



GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

State Environmental Review Process for Wastewater Infrastructure Funded by ARPA

Audra Dickson
Wastewater Regulatory Program Manager

July 8, 2022



AMERICAN RESCUE PLAN ACT (ARPA)

American Rescue Plan



State Fiscal
Recovery

Federal Uniform Guidance rules are applicable for American Rescue Plan Act funds.

Uniform Guidance can be found at 2 CFR Part 200, and it establishes uniform administrative, cost principles, and audit requirements for federal awards to non-federal entities.



State Fiscal
Recovery





STATE ARPA PROJECTS



All wastewater projects should be sent to gaepd.wrp@dnr.ga.gov and include the applicable Categorical Exclusion or Notice of No-Significant impact form.

If your project requires an Environmental Impact Statement (EIS) please contact us.

- **complete this form if you are requesting a  categorical exclusion (ce) for a wastewater project**
- **complete this form if you are requesting a  notice of no-significant impact (nonsi) for a wastewater project**

In the subject line of the e-mail please include the below information. Once your project has been received it will be assigned to a team member for review and follow-up.

1. Name of City or County
2. Wastewater Permit No.
3. Brief Project Description (for example, New WWTP, Sewer Replacement, Expanding WWTP, Upgrade WWTP, etc.)

Example Subject Line: City of EPD, GA0000abc, Sewer Rehabilitation



HISTORY & REGULATIONS

Federal Authority

- The National Environmental Policy Act (NEPA) of 1970 requires federal agencies to assess environmental effects of their proposed actions prior to making decisions.
- The Clean Water State Revolving Fund (CWSRF) program was authorized in 1987 to fund a wide variety of water quality protection efforts.

State Authority

- The Georgia Environmental Policy Act (GEPA) of 1991 required that the Georgia Environmental Protection Division (EPD) issue guidelines to assist agencies in preparing environmental effects reports and conduct a NEPA-like review.
- Georgia's SERP was approved in 1989 for EPD to review and approve environmental review documents developed for all SRF projects.



SERP OVERVIEW

Purpose

- The Georgia Environmental Protection Division (EPD) conducts the State Environmental Review Process (SERP) for CWSRF loans, ARC grants, and ARPA grants.

Determinations

- Categorical Exclusion (CE)
- Notice of No Significant Impact (NONSI)
- Environmental Impact Statement (EIS)

<https://epd.georgia.gov/state-american-rescue-plan-act-fund>

gaepd.wrp@dnr.ga.gov



EXAMPLE PROJECTS QUALIFYING FOR A CATEGORICAL EXCLUSION

Rehabilitation of wastewater
treatment plants

Rehabilitation/replacement
of sewer lines

In-kind replacement of
equipment at wastewater
treatment plants



PROJECT DESCRIPTION OUTLINE

- Narrative
- Purpose
- Map(s)

Project Scope

S.R. 32 Pump Station Replacement: The City of _____ has selected _____ to design the proposed pump station replacement along State Route 32. The pump station replacement will include the decommissioning and replacement of four (4) pump stations, relocating the pump stations off the Georgia Department of Transportation's Right-of-Way. Easements will need to be acquired from four (4) individual property owners to relocate each pump station to an area adjacent to the existing pump station manholes. These pump stations need to be replaced to remove aging mechanical components, improve safe access for operations and maintenance, increase pumping efficiency and improve pumping capacity. This project will include sewer extended to new wet wells and force main installed and connected to existing pipe. All existing mechanical and electrical components within the existing manholes will be removed. These manholes will then be re-used as traditional sewer manholes, transporting collected sewer to each new wet well.

All four (4) pump stations will be sized to pump sewage for both existing customers and future development. These stations will be owned and operated by the City of _____.

