

## Response to Comments

FL Club

LAS Permit No. GAG278119

Taylor County, Flint River Basin

Comment	EPD Response
<p>What is this permit. I'm just a concerned citizen</p>	<p>This permit regulates new and existing discharges of sanitary wastes from large community systems to subsurface fluid distribution systems within the State of Georgia. This permit is designed for discharges of sanitary wastes from community systems to subsurface disposal systems that are designed for flows less than 150,000 gpd (0.15 MGD).</p>
<p>Where can I view a public 'Blue Prints' or 'Scope of Work' for this permit?</p>	<p>For General permits, the draft permit, notice of intent, fact sheet, and supporting documents are accessible through the EPD Watershed Protection Branch Permit and Public Comments Clearinghouse website at the following address: <a href="https://epd.georgia.gov/forms-and-permits/watershed-protection-branch-forms-permits/watershed-protection-branch-permit-and">https://epd.georgia.gov/forms-and-permits/watershed-protection-branch-forms-permits/watershed-protection-branch-permit-and</a></p> <p>Information about this specific project can be found on the GEOS public page: <a href="https://geos.epd.georgia.gov/GA/GEOS/Public/GovEnt/Shared/Pages/Main/Login.aspx">https://geos.epd.georgia.gov/GA/GEOS/Public/GovEnt/Shared/Pages/Main/Login.aspx</a></p> <p>Select "Public Inquiry Portal" and enter the facility name or submittal ID "847386".</p>
<p>Please reconsider this permit. This is a small community with farms and livestock within a mile or less from this Golf course. A sewage plant or sludge plant could destroy our farms and homes from pollutants.</p>	<p>This is a subsurface facility that is designed in accordance with EPD guidelines. There will be no wastewater discharged to surface waters. Sludge will not be land applied on permitted site. The facility is required by the permit to meet all maximum contaminant levels for drinking water. So long as groundwater leaving the site meets maximum contaminant levels, there is no expectation that impacts to groundwater could negatively impact downgradient private water supply wells.</p>

I am writing to inform you of my concern and objection regarding permit GAG278000-FL club.

My first concern is the elusiveness and inadequate notice. The only notice I've seen is an 8X10 piece of paper on a wooden post on the side of the road with print so small it's not legible and in the local paper which not everyone is able to financially or physically able to obtain a copy. I went on the DNR website and could view the application but the link to access the NOI form and further information does not work.

A few additional concerns I have are where is the water being sourced from? Our rural town relies on aquifer fed wells to supply drinking water and water to our crops and livestock.

Where and how is the sewage sludge being processed/disposed of? Our farm and many around us strive to use natural sustainable processes and are worried about the potential contamination and effects on our water and soil.

The permittee completed all public notice requirements for consideration of coverage in accordance with the Rules and Regulations of the State of Georgia (the Rules) at 391-3-6-.26. In accordance with the Rules, a copy of the public notice was posted to the EPD website. Despite not being required by the Rules, the applicant, at EPD's request posted an additional newspaper notice and at the proposed project location.

EPD's public notice began on July 1. The facility posted their signage in two different locations on July 2, and the required one-time newspaper posting was posted July 4.

An additional notification for a public hearing was posted on August 30, 2024 and the hearing was held on October 3, 2024.

Comments related to other local or environmental permits, such as: zoning, construction, stormwater, and water withdrawal are outside of the scope of this wastewater permit.

Septage will be removed from tanks when levels reach 18-24 inches of depth and hauled to an offsite treatment facility that receives septage by a licensed hauling contractor in accordance with 40 CFR Part 503. No sludge will be land applied on the permitted site.

Regarding General LAS Permit GAG278000-FL Club (Taylor county). Please reconsider approval of this permit. The proposed project places the surrounding farming community at risk for adverse impacts on the aquifer for our wells along with contamination. We had no prior notification as with much of this construction project which has negatively impacted the environment.

The facility is required by the permit to meet all maximum contaminant levels for drinking water. So long as groundwater leaving the site meets maximum contaminant levels, there is no expectation that impacts to groundwater could negatively impact downgradient private water supply wells.

The permittee completed all public notice requirements for consideration of coverage in accordance with the Rules and Regulations of the State of Georgia (the Rules) at 391-3-6-.26. In accordance with the Rules, a copy of the public notice was posted to the EPD website. Despite not being required by the Rules, the applicant, at EPD's request posted an additional newspaper notice and at the proposed project location.

EPD's public notice began on July 1. The facility posted their signage in two different locations on July 2, and the required one-time newspaper posting was posted July 4.

