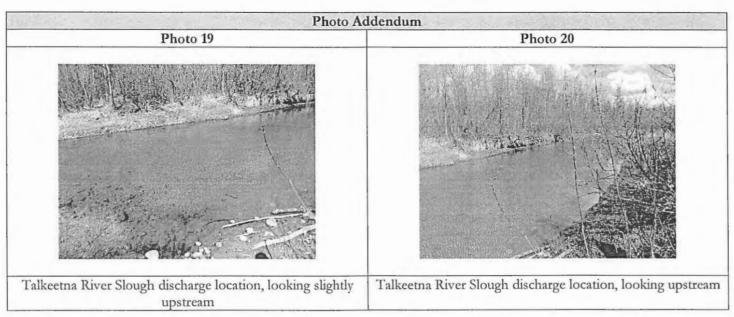


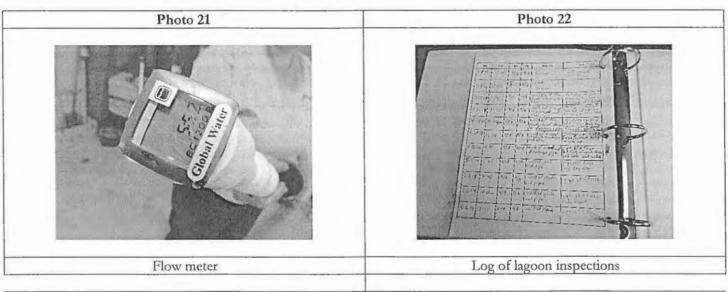
Photo Addendum Photo 13 Photo 14 Constructed wetlands Constructed wetlands





Talkeetna Lagoon May 28, 2015





NPDES ID(s): AKG573033 Major/Minor Indicator: Minor

Violation Date: 09/30/2013 - 03/31/2015

Violation Type(s): DMR Non-Receipt Violation: Effluent Violation; Schedule Violation; Single Event Violation

Environmental Protection Agency Integrated Compliance Information System **Violations Report**

Created Date: 09/15/2010 Refresh Date: 04/27/2015

Report Version 1.2, Modified: 01/03/2011

AKG573033

4952

Permittee Name:

MATSU BOROUGH-TALKEETNA LAGOON

Permittee Address:

340 EAST DAHLIA AVENUE

PALMER, AK 99645

RNC Tracking Flag:

Minor

On On

Primary SIC Code: Primary SIC Desc:

Sewerage Systems

Primary NAICS Code:

Primary NAICS Desc:

Cognizant Official:

Receiving Body:

Permit Issued:

08/01/2013

Permit Effective: Permit Expired:

09/01/2013

Permit Status:

08/31/2018 Effective

Major/Minor Indicator:

Compliance Track. Status: DMR Non Receipt Flag:

On

CHUCK BRAUN

Facility Information

Facility Name: Facility Location: TALKEETNA LAGOON

BEAVER ROAD

TALKEETNA, AK 99645

County:

State-Region:

Region:

Matanuska-Susitna

10

FRS ID:

110056402922

Federal Facility Ownership:

Type of Ownership:

				DMR Non-Re	eceipt Violati	ons					
Violation Code	Monitoring Period End Date	DMR Due Date	Limit Set	Parameter	Mon. Loc.	Seas.	DMR Value	NOOI Code	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date	DMR Val. Rec Date
D90	02/28/2015	03/15/2015	001-A	00300 - Oxygen, dissolved [DO]	1	0	C1		C. Freeze,		
D90	02/28/2015	03/15/2015	001-A	00300 - Oxygen, dissolved [DO]	1	0	C3		K 04/15/2015	1 04/15/2015	
D90	02/28/2015	03/15/2015	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	Q1		N 044457045	1	

04/15/2015 04/15/2015 D90 02/28/2015 03/15/2015 001-A 00310 - BOD, 5-day, 20 deg. C 1 0 C2 N 04/15/2015 04/15/2015 D80 02/28/2015 03/15/2015 001-A 00310 - BOD, 5-day, 20 deg. C G 0 C2 04/15/2015 04/15/2015 D90 02/28/2015 001-A 00310 - BOD, 5-day, 20 deg, C W 0 01 03/15/2015 04/15/2015 04/15/2015 D90 02/28/2015 03/15/2015 00310 - BOD, 5-day, 20 deg. C W 0 C2 001-A 04/15/2015 04/15/2015 D90 02/28/2015 00400 - pH 1 0 C1 03/15/2015 001-A K D90 02/28/2015 03/15/2015 001-A 00400 - pH 1 0 C3 04/15/2015 04/15/2015 N D90 02/28/2015 03/15/2015 001-A 00530 - Solids, total suspended 1 0 Q1 04/15/2015 04/15/2015

Created Date: 09/15/2010 Refresh Date: 04/27/2015

Report Version 1.2, Modified: 01/03/2011

	Name of Edition Co.	CAT OF STREET		DMR Non-Receip			D.44	MODI	DATE OF THE PARTY	DUO DO GOLDON	DUD VI-L T
Violation Code	Monitoring Period End Date	DMR Due Date	Limit Set	Parameter	Mon. Loc.	Seas.	DMR Value	NODI Code	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date	DMR Val. Red Date
D90	02/28/2015	03/15/2015	001-A	00530 - Solids, total suspended	1	0	C2		N 04/15/2015	1 04/15/2015	
D80	02/28/2015	03/15/2015	001-A	00530 - Solids, total suspended	G	0	C2		N 04/15/2015	1 04/15/2015	
D90	02/28/2015	03/15/2015	001-A	50050 - Flow, in conduit or thru treatment plant	1	0	Q2		K 04/15/2015	1 04/15/2015	
D90	02/28/2015	03/15/2015	001-A	50060 - Chlorine, total residual	1	0	C2		N 04/15/2015	1 04/15/2015	
D90	02/28/2015	03/15/2015	001-A	50060 - Chlorine, total residual	1	0	С3		K 04/15/2015	1 04/15/2015	
D90	02/28/2015	03/15/2015	001-A	74055 - Coliform, fecal general	1	0	C2		N 04/15/2015	1 04/15/2015	
D90	02/28/2015	03/15/2015	001-A	74055 - Coliform, fecal general	1	0	C3		K 04/15/2015	1 04/15/2015	
D90	02/28/2015	03/15/2015	001-A	81010 - BOD, 5-day, percent removal	К	0	C1				
D90	02/28/2015	03/15/2015	001-A	81011 - Solids, suspended percent removal	K	0	C1				
D90	01/31/2015	02/15/2015	001-A	00300 - Oxygen, dissolved [DO]	1	0	C1				
D90	01/31/2015	02/15/2015	001-A	00300 - Oxygen, dissolved [DO]	1	0	C3		K 03/18/2015	1 03/18/2015	
D90	01/31/2015	02/15/2015	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	Q1		N 03/18/2015	1 03/18/2015	
D90	01/31/2015	02/15/2015	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	C2		N 03/18/2015	1 03/18/2015	
D80	01/31/2015	02/15/2015	001-A	00310 - BOD, 5-day, 20 deg. C	G	0	C2		N 03/18/2015	1 03/18/2015	
D90	01/31/2015	02/15/2015	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	Q1		K 03/18/2015	1 03/18/2015	
D90	01/31/2015	02/15/2015	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	C2		K 03/18/2015	1 03/18/2015	
D90	01/31/2015	02/15/2015	001-A	00400 - pH	1	0	C1				
D90	01/31/2015	02/15/2015	001-A	00400 - pH	1	0	C3		K 03/18/2015	1 03/18/2015	
D90	01/31/2015	02/15/2015	001-A	00530 - Solids, total suspended	1	0	Q1		N 03/18/2015	1 03/18/2015	

Created Date: 09/15/2010 Refresh Date: 04/27/2015 Report Version 1.2, Modified: 01/03/2011

				DMR Non-Receip	t Violati	ons					
Violation Code	Monitoring Period End Date	DMR Due Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	DMR Value	NODI Code	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date	DMR Val. Red Date
D90	01/31/2015	02/15/2015	001-A	00530 - Solids, total suspended	1	0	C2		N 03/18/2015	1 03/18/2015	
D80	01/31/2015	02/15/2015	001-A	00530 - Solids, total suspended	G	0	C2		N 03/18/2015	1 03/18/2015	
D90	01/31/2015	02/15/2015	001-A	50050 - Flow, in conduit or thru treatment plant	1	0	02		K 03/18/2015	1 03/18/2015	
D90	01/31/2015	02/15/2015	001-A	50060 - Chlorine, total residual	1	0	C2		N 03/18/2015	1 03/18/2015	
D90	01/31/2015	02/15/2015	001-A	50060 - Chlorine, total residual	1	0	C3		K 03/18/2015	1 03/18/2015	
D90	01/31/2015	02/15/2015	001-A	74055 - Coliform, fecal general	1	0	C2		N 03/18/2015	1 03/18/2015	
D90	01/31/2015	02/15/2015	001-A	74055 - Coliform, fecal general	1	0	C3		K 03/18/2015	1 03/18/2015	
D90	01/31/2015	02/15/2015	001-A	81010 - BOD, 5-day, percent removal	K	0	C1				
D90	01/31/2015	02/15/2015	001-A	81011 - Solids, suspended percent removal	K	0	C1				
D90	12/31/2014	01/15/2015	001-A	00300 - Oxygen, dissolved [DO]	1	0	C1				
D90	12/31/2014	01/15/2015	001-A	00300 - Oxygen, dissolved [DO]	1	0	C3		K 02/15/2015	1 02/15/2015	
D90	12/31/2014	01/15/2015	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	Q1		N 02/15/2015	1 02/15/2015	
D90	12/31/2014	01/15/2015	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	C2		N 02/15/2015	1 02/15/2015	
D80	12/31/2014	01/15/2015	001-A	00310 - BOD, 5-day, 20 deg. C	G	0	C2		N 02/15/2015	1 02/15/2015	
D90	12/31/2014	01/15/2015	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	Q1		K 02/15/2015	1 02/15/2015	
D90	12/31/2014	01/15/2015	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	C2		K 02/15/2015	1 02/15/2015	
D90	12/31/2014	01/15/2015	001-A	00400 - pH	1	0	C1				
D90	12/31/2014	01/15/2015	001-A	00400 - pH	1	0	C3		K 02/15/2015	1 02/15/2015	
D90	12/31/2014	01/15/2015	001-A	00530 - Solids, total suspended	1	0	Q1		N 02/15/2015	1 02/15/2015	

Created Date: 09/15/2010 Refresh Date: 04/27/2015

Report Version 1.2, Modified: 01/03/2011

				DMR Non-Receip	t violati	ons .			ASSIGNATION OF STREET	And the state of the state of the	
/iolation Code	Monitoring Period End Date	DMR Due Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	DMR Value	NODI Code	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date	DMR Val. Red Date
D90	12/31/2014	01/15/2015	001-A	00530 - Solids, total suspended	1	0	C2		N 02/15/2015	1 02/15/2 0 15	
D80	12/31/2014	01/15/2015	001-A	00530 - Solids, total suspended	G	0	C2		N 02/15/2015	1 02/15/2015	
D90	12/31/2014	01/15/2015	001-A	50050 - Flow, in conduit or thru treatment plant	1	0	Q2		K 02/15/2015	1 02/15/2015	
D90	12/31/2014	01/15/2015	001-A	50060 - Chlorine, total residual	1	0	C2		N 02/15/2015	1 02/15/2015	
D90	12/31/2014	01/15/2015	001-A	50060 - Chlorine, total residual	1	0	C3		K 02/15/2015	1 02/15/2015	
D90	12/31/2014	01/15/2015	001-A	74055 - Coliform, fecal general	1	0	C2		N 02/15/2015	1 02/15/2015	
D90	12/31/2014	01/15/2015	001-A	74055 - Coliform, fecal general	1	0	С3		K 02/15/2015	1 02/15/2015	
D90	12/31/2014	01/15/2015	001-A	81010 - BOD, 5-day, percent removal	K	0	C1				
D90	12/31/2014	01/15/2015	001-A	81011 - Solids, suspended percent removal	K	0	C1				
D90	11/30/2014	12/15/2014	001-A	00300 - Oxygen, dissolved [DO]	1	0	C1				
D90	11/30/2014	12/15/2014	001-A	00300 - Oxygen, dissolved [DO]	1	0	C3		K 01/15/2015	1 01/15/2015	
D90	11/30/2014	12/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	Q1		N 01/15/2015	1 01/15/2015	
D90	11/30/2014	12/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	C2		N 01/15/2015	1 01/15/2015	
D80	11/30/2014	12/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	G	0	C2		N 01/15/2015	1 01/15/2015	
D90	11/30/2014	12/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	Q1		K 01/15/2015	1 01/15/2015	
D90	11/30/2014	12/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	C2		K 01/15/2015	1 01/15/2015	
D90	11/30/2014	12/15/2014	001-A	00400 - pH	1	0	C1				
D90	11/30/2014	12/15/2014	001-A	00400 - pH	1	0	C3		K 01/15/2015	1 01/15/2015	
D90	11/30/2014	12/15/2014	001-A	00530 - Solids, total suspended	1	0	Q1		N 01/15/2015	1 01/15/2015	

