Public Comments and EPD Responses on Draft Permit Guyton Water Pollution Control Plant LAS Permit No. GAJ040010

Comment	Response to Comment
Rather than seeking this short-term expansion of disposal capacity, the City of Guyton should take a longer-term view of its wastewater capacity and utilize the current and future availability of other wastewater treatment facilities. Guyton, like the rest of Effingham County and the wider North Coastal Georgia region, has seen unprecedented growth in recent years that is only projected to continue. To address long-term needs, ORK encourages the City of Guyton to embrace a regional approach to wastewater management and utilize already-available treatment options rather than pursue the proposed expansion.	Comment noted. Evaluation of regional alternatives is not a requirement in the permitting process for a LAS permit.
Anticipated wastewater treatment capacity growth in the Guyton service area can be met through treatment facilities in the area. Both the Effingham County Wastewater Treatment Facility and the imminent North Bryan Water Reclamation Facility. Effingham County's facility, located on Low Ground Road, is already located close to the City of Guyton and within Gutyon's Service Area. Utilizing this nearby resource not only avoids the need to sink more costs into the existing LAS operation, it will avoid many of the water quality and pollution issues associated with wastewater treatment will producing reuse water, reducing pressure on an already- strained Upper Floridan Aquifer and prevent accelerated saltwater intrusion into the region's main drinking water supply. In addition, the North Bryan Water Reclamation Facility will offer a significant amount of wastewater treatment capacity. With a new force main to pass through Effingham County already and a negotiated service agreement allowing the County to acquire treatment capacity, Guyton's additional wastewater	

having to invest additional funds in a short-term, 0.118 MGD expansion project that could quickly be exhausted	
project mat could quickly be exhausted.	
A long-term view of growth should be at the center of this decision-making	
process. Considering the Hyundai Mega-Site, Hyundai's suppliers and	
other supporting industries, expansion at the Port of Savannah, and the	
treatment demand is certain to increase. Rather than rely on a patchwork	
of independent approaches that duplicates work and increases costs for all	
localities, a regional approach should be pursued. Efforts are already	
underway to make the North Bryan Water Reclamation Facility available	
for a number of localities. Investing in regionalization of sewer efforts	
rather than short-term capacity increases through land application or septic systems is much more efficient will result in less water and land pollution	
and allow for future capacity to be expanded. ORK urges state and local	
decision makers to pursue a regional and comprehensive approach to	
wastewater management ahead of unprecedented growth.	
Wetlands share space and surround the existing spravfields. These state	The wetlands on project site were delineated by a wetland scientist and
waters play many important roles in the human and natural environments,	certified as jurisdictional by the United States Army Corps of Engineers
including flood control, wildlife habitat, and aquifer recharge. These	(USACE). All proposed sprayfields will be outside of the delineated
environmental services rely on healthy wetlands. Pollution runoff from	wetlands based on the maps and other information included in the Design
With the exact locations of the spray fields are not clearly delineated in the	conducted a site visit on August 15, 2023 to verify that all site features
Location Map in the Guyton WPCP's draft permit, it is not clear the extent	have been properly identified in the DDR. A copy of the DDR for the
that direct spray activities may be occurring in these wetlands. If spray	proposed sprayfields can be made available for review through an open
activities are occurring directly in these state waters, a National Pollution	records request by contacting: <u>GORArequst.water@dnr.ga.gov</u>
Discharge Elimination System (NPDES) permit addressing that direct	
discharge would be required, beyond the LAS nonpoint source permit being considered here. Regardless, runoff is a serious concern and should	I here are no proposed point source discharges and an appropriate buffer will be maintained between the edge of the sprayfields and the wetlands
receive monitoring beyond what is proposed here.	therefore an NPDES permit is not required. Furthermore, the wetlands on
	the project site are intermittent and non-flowing. These conditions make it
Regarding wetlands, ORK makes three requests. First, that applicants	impracticable to obtain upstream or downstream samples to establish a
verify the precise locations of their sprayfields and the locations of any	baseline or to evaluate potential impacts to surface water quality, therefore
weuanus, including both jurisdictional and non-jurisdictional wetlands.	

