Public Comments and EPD Responses on Draft Pretreatment Permit
Pilgrim's Pride Corporation (Elbert County) – Permit No. GAP050073

COMMENTS RECEIVED	EPD RESPONSE
While the limits for BOD5 and TSS are higher than I would like, I might overlook that, if there were a solid justification for putting high loads of BOD5 and TSS into the sewage system for Falling Creek wastewater treatment. Essentially what that is doing is transferring the cost of aeration from the producer to the taxpayer. It is not that the sewage treatment plant can't handle it, it is that the sewage treatment plant should not have to handle it unless, of course, Pilgrim's Pride is paying extra for it. It seems curious to me that the limits set for BOD_5 and TSS are exactly the same, given that they are related only tangentially in that some of the TSS also represents BOD.	Local limits are evaluated based on the potential for pass-through and interference at the POTW, local ordinances and federal effluent limitation guidelines. The calculated local limits based on pass-through and interference were 1724.7 mg/L of BOD and 1763.57 mg/L of TSS. The City of Elberton Sewer Use Ordinance sets limits for BOD and TSS at 750 mg/L. The limits included in the proposed permit of 250 mg/L were maintained from the previous permit in accordance with the antibacksliding requirements of the Clean Water Act Section 402(o).
I note that there are large differences between maximal concentrations and average concentrations in several measures of actual concentration at the outfall for BOD5, TSS, Ammonia, and COD. I also note that maximal daily value for BOD5, TSS and Ammonia each violated the EPD set limits for those concentrations at the outfall during the previous permit period. Were those violations reported at the time they occurred and were the causes identified and corrected? In other words, can we trust Pilgrim's Pride to report violations and correct the problems that led to the violations?	The facility received Notices of Violations (NOVs) from EPD on April 15, 2020 and December 23, 2020 documenting permit violations which occurred between January 2017 and August 2020. In response letters from the facility dated April 30, 2020 and January 4, 2021 the company outlined planned changes which they believed would result in compliance with their effluent limitations going forward. These changes included: • Fixing a malfunctioning auto-purge unit • Adding supplemental alkalinity and nitrifying bacteria to the treatment pond • Improvements to the aeration pond, including the installation of a high efficiency blower connected to floating laterals with subsurface to improve mixing and increase dissolved oxygen concentrations • Routine ammonia testing in-house on incoming wastewater to provide warning of high ammonia concentrations

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	• Alkalinity testing to indicate when additional alkalinity maybe needed • Daily monitoring of refrigeration equipment, and if an issue is found, wastewater with high ammonia concentrations is diverted into containers and hauled off site
There are a couple of errors in the published copy. First, on page 10 of the FACT SHEET in the calculations, the third equation should read ammonia (AHL) not arsenic (AHL). Second, Appendix A is out of order, the first 10 pages are 17-8 in that order, followed by 18, then by 35-19 in that order, then 36, then 41-37 in that order, and finally 42. And Appendix C seems to be missing Tables 5, 6, and 9.	The typographical error in Section 3.6.f. of the proposed fact sheet has been correct. The pages of Appendix A have been rearranged into the correct order (pages 8 through 42 of the Sewer Use Ordinance). Tables 5, 6, and 9 were not included in Appendix C of the proposed fact sheet as the calculations are not relevant to discharges to this POTW because sludge is sent off-site to a landfill and the POTW does not use anaerobic digestion. Tables 5, 6, and 9 have been included in the proposed fact sheet to show that they are blank.