Public Comments and EPD Responses on Draft NPDES Permit
GRP Franklin Renewable Energy Facility, LLC – Permit No. GA0039292

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Due to the volume of comments received and the number of topics covered in a comment, EPD has summarized and grouped comments together based on the topic.

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COMMENT RECEIVED	EPD RESPONSE
Permit Development	
1. I oppose the permit to dump this energy plant's wastewater out on the ground. I see it as comparable to my asking to run my household sewer out into the back yard, " as long as it runs downhill". There is no measure of impacts of said waste components' release. No description of a strategy for waste components' treatment for safe release. The inclusion of storm water bypasses ordinary state storm water engineering requirements, doesn't it? I can't see how they can avoid some kind of contained treatment prior to release, and if release is not feasible, then removal to a disposal area where water volume receiving the release can dilute contaminants to tolerable levels. 2. They want to dump their untreated wastewater and stormwater into Indian Creek. The waste contains numerous chemicals including chloroform, phosphorus and cyanide. This toxic waste will flow through our local streams, the Watson Mill State Park and the Savannah River Basin.	The draft permit is for the discharge of treated wastewater from the GRP Franklin facility to unnamed tributaries of Indian Creek in the Savannah River Basin. The two permitted outfalls (001 and 002) discharge from ponds designed for treatment and retention. A copy of the facility's wastewater treatment flow diagram can be viewed at: https://geos.epd.georgia.gov/GA/GEOS/Public/EnSuite/Shared/Pages/util/StreamDoc.ashx?id=98111&type=attachment GRP Franklin treats the wastewater via an oil/water separator, pH neutralization and aeration. The facility will also be installing and operating a clarifier to be used as needed for phosphorus control. Additionally, the permit includes an 18th month schedule in order to evaluate sources of copper and total residual chlorine, develop a plan for the reduction of these parameters, and if necessary, design, procure, and install treatment in order to comply with the permitted effluent limitations.
The argument in the permit that effluent limit guidelines do not apply to biomass is not convincing (Fact Sheet page 4). Biomass, put simply, is non-aged fossil fuel or fossil fuel in the making. Industrial effluent limit guidelines should apply to biomass.	At present there are no applicable federal Effluent Limit Guidelines (ELGs) for facilities engaged in the generation of power using an energy source such as biomass. Refer to US EPA's webpage for a list of the category of industries: https://www.epa.gov/eg/industrial-effluent-guidelines. Per EPA's *Technical Development Document for the Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Category* [EPA-821-R-15-007], "This rule does not apply to plants that use non-fossil fuel or non-nuclear fuel or other energy sources, such as biomass or solar thermal energy."

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1. Depending on GRP to self test and self report is ridiculous especially months after the discharge occurs. 2. Chemical testing is every 18 months instead of every week instead of every day. GRP should be required to have a 3rd party test their quality.	The National Pollutant Discharge Elimination System (NPDES) Program relies on regular self-monitoring performed by the permitted facility to determine compliance with effluent limitations and/or other regulatory requirements. Part I.B.3. of the draft permit requires that US EPA-approved analytical methods listed at 40 C.F.R. 136 must be used. Part II.A.10. of the draft permit requires that the person in responsible charge of the laboratory performing the analysis for determining permit compliance is certified in accordance with the Georgia Certification of Water and Wastewater Treatment Plant Operators and Laboratory Analysts Act, as amended, and the Rules promulgated thereunder. Part I.D.1. of the draft permit requires that all monitoring results obtained during a calendar month shall be summarized for each month and reported on the DMR which shall be submitted no later than 11:59 p.m. on the 15th day of the month following the sampling period. Part I.A.1 of the draft permit requires the flow, total suspended solids, total residual chlorine, total copper, total mercury, total phosphorus, temperature, delta temperature and pH to be sampled once per week. Oil and grease and total zinc must be sampled twice per month. The facility is also required to conduct two (2) whole effluent toxicity tests to ensure protection of the narrative instream water quality standard for toxicity.
Where is the environmental impact study?	Federal agencies prepare an Environmental Impact Statement (EIS) if a proposed major federal action is determined to significantly affect the quality of the human environment. As this permit reissuance is not a federal action, an EIS is not required. EPD prepared a draft permit which is protective of human health and the environment in accordance with the