Created Date: 09/15/2010 Refresh Date: 04/27/2015

Report Version 1.2, Modified: 01/03/2011

				DMR Non-Receip	AND ADDRESS OF THE PARTY OF THE	100,000	The Paris of the P	Service Con			Service Allert Ball
Violation Code	Monitoring Period End Date	DMR Due Date	Limit Set	Parameter	Mon. Loc.	Seas.	DMR Value	Code	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date	DMR Val. Rec Date
D90	11/30/2014	12/15/2014	001-A	00530 - Solids, total suspended	1	0	C2		N 01/15/2015	1 01/15/2015	
D80	11/30/2014	12/15/2014	001-A	00530 - Solids, total suspended	G	0	C2		N 01/15/2015	1 01/15/2015	
D90	11/30/2014	12/15/2014	001-A	50050 - Flow, in conduit or thru treatment plant	1	0	Q2		K 01/15/2015	1 01/15/2015	
D90	11/30/2014	12/15/2014	001-A	50060 - Chlorine, total residual	1	0	C2		N 01/15/2015	1 01/15/2015	
D90	11/30/2014	12/15/2014	001-A	50060 - Chlorine, total residual	1	0	C3		K 01/15/2015	1 01/15/2015	
D90	11/30/2014	12/15/2014	001-A	74055 - Coliform, fecal general	1	0	C2		N 01/15/2015	1 01/15/2015	
D90	11/30/2014	12/15/2014	001-A	74055 - Coliform, fecal general	1	0	СЗ		K 01/15/2015	1 01/15/2015	
D90	11/30/2014	12/15/2014	001-A	81010 - BQD, 5-day, percent removal	К	0	C1				
D90	11/30/2014	12/15/2014	001-A	81011 - Solids, suspended percent removal	K	0	C1				
D90	10/31/2014	11/15/2014	001-A	00300 - Oxygen, dissolved [DQ]	1	0	C1				
D90	10/31/2014	11/15/2014	001-A	00300 - Oxygen, dissolved [DO]	1	0	СЗ		K 12/16/2014	1 12/16/2014	
D90	10/31/2014	11/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	Q1		N 12/16/2014	1 12/16/2014	
D90	10/31/2014	11/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	C2		N 12/16/2014	1 12/16/2014	
D80	10/31/2014	11/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	G	0	C2		N 12/16/2014	1 12/16/2014	
D90	10/31/2014	11/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	Q1		K 12/16/2014	1 12/16/2014	
D90	10/31/2014	11/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	C2		K 12/16/2014	1 12/16/2014	
D90	10/31/2014	11/15/2014	001-A	00400 - pH	1	0	C1				
D90	10/31/2014	11/15/2014	001-A	00400 - pH	1	0	C3		K 12/16/2014	1 12/16/2014	
D90	10/31/2014	11/15/2014	001-A	00530 - Solids, total suspended	1	0	Q1		N 12/16/2014	1 12/16/2014	

Created Date: 09/15/2010 Refresh Date: 04/27/2015 Report Version 1.2, Modified: 01/03/2011

Violation Code	Monitoring Period End Date	DMR Due Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	DMR Value	NODI Code	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date	DMR Val. Rec Date
D90	10/31/2014	11/15/2014	001-A	00530 - Solids, total suspended	1	0	C2	e	N 12/16/2014	1 12/16/2014	
D80	10/31/2014	11/15/2014	001-A	00530 - Solids, total suspended	G	0	C2		N 12/16/2014	1 12/16/2014	
D90	10/31/2014	11/15/2014	001-A	50050 - Flow, in conduit or thru treatment plant	1	0	Q2		K 12/16/2014	1 12/16/2014	
D90	10/31/2014	11/15/2014	001-A	50060 - Chlorine, total residual	1	0	C2		N 12/16/2014	1 12/16/2014	
D90	10/31/2014	11/15/2014	001-A	50060 - Chlorine, total residual	1	0	C3		K 12/16/2014	1 12/16/2014	
D90	10/31/2014	11/15/2014	001-A	74055 - Coliform, fecal general	1	0	C2		N 12/16/2014	1 12/16/2014	
D90	10/31/2014	11/15/2014	001-A	74055 - Coliform, fecal general	1	0	C3		K 12/16/2014	1 12/16/2014	
D90	10/31/2014	11/15/2014	001-A	81010 - BOD, 5-day, percent removal	К	0	C1				=
D90	10/31/2014	11/15/2014	001-A	81011 - Solids, suspended percent removal	K	0	C1				
D90	09/30/2014	10/15/2014	001-A	00300 - Oxygen, dissolved [DO]	1	0	C1				
D90	09/30/2014	10/15/2014	001-A	00300 - Oxygen, dissolved [DO]	1	0	СЗ		K 11/15/2014	1 11/15/2014	
D90	09/30/2014	10/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	Q1		N 11/15/2014	1 11/15/2014	
D90	09/30/2014	10/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	C2		N 11/15/2014	1 11/15/2014	
D80	09/30/2014	10/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	G	0	C2		N 11/15/2014	1 11/15/2014	
D90	09/30/2014	10/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	Q1		K 11/15/2014	1 11/15/2014	
D90	09/30/2014	10/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	C2		K 11/15/2014	1 11/15/2014	
D90	09/30/2014	10/15/2014	001-A	00400 - pH	1	0	C1				
D90	09/30/2014	10/15/2014	001-A	00400 - pH	1	0	C3		K 11/15/2014	1 11/15/2014	
D90	09/30/2014	10/15/2014	001-A	00530 - Solids, total suspended	1	0	Q1		N 11/15/2014	1 11/15/2014	

Created Date: 09/15/2010 Refresh Date: 04/27/2015 Report Version 1.2, Modified: 01/03/2011

Violation Code	Monitoring Period End Date	DMR Due Date	Limit Set	Parameter	Mon. Loc.	Seas.	DMR Value	NODI Code	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date	DMR Val. Red Date
D90	09/30/2014	10/15/2014	001-A	00530 - Solids, total suspended	1	0	C2		N 11/15/2014	1 11/15/2014	
D80	09/30/2014	10/15/2014	001-A	00530 - Solids, total suspended	G	0	C2		N 11/15/2014	1 11/15/2014	
D90	09/30/2014	10/15/2014	001-A	50050 - Flow, in conduit or thru treatment plant	1	0	Q2		K 11/15/2014	1 11/15/2014	
D90	09/30/2014	10/15/2014	001-A	50060 - Chlorine, total residual	1	0	C2		N 11/15/2014	1 11/15/2014	
D90	09/30/2014	10/15/2014	001-A	50060 - Chlorine, total residual	1	0	C3		K 11/15/2014	1 11/15/2014	
D90	09/30/2014	10/15/2014	001-A	74055 - Coliform, fecal general	1	0	C2		N 11/15/2014	1 11/15/2014	
D90	09/30/2014	10/15/2014	001-A	74055 - Coliform, fecal general	1	0	СЗ		K 11/15/2014	1 11/15/2014	
D90	09/30/2014	10/15/2014	001-A	81010 - BOD, 5-day, percent removal	K	0	C1				_
D90	09/30/2014	10/15/2014	001-A	81011 - Solids, suspended percent removal	K	0	C1				
D90	08/31/2014	09/15/2014	001-A	00300 - Oxygen, dissolved [DO]	1	0	C1				
D90	08/31/2014	09/15/2014	001-A	00300 - Oxygen, dissolved [DO]	1	0	C3		K 10/16/2014	1 10/16/2014	
D90	08/31/2014	09/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	Q1		N 10/16/2014	1 10/16/2014	
D90	08/31/2014	09/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	C2		N 10/16/2014	1 10/16/2014	
D80	08/31/2014	09/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	G	0	C2		N 10/16/2014	1 10/16/2014	
D90	08/31/2014	09/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	Q1		K 10/16/2014	1 10/16/2014	
D90	08/31/2014	09/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	C2		K 10/16/2014	1 10/16/2014	
D90	08/31/2014	09/15/2014	001-A	00400 - pH	1	0	C1				- 6
D90	08/31/2014	09/15/2014	001-A	00400 - pH	1	0	C3		K 10/16/2014	1 10/16/2014	
D90	08/31/2014	09/15/2014	001-A	00530 - Solids, total suspended	1	0	Q1		N 10/16/2014	1 10/16/2014	

Created Date: 09/15/2010 Refresh Date: 04/27/2015 Report Version 1.2, Modified: 01/03/2011

				DMR Non-Receip	t Violati	ons				and the second	47)
Violation Code	Monitoring Period End Date	DMR Due Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	DMR Value	NODI Code	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date	DMR Val. Rec Date
D90	08/31/2014	09/15/2014	001-A	00530 - Solids, total suspended	1	0	C2		N 10/16/2014	1 10/16/2014	
D80	08/31/2014	09/15/2014	001-A	00530 - Solids, total suspended	G	0	C2		N 10/16/2014	1 10/16/2014	
D90	08/31/2014	09/15/2014	001-A	50050 - Flow, in conduit or thru treatment plant	1	0	Q2		K 10/16/2014	1 10/16/2014	-
D90	08/31/2014	09/15/2014	001-A	50060 - Chlorine, total residual	1	0	C2		N 10/16/2014	1 10/16/2014	
D90	08/31/2014	09/15/2014	001-A	50060 - Chlorine, total residual	1	0	C3		K 10/16/2014	10/16/2014	
D90	08/31/2014	09/15/2014	001-A	74055 - Coliform, fecal general	1	0	C2		N 10/16/2014	1 10/16/2014	
D90	08/31/2014	09/15/2014	001-A	74055 - Coliform, fecal general	1	0	C3		K 10/16/2014	1 10/16/2014	
D90	08/31/2014	09/15/2014	001-A	81010 - BOD, 5-day, percent removal	К	0	C1				
D90	08/31/2014	09/15/2014	001-A	81011 - Solids, suspended percent removal	K	0	C1				
D90	07/31/2014	08/15/2014	001-A	00300 - Oxygen, dissolved [DO]	1	0	C1				12/31/2014
D90	07/31/2014	08/15/2014	001-A	00300 - Oxygen, dissolved [DO]	1	0	C3		K 09/15/2014	2 12/31/2014	12/31/2014
D90	07/31/2014	08/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	Q1	**X**	N 09/15/2014	1 09/15/2014	12/31/2014
D90	07/31/2014	08/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	C2		N 09/15/2014	2 12/31/2014	12/31/2014
D80	07/31/2014	08/15/2014	0 0 1-A	00310 - BOD, 5-day, 20 deg. C	G	0	C2	**X**	N 09/15/2014	1 09/15/2014	12/31/2014
D90	07/31/2014	08/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	Q1	**X**	K 09/15/2014	1 09/15/2014	12/31/2014
D90	07/31/2014	08/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	C2	**X**	K 09/15/2014	1 09/15/2014	12/31/2014
D90	07/31/2014	08/15/2014	001-A	00400 - pH	1	0	C1				12/31/2014
D90	07/31/2014	08/15/2014	001-A	00400 - pH	1	0	C3		K 09/15/2014	2 12/31/2014	12/31/2014
D90	07/31/2014	08/15/2014	001-A	00530 - Solids, total suspended	1	0	Q1	**X**	N 09/15/2014	1 09/15/2014	12/31/2014

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				DMR Non-Receip	t Violati	ons					Carlo and San San a
Violation Code	Monitoring Period End Date	DMR Due Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	DMR Value	NODI Code	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date	DMR Val. Red Date
D90	07/31/2014	08/15/2014	001-A	00530 - Solids, total suspended	1	0	C2		N 09/15/2014	2 12/31/2014	12/31/2014
D80	07/31/2014	08/15/2014	001-A	00530 - Solids, total suspended	G	0	C2	**X**	N 09/15/2014	1 09/15/2014	12/31/2014
D90	07/31/2014	08/15/2014	001-A	50050 - Flow, in conduit or thru treatment plant	1	0	Q2		K 09/15/2014	2 12/31/2014	12/31/2014
D90	07/31/2014	08/15/2014	001-A	50060 - Chlorine, total residual	1	0	C2	**X**	N 09/15/2014	1 09/15/2014	12/31/2014
D90	07/31/2014	08/15/2014	001-A	50060 - Chlorine, total residual	1	0	C3	**X**	K 09/15/2014	1 09/15/2014	12/31/2014
D90	07/31/2014	08/15/2014	001-A	74055 - Coliform, fecal general	1	0	C2		N 09/15/2014	2 12/31/2014	12/31/2014
D90	07/31/2014	08/15/2014	001-A	74055 - Coliform, fecal general	1	0	C3		K 09/15/2014	2 12/31/2014	12/31/2014
D90	07/31/2014	08/15/2014	001-A	81010 - BOD, 5-day, percent removal	K	0	C1	**X**			12/31/2014
D90	07/31/2014	08/15/2014	001-A	81011 - Solids, suspended percent removal	K	0	C1	**X**			12/31/2014
D90	06/30/2014	07/15/2014	001-A	00300 - Oxygen, dissolved [DO]	1	0	C1				12/31/2014
D90	06/30/2014	07/15/2014	001-A	00300 - Oxygen, dissolved [DO]	1	0	C 3		K 08/15/2014	2 12/31/2014	12/31/2014
D90	06/30/2014	07/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	Q1	**X**	N 08/15/2014	1 08/15/2014	12/31/2014
D90	06/30/2014	07/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	C2		N 08/15/2014	2 12/31/2014	12/31/2014
D80	06/30/2014	07/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	G	0	C2	**X**	N 08/15/2014	1 08/15/2014	12/31/2014
D90	06/30/2014	07/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	Q1	**X**	K 08/15/2014	1 08/15/2014	12/31/2014
D90	06/30/2014	07/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	C2	**X**	K 08/15/2014	1 08/15/2014	12/31/2014
D90	06/30/2014	07/15/2014	001-A	00400 - pH	1	0	C1				12/31/2014
D90	06/30/2014	07/15/2014	001-A	00400 - pH	1	0	C3		K 08/15/2014	2 12/31/2014	12/31/2014
D90	06/30/2014	07/15/2014	001-A	00530 - Solids, total suspended	1	0	Q1	**X**	N 08/15/2014	1 08/15/2014	12/31/2014

