

Georgia Department of Natural Resources

Environmental Protection Division

Environmental Protection Division • Watershed Protection Branch
2 Martin Luther King Jr. Drive • Suite 1152 East • Atlanta • Georgia 30334
(404) 463-1511; Fax (404) 651-8455
Judson H. Turner, Director

APR 20 2016

Persons who commented on
Draft NPDES Permit No. GA0001431

RE: Comments Received for
Georgia Power Plant McDonough –
Atkinson
NPDES Permit No. GA0001431
Smyrna, Cobb County

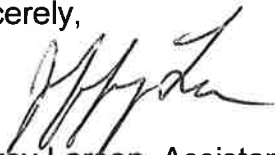
Dear Sir/Madam:

Thank you for your comments regarding the permit issuance for the Georgia Power Plant McDonough-Atkinson. Attached is a summary of comments from the public and our responses to the issues raised. In addition, we have attached a Permit Addendum and Permit Rationale Addendum documenting changes made to the attached 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 Charles Nezianya of my staff at 404-232-1567 or charles.nezianya@dnr.ga.gov.

Sincerely,



Jeffrey Larson, Assistant Branch Chief
Watershed Protection Branch

JL/cn
Attachment: Response to Comments

**Public Comments and EPD Responses on Draft NPDES Permit
Georgia Power Plant McDonough-Atkinson Permit No. GA0001431**

COMMENTS RECEIVED	EPD RESPONSE
<p>Removal of permit conditions from the previous permit, also referred to as “backsliding,” is impermissible. The previous permit included limitations on temperature and total residual chlorine (TRC) that appear to be absent from this draft.</p>	<p>The previous permit contained limitations for a once-through cooling water discharge in Section A.1 of the permit. The facility has since installed a closed-cycle cooling system which will minimize thermal impacts to the receiving stream, and has eliminated the discharge of once-through cooling water, on which the temperature limitations and mixing zone were previously applied. Hence, the antbacksliding rule is not applicable since the circumstances upon which the previous permit was based have materially and substantially changed since the time the permit was issued in accordance with 40 CFR 122.44(l)(1). TRC limitations are applied to the cooling tower blowdown wastestreams, as specified in 40 CFR 423. Additionally, the permittee shall develop a CORMIX model to establish a revised designated mixing zone for temperature to ensure the in-stream water quality standards for temperature are met at all times.</p>
<p>The Chattahoochee has been designated as impaired for certain parameters including temperature.</p>	<p>A 9.5 miles (Peachtree Creek to Utoy Creek) stretch of the Chattahoochee River was impaired for temperature and listed on the 2002 303(d) list. A temperature total maximum daily load (TMDL) was developed in 2003 and was delisted for temperature in 2010.</p>
<p>EPD should require an antidegradation analysis for the discharge.</p>	<p>An antidegradation analysis is required when a new or expanded point source is proposed for discharge to state waters that will degrade or lower water quality. The discharges authorized by this draft permit are neither new nor expanded.</p>

**Public Comments and EPD Responses on Draft NPDES Permit
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COMMENTS RECEIVED	EPD RESPONSE
<p>EPD's reasonable potential analysis is inadequate</p>	<p>EPD utilizes the EPA-supported Form 2-C application for the reissuance of an existing NPDES permit. This form requires that at least 1 analytical result be provided for those pollutants suspected present in a given discharge. EPD's reasonable potential analysis (RPA) of the permit application did not indicate the presence of contaminants at levels of concern as defined in Georgia's Rules and Regulations for Water Quality Control (Rules), 391-3-6-.06(4).</p>
<p>This is an environmental justice issue because over 50% of the people living within 3 miles of the McDonough plant are African-American.</p>	<p>The permit was drafted in accordance with the State of Georgia Rules and Regulations for Water Quality Control, EPA regulation for Steam Electric Power Generating Point Source Category and the Clean Water Act (CWA). As part of the permit renewal process, EPD conducted public notice and hearing as an outreach to inform the community about the permit renewal.</p>
<p>EPD must strengthen provisions related to coal ash in order to protect human health and the environment.</p>	<p>In addition to EPD's water quality RPA conducted to ensure that the Water Quality Standards (WQS) are met, the coal ash pond discharge is a legacy wastewater which is regulated under the low volume waste discharge in accordance with EPA's Steam Electric regulation definition in 40 CFR 423.11(b). The effluent limits for coal ash pond discharges from outfalls 03, 04 and 09 on page 5 of 22 of the draft permit are based on the new best practicable control technology currently available (BPT) limits in the recently published EPA Rule for Steam Electric Power Generating Industry published in the Federal Register on November 3, 2015 and effective on January 4, 2016. The new EPA Rule (40 CFR 423) can be obtained at the following EPA web address: http://www.epa.gov/eg/steam-electric-power-generating-effluent-guidelines</p>

**Public Comments and EPD Responses on Draft NPDES Permit
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COMMENTS RECEIVED	EPD RESPONSE
<p>The ash pond impoundment integrity requirements must be strengthened to include safe guide for failure.</p>	<p>The requirements for ongoing assessment, operations, and maintenance of coal ash pond impoundments as specified in the NPDES permit have been developed based upon guidance from EPA Region 4 as well as guidance from regulatory authorities in other States. In addition to the Safe Dams Act Regulations, the EPA Administrator signed a final rule establishing a comprehensive set of requirements for the disposal of Coal Combustion Residuals (CCRs) or coal ash in landfills and ash ponds on December 19, 2014, under the Resource Conservation and Recovery Act (RCRA). The new EPA rule (40 CFR Parts 257 and 261), fact sheet and summary of the rule can be obtained at the following EPA web address: http://www2.epa.gov/coalash/coal-ash-rule.</p>
<p>EPD must provide limits that ensure water quality at the first surface water, it appears from a topography map that an ash pond discharges to surface water.</p>	<p>EPD has drafted the NPDES permit based on the submitted application and supporting documentation. The ash ponds have three outfalls (03, 04 and 09) locations based on the information submitted in the application and supporting documentation. The effluent limits for these legacy wastewaters are based on best practicable control technology currently available (BPT) for low volume waste discharges under the new EPA Steam Electric Rule in 40 CFR 423.12(b)(3).</p>
<p>Other states have included groundwater monitoring in their NPDES permits for coal-fired power plants.</p>	<p>As previously stated, the new RCRA Rule has established a comprehensive set of requirements for the disposal of CCRs and groundwater sampling and analysis requirements are detailed in 40 CFR 257.93. Please be advised, that Plant McDonough-Atkinson has since converted to natural gas and is no longer a coal-fired power plant.</p>

