

**Public Comments and EPD Responses on the draft
General NPDES Permit for Drinking Water Treatment Plant Dischargers Permit No. GAG640000**

Comment	Response to Comment
<ol style="list-style-type: none"> 1. Clarifications on the new Total Residual Chlorine Limit of 0.011 mg/L 2. There is no recorded 7Q10 for the receiving stream. There are ways to estimate the 7Q10. Will these be allowed in order to use the dilution calculation for the interim Total Residual Chlorine (TRC) limit? 	<p>The Georgia Water Quality Control Act (GA Rules and Regulations), Chapter 391-3-6-.05 describes the narrative toxicity standards for all waters of the State. The GA Rules and Regulations state that waters shall not have toxic, corrosive, acidic, and caustic substances from municipal discharges that can be harmful to humans, animals or aquatic life.</p> <p>The General Permit for Drinking Water Treatment Plant Dischargers (General Permit) must protect the narrative toxicity standards to be considered protective of all receiving waters across Georgia. A daily maximum total residual chlorine (TRC) limit of 0.011 mg/L has been included in the draft permit based on US EPA’s chronic TRC criterion of 11 µg/L in the receiving stream assuming a 7Q10 of zero. The assumed 7Q10 of zero is necessary in the General Permit to ensure all receiving waterbodies that may receive discharges from drinking water treatment plants are protected.</p> <p>The proposed TRC limit may be below the detection limit of the analytical method prescribed in the federal regulations in 40 CFR 136. In accordance with Part II.A.g in the draft permit, if the facility’s effluent TRC is lower than the detection limit of the analytical method used, the facility should report TRC as “non detect” in the Discharge Monitoring Reports. The detection limit of the method will also be reported.</p>
<p>A 12-month deadline for compliance is an unreasonable time-table. Any design, permitting and construction could not happen so quickly. Two or three years would be the soonest possible.</p>	<p>The current General Permit issued on January 6, 2016, includes a total residual chlorine limit and the existing facilities covered under this permit already use chlorine for disinfection. Hence facilities are already equipped with a dechlorination system and a 12-month compliance schedule has been maintained in the final permit allowing time to optimize treatment.</p>

Comment

Clarifications on drinking water sludge disposal.

Response to Comment

The current permit, issued on January 6, 2016, and proposed final permit do not authorize land application of drinking water sludge. The ultimate disposal and land application of drinking water sludge is regulated under the federal regulations in 40 CFR Part 257 and the recovered materials provisions under Chapter 391-3-4.04(7) of the Georgia Solid Waste Management Rules.

The federal regulations in 40 CFR Part 503 and Chapter 391-3-6.17 of the GA Rules and Regulations do not authorize the disposal of sludge generated during the treatment of drinking water; therefore, land application of drinking water sludge cannot be permitted under those regulations. These regulations authorize the disposal and land application of sewage sludge generated from a publicly owned wastewater treatment plant.

However, drinking water sludge may be land applied if requirements of 40 CFR 257 and the recovered materials provisions under Chapter 391-3-4.04(7) of the Georgia Solid Waste Management Rules can be met.