An additional notification for a public hearing was posted on August 30, 2024 and the hearing was held on October 3, 2024.

We wanted to voice our concerns regarding General LAS Permit GAG278000-FL Club (Taylor county) and our family farm.

We strive to use organic farming practices, including what our livestock is fed.

The approval of this permit puts our water supply at risk for contamination including adverse effects to our well water due to the chemicals (we have viewed many "lawn care" chemical trucks entering this property) and there will be an enormous strain on the aquifers. Please reconsider this permit approval.

The facility is required by the permit to meet all maximum contaminant levels for drinking water. So long as groundwater leaving the site meets maximum contaminant levels, there is no expectation that impacts to groundwater could negatively impact downgradient private water supply wells.

Land management practices employed by the facility outside of the areas regulated by the proposed permit coverage are outside of the scope of the wastewater permit.

This request has generated many residents to oppose this action. It would be of interest to hold a public meeting to allow the residents to voice their concerns of a private wastewater facility being built on their backyards.

This area is mostly sand and is constantly shifts and sinks, I have many 'Sink holes' on my property that would have broken any man-made structure.

My concern is contamination or our drinking water in the event of a spillage from shifting sand or overflow from rainwater, the wildlife both above ground and below ground.

Fall Line Club LLC has already done enough damage to the environment with the leveling of our wildlife habitat and killing of unknown numbers of Gopher Tortoises with bulldozers.

The risk to the environment is great and will be irreversible for generations.

I am emailing to ask you to reconsider approval of this permit. There are many small farms and residential wells here that this could affect. "Various human activities are sources of pharmaceutical residues which can have a significant impact on human health and the condition of ecosystems. The intensive agriculture, the high expansion of urban areas and the use of fertilizers based on sewage sludge causes the entry of contaminants into the environment." <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC9293921/>

There are no man-made structures on or in the vicinity of the application site. The approved DDR indicates that the proposed drip field will be installed in accordance with buffer requirements in EPD's Guidelines for Land Treatment of Municipal Wastewater by Drip Irrigation, 1996.

The provided soil report indicates there is no risk of sinkholes developing in the application fields.

All wastewater is contained, not accessible by the public and held in storage tanks in accordance with EPD guidelines, therefore there are not concerns with overflow from the storage structures. Subsurface drip irrigation systems are designed not to produce any surface flow of wastewater. Therefore, EPD does not anticipate runoff from the proposed facility into any surface waters.

Comments related to other local or environmental permits such as: zoning, construction, stormwater, and water withdrawal are outside of the scope of this wastewater permit.

The facility is required by the permit to meet all maximum contaminant levels for drinking water. So long as groundwater leaving the site meets maximum contaminant levels, there is no expectation that impacts to groundwater could negatively impact downgradient private water supply wells.

Septage will be removed from tanks when levels reach 18-24 inches of depth and hauled to an offsite treatment facility that receives septage by a licensed hauling contractor in accordance with 40 CFR Part 503. No sludge will be land applied on the permitted site.

This Permit needs to be reconsidered due to health concerns of the community and lack of notice from the applicant. Is sticking an 8 by 10 piece of paper on a post barely visible only a few days ago appropriate notice for the community?

The facility is required by the permit to meet all maximum contaminant levels for drinking water. So long as groundwater leaving the site meets maximum contaminant levels, there is no expectation that impacts to groundwater could negatively impact downgradient private water supply wells or public health.

The permittee completed all public notice requirements for consideration of coverage in accordance with the Rules and Regulations of the State of Georgia (the Rules) at 391-3-6-.26. In accordance with the Rules, a copy of the public notice was posted to the EPD website. Despite not being required by the Rules, the applicant, at EPD's request posted an additional newspaper notice and at the proposed project location.

EPD's public notice began on July 1. The facility posted their signage in two different locations on July 2, and the required one-time newspaper posting was posted July 4.

An additional notification for a public hearing was posted on August 30, 2024 and the hearing was held on October 3, 2024.

Is it going to smell?

Subsurface drip irrigation systems are designed not to produce any surface flow of wastewater. Effluent will be stored in tanks. Therefore, EPD does not anticipate odor concerns from the effluent.

Will it impact other people's wells?

The facility is required by the permit to meet all maximum contaminant levels for drinking water. So long as groundwater leaving the site meets maximum contaminant levels, there is no expectation that impacts to groundwater could negatively impact downgradient private water supply wells.

Comments related to potential impacts from water withdrawal are outside of the scope of this wastewater permit.