**Public Comments and EPD Responses on Draft NPDES Permit
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COMMENTS RECEIVED	EPD RESPONSE
<p>The coal ash waste should be stored in lined pits to limit toxic discharge. The permit should include a timeline for closure of the ash ponds. Dry storage should be the preferred method.</p>	<p>As stated in the NPDES permit rationale, Georgia Power is required to comply with Subtitle D of the new RCRA Rule 40 CFR Parts 257 and 261 regarding the closure of the ash ponds.</p>
<p>Groundwater and stormwater should be routed away from the ash ponds.</p>	<p>Georgia Power's existing stormwater/groundwater management system includes a discharge to ash pond no. 4. The large volume of the pond provides significant storage and equalization.</p>
<p>Technology-based effluent limits (TBELS) should be applied to the ash pond discharge. A Best Professional Judgment (BPJ) analysis should be conducted to develop TBELS for all toxic pollutants likely to be present in such discharges.</p>	<p>The effluent limits for coal ash pond discharges from outfalls 03, 04 and 09 (legacy wastewaters) on page 5 of 22 of the permit are based on Technology-based Effluent Limits (TBEL) in 40 CFR 423.23.12(b)(3). This is based on the best practicable control technology currently available (BPT) effluent limitations for low volume waste discharge. The regulation can be found at the following EPA website address: http://www.epa.gov/eg/steam-electric-power-generating-effluent-guidelines</p>

**Public Comments and EPD Responses on Draft NPDES Permit
Georgia Power Plant McDonough-Atkinson Permit No. GA0001431**

COMMENTS RECEIVED	EPD RESPONSE
<p>The draft permit does not clearly prohibit unauthorized discharges, i.e. seepage from ash ponds.</p>	<p>The draft permit only allows discharge(s) from the specific outfalls referenced in the permit application and identified in the permit. Chapter 391-3-6-.06(3)(a), (b) and (c) of the Rules, Waste Treatment and Permit Requirements, states that any person discharging or proposing to discharge into the waters of the State any pollutant from a point source or non-point source under any of the circumstances described in the Official Code of Georgia Annotated (O.C.G.A.) Section 12-5-30(a-b), shall obtain a permit from the EPD to make such discharge. Failure to obtain the appropriate permit would be a violation of the Rules and O.C.G.A.</p>
<p>The permit lacks any River-mile designation and the coversheet should be revised to reflect the river mile(s) of the various outfalls.</p>	<p>The permit and permit coversheet identifies the receiving stream for each final outfall. The latitude and longitude coordinates for each final outfall discharge is specified in the submitted EPA NPDES permit application Form 2C page 1 of 4.</p>
<p>There is no explanation describing chemical cleaning waste, analysis as to the constituents within the chemical waste or flow estimation.</p>	<p>Chemical metal cleaning waste is defined in 40 CFR 423.11(c) as any wastewater resulting from cleaning of any metal process equipment with chemical compounds, including, but not limited to, boiler tube cleaning. The chemical cleaning discharge is covered in the permit as an internal outfall number 03H on page 6 of 22 of the permit. The effluent limits in the permit for chemical metal cleaning discharge are based on the best available technology economically achievable (BAT) under 40 CFR 423.13(e). This regulation can be found at this website: http://www.ecfr.gov/cgi-bin/text-idx?SID=cca2e920ba34f7bc93f028f1caa200bd&mc=true&node=pt40.29.423&rgn=div5</p>

**Public Comments and EPD Responses on Draft NPDES Permit
Georgia Power Plant McDonough-Atkinson Permit No. GA0001431**

COMMENTS RECEIVED	EPD RESPONSE
<p>EPD must require the continuous operation of closed-cycle cooling in order to comply with 316(b).</p>	<p>The submitted permit application and supporting documents states that the permittee operates the closed-cycle cooling system as part of its process to generate power and thus will be continuously operated. If the permittee makes any changes from the information of which the permit is based on, the permittee must notify EPD in accordance with the permit requirements.</p>
<p>Ground/stormwater collection basin flow from the collection basin into the ash pond, EPD should require monitoring on flow from the collection basin into the ash pond.</p>	<p>Based on the submitted application and line diagram the ground/stormwater collection basin is listed as internal outfall 03G with a maximum flow rate of 290 gpm directly discharges into ash pond 4. Ash pond 4 wastewater, which discharges into the Chattahoochee River, is regulated in the permit under outfall 03 (legacy wastewater) on page 5 of 22 of the permit and the BPT effluent limits are based on 40 CFR 423.12(b)(3) for low volume wastewater.</p>
<p>Due to the significant changes to the facility, EPD should consider this permit as covering a new facility and must conduct all the requirements for a new facility.</p>	<p>The permittee's discharges do not meet the definition of new sources and new discharges in accordance with 40 CFR 122.29(b) and 40 CFR 122.2, which states that a new source has to be constructed at a site at which no other source is located; or it totally replaces the process or production equipment that causes the discharge of pollutants at an existing source; or it processes are substantially independent of an existing source at the same site.</p>
<p>EPD should require daily monitoring for temperature.</p>	<p>The permittee is required to conduct a temperature study as outlined in Part III.B.9 of the permit. As part of the study, the permittee shall collect daily effluent and instream temperature measurements and submit them to EPD.</p>

**Public Comments and EPD Responses on Draft NPDES Permit
Georgia Power Plant McDonough-Atkinson Permit No. GA0001431**

COMMENTS RECEIVED	EPD RESPONSE
EPD should require that Plant Scherer reduce its greenhouse gases output.	The NPDES permit renewal is for Plant McDonough-Atkinson and not for Plant Scherer.
Commend EPD for increasing monitoring frequencies	Comment noted
Commend EPD for including Coal Combustion Residual (CCR) language	Comment noted

Permit Rationale Addendum
Georgia Power Plant McDonough- Atkinson
NPDES Permit No. GA0001431
Cobb County

**Application For Reissuance Of A National Pollutant Discharge Elimination System
(NPDES) Permit To Discharge Treated Wastewater Into Waters Of The State Of
Georgia**

Were there any revisions between the draft proposed NPDES Permit and the final proposed NPDES permit? Yes No

If yes, specify:

Page 2 of 4 Added language to specify that the permit was prepared in accordance with the new EPA Steam Electric Rule.

Page 2 of 4 Added language about the EPA regulation on Coal Combustion Residuals (CCRs) / ash pond disposal.

The permittee has been made aware of these changes.

Summary of NPDES Permit Rationale

Name: Georgia Power Plant McDonough-Atkinson

Permit No: GA0001431

Location: Smyrna, Cobb County

Discharge: Minor

Date: 5.Jan.15 Revised 1/26/16

Prepared By: Josh Welte

Draft permit is:

- first issuance
- reissuance with no or minor modifications from previous permit
- reissuance with modifications from previous permit
- modification of existing permit

Discharge is:

- industrial
- municipal
- privately-owned (municipal wastewater only)

Brief Description of Process and Facility Wastewater: The facility is capable of generating 2520 MW of power and is subject to regulation in accordance with 40 CFR Part 423 – Steam Electric Power Generating Point Source Category. The facility has completed substantial modifications since the last permit issuance in 2004. These changes include:

- The old coal-fired units have been decommissioned and replaced with natural gas combined-cycle units. Generation of coal ash has ceased.
- Cooling towers have been installed to eliminate once-through cooling water usage.
- Coal pile and runoff pond have been removed.
- Waste streams containing chemical metal cleaning wastes are now typically hauled off-site for proper treatment and disposal. Non-chemical metal cleaning wastes are handled within the low volume waste stream.

These changes have resulted in an overall reduction in process water usage and pollutant discharge to the river.

