

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. GA0046973**

APR 19 2019

**RE: EPD Response to Comments
Georgia-Pacific Consumer Operations, LLC
Savannah River Mill
NPDES Permit No. GA0046973**

To Whom it May Concern:

Thank you for your comments regarding the permit issuance for the Georgia-Pacific Consumer Operations, LLC – Savannah River Mill. Attached is a summary of comments from the public and our responses to the issue raised. In addition, we have attached the Permit Addendum and Permit Fact Sheet 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 Whitney Fenwick of my staff at 404-656-2795.

Sincerely,



**Audra Dickson, Manager
Wastewater Regulatory Program
Watershed Protection Branch**

AHD/wf

Attachment

**Public Comments and EPD Responses on Draft NPDES Permit
Georgia-Pacific Consumer Operations, LLC (Savannah River Mill) – Permit No. GA0046973**

COMMENTS RECEIVED	EPD RESPONSE
Fact Sheet Page 2, Section 1.9, Description of the Wastewater Treatment Facility. This sections suggests that Permit No. 051-009D(L)(I) is a permit for an offsite landfill. It is not. That permit number is for our onsite solid waste landfill, and we do not dispose of sludge in our onsite solid waste landfill. The reference to our onsite landfill permit should be removed and the Fact Sheet Should read “shipped to an offsite permitted landfill, or transferred...”	Comment noted. This correction has been made in Section 1.9.
Fact Sheet Page 21, Section 5.2, Thermal Mixing Zone. The latitude and longitude coordinates must be changed to match those listed on Page 1, Section 1.4. That is, the proper coordinates are 32°21'4" N (32.351111); Longitude: 81°9'43" W (-81.161944).	Comment noted. This correction has been made in Section 5.2.
EPD Attached to the Fact Sheet a November 29, 2019 internal memorandum from Lucy Sun to Audra Dickson regarding the thermal mixing zone analysis. Page 2 of that memo contains a photo with a figure that purports to show the mixing zone. The mixing zone figure, however, is inaccurate. We request that EPD substitute the memo photo and figure with the enclosed photo and figure. The mixing zone figure in the enclosed photo is a more accurate depiction of the mixing zone.	A revised figure has been provided by the Georgia EPD Water Quality Modeling Unit that more accurately depicts the length of the temperature mixing zone.
Permit Cover Page: Rincon is misspelled in the facility address as Ricon. We request the misspelled Ricon with Rincon.	Comment noted. This correction has been made to the Permit Cover Page.

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Permit Pages 6 and 9, I.B.1.a. and I.B.1.b. The Permit requires us to monitor Temperature (Ambient and Edge of Mixing Zone) once a month using a grab sample. We are planning to have a USGS continuous temperature monitor which will give us considerably more data than one grab sample a month. Because of this, taking one grab sample a month – or picking one of the hundreds of continuously reported temperature points in time to report as our one sample – does not make sense.	Part I.B.1.a. and I.B.1.b. have been revised to include a sample type of “recorder” for Temperature °F (Ambient) and Temperature °F (Edge of Mixing Zone) to account for the continuous temperature monitor. A footnote has been added to clarify that in the event that data from the temperature recorder is not available for a given monitoring period, Temperature °F (Ambient) and Temperature °F (Edge of Mixing Zone) may be collected via grab sample at a frequency of 1/Month.
Permit Page 14, I.B.3. This section requires quarterly monitoring for all groundwater parameters except depth to groundwater (1/month) and Fecal Coliform Bacteria (semiannual). We request that EPD amend the frequency of all groundwater monitoring to semi-annually as we have been doing since 2003. EPD’s July 2010 Guidelines for Slow-Rate Land Treatment of Wastewater Via Spray Irrigation state that with respect to groundwater monitoring, “sampling frequency...will be determined on a case-by-case basis and will be dependent on site conditions.” 2010 Guidelines at 31. We are not aware of any site conditions that would justify EPD increasing the frequency of groundwater monitoring. To the extent EPD justifies more frequent monitoring by relying on guidance specific to municipalities, such reliance is misplaced. While the facility land applies domestic wastewater, the facility is not a municipality. EPD has separate Guidelines for municipalities and other LAS permit holders for a reason – the two are inherently different. In addition, EPD cannot rely on its Draft 2018 Guidelines that combine the two former Guidelines into one document because (1) the 2018 Guidelines are still Draft form and (2) we understand that EPD does not intend to issue the 2019 Guidelines as currently drafted.	Georgia EPD has increased groundwater monitoring frequencies in recently reissued permits to ensure data is being collected that is representative of seasonal conditions in order to ensure year-round protection of groundwater resources. Sampling frequencies are determined on a case-by-case basis. EPD has included monitoring frequencies for the land application system that more closely align with recently issued permits where domestic wastewater is land applied.