Second, if any sprayfields are located within wetlands, ORK asks that the GA EPD require additional NPDES requirements as required by GAC 391- 3-6 for discharge into waters of the state. Third, ORK asks that annual wetland water quality monitoring be specifically included in the permit at Part II.C.3.	surface water monitoring of the wetlands has not been included in the permit.
Another concern of the Guyton WPCP's location is its presence in the floodplain. In Georgia, 'floodplain' is a commonly used shorthand for the "Special Flood Hazard Area," which is described as an "area of high flood risk that is inundated by the 1% annual flood chance." This is the same definition that the Federal Emergency Management Agency (FEMA) uses for its Flood Hazard Zone A designation. FEMA states that these areas have at least a one-in-four chance of flooding over a 30-year period. And as storm frequency and intensity is expected to increase in the coming decades, the possibility of flooding likewise increases. While the application zones are not clearly demarcated, it appears that Guyton WPCP's application Zones C, D, and D2-ii are all at least partially within the floodplain. In addition, both the aeration and storage pond seem to be entirely within the floodplain. A map of the FEMA-designated floodplain is included below in Attachment A. Flooding at this LAS site presents serious water quality and human health concerns. The wastewater in the storage and aeration ponds as well as what is applied to the lands within the floodplain could easily be swept up in a flood and transported far beyond the Guyton WPCP. The pollutants in these flood waters could easily enter neighboring and nearby properties, homes, and drinking water wells, creating potentially serious health issues for these people. Additionally, water quality, sensitive habitats and wildlife, and recreational spaces are all vulnerable to the negative impacts from these pollutant-laden flood waters. This proposed modification would allow even more wastewater to be applied and, in the event of a flood, impact nearby waters and properties.	 EPD does not allow treated effluent to be land applied in floodplain. Existing Zones C and D are located in the floodplain and the City is under a compliance schedule since 2021 to abandon these fields. Refer to Part I.C.4 of the permit. The City will no longer be allowed to land apply to Zone C and D after April 30, 2025. Although the plant footprint may be within the floodplain, the entire treatment process (headworks & treatment pond), the storage pond, and all associated mechanical equipment (mechanical screens, aerators, irrigation pumps) are above the 100-year flood zone elevation and therefore protected against flood. All proposed sprayfields (including Zone D2) are outside of the 100-year floodplain based on the maps and other information included in the DDR submitted by the City. A copy of the DDR for the proposed sprayfields can be made available for review through an open records request by contacting: <u>GORArequst.water@dnr.ga.gov</u>

ORK makes two requests with regards to floodplain application. First, no new increases in wastewater application should be permitted in Zones within the floodplain. Further, GA EPD should seriously consider denying any and all wastewater discharges in the floodplain - including but not limited to Zones C, D, and D2-ii. In reviewing these proposed modifications, GA EPD has the opportunity and the duty to consider whether current wastewater application meets state and federal standards for ensuring safe and healthy human and natural environments. Second, if the proposed modifications are approved, ORK asks that specific, flood- focused measures be included in the permit. These could include weather- dependent and weather-responsive application procedures, inclusion of	
floods in Part II.A.12 to accompany spill reporting, and flood damage prevention structures near the ponds, among any other impact-reducing measures that GA EPD sees fit. Through a combination of these measures, pollution impacts from flooding could be reduced or wholly eliminated.	
ORK further requests that bacteria be included as a pollution parameter that is specifically monitored at and around the Guyton WPCP. With wastewater disposal, bacteria is certainly a concern. The permit, however, does not call for bacteria monitoring. To ensure surface and groundwater is not contaminated with bacterial pollution, this permit should require <i>E. coli</i> monitoring in the following sections - Treatment Pond discharges in Part I.B.1, Part I.B.2, Part I.B.3; Storage Pond discharges in Part I.B.7.	The monitoring requirements for bacteria (<i>E. coli</i>) in the proposed permit (Part I.B.5) are in accordance with EPD monitoring guidelines for land treatment systems and consistent with other municipal LAS permits. Groundwater monitoring for <i>E. coli</i> has been included to ensure that groundwater leaving the land treatment system boundaries does not exceed the primary maximum contaminant levels for drinking water. Further monitoring for bacteria is not warranted.