Basis for derivation of limitation:

- Stream water-quality limited
 - Based on water quality model
 - Based on 7-day, 10-year low flow
- Effluent limited
 - Based on promulgated guidelines
 - Based on plant's demonstrated performance
 - Based on demonstrated technology

Receiving Stream: The receiving stream is the Chattahoochee River and is listed as "Not Supporting" its designated use. The criteria violated are fecal coliform and fish consumption guidelines (PCB). TMDLs were developed in 2003 and Plant McDonough was not identified as causing or contributing to the impairment. The 7Q10 flow in the river is 750 cfs, resulting in an IWC of less than 1% at plant average flow conditions. The low concentrations of priority pollutants in plant discharge(s) do not have

Summary of NPDES Permit Rationale

reasonable potential to cause violations of water quality standards in the receiving stream based on the reasonable potential analysis (RPA).

Discussion: Permit limits for this facility are consistent with the effluent limitation guidance (ELG) in 40 CFR Part 423. The permittee has met the best technology available (BTA) requirements of the Clean Water Act under Section 316(b) through the installation of closed cycle cooling.

The draft permit has been prepared in accordance with the new EPA's Final Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Industry published in the Federal Register on November 3, 2015 and effective on January 4, 2016. The ash pond outfalls 03, 04, and 09 discharges are legacy wastewaters based on EPA's new Steam Electric Rule Preamble and the effluent limits in the permit are based on the best practicable control technology currently available (BPT) under this new Rule in 40 CFR 423.12(b)(3) for low volume discharges.

Summary of discharges to waters of the State:

- Outfall 01 – Final plant discharge of ~1226 gpm average flow. ELGs for pH limits have been applied. Flow monitoring has also been required.
- Outfall 02A Alternate – Low volume waste streams are typically recycled into the cooling tower makeup water. This discharge is an alternative to that recycle and will only be utilized during outages of Generating Unit #4, estimated at 14 days/year maximum. ELGs for Total Suspended Solids (TSS), Oil and Grease (O&G), and pH have been applied.
- Outfall 03 – Ash pond discharge of ~3500 gpm maximum intermittent flow based on rainfall and existing wastewater within the pond. ELGs for TSS, O&G, and pH have been applied. The reasonable potential analysis did not indicate cause for additional monitoring or any additional effluent limits.
- Outfalls 04 and 09 – Ash pond emergency overflows, utilized only during extreme rainfall events. These have not been utilized since 2007. ELGs for TSS, O&G, and pH have been applied.

Summary of internal waste streams:

- Outfalls 01A, 01B, and 01C – Cooling tower blowdown of ~1220 gpm average flow. ELGs have been applied for chlorination, as well as Part III.B., Special Requirements for additional chlorine controls and compliance certification in lieu of monitoring for total chromium and total zinc.
- Outfalls 02A, 02B, and 02C – Low volume recycle streams providing makeup flow ~86 gpm to cooling towers. No monitoring is required.
- Outfall 03H – Chemical metal cleaning waste alternate discharge, which was utilized once in 2013. ELG's for TSS, O&G, copper, and iron have been applied. This waste stream is typically hauled off-site via tanker truck for proper treatment and disposal.

Summary of ash ponds:

- On December 19, 2014, the EPA Administrator signed the final rule establishing a comprehensive set of requirements for the disposal of Coal Combustion Residuals (CCRs) or coal ash in landfills and ash ponds. The requirements have been finalized under the solid waste provisions, subtitle D, of the Resource Conservation and Recovery Act. Plant McDonough-Atkinson ash pond fits into this new regulation and the company will have to comply with the regulation. The new EPA rule (40 CFR Parts 257 and 261), fact sheet and summary of the rule can be obtained at the following EPA web address: <http://www2.epa.gov/coalash/coal-ash-rule>.

Summary of NPDES Permit Rationale

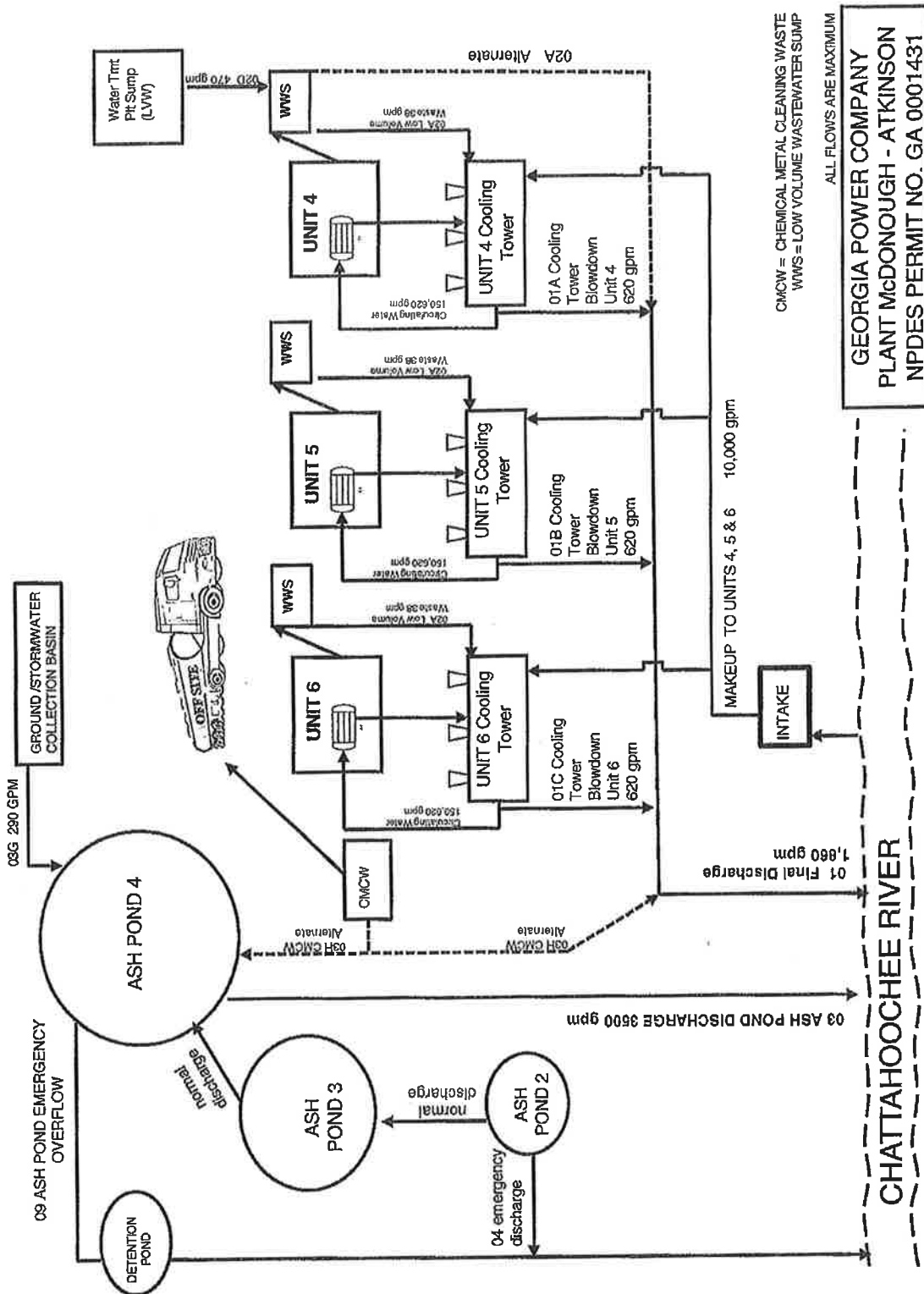
- Part III.D of the permit contains the coal ash or coal combustion residuals (CCRs) impoundment integrity inspection requirements.
- Since the decommissioning of the coal-fired units, coal ash is no longer generated and added to the ponds. Ongoing wastewater discharge from the ponds is regulated as described above, while the eventual pond closure will be coordinated and regulated by EPD's Solid Waste Management Program. The impoundment on ash pond No. 4 is categorized as a Category I Dam and is regulated by EPD's Safe Dams Program.
- Part III.D, Impoundment Integrity, of the permit requires additional best management practice requirements for the coal ash ponds. The section has specific requirements for operation and maintenance, inspections, corrective action, and reporting and record keeping.