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Vieletier	A STATE OF THE STA	DMD Day	- Lancisco	DMR Non-Receip	mani-placement and mani-	HUSERIE HILLIAM I	DMR	NODI	RNC Det. Code/	RNC Res. Code/	DMR Val. Rec
Violation Code	Monitoring Period End Date	DMR Due Date	Limit Set	Parameter	Mon. Loc.	Seas.	Value	Code	RNC Det. Code/	RNC Res. Code/	Date Date
D90	06/30/2014	07/15/2014	001-A	00530 - Solids, total suspended	1	0	C2		N 08/15/2014	2 12/31/2014	12/31/2014
D80	06/30/2014	07/15/2014	001-A	00530 - Solids, total suspended	G	0	C2	**X**	N 08/15/2014	1 08/15/2014	12/31/2014
D90	06/30/2014	07/15/2014	001-A	50050 - Flow, in conduit or thru treatment plant	1	0	Q2		K 08/15/2014	2 12/31/2014	12/31/2014
D90	06/30/2014	07/15/2014	001-A	50060 - Chlorine, total residual	1	0	C2	**X**	N 08/15/2014	1 08/15/2014	12/31/2014
D90	06/30/2014	07/15/2014	001-A	50060 - Chlorine, total residual	1	0	C3	**X**	K 08/15/2014	1 08/15/2014	12/31/2014
D90	06/30/2014	07/15/2014	001-A	74055 - Coliform, fecal general	1	0	C2		N 08/15/2014	2 12/31/2014	12/31/2014
D90	06/30/2014	07/15/2014	001-A	74055 - Coliform, fecal general	1	0	C3		K 08/15/2014	2 12/31/2014	12/31/2014
D90	06/30/2014	07/15/2014	001-A	81010 - BOD, 5-day, percent removal	K	0	C1	**X**			12/31/2014
D90	06/30/2014	07/15/2014	001-A	81011 - Solids, suspended percent removal	K	0	C1	**X**			12/31/2014
D90	05/31/2014	06/15/2014	001-A	00300 - Oxygen, dissolved [DO]	1	0	C1				12/31/2014
D90	05/31/2014	06/15/2014	001-A	00300 - Oxygen, dissolved [DO]	1	0	C3		K 07/16/2014	2 12/31/2014	12/31/2014
D90	05/31/2014	06/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	Q1	**X**	N 07/16/2014	1 07/16/2014	12/31/2014
D90	05/31/2014	06/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	C2		N 07/16/2014	2 12/31/2014	12/31/2014
D80	05/31/2014	06/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	G	0	C2	**X**	N 07/16/2014	1 07/1 6 /2014	12/31/2014
D90	05/31/2014	06/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	Q1		K 07/16/2014	1 07/16/2014	
D90	05/31/2014	06/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	C2		K 07/16/2014	2 12/31/2014	12/31/2014
D90	05/31/2014	06/15/2014	001-A	00400 - pH	1	0	C1				12/31/2014
D90	05/31/2014	06/15/2014	001-A	00400 - pH	1	0	C3		K 07/16/2014	2 12/31/2014	12/31/2014
D90	05/31/2014	06/15/2014	001-A	00530 - Solids, total suspended	1	0	Q1	**X**	N 07/16/2014	1 07/16/2014	12/31/2014

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				DMR Non-Receip	t Violati	ons					
Violation Code	Monitoring Period End Date	DMR Due Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	DMR Value	NODI Code	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date	DMR Val. Red Date
D90	05/31/2014	06/15/2014	001-A	00530 - Solids, total suspended	1	0	C2		N 07/16/2014	2 12/31/2014	12/31/2014
D80	05/31/2014	06/15/2014	001-A	00530 - Solids, total suspended	G	0	C2	**X**	N 07/16/2014	1 07 /16/2014	12/31/2014
D90	05/31/2014	06/15/2014	001-A	50050 - Flow, in conduit or thru treatment plant	1	0	Q2		K 07/16/2014	2 12/31/2014	12/31/2014
D90	05/31/2014	06/15/2014	001-A	50060 - Chlorine, total residual	1	0	C2	**X**	N 07/16/2014	1 07/16/2014	12/31/2014
D90	05/31/2014	06/15/2014	001-A	50060 - Chlorine, total residual	1	0	C3	**X**	K 07/16/2014	1 07/16/2014	12/31/2014
D90	05/31/2014	06/15/2014	001-A	74055 - Coliform, fecal general	1	0	C2	**X**	N 07/16/2014	1 07/16/2014	12/31/2014
D90	05/31/2014	06/15/2014	001-A	74055 - Coliform, fecal general	1	0	C3		K 07/16/2014	2 12/31/2014	12/31/2014
D90	05/31/2014	06/15/2014	001-A	81010 - BOD, 5-day, percent removal	К	0	C1	**X**			12/31/2014
D90	05/31/2014	06/15/2014	001-A	81011 - Solids, suspended percent removal	K	0	C1	**X**			12/31/2014
D90	04/30/2014	05/15/2014	001-A	00300 - Oxygen, dissolved [DQ]	1	0	C1	С			12/31/2014
D90	04/30/2014	05/15/2014	001-A	00300 - Oxygen, dissolved [DO]	1	0	C3	С	K 06/15/2014	2 12/31/2014	12/31/2014
D90	04/30/2014	05/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	01	С	N 06/15/2014	2 12/31/2014	12/31/2014
D90	04/30/2014	05/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	C2	С	N 06/15/2014	2 1 2/31/20 14	12/31/2014
D80	04/30/2014	05/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	G	0	C2	С	N 06/15/2014	2 12/31/2014	12/31/2014
D90	04/30/2014	05/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	Q1	С	K 06/15/2014	2 12/31/2014	12/31/2014
D90	04/30/2014	05/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	C2	С	K 06/15/2014	2 12/31/2014	12/31/2014
D90	04/30/2014	05/15/2014	001-A	00400 - pH	1	0	C1	С			12/31/2014
D90	04/30/2014	05/15/2014	001-A	00400 - pH	1	0	C3	С	K 06/15/2014	2 12/31/2014	12/31/2014
D90	04/30/2014	05/15/2014	001-A	00530 - Solids, total suspended	1	0	Q1	С	N 06/15/2014	2 12/31/2014	12/31/2014

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				DMR Non-Receip	t Violati	ons					
Violation Code	Monitoring Period End Date	DMR Due Date	Limit Set	Parameter	Mon. Loc.	Seas.	DMR Value	NODI Code	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date	DMR Val. Red Date
D90	04/30/2014	05/15/2014	001-A	00530 - Solids, total suspended	1	0	C2	С	N 06/15/2014	2 12/31/2014	12/31/2014
D80	04/30/2014	05/15/2014	001-A	00530 - Solids, total suspended	G	0	C2	С	N 06/15/2014	2 12/31/2014	12/31/2014
D90	04/30/2014	05/15/2014	001-A	50050 - Flow, in conduit or thru treatment plant	1	0	Q2	С	K 06/15/2014	2 12/31/2014	12/31/2014
D90	04/30/2014	05/15/2014	001-A	50060 - Chlorine, total residual	1	0	C2	С	N 06/15/2014	2 12/31/2014	12/31/2014
D90	04/30/2014	05/15/2014	001-A	50060 - Chlorine, total residual	1	0	C3	С	K 06/15/2014	2 12/31/2014	12/31/2014
D90	04/30/2014	05/15/2014	001-A	74055 - Coliform, fecal general	1	0	C2	С	N 06/15/2014	2 12/31/2014	12/31/2014
D90	04/30/2014	05/15/2014	001-A	74055 - Coliform, fecal general	1	0	C3	С	K 06/15/2014	2 12/31/2014	12/31/2014
D90	04/30/2014	05/15/2014	001-A	81010 - BOD, 5-day, percent removal	K	0	C1	С			12/31/2014
D90	04/30/2014	05/15/2014	001-A	81011 - Solids, suspended percent removal	K	0	Ç1	С			12/31/2014
D90	03/31/2014	04/15/2014	001-A	00300 - Oxygen, dissolved [DO]	1	0	C1				
D90	03/31/2014	04/15/2014	001-A	00300 - Oxygen, dissolved [DO]	1	0	C3		K 05/16/2014	1 05/16/2014	
D90	03/31/2014	04/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	Q1		N 05/16/2014	1 05/16/2014	
D90	03/31/2014	04/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	C2		N 05/16/2014	1 05/16/2014	
D80	03/31/2014	04/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	G	0	C2		N 05/16/2014	1 05/16/2014	
D90	03/31/2014	04/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	Q1		K 05/16/2014	1 05/16/2014	
D90	03/31/2014	04/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	C2		K 05/16/2014	1 05/16/2014	
D90	03/31/2014	04/15/2014	001-A	00400 - pH	1	0	C1				
D90	03/31/2014	04/15/2014	001-A	00400 - pH	1	0	C3		K 05/16/2014	1 05/16/2014	
D90	03/31/2014	04/15/2014	001-A	00530 - Solids, total suspended	1	0	Q1		N 05/16/2014	1 05/16/2014	

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				DMR Non-Receip	The state of the s			MISSESSESSESSESSESSESSESSESSESSESSESSESSE		Telli-	
Violation Code	Monitoring Period End Date	DMR Due Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	DMR Value	NODI Code	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date	DMR Val. Red Date
D90	03/31/2014	04/15/2014	001-A	00530 - Solids, total suspended	1	0	C2		N 05/16/2014	1 05/16/2014	
D80	03/31/2014	04/15/2014	001-A	00530 - Solids, total suspended	G	0	C2		N 05/16/2014	1 05/16/2014	
D90	03/31/2014	04/15/2014	001-A	50050 - Flow, in conduit or thru treatment plant	1	0	Q2		K 05/16/2014	1 05/16/2014	
D90	03/31/2014	04/15/2014	001-A	50060 - Chlorine, total residual	1	0	C2		N 05/16/2014	1 05/16/2014	
D90	03/31/2014	04/15/2014	001-A	50060 - Chlorine, total residual	1	0	С3		K 05/16/2014	1 05/16/2014	
D90	03/31/2014	04/15/2014	001-A	74055 - Coliform, fecal general	1	0	C2		N 05/16/2014	1 05/16/2014	
D90	03/31/2014	04/15/2014	001-A	74055 - Coliform, fecal general	1	0	СЗ		K 05/16/2014	1 05/16/2014	
D90	03/31/2014	04/15/2014	001-A	81010 - BOD, 5-day, percent removal	K	0	C1				
D90	03/31/2014	04/15/2014	001-A	81011 - Solids, suspended percent removal	К	0	C1				
D90	02/28/2014	03/15/2014	001-A	00300 - Oxygen, dissolved [DQ]	1	0	C1				
D90	02/28/2014	03/15/2014	001-A	00300 - Oxygen, dissolved [DO]	1	0	C3		K 04/15/2014	1 04/15/2014	
D90	02/28/2014	03/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	Q1		N 04/15/2014	1 04/15/2014	
D90	02/28/2014	03/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	C2		N 04/15/2014	1 04/15/2014	
D80	02/28/2014	03/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	G	0	C2		N 04/15/2014	1 04/15/2014	
D90	02/28/2014	03/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	Q1		K 04/15/2014	1 04/15/2014	
D90	02/28/2014	03/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	C2		K 04/15/2014	1 04/15/2014	
D90	02/28/2014	03/15/2014	001-A	00400 - pH	1	0	C1				
D90	02/28/2014	03/15/2014	001-A	00400 - pH	1	0	C3		K 04/15/2014	1 04/15/2014	
D90	02/28/2014	03/15/2014	001-A	00530 - Solids, total suspended	1	0	Q1		N 04/15/2014	1 04/15/2014	

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/iolation Code	Monitoring Period End Date	DMR Due Date	Limit Set	Parameter	Mon. Loc.	Seas.	DMR Value	NOD! Code	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date	DMR Val. Rec Date
D90	02/28/2014	03/15/2014	001-A	00530 - Solids, total suspended	1	0	C2		N 04/15/2014	1 04/15/2014	14 17
D80	02/28/2014	03/15/2014	001-A	00530 - Solids, total suspended	G	0	C2		N 04/15/2014	1 04/15/2014	
D90	02/28/2014	03/15/2014	001-A	50050 - Flow, in conduit or thru treatment plant	1	0	Q2		K 04/15/2014	1 04/15/2014	
D90	02/28/2014	03/15/2014	001-A	50060 - Chlorine, total residual	1	0	C2		N 04/15/2014	1 04/15/2014	_
D90	02/28/2014	03/15/2014	001-A	50060 - Chlorine, total residual	1	0	C3		K 04/15/2014	1 04/15/2014	
D90	02/28/2014	03/15/2014	001-A	74055 - Coliform, fecal general	1	0	C2		N 04/15/2014	1 04/15/2014	
D90	02/28/2014	03/15/2014	001-A	74055 - Coliform, fecal general	1	0	C3		K 04/15/2014	1 04/15/2014	
D90	02/28/2014	03/15/2014	001-A	81010 - BOD, 5-day, percent removal	K	0	C1				
D90	02/28/2014	03/15/2014	001-A	81011 - Solids, suspended percent removal	K	0	C1				
D90	01/31/2014	02/15/2014	001-A	00300 - Oxygen, dissolved [DO]	1	0	C1				
D90	01/31/2014	02/15/2014	001-A	00300 - Oxygen, dissolved [DO]	1	0	СЗ		K 03/18/2014	1 03/18/2014	
D90	01/31/2014	02/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	01		N 03/18/2014	1 03/18/2014	
D90	01/31/2014	02/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	1	0	C2		N 03/18/2014	1 03/18/2014	
D80	01/31/2014	02/15/2014	001-A	00310 - BQD, 5-day, 20 deg. C	G	0	C2		N 03/18/2014	1 03/18/2014	
D90	01/31/2014	02/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	Q1		K 03/18/2014	1 03/18/2014	
D90	01/31/2014	02/15/2014	001-A	00310 - BOD, 5-day, 20 deg. C	W	0	C2		K 03/18/2014	1 03/18/2014	
D90	01/31/2014	02/15/2014	001-A	00400 - pH	1	0	C1				
D90	01/31/2014	02/15/2014	001-A	00400 - pH	1	0	C3		K 03/18/2014	1 03/18/2014	
D90	01/31/2014	02/15/2014	001-A	00530 - Solids, total suspended	1	0	Q1		N 03/18/2014	1 03/18/2014	

