



GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Watershed Protection Branch
2 Martin Luther King, Jr. Drive
Suite 1152, East Tower
Atlanta, Georgia 30334
404-463-1511

FEB 6 2018

Persons who commented on Draft LAS Permit GAJ010300

RE: EPD Response to Comments
Crider, Inc.–Stillmore, Emanuel and Candler
Counties
LAS Permit No. GAJ010300

Dear Sir/Maddam:

Thank you for your comments regarding the permit issuance for the Crider, Inc. Land Application System (LAS). Attached is a summary of comments from the public and our responses to the issues raised. In addition, we have attached the Permit Addendum and Permit Fact Sheet Addendum documenting the changes made to the attached permit. We appreciate your interest in this matter.

After consideration of your comments, EPD has determined that the permit is protective of water quality standards and we have issued the permit.

If you have any questions, please contact Audra Dickson of my staff at 404-463-4934.

Sincerely,

Audra Dickson, Manager
Wastewater Regulatory Program
Watershed Protection Branch

Attachment

**Public Comments and EPD Responses on Draft LAS Permit
Crider, Inc., LAS Permit No.: GAJ010300**

COMMENTS RECEIVED	EPD RESPONSE
<p>The Fact Sheet states that the Design Development Report ("DDR") for this facility was last approved in 2006 meaning that it has been used for 3 permit cycles. Given the potential for technological and other improvements, as well as for changes on the ground, we believe that it is important for EPD to require an updated DDR. Similarly, the Fact Sheet states that the Operation and Management Plan was last approved in 2007, again raising the question of whether the information being relied upon by EPD to draft the permit is timely or outdated.</p>	<p>To obtain a Land Application System (LAS) permit, the applicant must first submit for approval a Design Development Report (DDR) prior to obtaining the first LAS permit. Subsequent DDRs are required to be submitted and approved prior to any significant changes to the facility. To ensure significant changes have not occurred, EPD is requiring permittee to submit a revised DDR within 6 months of the effective date of the permit.</p>
<p>The permit conditions have been largely unchanged for several permit cycles as well, except for several instances of weakening of the permit as noted below. If this facility had no history of violations and other problems, that might be acceptable. However, the EPD file contains a number of violations and Consent Orders, which indicate that the current permit terms are not adequate.</p>	<p>The terms and conditions of the LAS permit are based on the approved DDR, application and supportive documents. This draft permit has been significantly revised and to include the following changes, 1) modified the numeric effluent BOD and TSS limits from a mass loading to a concentration based limit of 300 mg/L and 300 mg/L; respectively, 2) the total nitrogen effluent limit has been modified from a quarterly mass loading to a monthly mass loading to be able to better monitor the loading to spray fields, 3) included fecal coliform monitoring in the groundwater monitoring wells and 4) included targeted Special Conditions requiring the submittal of a revised DDR.</p> <p>The facility's past noncompliance has been addressed through appropriate enforcement actions.</p> <p>The draft permit is legal, protective, and enforceable as proposed. EPD expects the permittee to comply with the permit conditions.</p>

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COMMENTS RECEIVED	EPD RESPONSE
<p>Section B.1., there are no limits for nitrate- nitrogen but there should be and the monitoring should be more frequent. According to the most recent monitoring reports we have seen, Crider has had to close down several fields because of "elevated nitrate-nitrogen levels found in interior groundwater wells." Additionally, the 2016 reports consistently noted that nitrate-nitrogen levels exceeded</p>	<p>Total nitrogen loading has a limit and is calculated (see fact sheet) based on the sum of Total Kjeldahl Nitrogen (TKN) as N and Nitrate-Nitrogen as N.</p>
<p>EPD has removed what was previously Special Condition D.1, which was the provision that required Crider to suspend spraying fields when the monitoring wells for that field show nitrate-nitrogen levels exceed 10 mg/1. This would seem to be a critical revision to the permit since it has historically been used when the groundwater levels of nitrate-nitrogen exceed drinking water standards. Additionally, this condition was the foundation for the issuance of a prior Notice of Violation to Crider by EPD. Thus, removal of this provision without doing anything additional to address this problem constitutes not just improper backsliding but also is simply a bad idea.</p>	<p>A Notice of Violation (NOV) was issued to address noncompliance of permit regarding wells exceeding nitrate-nitrogen concentration of 10 mg/L. The facility has since ceased utilizing the specific spray field, hence the permit condition has been removed. In addition, EPD has included a special condition requiring additional evaluation and investigation and submittal of a new DDR.</p>
<p>With regard to the total nitrogen limits of 51 pounds per acre per month, we believe that this number is significantly too high. It is based upon an annual loading limit of 612 pounds per acre. We have noted that EPD itself has previously suggested that this figure be reduced by about a</p>	<p>EPD approved a DDR and a supplemental DDR submitted in May 2006 and April 2007, respectively. Total nitrogen loading is calculated based on nitrogen concentrations of 102 mg/L from the effluent sample. Then, through a series of calculations (see fact sheet) for plant uptake, evaporation, denitrification, and volatilization, percolate total nitrogen</p>

