



**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

Persons who commented on  
Draft NPDES Permit No. GA0020427

**SEP 23 2019**

**RE: EPD Response to Comments**  
**City of Savannah**  
**Travis Field Water Pollution Control Plant**  
**NPDES Permit No. GA0020427**

Dear Sir/Madam:

Thank you for your comments regarding the permit issuance for the City of Savannah Travis Field Water Pollution Control Plant NPDES Permit. 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 Kelli-Ann Sottile of my staff at 404-463-4945 or via email at [kelli-ann.sottile@dnr.ga.gov](mailto:kelli-ann.sottile@dnr.ga.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Audra Dickson", written over a horizontal line.

**Audra Dickson, Manager**  
**Wastewater Regulatory Program**

AD/kas

Attachment: Response to Comments

**Response to Comments**  
Travis Field Water Pollution Control Plant  
NPDES Permit No. GA0020427  
Chatham County, Savannah River Basin

<b>Comment</b>	<b>EPD Response</b>
<p>We disagree with the labelling of this permit as a “modification” when in fact, the currently permitted discharge location is being moved and the facility is currently inoperative. With the movement of the outfall location and the substantially increased proposed permit flow, this is in effect a “new” discharge and should be treated as such.</p>	<p>The City of Savannah (City) currently maintains a 1.5 MGD wastewater treatment facility at 198 Darque Road, Savannah, GA. On April 11, 2019, the City was issued a permit to discharge treated wastewater from this facility into Pipe Makers Canal downstream of the tide gate at the confluence with the Savannah River.</p> <p>The City was issued a wasteload allocation on September 27, 2017 for the proposed expanded discharge of 4.0 MGD and 8.0 MGD of treated domestic wastewater to Pipe Makers Canal downstream of the tide gate at the confluence of the Savannah River. The City subsequently proposed slightly modifying the outfall location in order to install a larger effluent pipe under the expansion. The proposed outfall is located approximately 600 feet from the current location and within the same stream segment. On April 30, 2019, the Wastewater Regulatory Program, on behalf of the Watershed Planning and Monitoring Program, issued a statement confirming that the adjustment to the outfall location is negligible and does not affect water quality modeling results in the issued 2017 wasteload allocation.</p> <p>Therefore, in accordance with 40 CFR Part 122.29, the proposed 4.0 and 8.0 MGD discharges to Pipe Makers Canal may result in the modification of the effective permit, since the following items have been met: the discharge will result from the same type of activity (treatment of domestic wastewater) as the current permitted facility; the adjusted outfall location is equivalent to the existing location for water quality purposes; the construction of the expanded facility is located on the same property as the existing facility; and, the project is primarily intended to replace and/or add to existing process equipment.</p> <p>Additionally, the process and documents required prior to issuance of a permit for both new discharges and expanding treatment facilities (modifications) are identical: an Antidegradation Analysis, Environmental Information Document, and Design Development Report. The City has submitted and received approval for all the referenced documents.</p> <p>Based on the above information, EPD has modified the existing permit to allow for the expanded discharge of treated domestic wastewater, rather than issuing a new permit.</p>

The proposed permit limits assume a tidal dilution ratio of 600:1, but when the tide goes out it appears that there will be much less dilution available. We believe that the dilution being assumed is insufficient.

A tidal dilution ratio of 600:1, which is equivalent to an instream wastewater concentration (IWC) of 0.2%, has been assumed for the Travis Field WPCP. In lieu of a tidally influenced dilution factor, the 7Q10 of the Savannah River may be used to estimate the IWC of the discharge. The 7Q10 recorded by USGS Gage #02198500 is 4500 cfs, which results in an IWC of 0.1%. The IWC equivalent to a dilution factor of 600:1, therefore, is more protective than that from using the 7Q10 of the Savannah River. Furthermore, the dilution factor of 600:1 is consistent with the values used for other permitted municipal NPDES facilities discharging to the Pipe Makers Canal (downstream of the tide gate). As a result, no changes have been made to the permit.

Given that the relevant water body has been listed as impaired for dissolved oxygen and a TMDL instituted, we do not believe that the proposed permit meets the requirements of the proper implementation of a TMDL. It appears that the permit assumes that no significant oxygen demanding substances will be discharged until proven otherwise, and only then will protective measures be taken. We object to this backwards approach to this TMDL.

In 2006 EPA established a TMDL for the Savannah Harbor from SR 25 (old US Hwy 17) to Elba Island Cut for dissolved oxygen (DO). The 2006 TMDL has since been superseded following the 2010 revision of Georgia's DO water quality criterion and the subsequent approval of the *Subcategory 5R Documentation For Point Source Dissolved Oxygen Impaired Water in the Savannah River Basin* (5R Plan).

The 5R Plan identifies the Travis Field WPCP as an NPDES permitted facility that discharges oxygen demanding substances. The 5R Plan allocates a monthly average ultimate oxygen demand load of 2,043 lb/day to the Travis Field WPCP during the critical months of March – October. The effluent limitations included in the permit for dissolved oxygen, biochemical oxygen demand, ammonia, and ultimate oxygen demand are in accordance with the 5R Plan.