

**Public Comments and EPD Responses on Draft Permit  
Gwinnett County – F. Wayne Hill Water Resources Center (WRC)  
NPDES Permit No. GA0038130**

| Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Response to Comment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| <p>[Gwinnett County] ha[s] no objection to switching from COD to cBOD, but [Gwinnett County] do[es] object to keeping both limits.</p> <p>Gwinnett County DWR would prefer to continue with the COD limit as the staff at F. Wayne Hill WRC have been effectively using this limit for compliance and operational management for over fifteen years.</p> <p>However, [...] including only cBOD in the final permit would significantly improve [Gwinnett County's] operational flexibility and reduce staffing constraints.</p> <p>[...] Gwinnett County DWR is requesting that the final NPDES permit include a limit for either COD or cBOD as proposed by GA EPD staff in the draft permit, but not both.</p> | <p>40 CFR Parts 125.3 and 133.102 require all publicly-owned treatment works to demonstrate compliance with effluent testing requirements for biochemical oxygen demand as BOD<sub>5</sub> or cBOD<sub>5</sub>.</p> <p>In accordance with 40 CFR Part 133.104(b), chemical oxygen demand (COD) limitations may be implemented in lieu of biochemical oxygen demand if a long-term correlation between BOD and COD has been demonstrated. However, it is EPD's understanding that a long-term correlation has not been developed by the F. Wayne Hill WRC.</p> <p>Despite the lack of a correlation study, EPD understands that COD has been historically included in the permit in lieu of biochemical oxygen demand, in accordance with the 2005 Resolution between Gwinnett County and the Lake Lanier Association, Inc.</p> <p>However, since the Lake Lanier water quality model is based on biochemical oxygen demand and a correlation between BOD and COD has not been developed, EPD cannot confirm whether the current COD limitation is protective of the water quality standard for dissolved oxygen, and/or whether the technology-based COD limitation is as stringent as the water-quality based cBOD<sub>5</sub> limitation outlined on the 2018 wasteload allocation.</p> <p>Therefore, in accordance with 40 CFR Part 133.102, effluent limitations for cBOD<sub>5</sub> must be included in the final permit at this time; and, since the facility can consistently meet the COD limitation, it is considered a technology-based effluent limitation based on demonstrative performance and must be maintained in the permit at this time.</p> <p>In the future, if a suitable long-term correlation study is established, EPD may remove the less stringent effluent limitation based on this new information,</p> |

in accordance with anti-backsliding requirements outlined in 40 CFR Part 122.44(l).

If the permittee wishes to pursue this option for a correlation study, the permittee must submit a monitoring plan for review and approval prior to the initiation of the study. Following EPD's approval of the plan and the correlation study results, the permit may be modified to reflect the relationship between the two parameters.