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<p>third. (See 2005 Memo from Glenn Treadwell). We agree and believe that this limit should be lowered. We also believe that these limits should be written as concentration limits as well as loading limits.</p>	<p>was calculated at 4.1 mg/L and is significantly lower than 10 mg/L for the maximum contaminant level for nitrate nitrogen.</p>
<p>Section B.2., in addition to the listed pollutants, we request that monitoring and limits also be required for arsenic, BOD, ammonia, total nitrogen, fecal coliform, fecal strep, and E. coli.</p>	<p>Based on submitted information, EPD does not believe arsenic, total nitrogen, E.coli, BOD, and fecal strep are pollutants of concern at this facility. However, EPD agrees to include fecal coliform into the monitoring program.</p>
<p>Surface water monitoring in Section B.4., we request EPD establish pollution concentration limits for the listed constituents in downstream sampling sites.</p>	<p>There is no point source direct discharge of wastewater into a surface water; hence, limits are not required. A surface water monitoring program is established to monitor potential indirect and unintended (runoff) discharges of wastewater into a stream.</p>
<p>Request that monitoring and limits also be required for arsenic.</p>	<p>Based on submitted information, EPD does not believe arsenic is a pollutant of concern, hence we have not required monitoring or included effluent limit.</p>
<p>It appears that some wells are being or have been relocated. We are concerned that these relocations take the monitoring away from areas that have previously reported elevated levels of nitrate-nitrogen and other pollutants. Can you advise us whether this is the case? If it is, we oppose any relocation that moves the wells away from locations with historically higher levels of pollutants.</p>	<p>The DDR submitted and approved in 2007, illustrated through a series of installed piezometers that monitoring wells 8N and 9N were not downgradient of the LAS system. However, the LAS permits issued in 2007 and 2012 required monitoring wells 8N and 9N to be sampled twice a year for further observation. Nitrate concentrations in monitoring well 8N located outside the LAS monitoring system has been less than 10 mg/L since December 2012. Therefore, the current Permit only requires the applicant to continue sampling monitoring well</p>

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<p>I am writing this brief e-mail in regards to the reissuance to Permit# GAJ010300, and Crider's proposal to dump an additional 1.7 MGD of pretreated poultry canning and process waste. I guess the alarming factor here is "what is your meaning of pretreated waste". Since I live in the area, and I smell the area of their ponds and drying beds, and I often ask myself what and the heck are they dumping. I have so many questions as to what's being dumped, how is it being pretreated, and who is watching the hen house. From what I see up here, there are NO resources to watch them or anyone as to what's being dumped into our water system.</p> <p>If you can tell me how Crider is pretreating the waste and how DNR monitors the dumping, then maybe I'll have a better feeling. As of this writing I would strongly vote NO on the reissuance. Have Crider spend some of his money to treat the waste properly.</p>	<p>9N located outside the LAS monitoring system on a twice/year frequency for further observation and evaluation.</p> <p>The proposed permit allows Crider, Inc. to continue land applying 1.7 MGD of treated waste water, hence this is not an increase in flow and volume. Waste water generated as a result of operation at this facility is treated by a anaerobic digestive pond and a facultative pond before it is land applied. Constituents of concern for this type of operation are listed in the permit. The permit sets limits for these constituents and monitors for them in effluent sampling, groundwater monitoring wells, and streams. Georgia EPD monitors Crider, Inc. operation by requiring them to submit monthly compliance reports.</p>

Permit Addendum

Name of Facility Crider, Inc.–Stillmore, Emanuel and Candler Counties

LAS Permit No. GAJ010300

Were there any revisions between the draft proposed LAS permit placed on public notice and the final proposed NPDES permit? If yes, specify: Yes No

Part I.B.1.a Changed Biochemical Oxygen Deman- 5-day limit from 400 mg/L to 300 mg/L.

Part I.B.1.a Changed Total Suspended Solids limit from 400 mg/L to 300 mg/L.

Part I.B.2 Added the analysis of “fecal coliform” to the groundwater monitoring program.

Part C.3 Required Permittee to submit a revised Design Development Report.

The permittee has been made aware of these changes

Fact Sheet Addendum

Name of Facility Crider, Inc.–Stillmore, Emanuel and Candler Counties

LAS Permit No. GAJ010300

Were there any revisions between the draft proposed LAS permit fact sheet placed on public notice and the final proposed LAS permit fact sheet? If yes, specify: Yes No

Part I.B.1.a Changed Biochemical Oxygen Deman- 5-day limit from 400 mg/L to 300 mg/L.

Part I.B.1.a Changed Total Suspended Solids limit from 400 mg/L to 300 mg/L.

Part I.B.2 Added the analysis of “fecal coliform” to the groundwater monitoring program.

Part C.3 Required Permittee to submit a revised Design Development Report.

The permittee has been made aware of these changes.