See attached flow schematic for additional information regarding outfalls, ash ponds, etc.

Check Appropriate Box After Permit Issuance:

- Public Comments were received during public notice period.
- Final permit was unchanged from draft permit.
- Final permit included changes from draft permit. See attached draft permit and/or correspondence file for details.

Summary of NPDES Permit Rationale



Permit Information and Data

General Info			Notes
Facility	Plant McDonough		
Location	Smyrna, Cobb County		
Permit Number	GA0001431		
Discharge	Final Discharge - Outfall 01		discharge location
Stream	Chattahoochee River		receiving stream
Basin	Chattahoochee		major basin
Date	Apr.14		
Treatment Facility			Notes
Plant Q	2.7 MGD		plant max daily flow
Eff. TSS	30 mg/L		permit limit or design
Hardness	40.4 mg/L as CaCO3		effluent hardness from permit application
Receiving Stream			Notes
7Q10	750 cfs	484.7 MGD	from WLA
1Q10	750 cfs	484.7 MGD	from WLA
Avg. Q	2480 cfs	1602.9 MGD	from WLA
Acute Dilution Factor	180.53 ratio		for use in metals calcs
Chronic Dilution Factor	180.53 ratio		for use in metals calcs
Avg Q Dilution Factor	594.66 ratio		for use in chemical calcs
IWC	0.6% %		instream waste concentration
Hardness	10 mg/L as CaCO3		background upstream hardness from WLA
pH	7.2 units		from WLA
TRC	0.011 mg/L		instream total residual chlorine standard
SS	10 mg/L		suspended solids upstream of discharge (~10 mg/L default)
SS	10.1 mg/L		suspended solids of stream + discharge
Hardness	10.2 mg/L as CaCO3		hardness of stream + discharge

PRIORITY POLLUTANTS TRACKING CHECKLIST

Facility: Plant McDonough

Date: Apr.14

Location: Smyrna, Cobb County

Permit Number: GA0001431

Sample 1:

Sample 2:

Sample 3:

Constituent	Det. Limit (µg/L)	Sample #			Avg	Constituent	Det. Limit (µg/L)	Sample #			Avg
		1	2	3				1	2	3	
1,1,1-Trichloroethane	2	-	-	-	-	Toluene	2	-	-	-	-
1,1,2,2-Tetrachloroethane	2	-	-	-	-	Toxaphene	2	-	-	-	-
1,1,2-Trichloroethane	2	-	-	-	-	Trichloroethylene	2	-	-	-	-
1,1-Dichloroethane	2	-	-	-	-	Vinyl Chloride	10	-	-	-	-
1,1-Dichloroethylene	2	-	-	-	-	Anthracene	10	-	-	-	-
1,2, 4,-Trichlorobenzene	10	-	-	-	-	a-Endosulfan	0.5	-	-	-	-
1,2-Dichlorobenzene	10	-	-	-	-	b-Endosulfan	0.5	-	-	-	-
1,2-Dichloroethane	2	-	-	-	-	Benzene	2	-	-	-	-
1,2-Dichloropropane	2	-	-	-	-	Benzydene	80	-	-	-	-
1,2-Diphenylhydrazine	10	-	-	-	-	Benzo Floranthene	10	-	-	-	-
1,2-Trans-Dichloroethylene	2	-	-	-	-	Benzo Perylene	10	-	-	-	-
1,3-Dichlorobenzene	10	-	-	-	-	Benzo(a) Anthracene	10	-	-	-	-
1,3-Dichloropylene (Cis)	2	-	-	-	-	Benzo(a) Pyrene	10	-	-	-	-
1,3-Dichloropylene (Trans)	2	-	-	-	-	Bis(2-chloroethoxy) Methane	10	-	-	-	-
1,4-Dichlorobenzene	10	-	-	-	-	Bis(2-chloroethyl) Ether	10	-	-	-	-
2,4,5-Trichlorophenoxy	10	-	-	-	-	Bis(2-chloroisopropyl) Ether	10	-	-	-	-
2,4,6-Trichlorophenol	10	-	-	-	-	Bis(2-ethylhexyl) Phthalate	10	-	-	-	-
2,4-Dichlorophenol	10	-	-	-	-	Bromofom	10	-	-	-	-
2,4-Dichlorophenoxyacetic acid	5	-	-	-	-	Butylbenzyl Phthalate	10	-	-	-	-
2,4-Dimethylphenol	10	-	-	-	-	Carbon Tetrachloride	2	-	-	-	-
2,4-Dinitrophenol	50	-	-	-	-	Chlordane	0.5	-	-	-	-
2,4-Dinitrotoluene	20	-	-	-	-	Chlorobenzene	10	-	-	-	-
2,6-Dinitrotoluene	20	-	-	-	-	Chlorodibromomethane	10	-	-	-	-
2-Chloroethyl Vinyl Ether	10	-	-	-	-	Chloroethane	5	-	-	-	-
2-Chloronaphthalene	10	-	-	-	-	Chloroform	2	-	-	-	-
2-Chlorophenol	10	-	-	-	-	Chrysene	10	-	-	-	-
2-Methyl-4,6-Dinitrophenol	50	-	-	-	-	a-BHC-Alpha	0.1	-	-	-	-
2-Nitrophenol	50	-	-	-	-	b-BHC-Beta	0.1	-	-	-	-
3,3-Dichlorobenzene	20	-	-	-	-	d-BHC-Delta	0.1	-	-	-	-
3,4-Benzofluoranthene	10	-	-	-	-	Dibenzo (a,h) Anthracene	10	-	-	-	-
3-Methyl-4-Chlorophenol	10	-	-	-	-	Dichlorobromomethane	10	-	-	-	-
4,4-DDD	0.2	-	-	-	-	Dieldrin	0.1	-	-	-	-
4,4-DDE	0.2	-	-	-	-	Diethyl Phathlate	10	-	-	-	-
4,4-DDT	0.2	-	-	-	-	Dimethyl Phthalate	10	-	-	-	-
4-Bromophenyl Phenyl Ether	10	-	-	-	-	Di-n-Butyl Phthalate	10	-	-	-	-
4-Chlorophenyl Phenyl Ether	10	-	-	-	-	Di-n-Octyl Phthalate	10	-	-	-	-
4-Nitrophenol	50	-	-	-	-	Endosulfan sulfate	0.5	-	-	-	-
Acenaphthene	10	-	-	-	-	Endrin	0.2	-	-	-	-
Acenaphthylene	10	-	-	-	-	Endrin Aldehyde	0.2	-	-	-	-
Acrolein	50	-	-	-	-	Ethylbenzene	2	-	-	-	-
Acrylonitrile	50	-	-	-	-	Fluoranthene	10	-	-	-	-
Aldrin	0.1	-	-	-	-	Fluorene	10	-	-	-	-
Heptachlor	0.1	-	-	-	-						
Heptachlor Epoxide	0.1	-	-	-	-						
Hexachlorobenzene	10	-	-	-	-						
Hexachlorobutadiene	10	-	-	-	-						

