



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

Persons who commented on
Draft NPDES Permit No. GA0025607

FEB 11 2019

RE: EPD Response to Comments
Town of Trion
Trion Water Pollution Control Plant
NPDES Permit No. GA0025607

Dear Sir/Madam:

Thank you for your comments regarding the permit issuance for the Town of Trion's Water Pollution Control Plant NPDES Permit. Attached is a summary of comments from the public and our responses to the issues raised. In addition, we have attached the Permit Addendum documenting the changes made to the attached permit. 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 Josh Hayes of my staff at (404) 463-1834.

Sincerely,

Audra Dickson, Manager
Wastewater Regulatory Program

AD/jbh
Attachment: Response to Comments

Response to Comments
Trion Water Pollution Control Plant (WPCP)
NPDES Permit No. GA0025607
Chattooga County, Coosa River Basin

Comment	EPD Response
The Trion WPCP is required to meet specific water quality criteria for “fishing.” We believe the use classification for the Chattooga River should be changed from “fishing” to “recreation.”	The Trion WPCP discharges to the Chattooga River in the segment described as “Lyerly to Stateline” in the Georgia Environmental Protection Division’s (EPD) 2016 Integrated 305(b)/303(d) List, the designated use for this segment of the river is “Fishing.” To request a change in the designated use of the Chattooga 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 EPDcomments@dnr.ga.gov or to the attention of Dr. Elizabeth Booth, 2 MLK Jr. Drive, S.E., Suite 1152, Atlanta, Georgia, 30334.
Many of the proposed sludge application sites are bordered or bisected by the Chattooga River or its tributaries. We recommend including requirements for instream monitoring upstream and downstream of the sludge application sites for pollutants of concern, e.g., orthophosphate, fecal coliform, and ammonia.	Sludge will be applied at agronomic rate and a minimum 50-foot buffer between the edge of the application areas and waters of the state will be maintained in accordance with EPD technical guidelines for land application of dewatered sludge. Instream monitoring is not necessary due to the buffer.