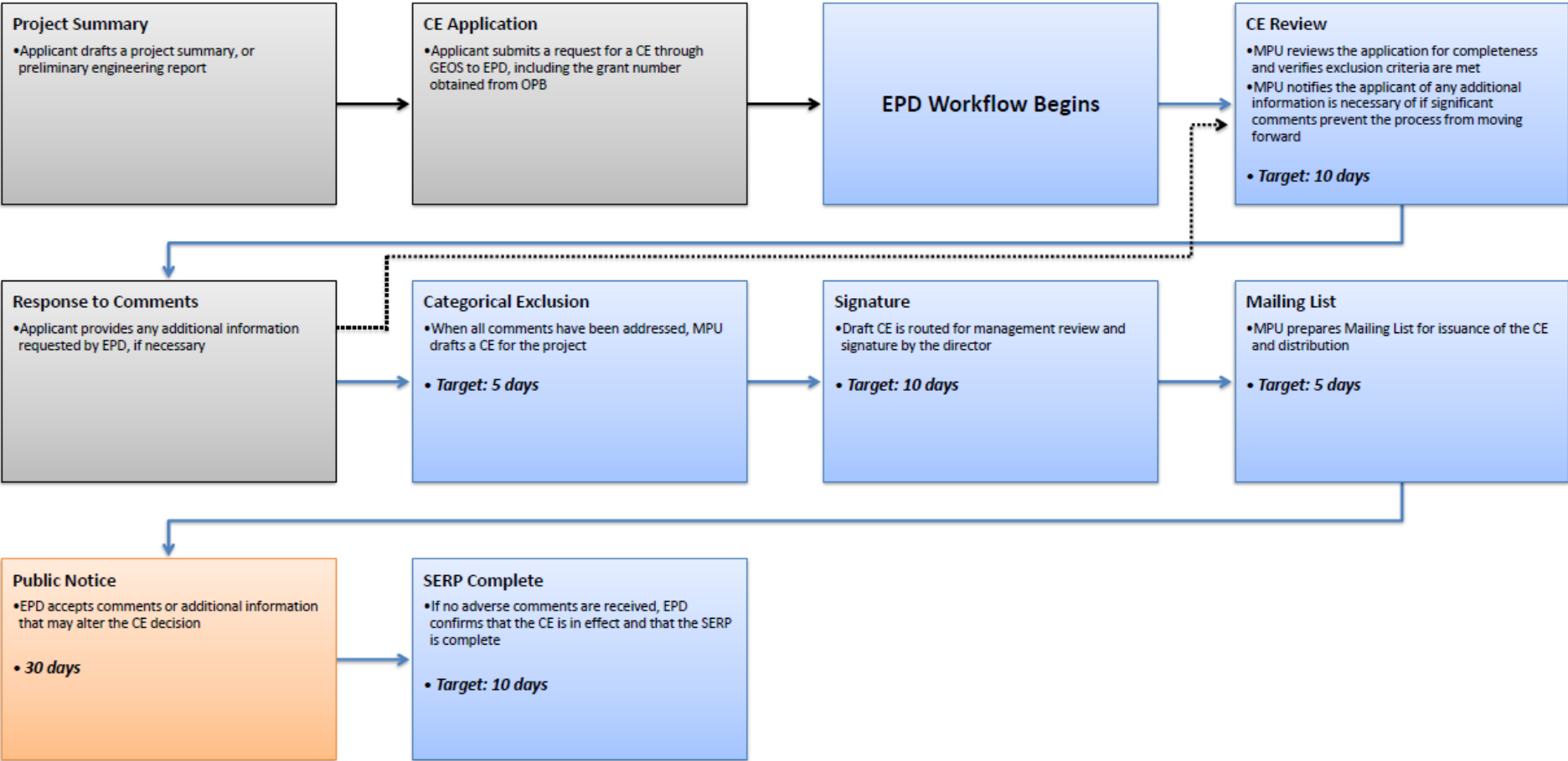
Preliminary Project Cost Estimate: ± \$2,000,000.00



CATEGORICAL EXCLUSION PROCESS

External Process or Submittal (Applicant/OPB)	EPD Workflow: Target Timeline Provided	Public Notice: Typically 30 days
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Categorical Exclusion (CE) Workflow