Created Date: 09/15/2010 Refresh Date: 04/27/2015

Report Version 1.2, Modified: 01/03/2011

AKG573033

				DMR Non-Receip	t Violatio	ons					
Violation Code	Monitoring Period End Date	DMR Due Date	Limit Set	Parameter	Mon. Loc.	Seas. ID	DMR Value	NODI Code	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date	DMR Val. Red Date
D90	01/31/2014	02/15/2014	001-A	00530 - Solids, total suspended	1	0	C2		N 03/18/2014	1 03/18/2014	
D80	01/31/2014	02/15/2014	001-A	00530 - Solids, total suspended	G	0	C2		N 03/18/2014	1 03/18/2014	
D90	01/31/2014	02/15/2014	001-A	50050 - Flow, in conduit or thru treatment plant	1	0	Q2		K 03/18/2014	1 03/18/2014	
D90	01/31/2014	02/15/2014	001-A	50060 - Chlorine, total residual	1	0	C2		N 03/18/2014	1 03/18/2014	
D90	01/31/2014	02/15/2014	001-A	50060 - Chlorine, total residual	1	0	С3		K 03/18/2014	1 03/18/2014	
D90	01/31/2014	02/15/2014	001-A	74055 - Coliform, fecal general	1	0	C2		N 03/18/2014	1 03/18/2014	
D90	01/31/2014	02/15/2014	001-A	74055 - Coliform, fecal general	1	0	C3		K 03/18/2014	1 03/18/2014	
D90	01/31/2014	02/15/2014	001-A	81010 - BOD, 5-day, percent removal	К	0	C1				
D90	01/31/2014	02/15/2014	001-A	81011 - Solids, suspended percent removal	К	0	C1				

Effluent Violations

Violation Code	Monitoring Period End	Limit	Parameter	Mon.	Seas.	SNC	EA Identifier	Value Type/	Reported	% Exceed.	Limit Value/ Units	RNC Det. Code/ RNC Det. Date	RNC Res. Code/ RNC Res. Date			
Code	Date	Date Set	Set	Set	261		Loc.	ID	Group		Stat. Base	Value/Units		Units	RNC Det. Date	RNC Res. Date
E90	07/31/2014	001-A	00300 - Oxygen,	1	0	(I)	MMM is countries to the countries of the	C1	4.25	39%	>=7	and a second and and a second and a second				
			dissolved [DO]					DAILY MN	mg/l		mg/l					
E90	07/31/2014	001-A	74055 -	1	0			C2	70	250%	<=20					
			Coliform, fecal general					MO GEOMN	#/100ml		#/100ml					
E90	07/31/2014	001-A	74055 -	1	0			C3	70	75%	<=40					
			Coliform, fecal general					DAILY MX	#/100ml		#/100ml					
E90	05/31/2014	001-A	00300 - Oxygen,	1	0		_	C1	1.11	84%	>=7					
			dissolved [DO]					DAILY MN	mg/l		mg/I					



Department of Environmental Conservation

DIVISION OF WATER COMPLIANCE AND ENFORCEMENT PROGRAM



555 Cordova St, 3rd Floor Anchorage, Alaska 99501 Main: 907.269.6281 Fax: 907.334.2415 www.dec.alaska.gov

O&M DIVISION

November 23, 2015

Terry Dolan Director of Public Works, Matanuska-Susitna Borough Talkeetna Wastewater Lagoon 1420 S. Industrial Way Palmer, AK 99645

Re: Notice of Intent to Seek Penalties for Clean Water Act Violations Opportunity to Confer

Dear Mr. Dolan:

The purpose of this letter is to inform you that the Alaska Department of Environmental Conservation (ADEC) intends to pursue an enforcement action against Talkeetna Wastewater Lagoon for violations of the Clean Water Act (CWA). By this letter, we are providing you the opportunity to discuss this matter with ADEC prior to the filing of a complaint.

The alleged violations of the CWA arise from the Matanuska-Susitna Borough's failure to comply with the Alaska Pollutant Discharge Elimination System (APDES) General Permit AKG573000, *Domestic Wastewater Treatment Lagoons Discharging to Surface Water* with unique identifier AKG573033, effective September 1, 2013. Specifically, the Talkeetna Wastewater Lagoon has failed to be compliant with permit effluent limits.

Under Alaska Statutes 46.03.760(e), ADEC is entitled to recover civil penalties for violations of Alaska regulations or APDES permits of not less than \$500 nor more than \$100,000 for the initial violation, nor more than \$10,000 for each day after that on which the violation continues for each violation. Under the CWA, ADEC is entitled to recover civil penalties of up to \$37,500 per violation per day.

Pre-filing discussions allow us to reach a better understanding of issues where our information may be incomplete, gives us an opportunity to discuss possible settlement options, and can lead to resolution of enforcement matters without resorting to the time and expense of litigation. If we are unable to reach an acceptable resolution through the negotiation process, ADEC may file a civil lawsuit to recover civil penalties, seek appropriate injunctive relief (e.g., corrective action to secure compliance), and recover attorney's fees.

If you wish to schedule a meeting, or if you have any questions about this letter, please contact Steve Ross, Assistant Attorney General, at (907) 269-5278 within 14 days of receipt of this letter.

Sincerely,

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Mike Solter ·
Compliance Program Manager

APPENDIX B ALTERNATIVE COST ESTIMATES

Alternative 1-Expand Facultative Lagoon Per Canadian Guidelines

Atternative 1-Expans	Unit	Estimated	Unit Price	Total Price
Work Description		Quantity		
CIVIL				
Mobilization/demobilization (5% of Civil Cost)	Lump Sum	1	\$ 202,400.00	\$ 202,400.00
Construction Surveying (3% Civil Cost)	Lump Sum	1	\$ 121,500.00	\$ 121,500.00
SWPPP (3% of Civil Cost)	Lump Sum	1	\$ 121,500.00	\$ 121,500.00
Clearing and Grubbing	Acre	16	\$ 7,500.00	\$ 120,000.00
Decomission Wetlands	Lump Sum	1	\$ 10,000.00	\$ 10,000.00
Surface Roads	Linear Foot	4,000	\$ 65.00	\$ 260,000.00
Dewatering	Lump Sum	1	\$ 100,000.00	\$ 100,000.00
Usable Excavation	Cubic Yard	32,200	\$ 12.00	\$ 386,400.00
Classified Fill	Ton	50,000	\$ 30.00	\$ 1,500,000.00
Cell Liner	Square Yard	41,000	\$ 10.00	\$ 410,000.00
Yard Piping (including trench excavation and backfill)	Linear Foot	2,020	\$ 200.00	\$ 404,000.00
Furnish and Install Manholes	Each	7	\$ 15,000.00	\$ 105,000.00
8-foot Chain Link Fence	Linear Foot	4,000	\$ 45.00	\$ 180,000.00
Topsoil/Seed	Acre	4	\$ 10,000.00	\$ 40,000.00
Lighting/Security	Lump Sum	1	\$ 50,000.00	\$ 50,000.00
Connect to Existing	Each	2	\$ 10,000.00	\$ 20,000.00
Baffles	Linear Foot	2,200	\$ 210.00	\$ 462,000.00
<u>TREATMENT</u>				
Process Equipment Building				
Excavation/compaction/prep site	Lump Sum	1	\$ 21,000.00	\$ 21,000.00
Concrete pad (20' x 20')	Lump Sum	1	\$ 38,000.00	\$ 38,000.00
Building Enclosure	Lump Sum	1	\$ 168,000.00	\$ 168,000.00
Electrical/Lighting	Lump Sum	1	\$ 90,000.00	\$ 90,000.00
HVAC	Lump Sum	1	\$ 129,000.00	\$ 129,000.00



Alternative 1-Expand Facultative Lagoon Per Canadian Guidelines

Work Description	Unit	Estimated Quantity	Unit Price	Total Price
Process Equipment				
Reaeration basin	Lump Sum	1	\$ 28,000.00	\$ 28,000.00
Blowers	Lump Sum	1	\$ 53,000.00	\$ 53,000.00
Blower housekeeping pads	Lump Sum	1	\$ 5,000.00	\$ 5,000.00
Blower Electrical and Controls Wiring	Lump Sum	1	\$ 19,000.00	\$ 19,000.00
Blower Commissioning	Lump Sum	1	\$ 15,000.00	\$ 15,000.00
Diffusers	Lump Sum	1	\$ 20,000.00	\$ 20,000.00
Air Piping	Lump Sum	1	\$ 10,000.00	\$ 10,000.00
Contact tank (coated steel)	Lump Sum	1	\$ 78,000.00	\$ 78,000.00
Chlorination Equipment (chemical pump and tank)	Lump Sum	1	\$ 14,000.00	\$ 14,000.00
Dechlorination Equipment (chemical pump and tank)	Lump Sum	1	\$ 14,000.00	\$ 14,000.00
Chemical Dosing Electrical and Controls Wiring	Lump Sum	1	\$ 9,000.00	\$ 9,000.00
<u>Electrical</u>				
SCADA integration	Lump Sum	1	\$ 86,000.00	\$ 86,000.00
Chlorine Residual Instrument (2)	Lump Sum	1	\$ 19,000.00	\$ 19,000.00
Effluent flow meter	Lump Sum	1	\$ 19,000.00	\$ 19,000.00
Security, Network	Lump Sum	1	\$ 12,000.00	\$ 12,000.00
Electric Service Extension	Lump Sum	1	\$ 100,000.00	\$ 100,000.00

Total Construction Cost	\$ 5,440,000
20% Contingency	\$ 1,088,000
Engineering Design Phase Services (10% of Total Construction Cost)	\$ 544,000
Construction Phase Services (10% of Total Construction Cost)	\$ 544,000
MSB Administration (3% of Total Construction Cost)	\$ 163,200
Total Capital Project Cost	\$ 7,800,000



Alternative 2-Partially Mixed Aerated Lagoon

Work Description	Unit	Estimated Quantity	Unit Price	Total Price
<u>CIVIL</u>				
Mobilization/demobilization (5% of Civil Cost)	Lump Sum	1	\$ 233,500.00	\$ 233,500.00
Construction Surveying (3% Civil Cost)	Lump Sum	1	\$ 140,100.00	\$ 140,100.00
SWPPP (3% of Civil Cost)	Lump Sum	1	\$ 140,100.00	\$ 140,100.00
Clearing and Grubbing	Acre	9	\$ 7,500.00	\$ 67,500.00
Surface Roads	Linear Foot	3,300	\$ 65.00	\$ 214,500.00
Dewatering	Lump Sum	1	\$ 100,000.00	\$ 100,000.00
Unclassified Excavation	Cubic Yard	17,000	\$ 12.00	\$ 204,000.00
Classified Fill	Ton	112,000	\$ 30.00	\$ 3,360,000.00
Lagoon Liner	Square Yard	44,200	\$ 5.00	\$ 221,000.00
Yard Piping (including trench excavation and backfill)	Linear Foot	1,100	\$ 200.00	\$ 220,000.00
Furnish and Install Manholes	Each	2	\$ 15,000.00	\$ 30,000.00
8-foot Chain Link Fence	Linear Foot	3,600	\$ 45.00	\$ 162,000.00
Topsoil/Seed	Acre	4	\$ 10,000.00	\$ 40,000.00
Lighting/Security	Lump Sum	1	\$ 50,000.00	\$ 50,000.00
<u>TREATMENT</u>				
Upgrade G Street LS Pumps				
Demo Existing Pumps	Lump Sum	1	\$ 4,100.00	\$ 4,100.00
New Electrical Service	Lump Sum	1	\$ 69,000.00	\$ 69,000.00
New Wiring, Raceways, Panels	Lump Sum	1	\$ 34,600.00	\$ 34,600.00
New Pumps, Rails, and Pump Shoes	Lump Sum	1	\$ 74,000.00	\$ 74,000.00
Process Building Site Work				
Excavation	Lump Sum	1	\$ 49,200.00	\$ 49,200.00
Place Geofabric	Lump Sum	1	\$ 26,700.00	\$ 26,700.00
Place and Compact Embankment	Lump Sum	1	\$ 199,100.00	\$ 199,100.00



Alternative 2-Partially Mixed Aerated Lagoon

Work Description	Unit	Estimated Quantity	Unit Price	Total Price
Process Equipment Building				
Form and cast steel reinfoced Foundation	Lump Sum	1	\$ 148,700.00	\$ 148,700.00
Building Enclosure	Lump Sum	1	\$ 483,700.00	\$ 483,700.00
Building Mechanical Heat and Vent Systems	Lump Sum	1	\$ 245,000.00	\$ 245,000.00
Building Electrical Lighting and Power Distribution Systems	Lump Sum	1	\$ 396,000.00	\$ 396,000.00
Communications, Network, and Security Systems	Lump Sum	1	\$ 23,500.00	\$ 23,500.00
Aeration Equipment Inside Building				
Aeration Piping Systems	Lump Sum	1	\$ 97,700.00	\$ 97,700.00
Blower Equipment Steel Reinforced Housekeeping Pads	Lump Sum	1	\$ 11,300.00	\$ 11,300.00
Aeration Blowers	Lump Sum	1	\$ 135,700.00	\$ 135,700.00
Electrical Power and Control Wiring, Raceways and Panels	Lump Sum	1	\$ 57,100.00	\$ 57,100.00
Commission Blower Equipment	Lump Sum	1	\$ 29,300.00	\$ 29,300.00
Raw Sewage Lift Station Inside Bldg				
Submersible Duplex Pump System Electrical Power and Control Wiring	Lump Sum	1	\$ 57,100.00	\$ 57,100.00
Submersible Duplex Pump System	Lump Sum	1	\$ 88,200.00	\$ 88,200.00
Overhead Hoist for Pump Maintenance	Lump Sum	1	\$ 13,300.00	\$ 13,300.00
Commission Pump System	Lump Sum	1	\$ 29,300.00	\$ 29,300.00
Disinfection Equipment				
Contact tank (coated steel)	Lump Sum	1	\$ 78,000.00	\$ 78,000.00
Chlorination Equipment	Lump Sum	1	\$ 14,000.00	\$ 14,000.00
Dechlorination Equipment	Lump Sum	1	\$ 14,000.00	\$ 14,000.00



