



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

July 10, 2020

Persons who commented on
Draft LAS Permit No. GA010578

RE: EPD Response to Comments
TenCate Protective Fabrics – Southern Mills, Inc.
LAS Permit No. GAJ010578

To Whom it May Concern:

Thank you for your comments regarding the permit issuance for the TenCate Protective Fabrics – Southern Mills, Inc. LAS Permit. Attached is a summary of comments from the public and our responses to the issue raised. In addition, we have attached a summary of the revisions made to the permit and fact sheet 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 Abigail Knapp of my staff at 404-463-0671.

Sincerely,

Audra Dickson, Manager
Wastewater Regulatory Program
Watershed Protection Branch

AHD/ask

Attachment

**Public Comments and EPD Responses on Draft LAS Permit
TenCate Protective Fabrics- Southern Mills, Inc. – Permit No. GAJ010578**

COMMENT RECEIVED	EPD RESPONSE
Commenter states that they own a 38 ft. deep water well which during dry periods produces groundwater with an odor. Commenter would like to know the characteristics of the effluent to the sprayfields.	The Georgia Environmental Protection Division (EPD) requires a characterization of the effluent to the sprayfields to be submitted as a part of Land Application System permit applications. The permit application submitted by TenCate Protective Fabrics/Southern Mills, Inc. (Permittee) may be viewed online at the GEOS Public Inquiry Portal at the following website: https://geos.epd.georgia.gov/GA/GEOS/Public/Client/GA_GEOS/Public/Pages/PublicApplicationList.aspx
Commenter expressed concerns about the sprayfield operation: “Was told that they were not supposed to spray when it rains but they do.”	Part I.C.1.d. of the Permit includes the following condition: “Unless otherwise approved, no wastewater shall be applied when conditions are such that the applied wastewater will not be absorbed into the soil. In addition, no wastewater shall be applied via spray or drip irrigation when it’s raining” . The facility is expected to comply with the Permit.
Commenter expressed concerns about a strong odor which comes from the Permittee property: “I understand your permit does not address odor, however the permit should require the wastewater to be treated to a high enough level so it would not produce an objectionable odor.”	EPD does not regulate odors that may come from the processing plant or the land treatment system. EPD is responsible for issuing protective, legal and enforceable permits in accordance with the Chapter 391-3-6 of the Georgia Rules and Regulations for Water Quality Control (Rules). Permits are based on the pollutant data submitted in the application and along with other supporting documents and the approved DDR. If a continuous odor is present from the wastewater treatment ponds it could be an indicator of septic wastewater being land applied as a result of several factors, such as a build-up of excessive sludge in the ponds that should be removed as part of an ongoing operational and maintenance plan. The presence of excessive odors from the wastewater treatment process can be an operational indicator for the wastewater treatment system operator.

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COMMENT RECEIVED	EPD RESPONSE
“Surface water monitoring should include all streams that traverse or border the property, not just the ones that drain to Spring Creek. Cox Branch, north of fields G/H, are accessible by TenCate and should be monitored up and downstream of the sprayfields.”	EPD has reviewed the surface water sampling maps and agree that Cox Branch is traversing/adjacent to the land treatment system and the surface water should be sampled, monitored, and reported. EPD has updated Part I.B.4. of the Permit to include the additional location.
“The referenced Consent Decree includes a COD and TSS limit to be met within the time limit covered by this permit.... All of these requirements should be incorporated in the renewal permit.”	Comment noted. EPD is not a party to the 2018 Flint Riverkeeper, Inc., et al. v. Southern Mills, Inc., d/b/a TenCate Protective Fabrics Consent Decree (Consent Decree); however, Part I.B.1.a. of the Permit includes effluent limits with an associated footnote. Please see the Permit for more information.
“On numerous trips past this LAS I have witnessed spray nozzles leaking effluent into puddles that run off. This occurs after the spray as stopped and appears to drain the residual effluent from the pipes but not under enough pressure to spray. This type of release should not be allowed.”	EPD has included the following conditions in Part I.C.1.d. and f. of the Permit: “Unless otherwise approved, no wastewater shall be applied when conditions are such that the applied wastewater will not be absorbed into the soil. In addition, no wastewater shall be applied via spray or drip irrigation when it’s raining.” The Permit requires the facility to be designed, operated, and maintained to ensure that there are no point source discharges to surface waters. The facility is expected to comply with the Permit.
“There is much confusion concerning the Public Notice. It first appeared on the EPD website as open for comment on Dec.11. Then it was posted on a bulletin board in the Upson county courthouse on Dec.14. Then in the Upson Beacon Dec.26 and again on Jan.2. Not as a “news release” as instructed, but as a legal ad. All of these postings gave a time for response as within 30 days from posting. This created a very uncertain cut off date for public response. This procedure needs to be corrected! A public hearing would give the public a better chance to express	As required in the Georgia Water Quality Control Act and the Rules, EPD’s public notice process currently includes an EPD public notice posted on the EPD website, a posting at the County courthouse, and a posting in the County legal organ. The comment period ends 30 days after the latest of any of the public notice postings for the permit reissuance. The EPD public notice was posted on the EPD website in notice # 2019-22ML on December 16, 2019. The Permittee posted a public notice at the courthouse on December 17, 2019 and published the notice in the Upson Beacon

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COMMENT RECEIVED	EPD RESPONSE
their concerns.”	newspaper on December 26, 2019. Additionally, EPD extended the public notice period to February 14, 2020. The public notice period was 60 days. EPD reviewed the <i>Upson Beacon’s</i> Thursday, January 2, 2020 issue (Volume 13, No. 1, 12 pages) and did not find any posting by the facility.
Commenter expressed concerns about carcinogens in drinking water, specifically PFAS and asked for additional information regarding the effluent.	EPD is currently focused on PFAS in drinking water systems and will conduct source tracking if needed. Additional information regarding the effluent may be viewed online at the GEOS Public Inquiry Portal at the following website: https://geos.epd.georgia.gov/GA/GEOS/Public/Client/GA_GEOS/Public/Pages/PublicApplicationList.aspx
1. Comment received on January 24, 2020: The Consent Decree requires the submittal and association of a DDR Addendum. We cannot support the permit reissuance until the DDR Addendum is received. 2. Comment received on February 14, 2020: We see that EPD has received the DDR Addendum. Accordingly, we support the permit reissuance.	Comments noted. EPD is not a party to the Consent Decree.