



Richard E. Dunn, Director

**Watershed Protection Branch
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404-463-1511**

**Persons who commented on
Draft LAS Permit No. GAJ010523**

11/25/2020

**RE: EPD Response to Comments
White Oak Pastures, Inc.
LAS Permit No. GAJ010523**

To Whom it May Concern:

Thank you for your comments regarding the permit issuance for White Oak Pastures, Inc. Attached is a summary of comments from the public and our responses to the issue raised. 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 Jeff Hopper of my staff at 404-651-5161.

Sincerely,

**Andra Dickson, Manager
Wastewater Regulatory Program
Watershed Protection Branch**

AHD/jh

**Public Comments and EPD Responses on Draft Land Application System Permit
White Oak Pastures – LAS Permit No. GAJ010523**

COMMENTS RECEIVED	EPD RESPONSE
We believe it is unreasonable to require groundwater sampling for <i>E. coli</i> as part of the LAS permit. This opinion is based on the fact that recent testing shows no <i>E. coli</i> was present in the facility groundwater, the groundwater monitoring network is not designed for bacteriological sampling, and research shows and government guidance instructs that the potential for <i>E. coli</i> breakthrough into groundwater is exceedingly remote.	The Georgia Water Quality Rules at 391-3-6-.11 require that groundwater leaving the land disposal system boundaries must not exceed the maximum contaminant level for drinking water, therefore monitoring has been included for specific parameters which EPD has reason to believe may be present to ensure maximum contaminant levels are not exceeded in the downgradient monitoring wells.
All six of the LAS monitoring wells were tested for <i>E. coli</i> and all six samples were below the reporting limit of 1 MPN/100mL. We also identified our concerns regarding the expense and logistical challenges of collecting these groundwater samples. Additionally, we cited EPA literature documenting the thorough removal efficiency of soil systems to eliminate pathogenic organisms. We ask EPD to revisit its consideration of our comments from August 4, 2020.	Only one sample was provided for each of the facility's six monitoring wells, which is not sufficient data to evaluate the potential impacts of the land application system on groundwater at the site.
EPD's basis for requiring this bacteria sampling is because bacteria have been identified as pollutants of concern in poultry processing wastewaters per the Technical Development Document for the Final Effluent Limitations Guidelines and Standards for the Meat and Poultry Products Point Source Category (40 CFR 432) [EPA-821-R-04-011]. That technical document applies to direct discharges to surface water and is inapplicable to the White Oak Pastures permit.	EPD's basis for requiring <i>E. coli</i> monitoring is that <i>E. coli</i> has been identified as a pollutant of concern in poultry processing wastewater. During the development of the draft permit, EPD utilized the thorough evaluation of the various types of wastewater streams generated at this specific type of industrial facility provided in the document. EPD reviewed the influent and effluent characterization data provided in the document in order to identify potential pollutants of concern. EPD understands and recognizes that the referenced technical development document applies to point sources discharges to surface waters; hence EPD did not use the document for determining permit limits.
In our experience, which we believe to be supported by broader research, coliform bacteria in well water is an indication of a problems with well head protection and not an indication of a	<i>E. coli</i> in well water may be an indication of well head protection concerns or an indication of contamination in the aquifer. Issues with well head protection on a site where bacteria-containing wastewater is land applied, could potentially lead to groundwater

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contaminated aquifer, except in instances where an aquifer is under the direct influence of surface water. Thus, if one of the LAS well samples were to include <i>E. coli</i>., it would indicate an issue with well head protection. The permit does not say what White Oak Pastures would need to do if it includes a positive sample. And, at a minimum, we would like to get an understanding from EPD about what corrective action might look like, if some samples indicate the presence of <i>E. coli</i> bacteria.	contamination if not identified and corrected. If sampling results indicate that <i>E. coli</i> is present, Part II.A.2. of the permit requires that the facility provide a written report to EPD containing a description of the noncompliance and its cause, the period of noncompliance, and the steps taken to reduce, eliminate and prevent recurrence of noncompliance. Part II.A.9. of the permit requires that if any groundwater sample is above the maximum contaminant level for drinking water, the permittee shall immediately develop a plan which will ensure that the primary maximum contaminant levels for drinking water are not exceeded.