Alternative 2-Partially Mixed Aerated Lagoon

Work Description	Unit	Estimated Quantity	Unit Price	Total Price	
<u>ELECTRICAL</u>					
SCADA Integration	Lump Sum	1	\$ 118,500.00	\$ 118,500.00	
Chlorine Residual Instrument (2)	Lump Sum	1	\$ 19,000.00	\$ 19,000.00	
Effluent Flow Meter	Lump Sum	1	\$ 19,000.00	\$ 19,000.00	
Security, Network	Lump Sum	1	\$ 12,000.00	\$ 12,000.00	
System Commissioning	Lump Sum	1	\$ 54,700.00	\$ 54,700.00	
Phase 3 Power Exension	Lump Sum	1	\$ 725,000.00	\$ 725,000.00	

Total Construction Cost	\$ 8,510,000
20% Contingency	\$ 1,702,000
Engineering Design Phase Services (10% of Total Construction Cost)	\$ 851,000
Construction Phase Services (10% of Total Construction Cost)	\$ 851,000
MSB Administration (3% of Total Construction Cost)	\$ 255,300
Total Capital Project Cost	\$ 12,169,300



APPENDIX C ALTERNATIVES MEMORANDUM



MEMORANDUM

DATE: November 23, 2016

TO: Matanuska-Susitna Borough

FROM: HDL Engineering Consultants

RE: Talkeetna Wastewater Treatment Facility Upgrades Alternatives

CIVIL ENGINEERING

GEOTECHNICAL ENGINEERING

TRANSPORTATION ENGINEERING

ENVIRONMENTAL SERVICES

PLANNING

SURVEYING & MAPPING

CONSTRUCTION ADMINISTRATION

MATERIAL TESTING

RIGHT-OF-WAY SERVICES

INTRODUCTION

The Matanuska-Susitna Borough's (MSB) Talkeetna Wastewater Treatment Facility (WWTF) is not in compliance with its State-administered wastewater discharge permit. Correspondence from the Alaska Department of Environmental Conservation (ADEC) includes a listing of permit compliance excursions, the most common of which are occurrences of high effluent fecal coliform (FC) counts and low effluent dissolved oxygen (DO) concentrations. Other less common excursions include inadequate biological oxygen demand (BOD $_5$), inadequate total suspended solids (TSS) removals, and/or excessively high effluent BOD $_5$ and TSS concentrations. The MSB is seeking to upgrade the WWTF to bring it into regulatory compliance now and into the future.

The purpose of this memo is to screen potential upgrade alternatives to the WWTF and choose two alternatives for further evaluation in a Preliminary Engineering Report (PER).

ASSESSMENT OF EXISTING WWTF

A review of the existing wastewater treatment facility (WWTF) was completed using the following observations, documents and data:

- 1. A tour of the facility in July of 2016 with operations personnel;
- 2. Construction project record drawings;
 - A. From the construction of the original ponds in 1988;
 - B. From construction of the wetland treatment system upgrade in 2003;
- 3. Lift station flow data from G Street Sewage Lift Station;
- Talkeetna Sewer and Water Assessment Technical Memorandum, 2014.

Background

The original wastewater lagoon was constructed in 1988 and consisted of a two cell, facultative lagoon with a third percolation cell. A facility upgrade project in 2003 converted the percolation cell to a facultative lagoon (referred to as Cell 3), and installed a constructed wetland treatment area with a discharge pipeline to the Talkeetna Slough. Based on treatment parameters used in the 2003 upgrades, the facility is designed for inflows of 42,000

gallons per day (gpd) with a BOD₅ loading of 70 lb/day. The existing lagoon cells have a combined volume of roughly 9.4 million gallons (MG).

Raw sewage from the community is pumped from the G Street Lift Station directly into Cell 2. From Cell 2 wastewater flows through Cell 1, to Cell 3, and finally through the treatment wetlands. Treated effluent is discharged through a measurement weir and into the Slough. Flow through the entire treatment system, including wetlands is by gravity. Per the facility's ADEC wastewater discharge permit, the facility is permitted to discharge treated effluent from May to October with wastewater being stored in the lagoon cells November through April. **Figure 1** shows the current operational configuration of the WWTF.



Figure 1: Talkeetna Wastewater Treatment Facility (Photo Taken June 2007)

Influent Flows

Flow volumes entering the treatment system can be inferred from total volume data reported by equipment at the G Street Lift Station as recorded by operations personnel. From those data, flow into the WWTF varies by season with low flows during winter months and significantly higher flows during the summer tourist season. Averaged weekly flows from January through October of 2016 are shown in **Figure 2**.



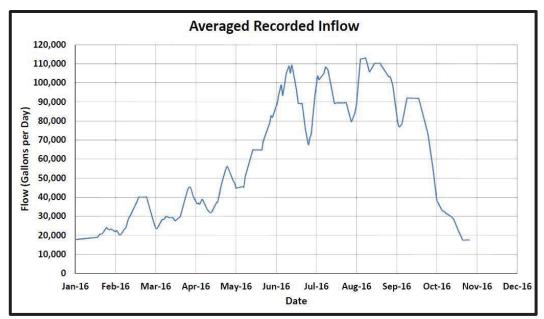


Figure 2: Influent Flows to the WWTF

Contributions to wastewater inflow to the WWTF are assumed to be comprised of two sources. One is the *base inflow* generated by year-round residents of Talkeetna. The other is the *seasonal inflow* generated by both the tourism industry and inflow/infiltration (I/I) from spring melt and rain events. From the data, and for the purpose of this memo, the base inflow will be estimated as 20,000 gallons per day (gpd), and seasonal inflow will be estimated as 90,000 gpd in 2016. Adding the base inflow and seasonal inflow gives a peak inflow of 110,000 gpd for 2016.

Influent Loadings

For this memo, data on solids and/or organic loadings to the treatment facility was limited to monitoring and reporting completed for compliance with the facility's discharge permit. Grab samples for monthly discharge monitoring reports (DMR) are collected for each month the facility discharges to the slough. Available results for these monitoring events from 2014 through 2016, as well as permit limits are provided in **Table 1**. Highlighted cells indicate instances where permit requirements were not met.

To aid in future studies and analysis, MSB collected weekly composite samples of influent wastewater at the G Street Lift Station as well as grab samples from each of the three lagoons. Samples were measured for chemical oxygen demand (COD), biochemical oxygen demand BOD₅, Total Suspended Solids (TSS), dissolved oxygen (DO), ultraviolet transmissivity (UVT), and chlorine demand. Results of these samples will contribute to the design of future upgrades and analysis in the PER.



	Table 1: Discharge Monitoring Report Results										
					Analyte						
			DO (mg/l)	BOD ₅ (mg/l)	рН	TSS (mg/l)	FC (col/100 ml)				
Permit Requirements		7-17	45 Max	6.5-8.5	70 Max	40 Daily Max					
		2014	1.11	13.3	7-8	33.3	34				
	MAY	2015	1.66	24.8	7.23	20.8	62				
		2016	3.6	17.4	8.5	18	ND				
	JUNE	2014	9.68	40.6	7.5	68.6	14				
		2015	5.69	35	7.78	41	510				
		2016	11.45	15.4	7.5	12.7	160				
ᇁ	JULY	2014	4.25	35.2	7.94	56	70				
lon		2015	5.96	43.3	7.47	50	290				
Discharge Month		2016	8.81	35.2	8.5	ND	410				
arg		2014	2.73	22.9	7.31	42	1,130				
isch	AUGUST	2015	5.7	26.6	7.49	37.9	3,100				
Ö		2016	7.13	14.4	7.43	5.5	54				
		2014	2.7	29.8	7.6	28	1,050				
	SEPTEMBER	2015	11.18	26.2	7.92	41	73				
		2016	ND	11.3	ND	17	27				
		2014	ND	ND	ND	ND	ND				
	OCTOBER	2015	8.19	14	7.68	17	128				
		2016	ND	13.3	ND	7	9				
						*N	D= NO DATA				

The Tabulated DMR values indicate the facility is consistently unable to meet permit requirements for fecal coliform and dissolved oxygen. Furthermore, while the table indicates that the effluent typically satisfies BOD_5 and TSS concentration requirements, there were 3 instances between 2014 and 2016 where the facility did not meet the 65 percent removal requirement of the permit. For one of those instances, in June of 2014, the facility did not meet BOD_5 or TSS percent removal.

FUTURE CAPACITY REQUIREMENTS

When addressing the Talkeetna WWTF deficiencies, it is important to consider both population and tourism growth to ensure that potential facility upgrades are capable of meeting existing permit limits.



Projections for year-round population growth of Talkeetna used herein are derived from the Alaska Department of Labor and Workforce Development 2014 report *Alaska Population Projections 2012 to 2042*. That document suggests, as a baseline projection, the statewide population will grow from 770,000 to 897,000 between 2016 and 2036, an increase of approximately 16%. By applying this same increase to the estimated 2016 base wastewater flow, the 2036 base flow can be estimated at approximately 23,000 gpd.

Projections for tourism visitation to Talkeetna are derived from the Talkeetna Community Tourism Plan. Those data report the number of people visiting Talkeetna in 2016 was 248,000. Using a 2.06% growth rate in tourist visitations, which is the average state-wide tourism growth rate reported by the Alaska Visitor Statistics Program, the projected number of visitors to Talkeetna in year 2036 would be 351,000, an increase of 41 percent over the 20-year time interval. By applying this same increase to the estimated 2016 seasonal wastewater flow, the 2036 seasonal inflow is estimated at approximately 127,000 gpd.

Adding the projected base and seasonal flows gives a peak flow of approximately 150,000 gpd in 2036. This compares with year 2016 peak flow of 110,000 gpd and equates to an approximately 36% increase over existing. Existing design flows, actual flows, and 20-year design flows are summarized in **Table 2** below.

Table 2: Peak Influent Flow Rates					
	Existing Design	Current Year (2016)	20-Year Design (2036)		
Base Flow (Residential)	N/A	20,000 gpd	23,000 gpd		
Seasonal Flows (Tourism and I/I)	N/A	90,000 gpd	127,000 gpd		
Base Flow + Seasonal Flow	42,000 gpd	110,000 gpd	150,000 gpd		

As shown above, the facility is receiving nearly three times the design capacity during peak flow periods. As residential and seasonal visitors increase over time, the system will become increasingly overloaded.

FACILITY LOADINGS

In addition to hydraulic loadings, the ability of the WWTF to routinely comply with regulatory criteria is dependent upon the solids and organic loadings anticipated into the future. Estimates of these future loadings are addressed in the following paragraphs.

Organic Loading

As previously stated, data from DMRs was used to approximate organic loadings to the WWTF. These data represent grab samples of influent flow collected during the summer months. To aid in development of chosen alternatives during the later stages of this project, HDL assisted MSB with collection of additional treatment data at various points in the WWTF during the latter portion of their 2016 discharge. Due to the timing of this data collection,



however, full results were not yet available and the following organic loading assumptions were made:

- Year-Round Resident Loading A value of 0.17 lbs of BOD₅ per capita per day is commonly reported for municipal sewage and is assumed to be the BOD₅ contribution from year-round residents. For a projected year 2036 permanent population of 1,218 people, this equates to a daily resident population loading of 207 pounds of BOD₅ per day.
- Seasonal Tourist Loading A value of 0.06 lbs of BOD₅ per capita per day is assumed to be the BOD₅ contribution from summer visitors to Talkeetna, occurring from June 1st to October 1st. This value represents approximately one third the daily per capita contribution and may be suitable for representing contributions from tourists visiting Talkeetna for only part of a day. For a projected year 2036 tourist visitor count of 351,000 people in 4 months, or an average of 2,925 visitors per day, this equates to a daily visitor loading of 176 pounds of BOD₅ per day during the summer season.

Solids Loading

As with organic loadings, assumptions of solids loadings for both year-round residents and seasonal visitors have been made per the following.

- Year-Round Resident Loading A value of 0.20 lbs of TSS per capita per day is commonly reported for municipal sewage and is assumed to be the solids contribution from year-round residents. For a projected year 2036 permanent population of 1,218 people, this equates to a daily resident population loading of 243 pounds of TSS per day.
- Seasonal Tourist Loading A value of 0.06 lbs of TSS per capita per day is assumed to be the solids contribution from summer visitors to Talkeetna, occurring from June 1st to October 1st. For a projected year 2036 tourist visitor count of 351,000 people in 4 months, or an average of 2,925 visitors per day, this equates to a daily visitor loading of 176 pounds of TSS per day.

Table 3 below summarizes anticipated design organic loadings to the WWTF.

Table 3: Future BOD₅ and TSS Loadings					
	Organic Loading		Solids Loading		
	Resident Loading	Seasonal Tourist Loading	Resident Loading	Seasonal Tourist Loading	
20-Year Design (2036)	207 lb/day	176 lb/day	243 lb/day	176 lb/day	

UPGRADE ALTERNATIVES ANALYSIS

Five possible WWTF upgrade alternatives are presented below. Based on this memo, MSB will select two alternatives to further analyze in a preliminary engineering report. The following section presents candidate upgrades to meet the design criteria listed in the previous sections.



RE: Talkeetna Wastewater Treatment Facility Upgrades Alternatives November 23, 2016 Page 7 of 19

Each alternative must meet the following site constraints:

- ✓ Occupy a footprint small enough to be accommodated on the parcel of land on which the treatment facility is located (Approximately 40 acres);
- ✓ Provide adequate separation distance between the treatment facility and nearby neighbors;
- ✓ Meet regulatory requirements for vertical separation between treatment structures and high groundwater for the area;
- ✓ Have the capability to withstand flood events without loss of functionality.

In addition to the foregoing, each treatment alternative upgrade must meet the following objectives:

- ✓ Meet the regulatory stipulations outlined in the WWTF discharge permit;
- ✓ Discharge seasonally into the slough May through October,
- ✓ Provide treatment for a 20 year planning horizon;
- ✓ Be configured as needed to secure ADEC approval for construction.