ENVIRONMENTAL REVIEW PLANNING DOCUMENT



ENVIRONMENTAL PROTECTION
DIVISION



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- ▼ About EPD
- ▼ Forms & Permits
- ▼ Rules, Laws & Enforcement
- ▼ Public Announcements
- ▼ Outreach
- Emergency Response

[Home](#) > [About EPD](#) > [Watershed Protection](#) > [Wastewater](#) > Clean Water State Revolving Loan Fund

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> Contact Us

> Air Protection

> Land Protection

▼ Watershed Protection

▼ Wastewater

Clean Water State Revolving
Loan Fund

Technical Review Process

Clean Water State Revolving Loan Fund

State Environmental Review Process (SERP)

Any domestic wastewater facility that wishes to receive funding from the State Revolving Loan Fund (SRF) must undergo an in-depth environmental review and approval process by EPD. This process is designed to ensure compliance with the State Water Quality Rule 391-3-6-.14 and all other applicable State acts, orders, guidelines, and rules related to the implementation of the Environmental Review Process. EPD will prepare either a Categorical Exclusion (CE), Notice of No Significant Impact (NONSI), or Environmental Impact Statement (EIS) based on the results of the review. The entire SERP is outlined below for the issuance of a CE or NONSI. Please note that while the EIS process has not been included here and is less common than CEs and NONSIs, it remains a possible outcome.

<https://epd.georgia.gov/watershed-protection-branch/wastewater/clean-water-state-revolving-loan-fund>



PROJECTS THAT DO NOT QUALIFY FOR A CE

Sewer extension

New or expanded facility

Installation of a chemical feed systems or biosolids treatment



ENVIRONMENTAL REVIEW PLANNING DOCUMENT OUTLINE

Project Overview:

- Summary
- Conclusions
- Recommendations

General:

- Study Purpose and Scope
- Planning Area Description
- Project Name
- Owner and Operator of the Facilities
- Location of Facilities



ENVIRONMENTAL REVIEW PLANNING DOCUMENT OUTLINE

Current Situation and Trends:

- Effluent Limitations
- Current Environmental Conditions
- Wastewater Flows and Population
- Location and Evaluation of Treatment Facilities
- Infiltration/Inflow



ENVIRONMENTAL REVIEW PLANNING DOCUMENT OUTLINE

Future Situation:

- Population and Flow Projections
- Land Use
- Future Environment Without the Project



ENVIRONMENTAL REVIEW PLANNING DOCUMENT OUTLINE

Alternatives Considered:

- No Action
- Maximum Operation of Existing Facilities
- Regional Solutions
- Innovative and Alternative Technologies
- Reclaiming and Recycling of Wastewater
- Soil Suitability for Land Application



ENVIRONMENTAL REVIEW PLANNING DOCUMENT OUTLINE

Plan Selection:

- Comparison of Alternatives
- Public Participation in Selection of Alternative
- Reasons for Selection
- Demonstration of Best Practicable Waste Treatment Technology



ENVIRONMENTAL REVIEW PLANNING DOCUMENT OUTLINE

Environmental Impacts:

- Historical Properties
- Wetlands Protection
- Noise & Air Quality
- Endangered Species
- Financial Impacts to Users
- And more (refer to guidelines for full list)