PRIORITY POLLUTANTS TRACKING CHECKLIST

Facility: Plant McDonough

Date: Apr.14

Location: Smyrna, Cobb County

Permit Number: GA0001431

Sample 1:

Sample 2:

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Constituent	Det. Limit (µg/L)	Sample #			Avg	Constituent	Det. Limit (µg/L)	Sample #			Avg
		1	2	3				1	2	3	
Hexachlorocyclopentadiene	10	-	-	-	-	Antimony	5	0.0096	-	-	0.010
Hexachloroethane	10	-	-	-	-	Arsenic	5	-	-	-	-
Indeno (1,2,3-cd) Pyrene	10	-	-	-	-	Beryllium	1	-	-	-	-
Isophorone	10	-	-	-	-	Cadmium	0.7	-	-	-	-
Lindane	0.1	-	-	-	-	Chromium (Total)	5	-	-	-	-
Methoxychlor	0.3	-	-	-	-	Chromium VI	10	-	-	-	-
Methyl Bromide	10	-	-	-	-	Copper	5	0.0139	-	-	0.014
Methyl Chloride	10	-	-	-	-	Cyanide	25	-	-	-	-
Methylene Chloride	10	-	-	-	-	Lead	1	0.0042	-	-	0.004
Naphthalene	10	-	-	-	-	Mercury	0.5	-	-	-	-
Nitrobenzene	10	-	-	-	-	Nickel	5	0.0071	-	-	0.007
N-Nitrosodimethylamine	10	-	-	-	-	Selenium	5	0.00103	-	-	0.001
N-Nitrosodi-n-Propylamine	10	-	-	-	-	Silver	5	-	-	-	-
N-Nitrosodiphenylamine	10	-	-	-	-	Thallium	1	-	-	-	-
PCB-1016	1	-	-	-	-	Zinc	10	0.0592	-	-	0.059
PCB-1221	1	-	-	-	-						
PCB-1232	1	-	-	-	-						
PCB-1242	1	-	-	-	-						
PCB-1248	1	-	-	-	-						
PCB-1254	1	-	-	-	-						
PCB-1260	1	-	-	-	-						
Pentachlorophenol	20	-	-	-	-						
Phenanthrene	10	-	-	-	-						
Phenol	10	-	-	-	-						
Pyrene	10	-	-	-	-						
Tetrachloroethylene	2	-	-	-	-						

Constituent	Limit
1,1,1-Trichloroethane	2
1,1,2,2-Tetrachloroethane	2
1,1,2-Trichloroethane	2
1,1-Dichloroethane	2
1,1-Dichloroethylene	2
1,2, 4,-Trichlorobenzene	10
1,2-Dichlorobenzene	10
1,2-Dichloroethane	2
1,2-Dichloropropane	2
1,2-Diphenylhydrazine	10
1,2-Trans-Dichloroethylene	2
1,3-Dichlorobenzene	10
1,3-Dichloropylene (Cis)	2
1,3-Dichloropylene (Trans)	2
1,4-Dichlorobenzene	10
2,4,5-Trichlorophenoxy	10
2,4,6-Trichlorophenol	10
2,4-Dichlorophenol	10
2,4-Dichlorophenoxyacetic acid	5
2,4-Dimethylphenol	10
2,4-Dinitrophenol	50
2,4-Dinitrotoluene	20
2,6-Dinitrotoluene	20
2-Chloroethylvinyl Ether	10
2-Chloronaphtalene	10
2-Chlorophenol	10
2-Methyl-4,6-Dinitrophenol	50
2-Nitrophenol	50
3,3-Dichlorobenzene	20
3,4-Benzofluoranthene	10
3-Methyl-4-Chlorophenoil	10
4,4-DDD	0.2
4,4-DDE	0.2
4,4-DDT	0.2
4-Bromophenyl Phenyl Ether	10
4-Chlorophenyl Phenyl Ether	10
4-Nitrophenol	50
a-BHC-Alpha	0.1
Acenaphthene	10
Acenaphthylene	10
Acrolein	50
Acrylonitrile	50
a-Endosulfan	0.5
Aldrin	0.1
Anthracene	10
Antimony	5
Arsenic	5
b-BHC-Beta	0.1
b-Endosulfan	0.5
Benzene	2
Benzenidene	80

Benzo Floranthene	10
Benzo Perylene	10
Benzo(a) Anthracene	10
Benzo(a) Pyrene	10
Berillium	1
Bis(2-chloroethoxy) Methane	10
Bis(2-chloroethyl) Ether	10
Bis(2-chloroisopropyl) Ether	10
Bis(2-ethylhexyl) Phthalate	10
Bromoform	10
Butylbenzyl Phthalate	10
Cadmium	0.7
Carbon Tetrachloride	2
Chlordane	0.5
Chlorobenzene	10
Chlorodibromomethane	10
Chloroethane	5
Chloroform	2
Chromium (Total)	5
ChromiumVI	10
Chrysene	10
Copper	5
Cyanide	25
d-BHC-Delta	0.1
Dibenzo (a,h) Anthracene	10
Dichlorobromomethane	10
Dieldrin	0.1
Diethyl Phathlate	10
Dimethyl Phthalate	10
Di-n-Butyl Phthalate	10
Di-n-Octyl Phathalate	10
Endosulfan sulfate	0.5
Endrin	0.2
Endrin Aldehyde	0.2
Ethylbenzene	2
Fluoranthene	10
Fluorene	10
Heptachlor	0.1
Heptachlor Epoxide	0.1
Hexachlorobenzene	10
Hexachlorobutadiene	10
Hexachlorocyclopentadiene	10
Hexachloroethatne	10
Indeno (1,2,3-cd) Pyrene	10
Isophorone	10
Lead	1
Lindane	0.1
Mercury	0.5
Methoxychlor	0.3
Methyl Bromide	10
Methyl Chloride	10
Methylene Chloride	10

Naphthalene	10
Nickel	5
Nitrobenzene	10
N-Nitrosodimethylaniline	10
N-Nitrosodi-n-Propylamine	10
N-Nitrosodiphenylamine	10
PCB-1016	1
PCB-1221	1
PCB-1232	1
PCB-1242	1
PCB-1248	1
PCB-1254	1
PCB-1260	1
Pentachlorophenol	20
Phenanthrene	10
Phenol	10
Pyrene	10
Selenium	5
Silver	5
Tetrachloroethylene	2
Thallium	1
Toluene	2
Toxaphene	2
Trichloroethylene	2
Vinyl Chloride	10
Zinc	10