Candidate Upgrades

As part of the initial alternative screening process, expanding the existing treatment wetlands was considered as a possible solution. To accommodate projected future flows, recommended hydraulic loading rates for effective wetland treatment require up to 10 times the land area occupied by the existing wetland area. Additionally, wetland treatment for FC removal is highly variable and cannot be counted on to consistently meet the existing limits of 20 and 40 FC/100 mL for monthly average and daily maximum values, respectively, as required by the current discharge permit. Several sources suggest that wetland treatment effluents should not be counted on to consistently produce FC concentrations less than 500 FC/100 mL. Based on these treatment limitations, the following alternatives all include the removal of the existing treatment wetlands.

The five alternative upgrades reviewed for this memorandum include:

- 1. Expand Facultative Lagoon per ADEC Guidelines;
- 2. Expand Facultative Lagoon per Canadian Guidelines;
- 3. Partially Mixed Aerated Lagoon Treatment;
- 4. Extended Aeration Activated Sludge Lagoon Treatment;
- 5. Mechanical Treatment Plant.

These options are described further below and compared in a table on Page 18 of this memo.

Alternative 1: Expand Facultative Lagoon per ADEC Lagoon Construction Guidelines

Expanding the existing lagoons will allow for adequate removal of TSS and BOD₅ as population expands and wastewater inflow increases; however, to achieve DO and fecal coliform requirements supplemental aeration and disinfection will also need to be included.

The ADEC Lagoon Construction Guidelines utilize the treatment process currently in place where wastewater is treated using facultative pond cells operating in series. Wastewater flows into the primary pond where solids settle, then flow into the secondary pond where further TSS and BOD₅ removal takes place.



The ADEC Guidelines require the facility be sized for annual retention of influent wastewater with seasonal discharge during summer months. In addition, rain and snow falling on the ponds must be factored into the size of the ponds. Further, the ponds themselves must be sized according to the anticipated organic loading to the WWTF. With the required geometric configurations of earthen embankments and operating water depths, the footprint of the overall treatment facility is approximately 24 acres. This compares to the existing 3-cell facility which is approximately 8 acres (excluding wetland treatment area).

In addition to the physical size of the upgraded lagoon being approximately 3 times larger than the existing facility, the distance from the current lagoon to existing occupied buildings shown in **Figure 3** is less than the ADEC minimum recommended distance of 1,000 feet. Expanding the treatment area to 24 acres would further decrease this separation distance.



Figure 3: Separation Distance Between Existing Lagoon and Occupied Building

Additional Treatment Addressing Effluent DO and FC's

Effluent DO

Because of the nature of facultative lagoons, additional modifications to the treatment process will be required to meet prescribed limits of the existing ADEC discharge permit. Options for corrective action that improve effluent DO values are listed and screened in **Table 4**.



Table 4: Option Screening for DO Compliance				
	Option	Advantage	Disadvantage	
А	Request a mixing zone in the slough large enough to enable compliance with effluent DO requirements	No mechanical power or equipment required for treatment	River is designated as habitat for salmon and likely unavailable for mixing zone	
В	Deploy in-pipeline aeration of effluent	Easy access to mechanical aeration equipment	 Best done with full pipe flow which is not available with existing outfall Requires mechanical aeration equipment 	
С	Include reaeration in final cell	Easy access to mechanical equipment.	1. More air supply required for facultative pond effluent than for wetland treatment effluent. 2. Requires seasonal pigging of effluent outfall pipe between third cell and slough	

Options B and C in **Table 4** provide compliance with regulatory effluent DO concentrations; however C is the preferred option.

Fecal Coliforms

Consistent regulatory compliance with Talkeetna's existing discharge permit for FCs is likely only possible by deployment of an effluent disinfection process. Options for corrective action that improve effluent FC concentrations are listed and screened in **Table 5**.



Table 5: Option Screening for FC Compliance					
	Option	Advantage	Disadvantage		
A	Effluent disinfection using Chlorination/Dechlorination	 Effective in controlling regulated pathogens Simple technology and equipment Low power consumption 	 Requires chlorine contact reactor tank and mechanical mixer Requires periodic draining and flushing solids out of contact tank Requires chemicals for chlorination and de-chlorination Requires chemical storage Requires online analyzer instrumentation to monitor and report chlorine residual Requires periodic pigging sample line to online analyzer 		
В	Effluent disinfection using UV Disinfection	 Effective in controlling regulated pathogens No chemicals added to effluent No chemical storage required Small footprint as no mechanical mixer or contact tank required 	 Requires electrical power for lamp operation Requires periodic lamp sleeve cleaning, though can be automated Requires periodic lamp replacement 		

As previously stated, MSB is in the process of performing a variety of data collection efforts, including ultraviolet transmittance testing (UVT) on effluent wastewater from Cell 3. Provided UVT levels are conducive, UV disinfection is the preferred process.

Figure 4 shows a conceptual configuration for this alternative including disinfection and aeration equipment.



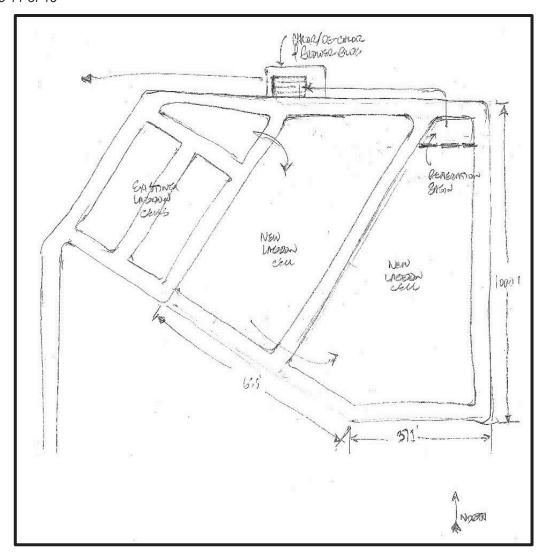


Figure 4: Conceptual Layout for Alternative 1- Lagoon Upgrade per ADEC Guidelines

Alternative 2: Expand Facultative Lagoon Per Canadian Guidelines

The following evaluates the option of upgrading the existing facultative lagoon treatment system utilizing a configuration and operation which complies with Canadian standards, and not necessarily with the ADEC guidelines for lagoon construction.

Since 1982, the Canadian Province of Alberta has been proactive in its research of lagoon performance for 190 facultative lagoons in Alberta operating in climatic environments not dissimilar to that of Talkeetna. The Province's Ministry of Environment and Parks is the agency which maintains and updates design and operational standards for facultative lagoon treatment systems. Based on published data from the University of Alberta, Edmonton, lagoon systems configured and operated according to provincial standards are able to meet Talkeetna's permit limits for BOD₅ and TSS. Effluent FCs are reported to be below 30 most all the time, but with excursions that would require supplemental disinfection. Effluent DO is not addressed by the Canadian research, and it is assumed that effluent reaeration would be needed.



The configuration for this alternative includes the addition of two anerobic lagoon cells, and one storage cell to the existing system, as well as a reaeration basin in the final storage cell and a chlorination/dechlorination building. A conceptual sketch of the configuration and flow process including reaeration and disinfection is shown in **Figure 5.** Water flows into the anerobic cells, then through the existing 3 cells, to the storage cell. From the storage cell treated water is directed to the reaeration basin, then to the disinfection building and finally discharged to the slough. Based on required depths and flow rates through each cell, using 3:1 horizontal to vertical side slopes, the footprint of the facultative lagoon would be approximately 15 acres. Similar to Alternative 1, this alternative would significantly reduce the separation distance between lagoons and the nearest occupied buildings.

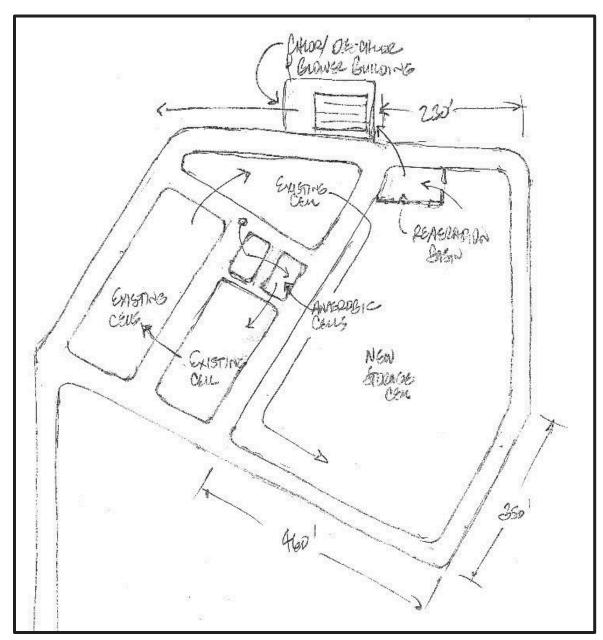


Figure 5: Conceptual Layout for Alternative 2 - Lagoon Upgrade per Canadian Guidelines



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Alternative 3: Partially Mixed Aerated Lagoon Treatment

Another treatment option is deployment of a partially mixed aerated facultative lagoon treatment system. These types of treatment facilities are in use within Alaska operating on municipal wastewater at Palmer, Wasilla, Nome, and North Pole.

In summary, for this process raw sewage would be directed in series to a sequence of aerated lagoon cells prior to effluent disinfection and seasonal discharge to the slough. Properly sized, configured, and maintained with periodic sludge solids removal, these types of facilities are able to routinely achieve the effluent quality stipulated in the current Talkeetna APDES permit. This alternative requires periodic sludge removal once every 5-10 years. Sludge removal is typically accomplished with floating dredges discharging sludge into either a mechanical dewatering process or a geotube.

To minimize the introduction of large debris into the lagoon cells, preliminary treatment equipment may be included upstream of the first lagoon cell. The location of this pretreatment equipment is often referred to as the headworks of the treatment system. The advantage of including headworks treatment is that sludge accumulation in the cells is slower and not hampered by large debris at the bottom of the cells.

Seasonal aeration of partially mixed lagoons can result in release of both odors and foam. Surface foam can be captured by the wind and transported off site. Foam formation is a product of oxidation of anoxic organic material released into the water column by aeration and/or seasonal pond turnovers. Odors released may last between several days to a few weeks depending upon the amount of sludge accumulated on the bottom of the aerated cells and the volume of air introduced for aeration. Continuous aeration would eliminate the odor issue.

Using 2036 loading criteria established previously and the foregoing configuration criteria, the footprint of a partially mixed facultative aerated lagoon system would be approximately 8 acres. Mechanical aeration blowers sized for 2036 loadings would be a pair of duty/redundant 30Hp blowers with VFD motor control equipment. While this alternative will also likely reduce the distance between lagoons and occupied buildings, it would be significantly less than Alternatives 1 and 2. A schematic of how this alternative could be configured for the existing site is illustrated in **Figure 6**.



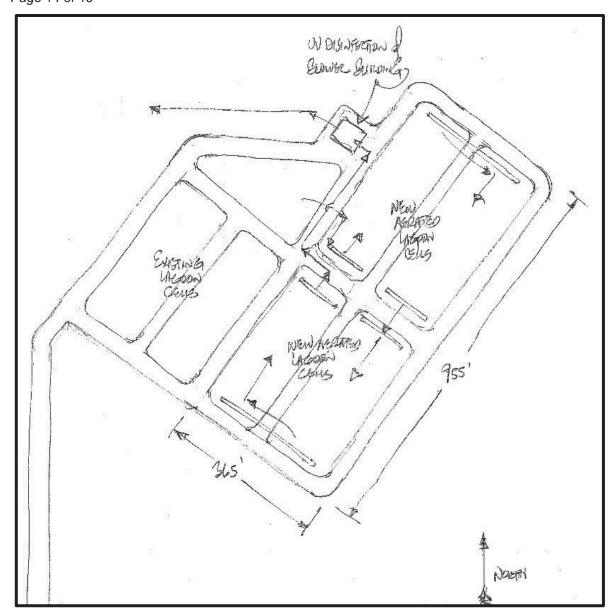


Figure 6: Conceptual Layout for Alternative 3 - Partially Mixed Aerated Lagoon Upgrade

Alternative 4: Extended Aeration AS Lagoon Treatment

Another wastewater treatment alternative for Talkeetna would be conversion of the existing facultative pond treatment system to a seasonally operated extended aeration activated sludge (AS) lagoon treatment system including effluent disinfection.

This treatment system would make use of a portion of one of the existing earthen diked ponds as a biological treatment reactor basin for an extended aeration AS process. The remainder of the existing ponds would be used to capture and store influent wastewater for subsequent seasonal treatment and discharge during the summer.

Instead of using the ponds for a combination of biological stabilization and sedimentation of solids, the lagoon AS process would use a separate clarifier for solids separation and return a portion of settled sludge to the aerated basin as required by the AS process. A conceptual drawing of the site configuration is shown in **Figure 7.**



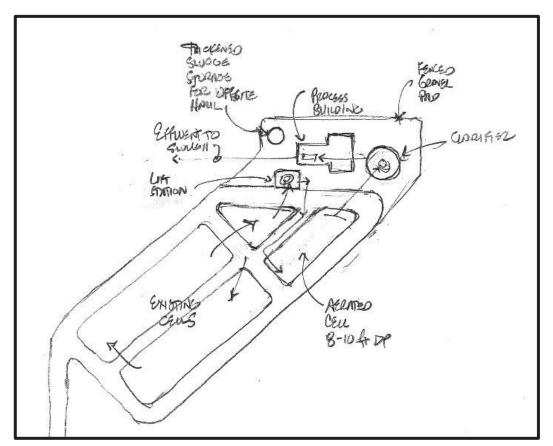


Figure 7: Conceptual Layout for Alternative 4 - Extended Air Activated Sludge Process

A schematic process flow diagram for this process is provided in Figure 8 below.

