



Antidegradation Form 2G

ALASKA DEPARTMENT OF ENVIRONMENTAL CONSERVATION (DEC)

Wastewater Discharge Authorization Program

555 Cordova Street, AK 99501

907-269-6285

All discharges that require a permit under 18 AAC 83 Alaska Pollutant Discharge Elimination System (APDES) or an application for state certification of a federal permit under Section 401 of the Clean Water Act (CWA) are subject to antidegradation regulatory requirements under 18 AAC 70.016. [\[18 AAC 70.016\(a\)\(1\)\(A & B\)\]](#).

Form 2G must be completed by all applicants for APDES individual permits and 401 certifications. The applicant shall submit sufficient information for the department to complete an antidegradation analysis and make findings under 18 AAC 70.016 (b), (c), and (d). DEC may request additional information as necessary.

Antidegradation analysis is tier-specific and the department findings for Tier 1 and Tier 2 are on a parameter-by-parameter basis. Analysis and department findings for Tier 3 water are on a basis of a designated water.

The antidegradation review procedure is based on:

- The level of protection (i.e. Tier 1, 2, or 3) assigned to the pollutants of concern within the receiving water,
- The type of receiving water,
- Existing water quality of the receiving water,
- The necessity of degradation, and
- The social and economic importance of the regulated activity.

Submit completed form to DEC Division of Water to the address above, or via email to either of the following email addresses depending on the type of permit:

- 401 Certification for 404 CWA, or other federal permits: DEC-401Cert@alaska.gov
- APDES Permits: DEC.Water.WQPermit@alaska.gov
- Or, via other means as coordinated with DEC Division of Water.

Section 1- Facility Information [\[18 AAC 70.016\(a\)\(5\)\(A – G\)\]](#)

Facility Name: _____ Permit Number: _____

1. Provide a list of Parameters of Concern in the discharge, the respective concentrations, persistence, and potential impacts to the receiving water.
2. Identify which Tier protection level should apply for each Parameter of Concern.

(For multiple parameters or if additional space is needed, attach separate sheet)

Receiving Waterbody or Wetland: _____

Tier* Protection Level:
*(*Note, complete this entry after completing the rest of the form)*

Parameter of Concern: _____

Concentrations: _____

Persistence: _____

Potential Impacts: _____

If applicable, data is attached on the parameters that may alter the effects of the discharge to the receiving water.

Yes, No, N/A

Section 2- Baseline Water Quality Provisions [\[18 AAC 70.016\(a\)\(6\)\(A – C\)\]](#)

If determined necessary and requested by the Department, submit sufficient and credible baseline water quality information for the receiving water which meets the requirements of 18 AAC 70.016(a)(6)(A – C).

Section 3- Tier 1 analysis of existing use protection [18 AAC 70.016(b)]

1. Does a discharge of any parameter identified in Section 1 occur to a Category 4 [305(b)] or Category 5 [303(d)] waterbody listed in the current approved Alaska's Integrated Water Quality Monitoring and Assessment Report?
 See <http://dec.alaska.gov/water/water-quality/impaired-waters.aspx> for the most recently approved integrated report and category listings.
- Yes No
- a. If yes, list parameters from Section 1 that are present in the proposed discharge that will be included in the Tier 1 analysis in the following table.

Receiving Water and Wetlands Information (if additional space is needed, attach separate sheet):							
a. Name of waterbodies or wetlands to which you discharge:	Impaired Waters						
	If you answered yes to b, then answer the following three questions (c, d, and e).						
	b. Is the proposed discharge(s) directly to any segment of a Category 4 or 5 waterbody?		c. What parameter(s) are causing the Category 4 or 5 water degradation?	d. Are the parameter(s) causing the degradation present in the proposed discharge?	e. Is the discharge consistent with the assumptions and requirements of applicable EPA approved or established Total Maximum Daily Load (TMDL)?		
	Yes	No		Yes	No	Yes	No
	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<input type="checkbox"/>	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Section 4- Tier 2 analysis of existing use protection [18 AAC 70.016(c)]

If not identified as requiring only Tier 1 level of protection, Tier 2 is presumed for all water as the default protection level for all parameters [18 AAC 70.016(c)(1)].

