



**Richard E. Dunn, Director**

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**EPD Director's Office**

2 Martin Luther King, Jr. Drive  
Suite 1456, East Tower  
Atlanta, Georgia 30334  
404-656-4713

Persons who commented on  
Newton County Water & Sewerage Authority  
Industrial Pretreatment Program

06/24/2022

RE: EPD Response to Comments Industrial  
Pretreatment Program Substantial  
Modifications  
Permit Nos. GAJ020013 & GA0050304

To Whom it May Concern:

Thank you for your comments regarding the substantial modifications to the Newton County Water & Sewerage Authority's industrial pretreatment program covering the Yellow River WPCP and the A. Scott Emmons WRF. 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 industrial pretreatment program meets federal pretreatment regulations and is protective of water quality standards. The modifications to the industrial pretreatment program are hereby approved.

If you have any questions, please contact Andrew Joyce of my staff at 470-524-0615 or [andrew.joyce@dnr.ga.gov](mailto:andrew.joyce@dnr.ga.gov).

Sincerely,

Richard E. Dunn  
Director

AJ

Attachment

**Public Comments and EPD Responses on Proposed Modifications to the Newton County Water & Sewerage  
Authority's Industrial Pretreatment Program  
Yellow River WPCP – Permit No. GAJ020013  
A. Scott Emmons WRF – Permit No. GA0050304**

COMMENT RECEIVED	EPD RESPONSE
<p>I would like to express my concern that there will be oversight applied by NCWSA to any and all discharge into the Little River. I ask that due diligence be done in all the applications from the JDA and Rivian, and that no appropriations be made for them to exceed current allowable levels of discharge, no matter the circumstance.</p>	<p>Newton County Water &amp; Sewerage Authority (NCWSA) is required to administer their industrial pretreatment program in accordance with the federal regulations at 40 CFR 403. This modification to their industrial pretreatment program establishes allowable headworks loadings for pollutants of concern that cannot be exceeded and are protective of the receiving waters.</p>
<p>I would like to express my concern for my drinking water source should the heavy industrial plant, Rivian, be built and operate in Morgan County. My water source is a well, as is the case with most citizens in Morgan. Rivian is proposed to be built on top of a major groundwater recharge area. The area also includes streams and wetlands. I am also greatly concerned that Rivian is attempting to evade environmental impact studies, regulations and water quality standards as set by the state.</p>	<p>Comments regarding local development ordinances, Army Corps of Engineers permits for land disturbing activities associated with waters of the United States, and permits for construction or industrial stormwater at the proposed Rivian industrial site are outside of the scope of an industrial pretreatment program modification.</p> <p>The Yellow River WPCP land application system (LAS) permit requires that groundwater leaving the site complies with the maximum contaminant levels for drinking water to ensure the protection of groundwater resources. The A. Scott Emmons WRF NPDES permit includes effluent limitations to ensure protection of the receiving waterbody's designated use of fishing.</p>
<p>I strongly object to this modification as auto manufacturing industrial waste produces some of the worst pollutants in the world.</p>	<p>This industrial pretreatment program modification identifies 31 pollutants of concern, including conventional pollutants and toxics that may be found in automotive manufacturing wastewater. NCWSA, in accordance with EPA guidelines, has established allowable loadings for these pollutants which are protective of the POTW and the receiving waters. Additionally, the NCWSA's A. Scott Emmons WRF NPDES permit includes quarterly monitoring requirements for Whole Effluent Toxicity (WET), which ensures the protection of aquatic life in the receiving stream.</p>

**Public Comments and EPD Responses on Proposed Modifications to the Newton County Water & Sewerage  
Authority's Industrial Pretreatment Program  
Yellow River WPCP – Permit No. GAJ020013  
A. Scott Emmons WRF – Permit No. GA0050304**

COMMENT RECEIVED	EPD RESPONSE
<p>The Rivian facility will require significant amounts of water each day to operate. Our current infrastructure and water supply is inadequate to provide support for this. According to the NEGRC, DRI report approximate water use for Rivian is 4.7 MGD and the permitted wastewater discharge for the A. Scott Emmons WRF is 1.56 MGD. Does the review of industrial pretreatment program modification cover the future industrial expansion in the watershed? We must be sure the water quality and quantity is protected for now and future generations.</p>	<p>NCWSA is currently in discussions with Rivian about potential water use and discharge scenarios. If in the future NCWSA requests to increase effluent flow to accommodate additional industrial wastewater effluent at their treatment facilities, a subsequent modification of their LAS or NPDES permit and industrial pretreatment program would be required.</p>
<p>Currently, water is distributed and treated by NCWSA with withdrawal from Lake Varner (Ocmulgee River watershed) to the Yellow River reclamation facility within the same watershed. The A. Scott Emmons Water Reclamation facility is located in the (Oconee River Watershed) and discharges to the Little River. As the ASE WRF comes online with water purchased from the Ocmulgee River Watershed and wastewater discharged to the Oconee River Watershed, will this not be an interbasin transfer of water requiring additional permitting?</p>	<p>Comments on Newton County's water withdrawal permit are outside of the scope of this industrial pretreatment program modification. NCWSA is not proposing an increase in discharge flow in this modification of the program. If in the future NCWSA requests to increase effluent flow to accommodate additional industrial wastewater effluent at their treatment facilities, a subsequent modification of their LAS or NPDES permit and industrial pretreatment program would be required.</p>
<p>With the modification of the NCWSA IPP to include the A. Scott Emmons WRF to accommodate future industrial users, can we assume antidegradation reviews will be triggered?</p>	<p>The antidegradation process was carried out and approved by Georgia EPD during the NPDES permitting process for the A. Scott Emmons WRF which was issued on August 25, 2021. Any future requests to increase discharge volume will require additional antidegradation review.</p>



# 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

June 22, 2022

Mr. Mike Hopkins, Executive Director  
Newton County Water & Sewerage Authority  
11325 Brown Bridge Road  
Covington, Georgia 30016

RE: Industrial Pretreatment Program  
Approved Modification of Local Limits  
Permit Nos. GAJ020013 & GA0050304

Dear Mr. Hopkins:

The Environmental Protection Division (EPD) has made a determination to move forward in the approval of the modification to the local limits.

Enclosed is a public notice to be published for one day in the largest daily newspaper in the area. This notice does not require a public comment period. The cost of publishing the public notice is the responsibility of the Authority. Please provide this office with a copy of the published notice within 10 days of the publication date.

If you have any questions or comments, please contact Andrew Joyce at (470) 524-0615 or [andrew.joyce@dnr.ga.gov](mailto:andrew.joyce@dnr.ga.gov).

Sincerely,

Whitney Fenwick, Manager  
Industrial Permitting Unit

WF/aj

cc: EPD Watershed Compliance Program – Samuel Wright ([samuel.wright@dnr.ga.gov](mailto:samuel.wright@dnr.ga.gov))  
Newton County WSA – Wayne Haynie ([wh@ncwsa.us](mailto:wh@ncwsa.us))  
Newton County WSA – Andy Butts ([abutts@ncwsa.us](mailto:abutts@ncwsa.us))



## **PUBLIC NOTICE**

### **Local Pretreatment Program Approval**

In accordance with Chapter 391-3-6-.09, Rules and Regulations for Water Quality Control, notice is hereby given of approval by the Georgia Environmental Protection Division of changes to a local pretreatment program for the Newton County Water & Sewerage Authority covering the Yellow River WPCP (GAJ020013) and the A. Scott Emmons WRF (GA0050304). The pretreatment program provides for the administration and enforcement of pretreatment standards for industrial users of the publicly owned treatment works.