ENVIRONMENTAL REVIEW PLANNING DOCUMENT OUTLINE

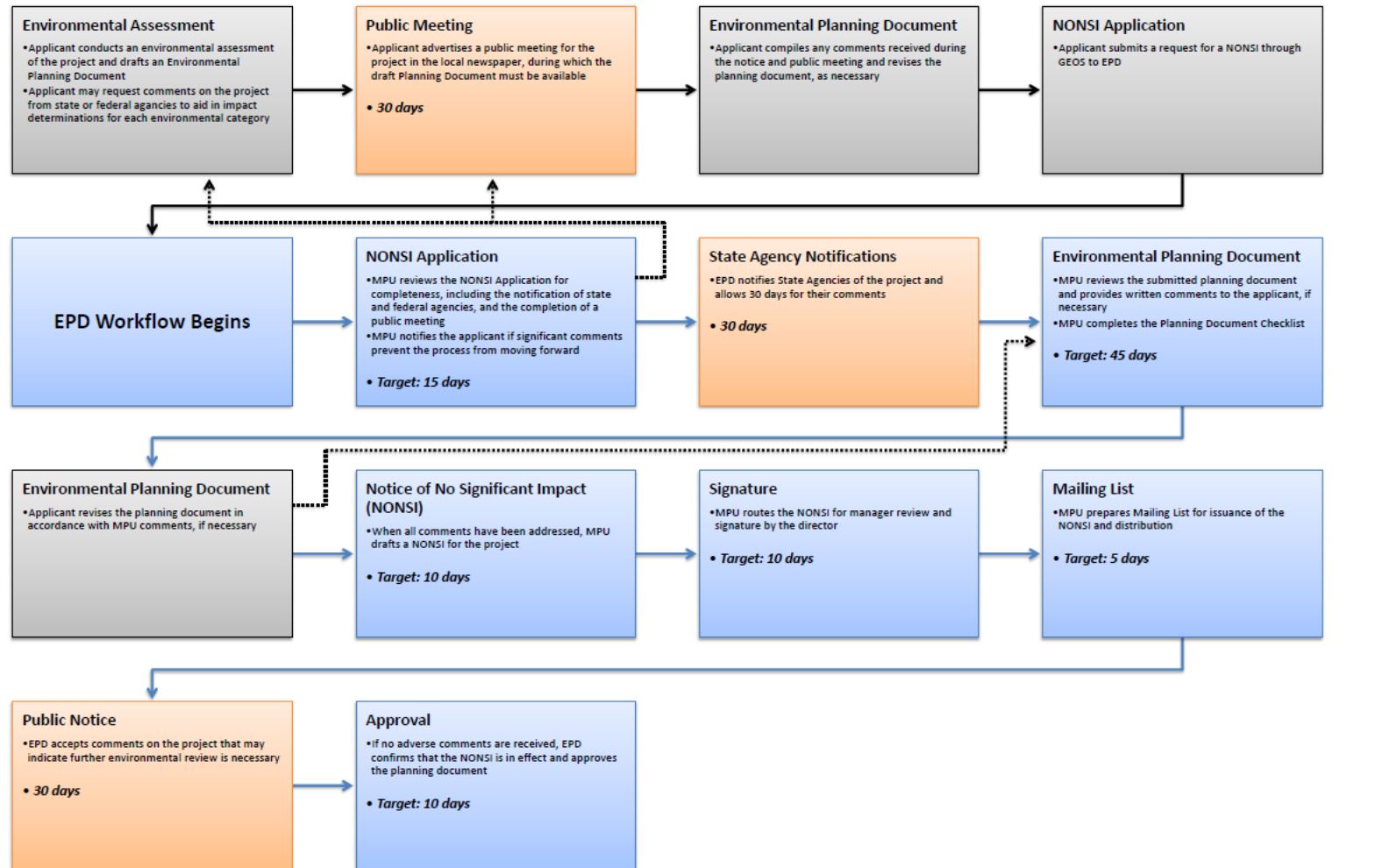
Additional Requirements:

- Preliminary Design
- Arrangements for Implementation
- Environmental Justice (EJ)
- Certifications (MNGWPD, SDS)



NONSI PROCESS

Notice of No Significant Impact (Nonsi) Workflow





PUBLIC MEETING ONLY REQUIRED FOR NONSI

- Submit proof of advertisement, meeting date/time, meeting minutes, questions received and responses to those questions, etc.)
- Public meeting can be scheduled and held before submitting document to EPD. You do not have to wait for EPD feedback on the document to schedule the meeting.
- Public comments received must be addressed. If the comments require revisions to the project, those must be incorporated in the document



PUBLIC MEETING

PUBLIC MEETING

The City of Thomson hereby gives notice that the City of Thomson will hold a public meeting on May 6, 2022 at 11:00 AM in the Thomson City Hall at 210 Railroad Street, Thomson, GA 30824.