1. Is the application for a (Check all that apply):
- New Discharge* Existing Discharge Expanded Discharge*
- * "new or expanded," with respect to discharges, means discharges that are regulated for the first time or discharges that are expanded such that they could result in an increase in permitted parameter load or concentration or other changes in discharge characteristics that could lower water quality or have other adverse environmental impacts.
2. Does a discharge of any parameter identified in **Section 1 – Facility Information** require Tier 2 analysis as defined under 18 AAC 70.016(c)(2)(A) – (E)?
- Yes**, proceed to **Question 3**
- No**, please **explain below** and proceed to **Section 5**
3. For each parameter requiring a Tier 2 analysis, provide a description per discharge (e.g., parameter specific per outfall) and an analysis of a range of practicable alternatives that have the potential to prevent or lessen the degradation associated with the proposed discharge [18 AAC 70.016(c)(4)] (if additional space is needed, attach separate sheet). Include:
- A. Identify receiving water quality and accompanying environmental impacts on the receiving water for each of the practicable alternatives;

B. Evaluate the cost for each of the practicable alternatives, relative to the degree of water quality degradation;

C. Identify a proposed practicable alternative that prevents or lessens water quality degradation while also considering accompanying cross-media environmental impacts. (If the applicant has selected a non-degrading alternative, the social or economic importance analysis in Question 4 is not required.)

4. Social or Economic Importance [\[18 AAC 70.016\(c\)\(5\)\]](#)

Provide information that demonstrates the accommodation of important social or economic development. The applicant shall complete either a social OR economic importance analysis (or both) for each affected community in the area where the receiving water for the proposed discharge is located. (if additional space is needed, attach separate sheet)

(A) Social Importance Analysis:

(select one or more areas, and describe below)

- community services provided;
- public health or safety improvements;
- infrastructure improvements;
- education and training;
- cultural amenities;
- recreational opportunities

(B) Economic Importance Analysis:

(select one or more areas, and describe below):

- employment, job availability, and salary impacts;
- tax base impacts;
- expanded leases and royalties;
- commercial activities;
- access to resources;
- access to a transportation network

Describe (checked items above or attach as separate document)

Section 5- Tier 3 analysis of existing use protection [\[18 AAC 70.016\(d\)\]](#)

1. Is the discharge to a designated Tier 3 water? Yes No

(Currently, the State of Alaska has not designated any Tier 3 waters).

See <http://dec.alaska.gov/water/water-quality/standards/antidegradation.aspx> for Tier 3 for further information.)

Section 6. Certification Information

An Alaska Pollutant Discharge Elimination System (APDES) permit application must be signed by an individual with the appropriate authority per [18 AAC 83.385](#) or 401 certification of 404 permits, or other federal permits, per [18 AAC 15.030](#).

APDES Permits	
Corporate Executive Officer 18 AAC 83.385 (a)(1)(A)	For a corporation, a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision-making functions for the corporation.
Corporate Operations Manager 18 AAC 83.385 (a)(1)(B)	For a corporation, the manager of one or more manufacturing, production, or operating facilities, if (i) the manager is authorized to make management decisions that govern the operation of the regulated facility, including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long term environmental compliance with environmental statutes and regulations; (ii) the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and (iii) authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
Sole Proprietor or General Partner 18 AAC 83.385 (a)(2)	For a partnership or sole proprietorship, the general partner or the proprietor respectively.
Public Agency, Chief Executive Officer 18 AAC 83.385 (a)(3)(A)	For a municipality, state, or other public agency, the chief executive officer of the agency.
Public Agency, Senior Executive Officer 18 AAC 83.385 (a)(3)(B)	For a municipality, state, or other public agency, a senior executive officer having responsibility for the overall operations of a principal geographic unit or division of the agency.
401 Certifications	
Corporations 18 AAC 15.030 (1)	In the case of corporations, by a principal executive officer of at least the level of vice president or his duly authorized representative, if the representative is responsible for the overall management of the project or operation.
Partnerships 18 AAC 15.030 (2)	in the case of a partnership, by a general partner
Proprietorship 18 AAC 15.030 (3)	in the case of a sole proprietorship, by the proprietor
Public Agency 18 AAC 15.030 (4)	in the case of a municipal, state, federal or other public facility, by either a principal executive officer, ranking elected official, or other duly authorized employee.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Organization:		Name:		Title:	
Phone:		Fax (optional):		Email:	
Mailing Address:	Street (PO Box):				
	City:		State:		Zip:
_____ Signature/Responsible Official			_____ Date		

Section 7. Form 2G Preparer *(Complete if Form 2G was prepared by someone other than the certifier.)*

Organization:		Name:		Title:	
Phone:		Fax (optional):		Email:	
Mailing Address: <input type="checkbox"/> Check if same as Certifiers Information	Street (PO Box):				
	City:		State:		Zip: