



**GEORGIA**  
DEPARTMENT OF NATURAL RESOURCES

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

**FEB 17 2017**

Persons who commented on  
Draft NPDES Permit No. GAJ020161

RE: EPD Response to Comments  
City of Pelham Land Application System  
NPDES Permit No. GAJ020161

Dear Sir/Madam:

Thank you for your comments regarding the permit reissuance for the City of Pelham's Land Application System. Attached is a summary of comments from the public and EPD's responses to the issues raised. In addition, we have attached the Permit Addendum documenting the changes made to the attached permit from the draft permit. 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 Kelli-Ann Sottile of my staff at 404-463-4945.

Sincerely,

Jeffrey Larson, Manager  
Wastewater Regulatory Program  
Watershed Protection Branch

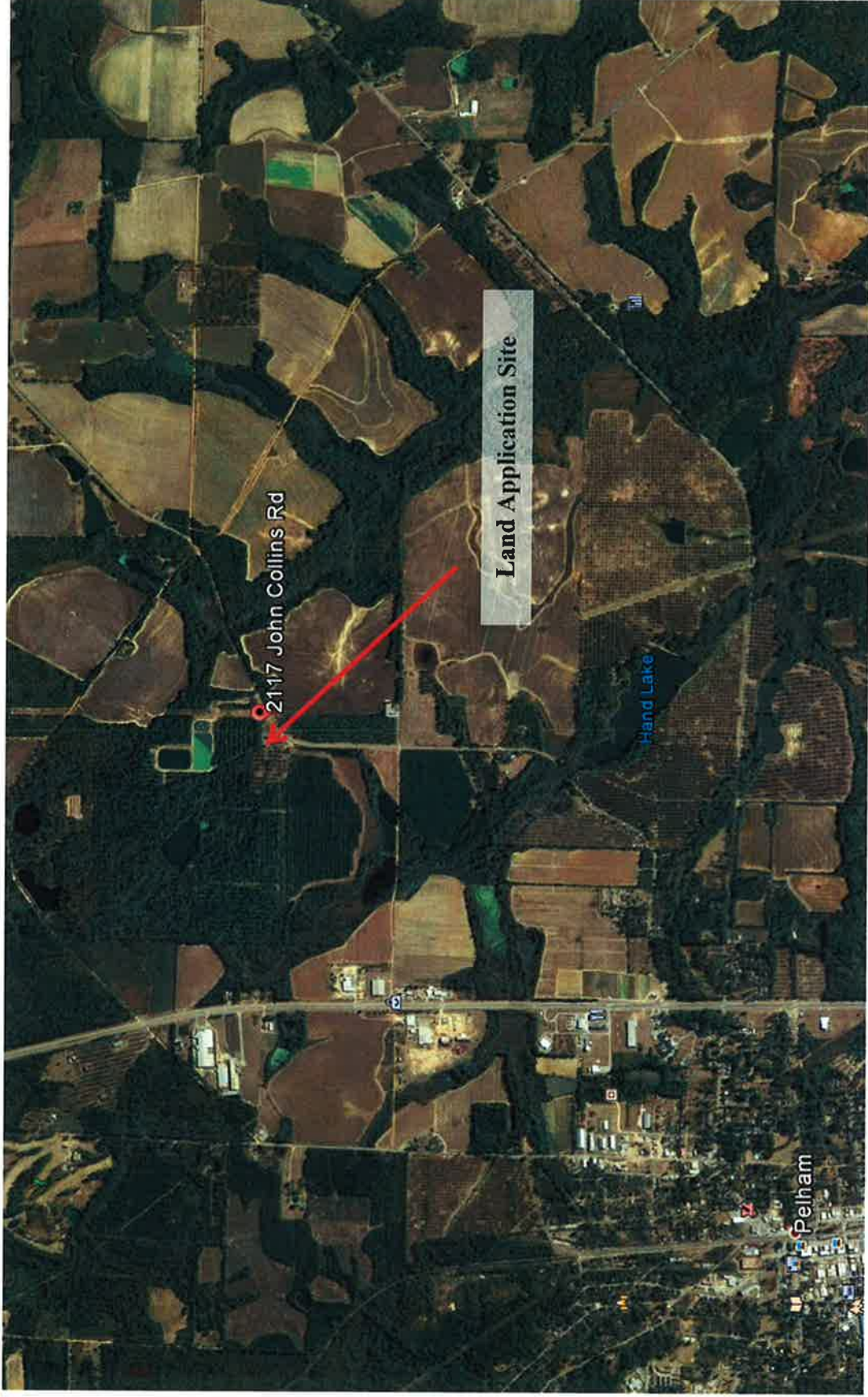
JL/kas  
Attachment

**ATTACHMENT – Response to Comments**  
 City of Pelham Land Application System  
 LAS Permit No. GAJ020161  
 (Mitchell County)

Comment	EPD Response
<p>The City is willing to follow the abandonment plan to avoid monitoring the wells associated with field 6. It would be expensive to monitor them quarterly for the next five years when we know that they are not going to meet compliance limits for nitrates anyway. We had just planned to check the nitrates maybe once a year and hope that it clears up in the future so that we can request a modification to put the field back on line if the nitrates clear up.</p>	<p>Review of data from the groundwater monitoring wells D-13 through D-19 in Field 6 shows that nitrate levels exceed maximum contaminant levels for drinking water. EPD is concerned that monitoring the wells less frequently will not provide adequate data for EPD review. Therefore, quarterly nitrate monitoring at Field 6 has been maintained in the permit.</p> <p>Since land application Field 6 is no longer in use, for the sake of monitoring consistency, EPD has decreased the monitoring frequency for wells D-13 through D-19 from one day/month to one day/quarter for the following parameters: Depth to Groundwater, pH, and Specific Conductivity.</p> <p>Please note that in accordance to Part I.A.2.c. of the final permit, we may require more frequent monitoring of groundwater wells and/or require the addition of new groundwater monitoring wells under Part I.B.3.c. of the final permit.</p>