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Permit Page 14, I.B.3. This section requires us to monitor for ortho-phosphate but ortho-phosphate is not included in the Fact Sheet, page 25 Section 8.1, Groundwater Monitoring. As a result, we assume we are not required to monitor for ortho-phosphate and we request you remove it from the Permit. If, however, EPD intends for us to monitor ortho-phosphate, then we request that EPD add this parameter to the Fact Sheet.	This was a typographical error. Orthophosphate monitoring is required for the effluent discharge from outfall 001.
Permit Page 16, I.C.4. The Permit requires us to report “NOT DETECTED” if a parameter is not detected at or above a detection limit and to report the detection limit for the parameter. NetDMR, however does not provide for reporting the latter. Using NetDMR, when the NODI code “B” is entered for “BELOW DETECTION LIMITS/NO DETECTION,” the system prohibits entering a detection limit. As a result, we request that EPD delete the detection limit reporting requirement so that the permit will read “a value of ‘NOT DETECTED’ will be reported for that sample.”	When using NODI code “B” in NetDMR to indicate a parameter is not detected at or above the detection limit, please report the detection limit for the parameter on the attached OMR.
Permit Page 18, Section I.D.2. We understand this section to require us to begin submitting our compliance monitoring data and reports (those listed in (a)-(d)) electronically by no later than December 21, 2020, consistent with 40 C.F.R. § 127.16. Up until that date, we are not required to submit these documents electronically. Please let us know if you disagree with our understanding.	EPD concurs with your interpretation of Part I.D.2. of the draft permit. The Federal National Pollutant Discharge Elimination System Electronic Reporting regulations in 40 CFR 127 require the permittee to begin electronically reporting the items listed in Part I.D.2. of the permit no later than December 21, 2020.

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Permit Page 30, Section III.B.1. The Permit contains new temperature limits and measuring requirements that will necessitate USGS installing two new measuring stations. We understand that the new station installations will take some time. As a result, we request that EPD add an extremely short compliance schedule to the Permit as a new III.B.1(c). The current III.B.1.(c) will then become III.B.1(d). We request that the new III.B.1.(c) state “The permittee shall begin following the temperature monitoring requirements by no later than three months after the Effective Date of this permit.” This three-month extension will give USGS time to install the monitoring stations and will give us time to ensure the stations are working. We also request that EPD modify III.B.1(a) to include the following emphasized language so that it will state “The effluent limitations and monitoring specified in Part I.B.1.a. are effective on the effective date of this permit, except as specified in Part III.B.1.b <u>and III.B.1.c</u> below.”	The draft permit did not require the use of a continuous recorder to measure instream temperature, however, EPD concurs that temperature data collected by a continuous recorder is a suitable alternative to a 1/Month grab sample if the facility chooses to have such equipment installed. Therefore, Part I.B.1.a. and Part I.B.1.b. have been revised to include a sample type of “recorder” for Temperature °F (Ambient) and Temperature °F (Edge of Mixing Zone) to account for the continuous temperature recorder. In lieu of including a schedule of compliance, EPD has included an option to measure temperature via a grab sample at a frequency of 1/Month until the continuous recorder can be installed.
To prevent the possibility of having two sets of compliance requirements within the same month (one set from the current permit and one set from the new Permit), we request the Permit’s effective date to be on the first day of the month.	Comment noted. The renewal permit will be issued with an effective date of the first day of the month.
BOD120 has been removed from the new Permit but is a part of our old permit. Since several months of 2019 have been subject to the old permit, we plan to report on BOD120 in our year-end submission. We will also report on UOD in that same submission. If EPD disagrees with this plan, please let us know.	Comment noted.

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We assume that the NetDMR e-reporting system will be update to accept our first report under the new permit. We understand, however, that other facilities have had problems e-reporting when switching from old to new permit requirements. If our e-reporting system has not been updated, we will call EPD to discuss options on how to report until the system is updated.	Comment noted.