The proposed project includes the addition of a new chemical feed system at the wastewater treatment plant to meet new NPDES Permit effluent limits for Total Recoverable Zinc.

The purposes of the public meeting are to:

- 1) Inform the public of the need for improvements to the City's wastewater system.
- 2) To comply with Section 391-3-6-.02 of Georgia's Water Quality Control Rules (and amendments thereto).
- 3) To encourage public involvement in the development of a plan to improve the wastewater system.
- 4) The public meeting will attempt to identify public preferences for alternative methods of improving the City's wastewater facilities. These alternatives will be evaluated and included in the City's Facilities Plan and Environmental Information Document, the major planning document covering the wastewater system.

Written commentary can also be submitted within thirty (30) days of the publish date of this notice to the following address:

Georgia Environmental Protection Division
Watershed Protection Branch
Wastewater Regulatory Program
ATTN: August Lutkehus
2 Martin Luther King Jr. Drive, Suite 1152 East
Atlanta, Georgia 30334

Public participation is considered essential to the selection and development of the final plan to be adopted prior to its approval by the State of Georgia, Department of Natural Resources.



INDIRECT POTABLE REUSE

- Indirect Potable Reuse (IPR) is the augmentation of a drinking water source with reclaimed water.
- Cases in which the discharge of treated wastewater into a surface water by one entity impacts the downstream drinking water source of another entity are classified as “de facto” reuse
- An IPR Guidance Document has been developed to (1) help applicants navigate through the regulatory complexity of a potential IPR project, (2) help the appropriate programs within EPD coordinate with each other, and (3) streamline the regulatory process
- Public meeting must be held in coordination with EPD and EPD must be present at the meeting



