Response to Comments
Odum Water Pollution Control Plant (WPCP)
NPDES Permit No. GAJ020027
Wayne County, Satilla River Basin

Comment	EPD Response
EPD must require monitoring on adjacent surface waters to the Odum LAS site. EPD proposes eliminating surface water monitoring requirements for Odum LAS, because EPD claims that the previously monitored unnamed tributary of Little Satilla Creek does not have an upstream sampling location. EPD has an obligation to monitor surface waters adjacent to Odum LAS. To solve the upstream monitoring issue, Satilla Riverkeeper recommends that EPD require instream monitoring on the Little Satilla Creek. For its upstream monitoring site, Odum LAS should monitor the intersection of Little Satilla Creek and Highway 341. For a midway monitoring site, Odum LAS should monitor the intersection of Little Satilla Creek and Odum Rd./Church Street. Lastly, for its downstream monitoring site, Odum LAS should monitor the intersection of Little Satilla Creek and the Odum Road Powerline Easement.	Upstream and downstream monitoring of the unnamed tributary of the Little Satilla Creek has been included in the permit.
It is imperative to test the surface water adjacent to the sprayfields, because Odum LAS may have contributed to the stream's fecal coliform impairment. The Keen Bay Branch to the Dry Branch segment is on the 303d list for impaired streams, because it is not supporting its designated use of fishing due to excess fecal coliform counts.	In 2006 EPD issued the "*Total Maximum Daily Load Evaluation for Eighteen Stream Segments in the Satilla River Basin for Fecal Coliform*", to address water quality impairments, including the segment of the Little Satilla Creek running through the City of Odum. Section 3.0 - Assessment, of the TMDL provides all known point and nonpoint

The latest Total Maximum Daily Load ("TMDL") evaluation completed for the fecal coliform impairment in the Keen Bay Branch to Dry Branch segment of the Little Satilla Creek identifies Odum LAS as a possible source of fecal loading.	sources identified as potential sources of pollutant loading to the impaired segments. The TMDL identifies sources such as NPDES permitted discharges with flows greater than 0.1 MGD, regulated municipal and industrial stormwater discharges, confined livestock and confined animal feeding operations (CAFOs). Section 3.2 of the TMDL discusses the Nonpoint Source Assessment and includes potential diffuse sources such as wildlife, agricultural livestock, animal grazing, animal access to streams, application of manure to pastureland and cropland, urban development, leaking sanitary sewer lines, leaking septic systems, land application systems, and landfills. Section 3.2.3.2 of the TMDL includes a list of permitted Land Application Systems, including the City of Odum's Land Application System, as they are a non-point source along with dozens of other potential sources identified in the TMDL. Section 6.2 - Fecal Coliform Management Practices, of the TMDL includes EPD's findings of all data evaluated for the TMDL. "Based on the findings of the source assessment, NPDES point source fecal coliform loads from wastewater treatment facilities do not significantly contribute to the impairment of the listed stream segments. This is because most facilities are required to treat to levels corresponding to instream water quality criteria. Fecal coliform loads from NPDES permitted MS4 areas may be significant, but these sources cannot be easily segregated from other storm water runoff. Other sources of fecal coliform in urban areas include wastes that are attributable to domestic animals, leaks and overflows from sanitary sewer systems, illicit discharges of sanitary waste, leaking septic systems, runoff from improper disposal of waste materials, and leachate from bothoperational and closed landfills. In agricultural areas, potential sources of fecal coliform may include CAFOs, animals grazing in pastures, drymanure storage facilities and lagoons, chicken litter storage areas, and direct access of livestock to streams. Wildlife and waterfowl can be an

	important source of fecal coliform bacteria." The TMDL did not identify any of the LAS facilities in their findings as contributing loads of bacteria to the impaired segments.
EPD should amend the permit to forbid wastewater application not only during rain events, but also twenty-four hours before a forecasted rain event and twenty-four hours after a rain event.	The Part I.C.1of the proposed permit states "… no wastewater shall be applied via spray or aboveground drip irrigation during rain or when the conditions are such that applied wastewater will not be absorbed into the soil". Additionally, Part II.A.11 of the proposed permit requires the facility to operate the system as a no discharge system. EPD believes these existing permit conditions are sufficiently protective and including additional language prohibiting land application prior to and after "forecasted rain" is overly restrictive and no changes have been made in response to this comment.
Since January 2019, Odum LAS violated their LAS permit multiple times. 10 Of Odum LAS's violations, Satilla Riverkeeper is especially concerned with the following violations: • Odum LAS's twelve application rate violations of their Discharge Monitoring Report ("DMR") since 2019. This includes recent LAS's application rate violations during May, September, and October 2021; • Past applications of partially-treated wastewater during days with rain events; • The ripped or damaged pond liners that may be leaching wastewater into the groundwater; • The evidence of recent overflows of partially-treated wastewater from the storage pond overflow pipes.	EPD has issued several enforcement actions to the City of Odum over the past several years to address various deficiencies including, application rate violations, operations, maintenance, structural, and management deficiencies. The City submitted a letter dated, February 19, 2019, stating several deficiencies had been addressed and the City was continuing to work with vendors to achieve compliance with the permit. The City submitted a Corrective Action Plan (CAP) to EPD on March 21, 2022. The CAP includes detailed corrective actions, specific projects, and an implementation schedule. EPD has included additional permit requirements in Part II.C.3. and Part II.C.4. of the proposed permit to continue facilitating compliance with the permit. EPD expects the city to comply with the issued permit.