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

July 21, 2020

Persons who commented on
Draft NPDES Permit No. GA0050218

RE: EPD Response to Comments
City of Hogansville
Hogansville Water Pollution Control Plant
NPDES Permit No. GA0050218

Dear Sir/Madam:

Thank you for your comments regarding the permit issuance for the Hogansville Water Pollution Control Plant NPDES Permit. Attached is a summary of comments from the public and our responses to the issue raised. No changes were made to the permit in response to the comments. 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 or *josh.hayes@dnr.ga.gov*.

Sincerely,

Audra Dickson, Manager
Wastewater Regulatory Program

AD/jbh
Attachment: Response to Comments

Public Comments and EPD Responses on Draft NPDES Permit
City of Hogansville (Hogansville WPCP) – Permit No. GA0050218

COMMENT RECEIVED	EPD RESPONSE
The City of Hogansville wants to request that four (4) WET tests not be required in the first year of operation. In addition to the increased O&M costs of the new plant and the increased costs of complying with the long-term watershed monitoring required in the WPP, four WET tests are costly. Besides, for a 1.5 MGD plant with strict permit limits four separate tests seems excessive – maybe more appropriate for a 20 MGD facility. In addition, this language also includes four (4) priority pollutant scans in the first year. With so little industry in the service area this seems excessive, too. Will one WET test and one PP scan for the first year of operation be sufficient?	All new or expanding wastewater treatment facilities with a permitted flow greater than 1.0 MGD are subject to the same monitoring requirements for whole effluent toxicity (WET) test and priority pollutants scans (PPS) pursuant to Federal regulations 40 CFR 122.21(j)(5)(ii) and 40 CFR 122.44(d); State regulations Chapter 391-3-6-.06(4)(d)5, and EPD permitting strategies *NPDES Reasonable Potential Procedures,* January 2003 and *Whole Effluent Toxicity Strategy*, April 2001. The City of Hogansville must conduct four WET tests and only <u>three</u> PPS during the first year after receiving EPD written authorization to commence operation, not four as suggested in the comment. No changes have been made to the proposed comment.

Public Comments and EPD Responses on Draft NPDES Permit
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COMMENT RECEIVED	EPD RESPONSE
We urge EPD mandate stricter limits for nutrients on wastewater discharges into West Point Lake. There is a clear trend of increasing nutrient levels in West Point lake as evidenced through CRK and EPD's chlorophyll a monitoring. Modern wastewater treatment facilities such as that under construction in Hogansville has the technology and capacity to treat effluent to well below permit limits much more stringent than what is proposed. Efforts to reduce nutrient loads from Atlanta into the lake could be lessened if nutrient from communities surrounding West Point Lake are not minimized using the best treatment technology available. The proposed permit limits for nutrients are less stringent than permit limits for other new wastewater treatment facilities in the Chattahoochee watershed.	Point source dischargers in the Chattahoochee river basin are subject to varying total phosphorus (TP) effluent limits due to their geographic location in the basin and EPD's memorandum *Discharges in the Metro Chattahoochee Basin*, January 2002. West Point lake is meeting its instream water quality standards and recent increases to chlorophyll-a are attributed to increased rainfall in recent years and the associated nonpoint source runoff. In accordance with EPD's memorandum *Strategy for Addressing Phosphorus in NPDES Permitting*, November 2011, direct discharges upstream from a lake require a monthly average TP effluent limit of 0.5 mg/L. No changes have been made to the proposed comment.