REQUIREMENTS FOR BOTH CE & NONSI

Maps

Interagency Review

Public Notice after EPD
Determination



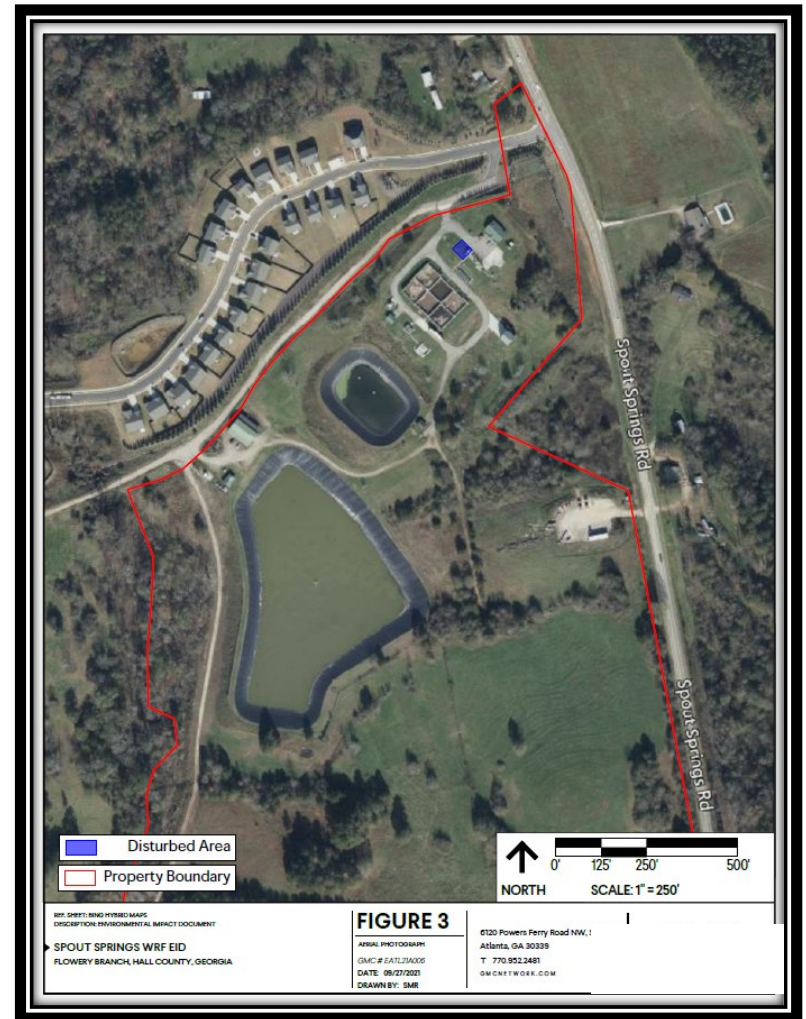
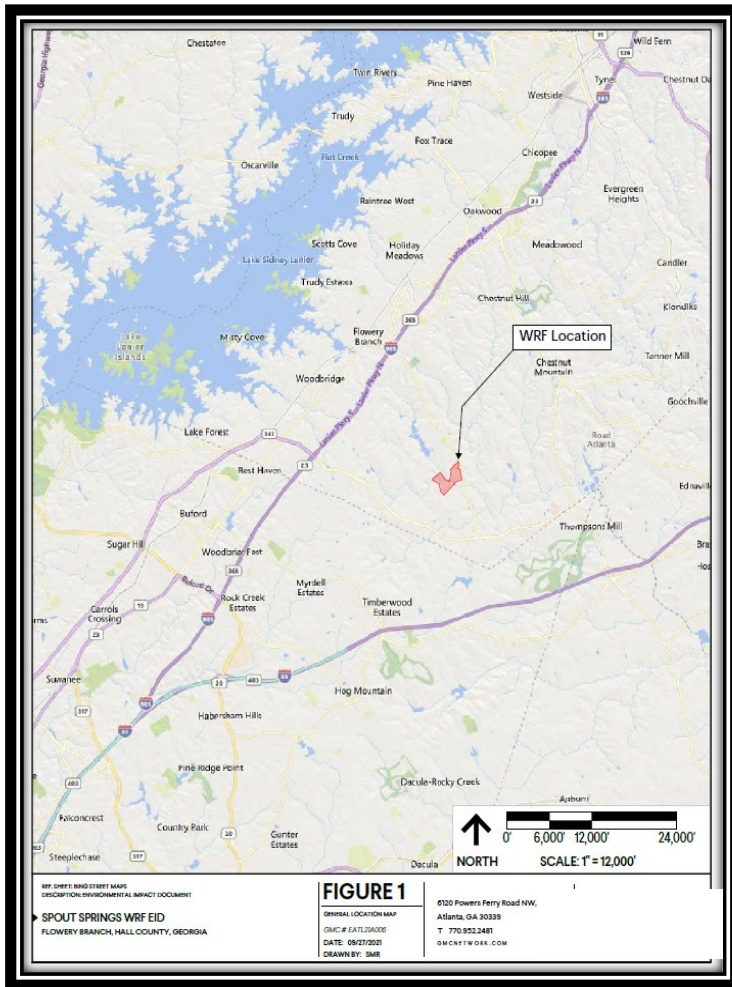
CE AND NONSI REQUIRED MAPS

- The maps should show an overview of the project area and surrounding features (Google Earth is an appropriate tool to capture this).
 - Road names
 - Latitude/longitude
 - Date of image

- More detailed maps for individual improvements (i.e. location of new pump station and proposed secondary clarifiers).



