



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

FEB 13 2018

Jesse Demonbreun-Chapman
Executive Director & Riverkeeper
Coosa River Basin Initiative
408 Broad Street
Rome, GA 30161

RE: EPD Response to Comments
City of Cartersville
Water Pollution Control Plant
NPDES Permit No. GA0024091
Bartow County

Dear Mr. Demonbreun-Chapman:

Thank you for your comments regarding the permit issuance for the City of Cartersville Water Pollution Control Plant NPDES permit. Attached is a summary of your comments and our responses to the issues 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 Kim Hembree of my staff at 404-463-4937.

Sincerely,

Benoit Causse, Manager
Municipal Permitting Unit

BSC/kh
Attachment

Response to Comments
City of Cartersville Water Pollution Control Plant
NPDES Permit No. GA0024091
January 2018

Public Comment	EPD Response
The Cartersville WWTP is required to meet specific water quality criteria for “fishing.” We believe the use classification for the Etowah River should be changed from “fishing” to “recreation” and “drinking water supplies.”	The City of Cartersville (Permittee) Water Pollution Control (WPCP) effluent discharge point is located in a segment of the Etowah River described as “Pumpkinvine Creek to Richland Creek.” In the Georgia Environmental Protection Division’s (EPD) 2014 Integrated 305(b)/303(d) List, the designated use for this segment of river is “Drinking Water Supplies,” which also supports the “Fishing” designated use. Please refer to pages 4-5 of the permit Fact Sheet. To request a change in the designated use of the Etowah River, a formal request must be submitted to the Georgia Environmental Protection Division for review during the Triennial Review process. The request should be sent to the attention of Dr. Elizabeth Booth, 2 MLK Jr. Drive, S.E., Suite 1152, Atlanta, Georgia, 30334.
Phosphorus limits for WWTPs upstream of Lake Allatoona are significantly less than 1 mg/L.	Total phosphorus limits for point source discharges upstream of Lake Allatoona are determined by the Georgia EPD’s 2013 Total Maximum Daily Load Evaluation for Lake Allatoona for Chlorophyll <i>a</i>. Total phosphorus limits for point source discharges downstream of Lake Allatoona are determined by the U.S. EPA’s 2008 Total Maximum Daily Load for Nutrient Impairment for Weiss Lake (2008 Weiss LakeTMDL), which calls for a 30% reduction in total phosphorus loads from Georgia, and a total phosphorus target growing season median of 0.06 mg/L at the Georgia-Alabama Stateline.

Response to Comments
City of Cartersville Water Pollution Control Plant
NPDES Permit No. GA0024091
January 2018

Public Comment	EPD Response
EPD is currently studying the possibilities of nutrient trading programs in the upper Coosa River basin. While it remains to be seen if such nutrient trading programs are viable, in order for these programs to significantly reduce non-point source pollution, there must be incentive for wastewater treatment plant operators to participate in nutrient trading. The incentive is only there if permit limits are set at a level that makes nutrient trading financially attractive.	Nutrient trading programs and the reduction of non-point source pollution are outside the scope of the City of Cartersville draft NPDES permit.
To provide the City of Cartersville with some regulatory certainty, avoid delays like the one incorporated into this permit and provide for continued improvement of water quality in the Coosa River and Weiss Lake, the permit should incorporate a timeline for phosphorus limit compliance beyond 46 months and include limits below 1 mg/L.	To ensure the Permittee achieves a 30% reduction of total phosphorus contributions as determined by the 2008 Weiss Lake TMDL, the Permittee was given a total phosphorus limit of 1.0 mg/L monthly average concentration. When compared with the Permittee's effluent total phosphorus data from 2010 through 2016, this limit will result in an average 70% reduction of total phosphorus contributions from the WPCP. Should stream monitoring and modeling indicate the need for a more stringent limit, the permit may be modified in the future to include a new total phosphorus limit, along with a compliance schedule to meet his limit.
We understand International Paper, a permitted facility, is now paying for this modeling [Coosa River dissolved oxygen TMDL] and that within the next four years, this project may be completed. The failure of EPD to conduct the modeling itself gives the impression that EPD is relinquishing oversight to the very entities it is supposed to be regulating.	International Paper will have periodic meetings with EPD during the model development project. Furthermore, EPD will oversee the modeling and will review the final model for accuracy and impartiality before approval.

Response to Comments
City of Cartersville Water Pollution Control Plant
NPDES Permit No. GA0024091
January 2018

Public Comment	EPD Response
The draft permit includes a total residual chlorine (TRC) limit of .14 mg/L for all months, a slight increase in allowable residual chlorine levels set in the 2000 permit (.12 mg/L at 15 MGD flows). The draft permit indicates that this change was made in accordance with current “7Q10 flow data provided in the 2013 Waste Load Allocation.” Please provide further clarification and justification for this change.	The TRC limit of 0.12 mg/L was originally calculated in the City of Cartersville’s July 1999 Waste Load Allocation (WLA) using a 7Q10 streamflow of 240 cfs, which was the minimum guaranteed flow from the Lake Allatoona Dam and Thomas Weinman Dam. The TRC limit of 0.14 mg/L was calculated using a 7Q10 streamflow of 275 cfs, which is the stream flow at the WPCP outfall to the Etowah River. The 275 cfs streamflow was used in calculating the TRC limit because it is a more accurate representation of streamflow at the facility’s discharge point to the Etowah River.
Form 2A NPDES requires the permittee to report a maximum value for several parameters, including dissolved oxygen. In the future, NPDES forms should request for maximum/minimum value rather than solely the maximum value.	The NPDES Form 2A Application is a standard, federal form designed by the United States Environmental Protection Agency (EPA) and is required for renewal under the NPDES program. However, the permittee monitors dissolved oxygen daily and does report the monthly minimum to EPD, as required by their current NPDES permit.