Priority Pollutant Rationale - Metals

Parameter	K _{po} (l/kg)	α (const)	Cd/Ct (fraction)	Acute (µg/L)	Criteria Chronic (µg/L)	Acute* (µg/L)	Chronic* (µg/L)	Total Recoverable Metals High (µg/L)	Average (µg/L)	Dissolved Instream Conc. Acute (µg/L)	Chronic (µg/L)	Permit Limits Month Avg (mg/L)	Daily Max (mg/L)
Arsenic	480,000	-0.7286	0.5265	340	150	170	75			0.00	0.00		
Cadmium	4,000,000	-1.1307	0.2528	1.00	0.15	0.11	0.02			0.00	0.00		
Chromium III	3,360,000	-0.9304	0.2021	320	42	44	6			0.00	0.00		
Chromium IV	3,360,000	-0.9304	0.2021	16	11	8	6			0.00	0.00		
Copper	1,040,000	-0.7436	0.3470	7	5	0.78	0.63	13.9	13.90	0.03	0.03		
Lead	2,800,000	-0.8000	0.1836	30	1.2	5	0.2	4.2	4.2	0.00	0.00		
Mercury	2,910,000	-1.1356	0.3199	1.4	0.012	1	0.006			0.00	0.00		
Nickel	490,000	-0.5719	0.4312	260	29	34	4	7.1	7.1	0.02	0.02		
Selenium				---	5	---	3			0.00	0.00		
Silver				65	65	8.4	8.5			0.00	0.00		
Zinc	1,250,000	-0.7038	0.2873					59.2	14.2	0.09	0.02		

NOTES:

K_{po} and α are constants and can be found in EPA's The Metals Translator Guidance for Calculating a Total Recoverable Permit Limit from Dissolved Criteria

Cd/Ct = fraction of dissolved metal to total recoverable metal

WQ criteria found in Rules & Regs 391-3-6-.03 (based on hardness of 50 mg/L)

*WQ criteria adj. for hardness and factor = 50%

if Dissolved Instream Concentration > 50% of Criteria Concentration, then permit limit is needed

Priority Pollutant Rationale - Organics

Parameter	Criteria Concentrations Human Health (µg/L)	Criteria Concentrations Human Health* (µg/L)	Measured Conc. (µg/L)	Instream Conc. (µg/L)	Permit Limit (mg/L)
		0	-	#VALUE!	#VALUE!

NOTES:

WQ criteria found in Rules & Regs 391-3-6-.03

*WQ criteria adjusted for factor = 50%

If Instream Concentration > 50% of Criteria Concentration, then permit limit is needed

Permit Information and Data

General Info

Facility	Plant McDonough
Location	Smyrna, Cobb County
Permit Number	GA0001431
Discharge	Ash Pond Discharge - Outfalls 03, 04 & 09 (See note below)
Stream	Chattahoochee River
Basin	Chattahoochee
Date	Apr.14

Treatment Facility

Plant Q	5.0 MGD
Eff. TSS	30 mg/L
Hardness	40.4 mg/L as CaCO3

Receiving Stream

7Q10	750 cfs	484.7 MGD
1Q10	750 cfs	484.7 MGD
Avg. Q	2480 cfs	1602.9 MGD
Acute Dilution Factor	97.18 ratio	
Chronic Dilution Factor	97.18 ratio	
Avg Q Dilution Factor	319.03 ratio	
IWC	1.0% %	
Hardness	10 mg/L as CaCO3	
pH	7.2 units	
TRC	0.011 mg/L	
SS	10 mg/L	
SS	10.2 mg/L	
Hardness	10.3 mg/L as CaCO3	

Note: Outfalls 03, 04 and 09 are the same kind of wastewater ash pond discharge

Notes

discharge location
receiving stream
major basin

Notes

plant max daily flow
permit limit or design
effluent hardness from permit application

Notes

from WLA
from WLA
from WLA
for use in metals calcs
for use in metals calcs
for use in chemical calcs
instream waste concentration
background upstream hardness from WLA
from WLA
instream total residual chlorine standard
suspended solids upstream of discharge (~10 mg/L default)
suspended solids of stream + discharge
hardness of stream + discharge

PRIORITY POLLUTANTS TRACKING CHECKLIST

Facility: Plant McDonough

Date: Apr.14

Location: Smyrna, Cobb County

Permit Number: GA0001431

Sample 1:

Sample 2:

Sample 3:

Constituent	Det. Limit (µg/L)	Sample #			Avg	Constituent	Det. Limit (µg/L)	Sample #			Avg
		1	2	3				1	2	3	
1,1,1-Trichloroethane	2	-	-	-	-	Toluene	2	-	-	-	-
1,1,2,2-Tetrachloroethane	2	-	-	-	-	Toxaphene	2	-	-	-	-
1,1,2-Trichloroethane	2	-	-	-	-	Trichloroethylene	2	-	-	-	-
1,1-Dichloroethane	2	-	-	-	-	Vinyl Chloride	10	-	-	-	-
1,1-Dichloroethylene	2	-	-	-	-	Anthracene	10	-	-	-	-
1,2, 4,-Trichlorobenzene	10	-	-	-	-	a-Endosulfan	0.5	-	-	-	-
1,2-Dichlorobenzene	10	-	-	-	-	b-Endosulfan	0.5	-	-	-	-
1,2-Dichloroethane	2	-	-	-	-	Benzene	2	-	-	-	-
1,2-Dichloropropane	2	-	-	-	-	Benzydene	80	-	-	-	-
1,2-Diphenylhydrazine	10	-	-	-	-	Benzo Floranthene	10	-	-	-	-
1,2-Trans-Dichloroethylene	2	-	-	-	-	Benzo Perylene	10	-	-	-	-
1,3-Dichlorobenzene	10	-	-	-	-	Benzo(a) Anthracene	10	-	-	-	-
1,3-Dichloropylene (Cis)	2	-	-	-	-	Benzo(a) Pyrene	10	-	-	-	-
1,3-Dichloropylene (Trans)	2	-	-	-	-	Bis(2-chloroethoxy) Methane	10	-	-	-	-
1,4-Dichlorobenzene	10	-	-	-	-	Bis(2-chloroethyl) Ether	10	-	-	-	-
2,4,5-Trichlorophenoxy	10	-	-	-	-	Bis(2-chloroisopropyl) Ether	10	-	-	-	-
2,4,6-Trichlorophenol	10	-	-	-	-	Bis(2-ethylhexyl) Phthalate	10	-	-	-	-
2,4-Dichlorophenol	10	-	-	-	-	Bromoform	10	-	-	-	-
2,4-Dichlorophenoxyacetic acid	5	-	-	-	-	Butylbenzyl Phthalate	10	-	-	-	-
2,4-Dimethylphenol	10	-	-	-	-	Carbon Tetrachloride	2	-	-	-	-
2,4-Dinitrophenol	50	-	-	-	-	Chlordane	0.5	-	-	-	-
2,4-Dinitrotoluene	20	-	-	-	-	Chlorobenzene	10	-	-	-	-
2,6-Dinitrotoluene	20	-	-	-	-	Chlorodibromomethane	10	-	-	-	-
2-Chloroethyl Vinyl Ether	10	-	-	-	-	Chloroethane	5	-	-	-	-
2-Chloronaphtalene	10	-	-	-	-	Chloroform	2	-	-	-	-
2-Chlorophenol	10	-	-	-	-	Chrysene	10	-	-	-	-
2-Methyl-4,6-Dinitrophenol	50	-	-	-	-	a-BHC-Alpha	0.1	-	-	-	-
2-Nitrophenol	50	-	-	-	-	b-BHC-Beta	0.1	-	-	-	-
3,3-Dichlorobenzene	20	-	-	-	-	d-BHC-Delta	0.1	-	-	-	-
3,4-Benzofluoranthene	10	-	-	-	-	Dibenzo (a,h) Anthracene	10	-	-	-	-
3-Methyl-4-Chlorophenol	10	-	-	-	-	Dichlorobromomethane	10	-	-	-	-
4,4-DDD	0.2	-	-	-	-	Dieldrin	0.1	-	-	-	-
4,4-DDE	0.2	-	-	-	-	Diethyl Phathlate	10	-	-	-	-
4,4-DDT	0.2	-	-	-	-	Dimethyl Phthalate	10	-	-	-	-
4-Bromophenyl Phenyl Ether	10	-	-	-	-	Di-n-Butyl Phthalate	10	-	-	-	-
4-Chlorophenyl Phenyl Ether	10	-	-	-	-	Di-n-Octyl Phathalate	10	-	-	-	-
4-Nitrophenol	50	-	-	-	-	Endosulfan sulfate	0.5	-	-	-	-
Acenaphthene	10	-	-	-	-	Endrin	0.2	-	-	-	-
Acenaphthylene	10	-	-	-	-	Endrin Aldehyde	0.2	-	-	-	-
Acrolein	50	-	-	-	-	Ethylbenzene	2	-	-	-	-
Acrylonitrile	50	-	-	-	-	Fluoranthene	10	-	-	-	-
Aldrin	0.1	-	-	-	-	Fluorene	10	-	-	-	-
Heptachlor	0.1	-	-	-	-						
Heptachlor Epoxide	0.1	-	-	-	-						
Hexachlorobenzene	10	-	-	-	-						
Hexachlorobutadiene	10	-	-	-	-						

