Public Comments and EPD Responses on Draft Permit
Newton County Water & Sewerage Authority – A. Scott Emmons Water Reclamation Facility at Little River
NPDES Permit No. GA0050304

Comment	Response to Comment
NCWSA requests that the permit be addressed to Mr. Mike Hopkins, Executive Director.	Comment noted and the permit file has been updated.
Update the description of the solids processing in the fact sheet to reflect that rotary presses are used instead of centrifuges.	Section 1.7 of the proposed permit fact sheet has been updated to reflect the description of the solids processing in the fact sheet.
The fact sheet states that Newton County Water & Sewer Authority (NCWSA) does not have an approved Industrial Pretreatment Program (IPP). NCWSA does have an approved IPP.	Language in the fact sheet and permit has been revised to clarify that the Authority's approved Industrial Pretreatment Program (IPP) does not include the A. Scott Emmons WRF and that a modification of the Authority's IPP must be completed before language for an approved IPP can be included in this proposed permit. Please contact Whitney Fenwick, Manager of the Industrial Permitting Unit at *whitney.fenwick@dnr.ga.gov* and/or (470) 607-3078 for any questions regarding the modification of the Authority's IPP. Once the modification of the IPP is completed, the permit can be modified to include language for an approved IPP.

Comment	Response to Comment
NCWSA is concerned about meeting 85% BOD5 and TSS removal requirement in the permit. Due to NCWSA's IPP, industrial flow, which makes us approximately 85% of the influent wastewater chemistry, is pretreated to BOD5 and TSS levels below 100 mg/L.. Typical wastewater streams have greater than 250 mg/L of BOD_5 and TSS. NCWSA is concerned that the effluent limits in the permit for both BOD5 and TSS will be met, but it may not result in 85% removal from the influent levels. We'd like to revisit the language in the permit so NCWSA isn't held to a higher standard of treatment beyond meeting the effluent limits.	In accordance with 40 CFR §133.103(d), a lower percent removal requirement may only be substituted provided that the permittee satisfactorily demonstrates that: (1) The treatment works is consistently meeting, or will consistently meet, its permit effluent concentration limits but its percent removal requirements cannot be met due to less concentrated influent wastewater, (2) to meet the percent removal requirements, the treatment works would have to achieve significantly more stringent limitations than would otherwise be required by the concentration-based standards, and (3) the less concentrated influent wastewater is not the result of excessive I/I. As indicated in the Design Development Report (DDR) concurred with on September 27, 2018, the proposed plant will be equipped with tertiary filtration. The facility is being designed to produce a monthly averge effluent of 5 mg/L or less for TSS and BOD_5. Based on these effluent concentrations, the monthly average influent TSS and BOD_5 would have to be less than 33 mg/L for the facility not to be able to meet 85% TSS and BOD_5 removal requirements. Based on the influent flow composition and wastewater strength information submitted in the comment, such low influent concentrations are not expected; therefore, the percent removal requirements in the proposed permit remain unchanged.