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	applicable federal (40 CFR 122, 125, 127, and 136) and state regulations (GA Water Quality Control Act, Chapter 391-3-6) for NPDES permits.
What chemicals are stored on site? How are the chemicals are stored? What amount of chemicals are discharged into ground water?	In accordance with the Emergency Planning and Community Right-to-Know Act of 1986, the facility submitted the following information regarding the storage of hazardous chemicals stored in quantities over 10,000 lbs and any extremely hazardous substances stored in quantities exceeding the specified total planning quantity (TPQ) or 500 lbs, whichever is less: Ammonia – stored in above ground tank Creosote fiber – outdoor storage pile Green sawdust/wood chips – outdoor storage pile Hydraulic oil – stored in above ground tank Additionally, the facility has a 350-gallon sulfuric acid tank which is in concrete containment, a 270-gallon used oil tank, also in concrete containment, and a 1000-gallon diesel tank which is double walled and under cover. The draft NPDES permit is for the discharge of treated wastewater to surface water (unnamed tributaries of Indian Creek) and does not authorize discharges to groundwater.
Nutrients	
1. Doesn't phosphorous cause toxic algae bloom? It already gets into the water via agriculture do we really need more being dumped into the streams.	The permitted outfalls discharge to tributaries of Indian Creek. There is no numeric water quality standard for phosphorus in Indian Creek or its tributaries.

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2. The flow in the unnamed tributary is 99% from the facility's outfalls. Unfortunately, Indian Creek itself is not very large having only about three miles of upstream from the discharge point. So, there is very little dilution effect when the waste water flows into the stream. In this regard, I have calculated the flows that would be required in Indian Creek to dilute the phosphorus concentrations to maximum acceptable levels that would be assumed not to stimulate algal growth in bodies of water (0.1 mg/L). And, by the way, there are four lakes downstream of Indian Creek, Clarks Hill Lake, the pool behind Stephens Creek Dam, the pool behind the Augusta Canal Diversion Dam and the pool behind the New Savannah Bluffs Dam. In addition, there are algal blooms occasionally in the Broad River downstream of Indian Creek. In order for the phosphorus to be diluted to acceptable levels if the facility continues to generate it at the rate it has been, the flow in Indian Creek would have to average 10.7 ft^3/sec. Since the 7Q10 for Indian Creek is 0.00337 ft^3/sec, it is likely that Indian Creek reaches a flow of 10.7 ft^3/sec only rarely at the facility's discharge point. And that is to accommodate the current average discharge of phosphorus from the facility. To accommodate the maximal discharge of phosphorus would require a flow of 43.0 ft^3/sec in Indian Creek, a flow I would guess never happens at the facility's discharge point. Phosphorus and ammonia are a continuing problem in the Indian Creek watershed. A monitoring requirement for orthophosphate should be reinstated because phosphorus discharge is a significant problem at this facility and because there have been algal blooms in the Broad River where it is free flowing and because there are impoundments downstream and because there are over one million chickens living in the Indian Creek watershed and contributing to the phosphorus problem.	Where instream or lake numeric water quality standards for phosphorus have not been developed, EPD implements the *Strategy for Addressing Phosphorus in NPDES Permitting (2011)* (Strategy). The strategy requires that routine permit reissuances without expansion require phosphorus monitoring. Phosphorus monitoring has been included in the permit in accordance with the Strategy. Orthophosphate monitoring for outfall 002 has been retained to ensure sufficient data has been collected for this parameter. The previous permit included monitoring for orthophosphate, however, because the facility did not begin reporting discharges until September 2019, a full permit term of data has not yet been collected at this facility. The facility treats the wastewater via an oil/water separator, pH neutralization and aeration. GRP Franklin will also be installing and operating a clarifier to be used as needed for phosphorus control.

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3. To solve the phosphorus, ammonia, and BOD problems, I suggest that GRP create a wetland between its outfalls (001 and 002) and Indian Creek. With appropriate plantings, the plants would absorb the excess phosphorus, ammonia, metals and BOD and could be harvested regularly to remove the excess nutrients and metals from the site. 4. I suggest incorporation of fungi to decompose wastewater toxins of the Madison/Franklin County biomass facilities prior to disposal.	
Permit Compliance	
Both GRP Franklin and GRP Madison power plants have both had environmental permit violations.	This response to comments pertains to the reissuance of NPDES Permit GA0039292 for GRP Franklin. Comments regarding the GRP Madison facility will be addressed separately in the permit record for draft NPDES permit number GA0050283.
1. Water pollution resulting in dead fish, discolored, unusable water has already occurred in Franklin County. 2. The Fact Section of the Draft Permit, Section 3.1, Receiving Waterbody Classification and Information Designated Water Use, says "The designated water use for Indian Creek is fishing". An Enforcement Order EPD-WP-8973 was issued on 9/8/2020 to GRP-Franklin for runoff from the wood chip fuel pile into a tributary of Indian Creek producing significant water quality changes that were potentially lethal to aquatic life and resulted in a fish kill. GRP was fined $48,107. GRP should not be permitted to dump polluted wastewater into Indian Creek.	Comments regarding air pollution control or noise should be reported to the EPD Air Protection Branch Stationary Source Compliance Office at 404-363-7000, as they are outside of the scope of the NPDES permitting process. Per Consent Order EPD-WP-8973, issued by EPD on September 8, 2020, between October 3, 2019 and October 5, 2019, GRP Franklin sprayed water estimated to be 1.14 million gallons on their wood chip fuel pile, which the facility alleged was necessary to suppress active combustion. Consent Order EPD-WP-8973 also indicates that on October 5, 2019 the Wildlife Resources Division (WRD) of the Georgia Department of Natural Resources was notified of a potential fish kill in Indian Creek and on October 5, 2019 a representative of the WRD visited the location of