<p>The permit should impose phosphorous, and possibly nitrogen, discharge limitations in order to meet the future TMDL requirements for Ochlockonee feeder streams.</p>	<p>The City of Pelham land applies treated wastewater onto a land application site located in Mitchell County, rather than discharging treated wastewater directly into a water of the State. Land Application Systems (LAS) are designed and permitted to be operated as a no discharge system, which means that the land treatment system is operated and maintained to ensure that there are no point source discharges of pollutants directly to surface waters of the State (reference Part II.A.11. of the permit).</p> <p>A Total Maximum Daily Load (TMDL) is the maximum amount of a pollutant that a water body can receive and still meet water quality standards.</p>

	<p>The draft Lake Talquin TMDL, Chapter 6, part 6.2.1, "State of Georgia," contains load reductions for nutrients at the Georgia-Florida state line which are based on specific watershed percent reductions for total nitrogen (TN) and total phosphorus (TP) for the Ochlocknee River and the Little River. Once this TMDL is finalized, EPD will implement the requirements of the TMDL.</p> <p>Although the City of Pelham is located just inside what is identified in the draft TMDL as the Lake Talquin Watershed, the land application site is a distance of about fifty (50) miles from Lake Talquin (<i>Refer to attached maps</i>). Additionally, as stated above, the City of Pelham's LAS is a no discharge system (i.e. does not discharge directly to surface waters) and, therefore, is not considered to be a point source in the development of the TMDL.</p> <p>Land Application Systems such as Pelham's are required to monitor surface water, groundwater and their storage ponds for nitrate-nitrogen. The draft permit includes monitoring for nitrate-nitrogen and total kjeldahl nitrogen at the storage pond. In response to comments received, total phosphorus and total nitrogen monitoring at the storage pond have also been included in the final permit.</p>
<p>If effluent limitations for the TMDL are not included, the permit should include a provision to allow the permit to be reopened upon the completion of the TMDL. This will allow for reductions in the discharge to be added that are consistent with the TMDL.</p>	<p>Part II.B.5. of the permit contains a reopener clause.</p>

**City of Pelham  
Land Application Site Location Map**



**City of Pelham  
Land Application Site Location Map**