REQUIRED MAPS





INTERAGENCY REVIEW

The Environmental Review Planning Document must be sent for review to the following state agencies:

- U.S. Army Corps of Engineers
- U.S. Fish and Wildlife Services
- Wildlife Resources Division (Headquarters Office)
- Wildlife Resources Division (Nongame & Endangered Wildlife Program) ⁽¹⁾
- Georgia Department of Transportation ⁽²⁾
- Historic Preservation Division
- Regional Commission

⁽¹⁾ Only sent Planning Documents for NONSI's

⁽²⁾ Only for sewer-related projects



INTERAGENCY REVIEW

- A 30-day review period is required for these agencies. It is recommended to send the document during the same 30-day public meeting advertisement period to expedite the overall process
- Any comments or recommendations provided by these agencies must be incorporated into the environmental review planning document



INTERAGENCY CONTACTS

Wildlife Resources Division

Headquarters Office

2065 U.S. Hwy 278 SE

Social Circle, GA 30025

Georgia Department of Community Affairs

Historic Preservation Division

60 Executive Park South NE

Attn: Environmental Review

Atlanta, GA 30329



INTERAGENCY CONTACTS

U.S. Army Corps of Engineers

Regulatory Division

100 W. Oglethorpe Avenue

Savannah, GA 31401

U.S. Fish and Wildlife Service*

North Georgia Office

Georgia Ecological Services

355 East Hancock Avenue, Room 320

Athens, GA 30601

*Email: gaes_assistance@fws.gov



INTERAGENCY CONTACTS

Wildlife Resource Division

Nongame & Endangered Wildlife Program

116 Rum Creek Drive

Forsyth, GA 31029

Georgia Department of Transportation

Environmental Services

600 West Peachtree Street NW, 16th Floor

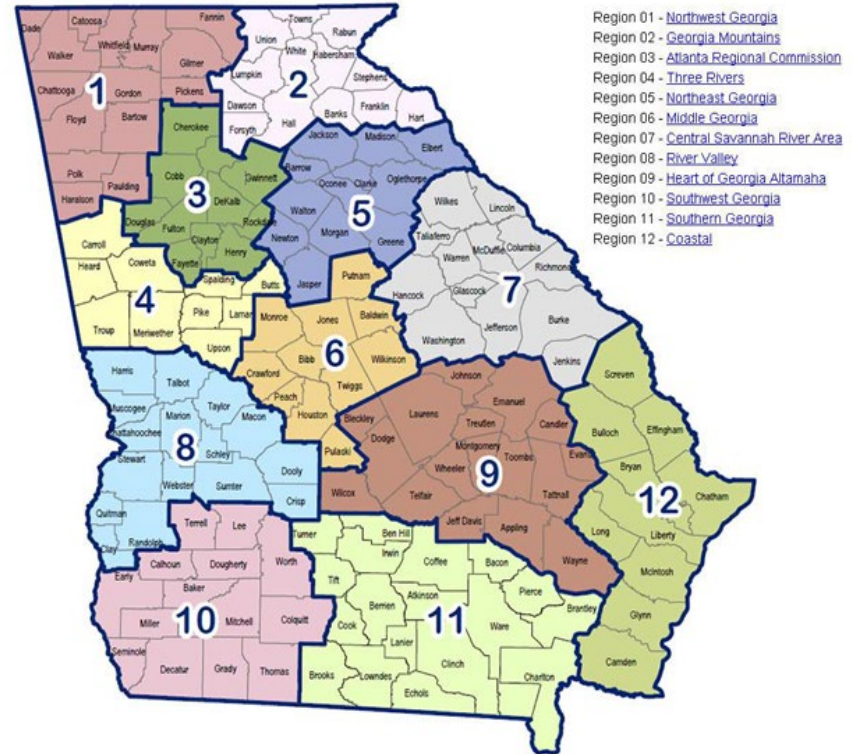
Atlanta, GA 30308

Regional Commission

Use the following link to find applicable RC:

<https://gcdd.org/images/RCMap.pdf>

Regional Commissions (RC's) Map and Contact Information





PUBLIC NOTICE IS REQUIRED FOR CE AND NONSI AFTER EPD ISSUES THE DETERMINATION

- The applicant will be required to post the CE or NONSI in a public location or on the City's website for 30 days
- EPD will also post a public notice for 30 days on our website and send the notice to interested stakeholders using the GovDelivery portal