PRIORITY POLLUTANTS TRACKING CHECKLIST

Facility: Plant McDonough

Date: Apr.14

Location: Smyrna, Cobb County

Permit Number: GA0001431

Sample 1:

Sample 2:

Sample 3:

Constituent	Det. Limit (µg/L)	Sample #			Avg	Constituent	Det. Limit (µg/L)	Sample #			Avg
		1	2	3				1	2	3	
Hexachlorocyclopentadiene	10	-	-	-	-	Antimony	5	0.0124	-	-	0.012
Hexachloroethane	10	-	-	-	-	Arsenic	5	0.0311	-	-	0.031
Indeno (1,2,3-cd) Pyrene	10	-	-	-	-	Beryllium	1	-	-	-	-
Isophorone	10	-	-	-	-	Cadmium	0.7	-	-	-	-
Lindane	0.1	-	-	-	-	Chromium (Total)	5	-	-	-	-
Methoxychlor	0.3	-	-	-	-	Chromium VI	10	-	-	-	-
Methyl Bromide	10	-	-	-	-	Copper	5	0.0109	-	-	0.011
Methyl Chloride	10	-	-	-	-	Cyanide	25	-	-	-	-
Methylene Chloride	10	-	-	-	-	Lead	1	-	-	-	-
Naphthalene	10	-	-	-	-	Mercury	0.5	-	-	-	-
Nitrobenzene	10	-	-	-	-	Nickel	5	0.0066	-	-	0.007
N-Nitrosodimethylamine	10	-	-	-	-	Selenium	5	0.00103	-	-	0.001
N-Nitrosodi-n-Propylamine	10	-	-	-	-	Silver	5	-	-	-	-
N-Nitrosodiphenylamine	10	-	-	-	-	Thallium	1	-	-	-	-
PCB-1016	1	-	-	-	-	Zinc	10	0.0114	-	-	0.011
PCB-1221	1	-	-	-	-						
PCB-1232	1	-	-	-	-						
PCB-1242	1	-	-	-	-						
PCB-1248	1	-	-	-	-						
PCB-1254	1	-	-	-	-						
PCB-1260	1	-	-	-	-						
Pentachlorophenol	20	-	-	-	-						
Phenanthrene	10	-	-	-	-						
Phenol	10	-	-	-	-						
Pyrene	10	-	-	-	-						
Tetrachloroethylene	2	-	-	-	-						

Constituent	Limit
1,1,1-Trichloroethane	2
1,1,2,2-Tetrachloroethane	2
1,1,2-Trichloroethane	2
1,1-Dichloroethane	2
1,1-Dichloroethylene	2
1,2, 4,-Trichlorobenzene	10
1,2-Dichlorobenzene	10
1,2-Dichloroethane	2
1,2-Dichloropropane	2
1,2-Diphenylhydrazine	10
1,2-Trans-Dichloroethylene	2
1,3-Dichlorobenzene	10
1,3-Dichloropylene (Cis)	2
1,3-Dichloropylene (Trans)	2
1,4-Dichlorobenzene	10
2,4,5-Trichlorophenoxy	10
2,4,6-Trichlorophenol	10
2,4-Dichlorophenol	10
2,4-Dichlorophenoxyacetic acid	5
2,4-Dimethylphenol	10
2,4-Dinitrophenol	50
2,4-Dinitrotoluene	20
2,6-Dinitrotoluene	20
2-Chloroethylvinyl Ether	10
2-Chloronaphtalene	10
2-Chlorophenol	10
2-Methyl-4,6-Dinitrophenol	50
2-Nitrophenol	50
3,3-Dichlorobenzene	20
3,4-Benzofluoranthene	10
3-Methyl-4-Chlorophenoil	10
4,4-DDD	0.2
4,4-DDE	0.2
4,4-DDT	0.2
4-Bromophenyl Phenyl Ether	10
4-Chlorophenyl Phenyl Ether	10
4-Nitrophenol	50
a-BHC-Alpha	0.1
Acenaphthene	10
Acenaphthylene	10
Acrolein	50
Acrylonitrile	50
a-Endosulfan	0.5
Aldrin	0.1
Anthracene	10
Antimony	5
Arsenic	5
b-BHC-Beta	0.1
b-Endosulfan	0.5
Benzene	2
Benzidene	80