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3. EPD gave GRP a permit to release wastewater and shortly thereafter they allowed the overflow of waste into Indian Creek causing a massive fish kill. Now they are asking for permission to put untreated waste into Indian Creek. 4. GRP does not have to pay any substantial money or pay any fine to allow for any clean up or the harm done once the water and our lives are destroyed. GRP needs further oversight by the EPD including penalties and stipulations. 5. The chemical odors from the burning are making us sick. 6. We are already receiving a lot of noise, water and air pollution from the plant.	the potential fish kill in Indian Creek and confirmed the presence of a fish kill. On October 9, 2019 the WRD issued the report *Fish Kill Investigation, Indian Creek, Franklin County, Broad River Drainage* stating that a fish-kill event occurred in 4.6 miles of Indian Creek Investigation by significant water quality changes potentially lethal to fish in the creek associated with run-off from a smoldering wood pile at chip fuel pile at the facility. The Notice of Violation (NOV) sent by EPD to GRP Franklin on December 9, 2019 indicated that the runoff from the fire suppression activities entered an unnamed tributary to Indian Creek through two stormwater basins (Basin A and Basin C) on October 5, 2019 through October 6, 2029. Basin A and C are settling basins which discharge through Outfall 001 and 002 respectively. The NOV also indicated that according to the facility, during the incident the skimmers installed in two of the facility's stormwater basins (Basin A and Basin C) were not operating as intended. Consent Order EPD-WP-8973 alleged that runoff on October 5, 2019 from the wood chip fuel pile passed through GRP Franklin's settling basins produced significant water quality changes that were potentially lethal to aquatic life and resulted in a fish kill which interfered with the legitimate use of the water. The Consent Order also alleged permit violations including: the submittal of inaccurate information on the October 2019 discharge monitoring report, the late submittal of a discharge monitoring report, effluent limit violations at outfall 001 and 002 in 2019 and 2020, and the failure to monitor BOD in May 2020. The Consent Order carried a penalty of $48,107 for the documented violations. It also required GRP Franklin to submit a standard operating

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	procedure for monitoring wood pile runoff and a corrective action plan to address the alleged effluent limit violations. GRP Franklin must continue to adhere to the standard operating procedure for monitoring wood pile runoff and the approved corrective action plan. EPD added effluent limitations for total residual chlorine, total copper, total mercury and total zinc to ensure that the wastewater discharge is protective of Georgia's instream water quality standards. Additionally, EPD has added a requirement to complete two whole effluent toxicity tests during the permit term to verify the wastewater discharge does not cause or contribute to a potential violation of the Georgia's narrative instream water quality criteria for toxicity.
1. There is historical evidence with the GA EPD that these facilities should not receive their proposed wastewater permits. 2. I do not support the NPDES Permit. 3. I request that EPD reject the permit application.	EPD is responsible for issuing protective, legal, and enforceable permits in accordance with the applicable regulations. An analysis was conducted on the pollutant data submitted with the permit renewal application along with other supporting documents and appropriate effluent limits and permit conditions have been included to ensure there the discharge, as permitted, will not cause or contribute to an instream water quality violation. The permit has more stringent permit requirements and effluent limits than the previously issued permit, providing a permit that is protective of human health and the environment.
Wastewater Treatment and Alternatives	
1. Both of these GRP facilities were incorrectly engineered and assembled for convenience instead of following proper engineering	The facility is required to install wastewater technology to achieve compliance with the permit. The facility treats the wastewater via an oil/water separator, pH neutralization and aeration. GRP Franklin will