Watershed Protection Branch Public Announcements

Suggested Guidelines for Public Participation

- [Coal Ash Information](#)
- [Public Advisories: Requests for State Waters Buffer Variance](#)
- [PDF Public Notice: Pending Applications for Non-Farm Groundwater Withdrawal Permits through 07/05/2022](#) - July 6, 2022
- [PDF Public Notice: Pending Applications for Non-Farm Surface Water Withdrawal Permits through 07/05/2022](#) - July 6, 2022
- [PDF Public Notice: Notice of No Significant Impact, Paulding County Water System S.R. 92 Hiram Sewer Extension GEFA Loan No. CW-2021-022, City of Hiram, Paulding County](#) - June 30, 2022
- [PDF Public Notice: Notice of No Significant Impact, West Dallas Connector Sewer Extension - Phase I GEFA Loan No. CW-2021-008, City of Dallas, Paulding County](#) - June 30, 2022

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STATE ENVIRONMENTAL REVIEW PROCESS (SERP)





STATE ENVIRONMENTAL REVIEW PROCESS (SERP)

Differences from Environmental Information Document (EID) that are required for NONSI

- Alternatives analysis
- Present worth analysis of all alternatives
- Reason for selection of proposed alternative



STATE ENVIRONMENTAL REVIEW PROCESS (SERP)

Differences from Environmental Information Document (EID) that are required for NONSI:

- Population projections
- Environmental Justice (EJ) analysis
- Certification of compliance with MNGWPD Plans (if applicable)
- Certification of compliance with Service Delivery Strategy



STATE ENVIRONMENTAL REVIEW PROCESS (SERP)

Recommendations:

- Do not limit evaluation to plant site and construction activities. If project is to accommodate population and economic growth in the service area, discuss possible indirect/long term impacts of the project on stormwater, drinking water supply, energy needs, etc.
- Contact state agencies prior to sending the project description or planning document to EPD to expedite the review process.



STATE ENVIRONMENTAL REVIEW PROCESS (SERP)

Recommendations:

- Protected species/Critical habitat: If they may be present in project area/County, do not just simply provide a list. Explain why project will or will not affect them.
- Archeological/Historical Resources: Correspondence with HPD should be provided with the Planning Document submittal and any recommendations from HPD must be discussed in the document.



STATE ENVIRONMENTAL REVIEW PROCESS (SERP)

Recommendations:

- Beaches, Dunes, Shorelines and Coastal Areas:
 - If the project is located within the 11-county coastal zone, submit a copy of the Planning Document to the Coastal Resources Division (CRD) for review
 - Indicate distance from the project area to the Atlantic Ocean



STATE ENVIRONMENTAL REVIEW PROCESS (SERP)

Recommendations

- Environmental impacts must be classified as direct or indirect, primary or secondary, and cumulative or not
 - Direct: Caused by the action and occur at the same time and place
 - Indirect: Caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable
 - Primary: Main impact of the action
 - Secondary: Occur from the action but are less in importance and/or magnitude than the primary impact
 - Cumulative: Effect on the environment that results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions



STATE ENVIRONMENTAL REVIEW PROCESS (SERP)

Recommendations:

- Wetlands: Provide a map from the USGS National Wetlands Inventory website
 - Website: <https://www.fws.gov/program/national-wetlands-inventory/wetlands-mapper>

- Floodplains: Provide a FEMA/FIRM map indicating 100-year flood elevation
 - Website: <https://www.fema.gov/flood-maps>

- Groundwater Recharge Area: Provide maps from Hydrologic Atlas 18 and 20



CONTACT INFORMATION

Audra Dickson, Program Manager

Wastewater Regulatory Program

(470) 524-0726

Audra.Dickson@dnr.ga.gov

Benoit Causse, Unit Manager

Municipal Permitting Unit

(470) 938-3353

Benoit.Causse@dnr.ga.gov

August Lutkehus, SERP Coordinator

Municipal Permitting Unit

(470) 524-0733

August.Lutkehus@dnr.ga.gov



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DEPARTMENT OF NATURAL RESOURCES

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gaepd.wrp@dnr.ga.gov