



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**

MAY 28 2019

Persons who commented on
Draft Pretreatment Permit No. GAP050334

**RE: EPD Response to Comments
N.W. Fries, Inc. (Sylvania Debone)
Pretreatment Permit No. GAP050334**

To Whom it May Concern:

Thank you for your comments regarding the permit issuance for the N.W. Fries, Inc. (Sylvania Debone) Pretreatment Permit. Attached is a summary of comments from the public and our responses to the issue raised. 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,

A handwritten signature in blue ink, appearing to read "Audra Dickson", is written over a faint, light blue rectangular stamp.

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

AHD/wf

Attachment

**Public Comments and EPD Responses on Draft Pretreatment Permit
N.W. Fries, Inc. (Sylvania Debone) – Permit No. GAP050334**

COMMENTS RECEIVED	EPD RESPONSE
<p>The city of Sylvania, GA has a waste treatment plant located on Friendship Road on the outer city limits. It has been there over 45 years and dumps wastewater in Buck Creek.</p> <p>The City's wastewater treatment plant does not have a permit to dump wastewater into Buck Creek and has not had one since 2006.</p>	<p>The pretreatment permit on public notice is for the N.W. Fries, Inc (Sylvania Debone) facility which is proposing to discharge to the City of Sylvania's wastewater treatment plant. The City of Sylvania is authorized to discharge treated wastewater to Buck Creek in accordance with state and federal regulations.</p> <p>The City of Sylvania operates the Sylvania Water Pollution Control Plant at 624 Friendship Road, Sylvania, Georgia 30467 has an effective NPDES permit (permit no. GA0021385) that was administratively extended on July 30, 2006. A letter was mailed to the City of Sylvania on June 27, 2006 by the EPD indicating the EPD's intent to extend permit GA0021385 until such time that it could be reissued within the appropriate river basin group.</p> <p>On April 30, 2019, EPD placed the City's NPDES draft renewal permit for the wastewater treatment plant on public notice for review and comment.</p>
<p>The city has all of its storm drains from all over town and they are also routed to Buck Creek.</p> <p>The city is supposed to have a permit to dump all of the storm drains into Buck Creek, but they do not.</p> <p>The storm drains from all over the city contain all types of trash, chemicals, raw sewage, and runoff from all the storms and streets and houses from the City of Sylvania and this is not regulated by the EPD or the health department.</p>	<p>As mentioned above in the EPD response, the pretreatment permit on public notice is for the N.W. Fries, Inc (Sylvania Debone) facility which is proposing to discharge to the City of Sylvania's wastewater treatment plant. The facility is not proposing a direct discharge to Buck Creek.</p>

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<p>The waste treatment plant over the years has had many raw sewage spills that have damaged all the property on Buck Creek.</p> <p>I have samples that I have taken of the spills and also documentation of all the times I have reported this to the city, EPD, Corps of Engineers, EPA and federal investigators.</p> <p>I have also tested the water and soil and all tests came back contaminated.</p> <p>All of the tests that were taken have high levels of pathogens, viruses and other types of hazardous materials.</p> <p>I do not let any of my family get close to the creek for fear of some type of sickness they might get from contact with the creek.</p>	<p>The pretreatment permit on public notice is for the N.W. Fries, Inc (Sylvania Debone) facility which is proposing to discharge to the City of Sylvania's wastewater treatment plant.</p> <p>EPD issued a Consent Order to the City of Sylvania in 2014 regarding spills to waters of the state.</p> <p>The commenter did not provide dates of alleged spills or results of soil or water sampling with the submitted comments for EPD to further evaluate and research the concerns.</p>
<p>The wastewater treatment plant dumps from 800,000 to over 2,000,000 gallons of wastewater into the creek on a daily basis that is supposed to be treated wastewater.</p> <p>By federal law no plant can dump water into a creek with no flow and Buck Creek has no flow unless it rains >5".</p> <p>90% of the flow in Buck Creek is wastewater and storm sewer from the City of Sylvania.</p>	<p>The pretreatment permit on public notice is for the N.W. Fries, Inc (Sylvania Debone) facility which is proposing to discharge to the City of Sylvania's wastewater treatment plant. The City of Sylvania is authorized to discharge treated wastewater to Buck Creek in accordance with state and federal regulations.</p> <p>The permit application for N.W. Fries, Inc. indicates a total flow of 66,000 gallons per day of treated process and nonprocess wastewater to the Sylvania water pollution control plant. The City of Sylvania is permitted to discharge up to 1.51 million gallons per day.</p>

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The wasteload allocation included in Appendix A of the Fact Sheet for the draft reissuance of Sylvania WPCP's NPDES Permit indicates that the mean annual streamflow at discharge for Buck Creek is 2.6 cfs or 1.7 million gallons per day.