



GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Workshop on Revisions to Antidegradation Implementation Guidance

June 11, 2018



Outline

- **Workshops**
 - Quick Re-cap of May 25th Meeting
 - Interim Comments
- **Review changes to the 2nd draft of the document**
- **Provide opportunity for public to give feedback and comments**



Schedule and Timeline:

Workshops:

1. Friday, May 25, 2018 from 10:00 am to 12:00 pm
 - Interim comments by June 1st
 - Try to post updated document online before next workshop
2. Monday, June 11, 2018 from 10:00 am to 12:00 pm

Comments: Due ~~June 15, 2018~~ **July 23, 2018**

Web Link: <https://epd.georgia.gov/georgia-water-quality-standards>



Purpose

Provide an opportunity for public involvement during the development and revisions of EPD's Antidegradation Implementation Guidelines document.





New Items as a Result of Triennial Review

- Use either a parameter-by-parameter or waterbody-by-waterbody approach
- Practicable alternative must be selected



Notes from the May 25th Workshop

Wasteload Allocation

- Part of Practicable Alternative Analysis
- Used to develop water quality limits – stringency

Nonpoint Source

- Covers only NPDES stormwater discharge
- Not required to do economic/social development



Notes from the May 25th Workshop

Reasonable Alternative

- Clarify that these result in no discharge
- Regional Plan requirements

LAS

- Define what is (and is not) required
- Not a discharge to surface water



Notes from the May 25th Workshop

Practicable Alternative

- Include the definition from the rule
 - Technologically feasible
 - Economically viable



Changes in the 2nd Draft

1.0 OVERVIEW – no major changes

2.0 APPLICABILITY – clarified by dividing into 4 sections

- 2.1 Does Not Discharge to a Surface Water
- 2.2 No Increase in Loading
- 2.3 Prohibited Discharges
- 2.4 Exceptions that Require an Antidegradation Analysis

3.0 ANTIDEGRADATION ANALYSIS



Changes in the 2nd Draft

4.0 REASONABLE ALTERNATIVE ANALYSIS – boiled down to a list of what doesn't discharge to surface waters and what will decrease loading

- 4.1 Discharges to Other Treatment Systems
- 4.2 Use of Land Disposal Treatment Systems
- 4.3 100% Year-round Urban Water Reuse
- 4.4 100% Recycle Systems
- 4.5 No Load Increase

5.0 IMPORTANT SOCIAL OR ECONOMIC DEVELOPMENT EVALUATION – no major changes

- 5.1 Domestic Wastewater
- 5.2 Industrial Wastewater



Changes in the 2nd Draft

6.0 PRACTICABLE ALTERNATIVE ANALYSIS – reorganized to define role of WLA, combined Domestic & Industrial technologies by subject

- 6.1 Technologically Possible
 - 6.1.1 Wastewater Treatment System Design and Selected Technology – clarified purpose of WLA
 - 6.1.2 Flow Minimization
 - 6.1.3 Return Flow Considerations
 - 6.1.4 Pollutant Reduction
 - 6.1.5 Best Management Practices
- 6.2 Economic Viability for Domestic Dischargers



Changes in the 2nd Draft

7.0 NONPOINT SOURCE – divided into regulatory and nonregulatory sections

- 7.1 Regulatory
- 7.2 Nonregulatory

8.0 PUBLIC PARTICIPATION – no major changes

Definition References – new



Interim Comments

- Extend the comment deadline.
- EPD should update the antidegradation forms for industrial and municipal applicants and make that process a public process too.
- Why do we have to do more than one analysis of alternatives?
- Define reasonable alternative and practicable alternative better & clarify responsibility
- Clarify that a TMDL can serve as an antideg analysis.



Interim Comments

- PIDs should not be able to reuse treated wastewater because return flows are important.
- Concern the WLA will be the only practicable alternative permittees will use.
- Why only 3 discharge locations?
- Clarify what is needed for return flow.
- Clarify the terminology and structure for consistency.
- Clarify Non Point Requirements.



Interim Comments - Late

- Provide criteria around when EPD would use a parameter-by-parameter or a waterbody-by-waterbody approach.
- Add language clarifying that the antideg process isn't automatically triggered when an NPDES permit application indicates an increase in constituent concentration.
- Modify the term "Reasonable Alternatives" to "Reasonable Non-Discharging Alternatives."
- Add language to address compliance with other requirements (e.g. groundwater remediation discharges)



Questions or Comments?