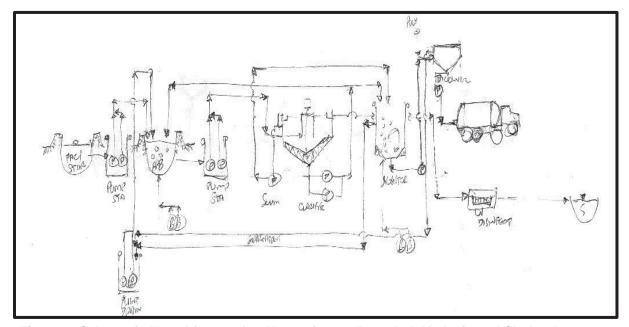


Figure 8: Schematic Flow Diagram for Alternative 4 - Extended Air Activated Sludge Process



For the foregoing treatment process, the footprint of the existing lagoon cells would remain the same and a new 3,500 square foot process building would be added. Additionally, a new circular clarifier and a small pump station to transfer wastewater to the new extended aeration treatment system would be needed. A conceptual building layout is provided in **Figure 9** below.

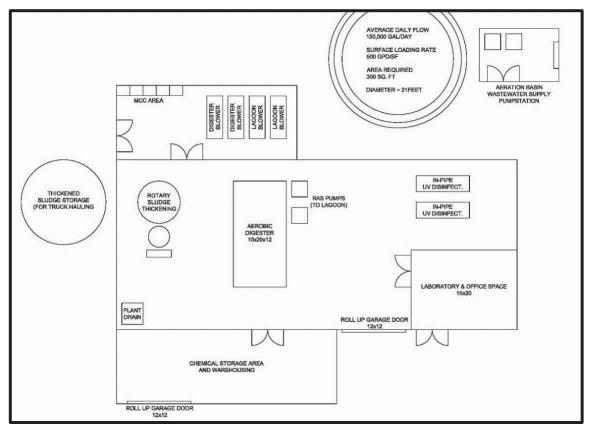


Figure 9: Conceptual Building Layout for Alternative 4 - Extended Air Activated Sludge Process

Alternative 5: Mechanical Treatment Plant

As with Alternative 4, this treatment alternative is also a seasonally operated system. Wastewater generated throughout the year would be directed to the existing three lagoon pond cells for storage. In summer, following ice melt and pond warming, stored wastewater would be withdrawn for treatment in a mechanical treatment plant. The mechanical treatment plant would be a membrane bioreactor (MBR) and includes disinfection and aeration. The MBR process occupies a smaller footprint relative to other mechanical processes, and can be largely automated to operate without continuous operator supervision. A schematic process flow diagram for this process is provided in **Figure 10**.



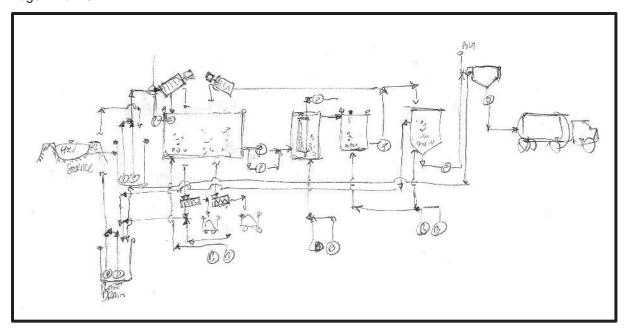


Figure 10: Schematic Flow Diagram for Alternative 5 - MBR Treatment Plant

For the foregoing treatment process, the footprint of the existing lagoon cells would remain the same. A new 5,000 square feet process building would be added to house the new MBR treatment system. A conceptual building layout is provided in **Figure 11**.

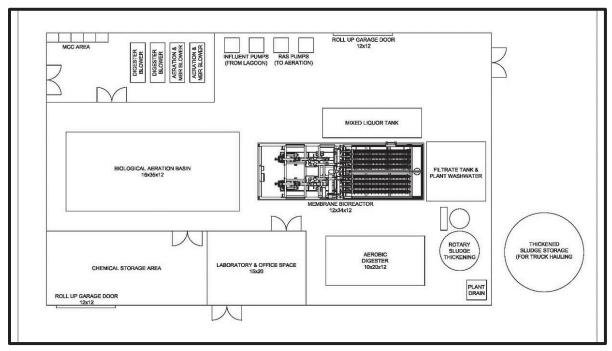


Figure 11: Conceptual Building Layout for Alternative 5 - MBR Treatment Plant



ALTERNATIVES COMPARISON

Table 6: Alternatives Comparison								
		Alte	rnative					
	1-Expand Facultative Lagoon per ADEC Guidelines	2-Expand Facultative Lagoon per Canadian Guidelines	3-Partially mixed Aerated Lagoon Treatment	4-Extended Aeration Activated Sludge Lagoon Treatment	5- Mechanical Treatment Plant			
Footprint	29 Acres	15 Acres	8 Acres	No Change to Lagoon Basin Size, 3,500 SF Building	No Change to Lagoon Basin Size, 5,000 SF Building			
Requires Supplemental Disinfection	Yes	Yes	Yes	Yes	No			
Requires Supplemental Aeration	Yes	Yes	No	No	No			
Operability	Same Process as existing, requires routine checks on aeration and disinfection equipment	Same process as existing, requires routine checks on aeration/disinfection equip Same process as existing, requires Less Intensive Than Option 4 Intensive			Can be mostly automated, likely requires higher operator level			
Constructability	Easy, unless wetland encroachment	Easy, unless wetland encroachment	Difficult	Moderate	Easy			
Requires 3 Phase Power	No	No	Yes	Yes	Yes			
Requires Solids Removal	No	No	YES (Dredge every 5-10 Years)	Yes	Yes			
Construction Cost Ranking (1=Lowest 5=Highest)	3	2	1	4	5			
O&M Cost	Low	Low	Mid	High	High			



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UPGRADE RECOMMENDATIONS

HDL presented upgrade alternatives to MSB staff in October 2016 upon which MSB directed HDL to further evaluate Alternatives 2 and 3. Furthermore, MSB has asked HDL to explore phasing options for each alternative, with the primary objective of the first phase to address dissolved oxygen and fecal coliform violations.

Chosen alternatives and possible phasing plans, complete with estimated construction and operation and maintenance costs will be further evaluated in a PER following United States Department of Agriculture, Rural Utilities Service Bulletin 1780-2 requirements.

APPENDIX D DECISION MATRIX COMPILED SCORES

Alternative Scoring Comparison (Unweighted)

Alternative 1 expands the facility using canadian standards for facultative lagoon treatment with suplemental disinfection Alternative 2 converts the facility into a partially mixed aerated lagoon with suplemental disinfection Scoring: 1= Least Desirable, 10 = Most Desirable

Scorer	Capita	al Cost	Annua	I O&M	Reuse of Exis	sting Facilities		y for Phased ruction	•	ty for Future rements	Overall	Footprint	Overall C	perability	Permi	tability	тот	AI SCORE
	Alternative1	Alternative 2	Alternative1	Alternative 2	Alternative1	Alternative 2	Alternative1	Alternative 2	Alternative1	Alternative 2	Alternative1	Alternative 2	Alternative1	Alternative 2	Alternative1	Alternative 2	Alternative1	Alternative 2
JJ MSB	6	2	7	3	8	4	8	6	4	6	6	8	8	6	7	7	54	42
MSB 1	6	2	8	7	8	8	8	3	4	8	4	8	8	6	6	8	52	50
MSB 2	5	2	5	2	5	5	6	6	4	4	4	6	6	4	5	5	40	34
MSB 3	6	1	4	8	1	1	7	5	5	7	2	6	2	8	4	6	31	42
DL HDL	5	1	7	5	10	10	6	6	5	8	5	8	5	8	5	8	48	54
CB HDL	10	6	10	8	7	6	8	5	2	8	3	7	7	7	5	5	52	52
NMY HDL	8	4	6	5	8	5	9	4	4	9	5	8	6	9	7	7	53	51
AA GVJ	10	4	9	8	6	6	5	10	6	8	5	10	6	9	9	7	56	62
GJ GVJ	10	8	6	5	5	5	5	5	5	8	6	6	8	6	6	6	51	49
Average	7.3	3.3	6.9	5.7	6.4	5.6	6.9	5.6	4.3	7.3	4.4	7.4	6.2	7.0	6.0	6.6	48.6	48.4

Importance Factor	
Capital Cost	18
Annual O&M	22
Reuse of Existing Facilities	5
Adaptability for Phased Construction	15
Adaptability for Future Requirements	20
Overall Footprint	5
Overall Operability	15
Permitability	(
Total points	100

Alternative Scoring Comparison (Weighted)

Scorer	Capita	al Cost	Annua	I 0&M	Reuse of Exis	ting Facilities	Adaptability	for Phased	Adaptablilit	y for Future	Overall I	Footprint	Overall O	perability	Permi	tability	TOTA	AI SCORE
Scorer	Alternative1	Alternative 2	Alternative1	Alternative 2	Alternative1	Alternative 2	Alternative1	Alternative 2	Alternative1	Alternative 2	Alternative1	Alternative 2	Alternative1	Alternative 2	Alternative1	Alternative 2	Alternative1	Alternative 2
JJ MSB	108	36	154	66	40	20	120	90	80	120	30	40	120	90	0	0	652	462
MSB 1	108	36	176	126	40	40	120	45	80	160	20	40	120	90	0	0	664	537
MSB 2	90	36	110	36	25	25	90	90	80	80	20	30	90	60	0	0	505	357
MSB 3	108	18	88	144	5	5	105	75	100	140	10	30	30	120	0	0	446	532
DL HDL	90	18	154	90	50	50	90	90	100	160	25	40	75	120	0	0	584	568
CB HDL	180	108	220	144	35	30	120	75	40	160	15	35	105	105	0	0	715	657
NMY HDL	144	72	132	90	40	25	135	60	80	180	25	40	90	135	0	0	646	602
AA GVJ	180	72	198	144	30	30	75	150	120	160	25	50	90	135	0	0	718	741
GJ GVJ	180	144	132	90	25	25	75	75	100	160	30	30	120	90	0	0	662	614
Average	132.0	60.0	151.6	103.3	32.2	27.8	103.3	83.3	86.7	146.7	22.2	37.2	93.3	105.0	0.0	0.0	621.3	563.3

APPENDIX E PROPOSED PROJECT PHASED CONSTRUCTION COST ESTIMATES

Alternative 1-Expand Facultative Lagoon Per Canadian Guidelines

Work Description	Unit	Estimated Quantity	Unit Price	Total Price
		Quantity		
CIVIL				
Mobilization/demobilization (5% of Civil Cost)	Lump Sum	1	\$ 202,400.00	\$ 202,400.00
Construction Surveying (3% Civil Cost)	Lump Sum	1	\$ 121,500.00	\$ 121,500.00
SWPPP (3% of Civil Cost)	Lump Sum	1	\$ 121,500.00	\$ 121,500.00
Clearing and Grubbing	Acre	16	\$ 7,500.00	\$ 120,000.00
Decomission Wetlands	Lump Sum	1	\$ 10,000.00	\$ 10,000.00
Surface Roads	Linear Foot	4,000	\$ 65.00	\$ 260,000.00
Dewatering	Lump Sum	1	\$ 100,000.00	\$ 100,000.00
Usable Excavation	Cubic Yard	32,200	\$ 12.00	\$ 386,400.00
Classified Fill	Ton	50,000	\$ 30.00	\$ 1,500,000.00
Cell Liner	Square Yard	41,000	\$ 10.00	\$ 410,000.00
Yard Piping (including trench excavation and backfill)	Linear Foot	2,020	\$ 200.00	\$ 404,000.00
Furnish and Install Manholes	Each	7	\$ 15,000.00	\$ 105,000.00
8-foot Chain Link Fence	Linear Foot	4,000	\$ 45.00	\$ 180,000.00
Topsoil/Seed	Acre	4	\$ 10,000.00	\$ 40,000.00
Lighting/Security	Lump Sum	1	\$ 50,000.00	\$ 50,000.00
Connect to Existing	Each	2	\$ 10,000.00	\$ 20,000.00
Baffles	Linear Foot	2,200	\$ 210.00	\$ 462,000.00
TREATMENT				
Process Equipment Building				
Excavation/compaction/prep site	Lump Sum	1	\$ 21,000.00	\$ 21,000.00
Concrete pad (20' x 20')	Lump Sum	1	\$ 38,000.00	\$ 38,000.00
Building Enclosure	Lump Sum	1	\$ 168,000.00	\$ 168,000.00
Electrical/Lighting	Lump Sum	1	\$ 90,000.00	\$ 90,000.00
HVAC	Lump Sum	1	\$ 129,000.00	\$ 129,000.00



Alternative 1-Expand Facultative Lagoon Per Canadian Guidelines

Work Description	Unit	Estimated Quantity	Unit Price	Total Price
Process Equipment				
Reaeration basin	Lump Sum	1	\$ 28,000.00	\$ 28,000.00
Blowers	Lump Sum	1	\$ 53,000.00	\$ 53,000.00
Blower housekeeping pads	Lump Sum	1	\$ 5,000.00	\$ 5,000.00
Blower Electrical and Controls Wiring	Lump Sum	1	\$ 19,000.00	\$ 19,000.00
Blower Commissioning	Lump Sum	1	\$ 15,000.00	\$ 15,000.00
Diffusers	Lump Sum	1	\$ 20,000.00	\$ 20,000.00
Air Piping	Lump Sum	1	\$ 10,000.00	\$ 10,000.00
Contact tank (coated steel)	Lump Sum	1	\$ 78,000.00	\$ 78,000.00
Chlorination Equipment (chemical pump and tank)	Lump Sum	1	\$ 14,000.00	\$ 14,000.00
Dechlorination Equipment (chemical pump and tank)	Lump Sum	1	\$ 14,000.00	\$ 14,000.00
Chemical Dosing Electrical and Controls Wiring	Lump Sum	1	\$ 9,000.00	\$ 9,000.00
<u>Electrical</u>				
SCADA integration	Lump Sum	1	\$ 86,000.00	\$ 86,000.00
Chlorine Residual Instrument (2)	Lump Sum	1	\$ 19,000.00	\$ 19,000.00
Effluent flow meter	Lump Sum	1	\$ 19,000.00	\$ 19,000.00
Security, Network	Lump Sum	1	\$ 12,000.00	\$ 12,000.00
Electric Service Extension	Lump Sum	1	\$ 100,000.00	\$ 100,000.00