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protocols in their industry, such as having insignificantly sized retention ponds for their large-scale operations. 2. The wastewater treatment method they are using and have applied for with this reissuance permit application is not the best or only option available to GRP. 3. GRP should be required to pretreat and transport their wastewater to a qualified wastewater treatment facility for further treatment prior to discharge. 4. GRP should have invested in a water treatment process before building the power plant. If GRP does not want to invest in water treatment, GRP should continue to transport the dirty water to water treatment plants in the area.	also be installing and operating a clarifier to be used as needed for phosphorus control. Additionally, Part III.B of the permit includes a compliance schedule to evaluate sources of copper and total residual chlorine, develop a plan for the reduction of these parameters, and if necessary design, procure, and install treatment in order to comply with the permitted effluent limitations.
Public Health and Recreation	
1. Please don't allow this permit to move forward as it will literally poison our children, families, and farms, in schools, homes, and businesses which all rely on local drinking water sources. 2. We use the rivers and streams for drinking water and recreation. GRP should not be allowed to dump industrial wastewater containing cyanide, chloroform, phosphorous, ammonia, oil and grease, arsenic, selenium, copper, lead, cadmium, chromium, phosphorous, organic nitrogen, chlorine, ortho-phosphates in any amounts into Indian Creek, then on to the Middle Fork of the Broad River, the Broad River, and the Savannah River Basin.	Comments regarding air pollution control or noise should be reported to the EPD Air Protection Branch Stationary Source Compliance Office at 404-363-7000, as they are outside of the scope of the NPDES permitting process. Indian Creek is designated as "fishing". Based on EPD's review, there are no surface water intake structures used for drinking water within 10 miles downstream of the GRP Franklin discharges. Based on information provided by the facility, there are no proposed discharges to groundwater, therefore the requirements of the Safe Drinking Water act are not applicable to the permitted discharges from

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3. The majority of properties in the Broad River drainage use well water. There is a risk of contamination of agriculture, drinking water, and recreation. Why doesn't GRP have the responsibility to monitor well water for my neighbors who live very close downstream on Culpepper road? 4. Many residences rely on wells or water coming from wells. 5. The water should be treated and be as clean as drinking water before discharge. 6. Are harmful chemicals acceptable in drinking water? In water for pets? In water for livestock? 7. This will be an environmental and public health tragedy larger than the Flint Water Crisis. 8. The harmful chemicals and poisons mentioned in the permit are devastating to the quality of the water and the water table in the stream and further downstream. 9. We know the approximately 200,000 gallons of waste water from this plant would contain chloroform, phosphorus and cyanide to name only three hazardous materials dangerous to health. 10. Would it be possible that this waste would contaminate Beaver Dam Lake Reservoir or some of its tributaries such as Long Branch Creek? Will it kill the fish that are living in those streams ? Will it possibly affect all the wildlife that visit those streams to get water to drink? 11. The chemical odors from the burning are making us sick.	this facility and the facility is not required to treat the generated wastewater to the drinking water standards. EPD evaluated the submitted permit application and supporting documentation and proposed a permit with appropriate effluent limitations based on applicable federal (40 CFR 122, 125, 127, and 136) and state regulations (GA Water Quality Control Act, Chapter 391-3-6) and the reasonable potential analysis conducted on the pollutants of concern identified in the permit application. The limitations and conditions in the permit are included to ensure the permit is protective of human health and the environment.

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Request for Additional Time for Comment	
1. In January, two EPD officials, one being Karen Haas' assistant deputy director, told Franklin County Commissioners and the attending public that a public meeting in Franklin County not just post it in the paper since there had been so many problems with the GRP facility. 2. The timing of this announcement to allow citizens to voice their opinions to be ready with research to discuss issues in a public meeting is simply overwhelming as folks are struggling to deal with severe illness, fatigue from overworking, stress with a faltering economy-jobs, dealing with children and schooling, and even the current political chaos at the capital/concerns for overspill in our state. 3. Please allow us another 30 days review as you've granted to Madison County.	The public comment period for the draft permit was open for a total of 87 calendar days. The initial public notice for the draft permit was posted on EPD's website and was sent to subscribers of the EPD Watershed Protection Branch – Permit Related Notices mailing list (mailing list) on December 16, 2020. It was also posted in the Franklin County Citizen Leader on December 17, 2020 and in the Franklin County Courthouse on December 17, 2020. A public hearing was later request and an additional 30 day public notice for the draft permit and public hearing was posted on EPD's website and sent to the mailing list on January 15, 2021. It was posted in the Franklin County Citizen Leader on January 21, 2021 and was posted in the Franklin County Courthouse on January 15, 2021. EPD accepted public comments until March 12, 2021.