Total Construction Cost	\$ 5,440,000
20% Contingency	\$ 1,088,000
Engineering Design Phase Services (10% of Total Construction Cost)	\$ 544,000
Construction Phase Services (10% of Total Construction Cost)	\$ 544,000
MSB Administration (3% of Total Construction Cost)	\$ 163,200
Total Capital Project Cost	\$ 7,800,000



Phase 1-Install Reaeration Basin, Disinfection System & Anaerobic Cells

Work Description	Unit	Estimated Quantity	Unit Price	Total Price
CIVIL				
Mobilization/demobilization (5% of Civil Cost)	Lump Sum	1	\$ 59,600.00	\$ 59,600.00
Construction Surveying (3% Civil Cost)	Lump Sum	1	\$ 35,800.00	\$ 35,800.00
SWPPP (3% of Civil Cost)	Lump Sum	1	\$ 35,800.00	\$ 35,800.00
Clearing and Grubbing	Acre	3	\$ 7,500.00	\$ 22,500.00
Decommission Wetlands	Lump Sum	1	\$ 10,000.00	\$ 10,000.00
Surface Roads	Linear Foot	1,500	\$ 65.00	\$ 97,500.00
Dewatering	Lump Sum	1	\$ 20,000.00	\$ 20,000.00
Usable Excavation	Cubic Yard	700	\$ 12.00	\$ 8,400.00
Classified Fill	Ton	20,000	\$ 30.00	\$ 600,000.00
Anaerobic Cell Liner	Square Yard	4,000	\$ 10.00	\$ 40,000.00
Yard Piping (including trench excavation and backfill)	Linear Foot	1,500	\$ 200.00	\$ 300,000.00
Furnish and Install Manholes	Each	6	\$ 15,000.00	\$ 90,000.00
Topsoil/Seed	Acre	0.25	\$ 10,000.00	\$ 2,500.00
TREATMENT				
Process Equipment Building				
Excavation/compaction/prep site	Lump Sum	1	\$ 21,000.00	\$ 21,000.00
Concrete pad (20' x 20')	Lump Sum	1	\$ 38,000.00	\$ 38,000.00
Building Enclosure	Lump Sum	1	\$ 168,000.00	\$ 168,000.00
Electrical/Lighting	Lump Sum	1	\$ 90,000.00	\$ 90,000.00
HVAC	Lump Sum	1	\$ 129,000.00	\$ 129,000.00
Process Equipment				
Reaeration basin	Lump Sum	1	\$ 28,000.00	\$ 28,000.00
Blowers	Lump Sum	1	\$ 53,000.00	\$ 53,000.00
Blower housekeeping pads	Lump Sum	1	\$ 5,000.00	\$ 5,000.00
Blower Electrical and Controls Wiring	Lump Sum	1	\$ 19,000.00	\$ 19,000.00
Blower Commissioning	Lump Sum	1	\$ 15,000.00	\$ 15,000.00
Diffusers	Lump Sum	1	\$ 20,000.00	\$ 20,000.00
Air Piping	Lump Sum	1	\$ 10,000.00	\$ 10,000.00
Contact tank (coated steel)	Lump Sum	1	\$ 78,000.00	\$ 78,000.00
Chlorination Equipment (chemical pump and tank)	Lump Sum	1	\$ 14,000.00	\$ 14,000.00
Dechlorination Equipment (chemical pump and tank)	Lump Sum	1	\$ 14,000.00	\$ 14,000.00
Chemical Dosing Electrical and Controls Wiring	Lump Sum	1	\$ 9,000.00	\$ 9,000.00
ELECTRICAL				
SCADA integration	Lump Sum	1	\$ 86,000.00	\$ 86,000.00
Chlorine Residual Instrument (2)	Lump Sum	1	\$ 19,000.00	\$ 19,000.00



Phase 1-Install Reaeration Basin, Disinfection System & Anaerobic Cells

Work Description	Unit	Estimated Quantity	Unit Price	Total Price
Effluent flow meter	Lump Sum	1	\$ 19,000.00	\$ 19,000.00
Security, Network	Lump Sum	1	\$ 12,000.00	\$ 12,000.00
Electric Service Extension	Lump Sum	1	\$ 100,000.00	\$ 100,000.00

Total Construction Cost	\$ 2,270,000
20% Contingency	\$ 454,000
Engineering Design Phase Services (10% of Total Construction Cost)	\$ 227,000
Construction Phase Services (10% of Total Construction Cost)	\$ 227,000
MSB Administration (3% of Total Construction Cost)	\$ 68,100
Total Capital Project Cost	\$ 3,200,000



Phase 2-Construct Storage Pond

Work Description	Unit	Estimated Quantity	Unit Price		Total Price
<u>CIVIL</u>					
Mobilization/demobilization (5% of Civil Cost)	Lump Sum	1	\$ 142,700.00	\$	142,700.00
Construction Surveying (3% Civil Cost)	Lump Sum	1	\$ 85,700.00	\$	85,700.00
SWPPP (3% of Civil Cost)	Lump Sum	1	\$ 85,700.00	\$	85,700.00
Clearing and Grubbing	Acre	13	\$ 7,500.00	\$	97,500.00
Surface Roads	Linear Foot	2,500	\$ 65.00	\$	162,500.00
Dewatering	Lump Sum	1	\$ 80,000.00	\$	80,000.00
Usable Excavation	Cubic Yard	31,500	\$ 12.00	\$	378,000.00
Classified Fill	Ton	30,000	\$ 30.00	\$	900,000.00
Storage Cell Liner	Square Yard	37,000	\$ 10.00	\$	370,000.00
Baffles	Linear Foot	2,200	\$ 210.00	\$	462,000.00
Yard Piping (including trench excavation and backfill)	Linear Foot	520	\$ 200.00	\$	104,000.00
Connect to Existing	Each	2	\$ 10,000.00	\$	20,000.00
Furnish and Install Manholes	Each	1	\$ 15,000.00	\$	15,000.00
8-foot Chain Link Fence	Linear Foot	4,000	\$ 45.00	\$	180,000.00
Lighting/Security	Lump Sum	1	\$ 50,000.00	\$	50,000.00
Topsoil/Seed	Acre	3.5	\$ 10,000.00	\$	35,000.00

Total Construction Cost	\$ 3,170,000
20% Contingency	\$ 634,000
Engineering Design Phase Services (10% of Total Construction Cost)	\$ 317,000
Construction Phase Services (10% of Total Construction Cost)	\$ 317,000
MSB Administration (3% of Total Construction Cost)	\$ 95,100
Total Capital Project Cost	\$ 4,500,000



APPENDIX F PUBLIC INVOLVEMENT COMMENTS FROM PREVIOUS PROJECTS

or are ont of town worth get This.

HOW'S THE WATER?

What are the challenges being experienced with the Talkeetna Sewer/Water System? The Mat-Su Borough has hired CRW Engineering Group, LLC to assess the current system's operations, facilities, and costs. To best understand what problems the Talkeetna community is experiencing with the water system, we need to hear from you. Please take a few minutes to provide the information below to help solve your community's water system challenges.

It is our goal to make the system run more efficiently, be more cost effective, and best meet the needs of the Talkeetna community.

THANK YOU FOR BEING PART OF THE SOLUTION!

Water Quality: Look, Feel, Taste and Smell.	Strangly Agree	Agize.	(Vegatal)	Disagree	Sнопріу Disagrad
My water is always clear. My water pressure is acceptable. The taste of my water is pleasing. My water is odorless.		X			
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The taxes we generate every summer should be paying for.
This rather Than being spent in the valley. Give Talkeothe it fair share at least.

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I use less than 2,000 gallons of water per month. luse less than 4,000 gallons of water per month. I use more than 8,000 gallons of water per month. Water Rates in Talkeetna Heutral Mancle Force / stee I think my monthly water bill is too high. I think my monthly water bill is too low. × I would be willing to pay more for my monthly water bill if I knew why the rates were increased. I understand that the Talkeetna water system is paid for by YES / NO (Please circle one) its residents and business owners. Water Education: What would you like to know? I am interested in learning more about how the water system YES) / NO (Please circle one) treats and distributes drinking water in Talkeetna. I would like to attend a community meeting to learn more (Please circle one) about the cost of water in Talkeetna. Additional Comments/Concerns: 145 the Sener that is the problem ATATO the fact that the water lines were rever installed properly. The Boroge needs to work on installing proper water lines or take care of the Sewage issue. It is Not up to those that has nothing to do with the installation originally.

Why dost it smell like sewaye mear the river?

How come revenue from businesses 15 50 close to and. from

vesidential? Businesses must use thousands thousands

of Gairons more than

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The taste of my water is pleasing.		×	acen.	tacto)	
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re many "bootleg" aflackula	well and	devinte.	herry	7'	

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My waterline pipes have burst due to freezing in the past.	YES NO (PI	ease circle one			
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Water Rates in Talkeetna	Strangly Agrae	Agree	Neutral	Disagree	Strongly Disagree
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I understand that the Talkeetna water system is paid for by its residents and business owners.	YES NO (PIE	ase circle one)			
Water Education: What would you like to know?					
I am interested in learning more about how the water system treats and distributes drinking water in Talkeetna. i would like to attend a community meeting to learn more about the cost of water in Talkeetna.	YES NO (Ple	ease circle one) ease circle one)			
Additional Comments/Concerns:		at loc			

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Water Quality: Look, Feel, Taste and Smell.	Strongly Agree	Agrilla	Nessel	Dissigna	Strongly Dangter
My water is always clear.	~				
My water pressure is acceptable.	4				
The taste of my water is pleasing.	~				
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Water System: Infrastructure (Exterior)					
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My waterline pipes have burst due to freezing in the past.	YES / NO (PI	ease circle one)	,,		
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comments@crweng.com

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Water Quality: Look, Feel, Taste and Smell.	Strangly Agree	Agrae	Neutral	Disagree	Strongly Dinagree
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My water pressure is acceptable.	1				
The taste of my water is pleasing.	\ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \				
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Water System: Infrastructure (Exterior)					
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My waterline pipes have burst due to freezing in the past.	YES (NO) (Ple	ease circle one)			
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I use less than 4,000 gallons of water per month.					
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I think my monthly water bill is too low.	1				1 1
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I understand that the Talkeetna water system is paid for by its residents and business owners.	YES (NO) (Ple	ase circle one)	NOT 1	N FULK	<
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I would like to attend a community meeting to learn more about the cost of water in Talkeetna.	YES/I NO (Ple	ase circle one)			
Additional Comments/Concerns:					
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ATTN: Jessica Smith | CRW Engineering Group, LLC | 3940 Arctic Blvd #300 | Anchorage, AK 99503

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(3) FIRE ITY DRINT STATUS - GOTHR MARKET COSTS

(3) RATE COST INCREASES - OVERSIGHT OF SYSTEM

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NEAREST INTERSECTION TO RESIDENCE: Water Quality: Look, Feel, Taste and Smell. Neutral Disegrap Strongly Disagree My water is always clear. My water pressure is acceptable. The taste of my water is pleasing. My water is odorless. Water System: Infrastructure (Exterior) My waterlines are generally in good working condition. I often have to let my water drip or run to prevent freezing in my waterline pipes. My waterline pipes have burst due to freezing in the past. YES /NO (Please circle one) Water Use (Please choose one) I don't know how much water I use per month. [i use less than 1,000 gallons of water per month. I use less than 2,000 gallons of water per month. [] I use less than 4,000 gallons of water per month. use more than 8,000 gallons of water per month. Water Rates in Talkeetna Strangly Disease Strengty Again Heatral I think my monthly water bill is too high. I think my monthly water bill is too low. I would be willing to pay more for my monthly water bill if I knew why the rates were increased. I understand that the Talkeetna water system is paid for by ES / NO (Please circle one) its residents and business owners. Water Education: What would you like to know? I am interested in learning more about how the water system NO (Please circle one) treats and distributes drinking water in Talkeetna. I would like to attend a community meeting to learn more YED / NO (Please circle one) about the cost of water in Talkeetna. Additional Comments/Concerns: we have seasonal Shut of for our Ausiness. of sould like to know more about the Sever treatment System.

Please Bring Your Completed Survey to the Talkeetna Community Meeting on March 25, 2014 or send to:

neighbor (since flood 1/2 yr

What are the challenges being experienced with the Talkeetna Sewer/Water System? The Mat-Su Borough has hired CRW Engineering Group, LLC to assess the current system's operations, facilities, and costs. To best understand what if problems the Talkeetna community is experiencing with the water system, we need to hear from you. Please take a few minutes to provide the information below to help solve your community's water system challenges.

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Vater Rates in Talkeetna	Stranglandgrav	Reject	Reutel	Disagree	Strangly Distant
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1 people having armic related h	ealth pro	blensin	wish +	hey had	et chan
Please Bring Your Completed Survey to the Talke	etna Communi	ty Meeting or	March 25, 2	014 or send	to: the
ATTN: Jessica Smith CRW Engineering Group,					
	@crweng.co		,	-	

appear that we guzzzle more water, but it isn't all for our own use. It has been a long process for them jetting things fixed - Fema red tape just to get a low interest loan + still needing to get work done - but reighbors need to help each other & we were blessed not to suffer any major loss - but hope you realize that these types of feedors might be out there esp. if you ever get rid of that rate.

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I often have to let my water drip or run to prevent freezing in my waterline pipes.					>
My waterline pipes have burst due to freezing in the past.	YES NO	lease circle one)			<u> </u>
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dditional Comments/Concerns:					

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ATTN: Jessica Smith | CRW Engineering Group, LLC | 3940 Arctic Blvd #300 | Anchorage, AK 99503

comments@crweng.com

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