Benzo Floranthene	10
Benzo Perylene	10
Benzo(a) Anthracene	10
Benzo(a) Pyrene	10
Berillium	1
Bis(2-chloroethoxy) Methane	10
Bis(2-chloroethyl) Ether	10
Bis(2-chloroisopropyl) Ether	10
Bis(2-ethylhexyl) Phthalate	10
Bromoform	10
Butylbenzyl Phthalate	10
Cadmium	0.7
Carbon Tetrachloride	2
Chlordane	0.5
Chlorobenzene	10
Chlorodibromomethane	10
Chloroethane	5
Chloroform	2
Chromium (Total)	5
ChromiumVI	10
Chrysene	10
Copper	5
Cyanide	25
d-BHC-Delta	0.1
Dibenzo (a,h) Anthracene	10
Dichlorobromomethane	10
Dieldrin	0.1
Diethyl Phathlate	10
Dimethyl Phthalate	10
Di-n-Butyl Phthalate	10
Di-n-Octyl Phathalate	10
Endosulfan sulfate	0.5
Endrin	0.2
Endrin Aldehyde	0.2
Ethylbenzene	2
Fluoranthene	10
Fluorene	10
Heptachlor	0.1
Heptachlor Epoxide	0.1
Hexachlorobenzene	10
Hexachlorobutadiene	10
Hexachlorocyclopentadiene	10
Hexachloroethatne	10
Indeno (1,2,3-cd) Pyrene	10
Isophorone	10
Lead	1
Lindane	0.1
Mercury	0.5
Methoxychlor	0.3
Methyl Bromide	10
Methyl Chloride	10
Methylene Chloride	10

Naphthalene	10
Nickel	5
Nitrobenzene	10
N-Nitrosodimethylaniline	10
N-Nitrosodi-n-Propylamine	10
N-Nitrosodiphenylamine	10
PCB-1016	1
PCB-1221	1
PCB-1232	1
PCB-1242	1
PCB-1248	1
PCB-1254	1
PCB-1260	1
Pentachlorophenol	20
Phenanthrene	10
Phenol	10
Pyrene	10
Selenium	5
Silver	5
Tetrachloroethylene	2
Thallium	1
Toluene	2
Toxaphene	2
Trichloroethylene	2
Vinyl Chloride	10
Zinc	10

Priority Pollutant Rationale - Metals

Parameter	K _{po} (l/kg)	α (const)	Cd/Ct (fraction)	Acute (µg/L)	Criteria Chronic (µg/L)	Criteria Acute* (µg/L)	Chronic* (µg/L)	Total Recoverable Metals High (µg/L)	Total Recoverable Metals Average (µg/L)	Dissolved Instream Conc. Acute (µg/L)	Dissolved Instream Conc. Chronic (µg/L)	Permit Limits Month Avg (mg/L)	Permit Limits Daily Max (mg/L)
Arsenic	480,000	-0.7286	0.5259	340	150	170	75	31.10	31.10	0.17	0.17		
Cadmium	4,000,000	-1.1307	0.2530	1.00	0.15	0.11	0.03			0.00	0.00		
Chromium III	3,360,000	-0.9304	0.2020	320	42	44	6			0.00	0.00		
Chromium IV	3,360,000	-0.9304	0.2020	16	11	8	6			0.00	0.00		
Copper	1,040,000	-0.7436	0.3464	7	5	0.79	0.64	10.9	10.90	0.04	0.04		
Lead	2,800,000	-0.8000	0.1833	30	1.2	5	0.2			0.00	0.00		
Mercury	2,910,000	-1.1356	0.3201	1.4	0.012	1	0.006	6.6	6.6	0.03	0.03		
Nickel	490,000	-0.5719	0.4302	260	29	34	4	1.0	1.0	0.00	0.00		
Selenium				---	5	---	3			0.00	0.00		
Silver				65	65	8.5	8.6	11.4	11.4	0.00	0.00		
Zinc	1,250,000	-0.7038	0.2868	65	65	8.5	8.6	11.4	11.4	0.03	0.03		

NOTES:

K_{po} and α are constants and can be found in EPA's The Metals Translator Guidance for Calculating a Total Recoverable Permit Limit from Dissolved Criteria
Cd/Ct = fraction of dissolved metal to total recoverable metal

WQ criteria found in Rules & Regs 391-3-6-.03 (based on hardness of 50 mg/L)

*WQ criteria adj. for hardness and factor = 50%

If Dissolved Instream Concentration > 50% of Criteria Concentration, then permit limit is needed

Priority Pollutant Rationale - Organics

Parameter	Criteria Health Human Health* (µg/L)	Criteria Concentrations Human Health* (µg/L)	Measured Conc. (µg/L)	Instream Conc. (µg/L)	Permit Limit (mg/L)
		0	-	#VALUE!	#VALUE!

NOTES:

WQ criteria found in Rules & Regs 391-3-6-.03

*WQ criteria adjusted for factor = 50%

If Instream Concentration > 50% of Criteria Concentration, then permit limit is needed

**Permit Addendum
Georgia Power Plant McDonough- Atkinson
NPDES Permit No. GA0001431
Cobb County**

**Application For Reissuance Of A National Pollutant Discharge Elimination System (NPDES)
Permit To Discharge Treated Wastewater Into Waters Of The State Of Georgia**

Were there any revisions between the draft proposed NPDES Permit and the final proposed NPDES permit? Yes No

If yes, specify:

Permit Cover Page Language has been modified from:
“In compliance with the provisions of the Georgia Water Quality Control Act (Georgia Laws 1964, p. 416, as amended), hereinafter called the “State Act;” the Federal Water Pollution Control Act, as amended (33 U.S. C. 1251 et seq.), hereinafter called the “Federal Act;” and the Rules and Regulations promulgated pursuant to each of these Acts,
is authorized to discharge from a facility located at
Plant McDonough-Atkinson
5551 South Cobb Drive
Smyrna, Georgia 30080 (Cobb County)
to receiving waters
Chattahoochee River in the Chattahoochee River Basin
in accordance with effluent limitations, monitoring requirements and other conditions set forth in the permit and with the statements and supporting information submitted with the application.”

To:

“In accordance with the provisions of the Georgia Water Quality Control Act (Georgia Laws 1964, p. 416, as amended), hereinafter called the State Act; the Federal Water Pollution Control Act, as amended (33 U.S. C. 1251 et seq.), hereinafter called the Federal Act; and the Rules and Regulations promulgated pursuant to each of these Acts,
is issued a permit to discharge from a facility located at
Plant McDonough-Atkinson
5551 South Cobb Drive
Smyrna, Georgia 30080 (Cobb County)
in accordance with effluent limitations, monitoring requirements and other conditions set forth in the permit.
This permit is issued in reliance upon the permit application signed on May 24, 2012, any other applications upon which this permit is based, supporting data entered therein or attached thereto, and any subsequent submittal of supporting data.”

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- Part I.A.1 Added monitoring of actual intake flow, corresponding footnote and the language for reporting all discharges.
- Part I.A.3 Outfall 02A was inadvertently listed as outfall 02 previously.
- Part I.A.4 Removed footnote stating that flow monitoring is only required for outfall 03.
- Part I.B Revised the paragraph heading from "Monitoring and Reporting" to "Monitoring."
- Part I.B.2 Removed the paragraph for Reporting, replaced it with a paragraph for the Sampling Period and added revised language to:
"2. Sampling Period
a. Unless otherwise specified in this permit, quarterly samples shall be taken during the periods January-March, April-June, July-September, and October-December.
b. Unless otherwise specified in this permit, semiannual samples shall be taken during the periods January-June and July-December.
c. Unless otherwise specified in this permit, annual samples shall be taken during the period of January-December."
- Part I.B.3 Moved the "Definitions" paragraph to Part I.C and renumbered the remaining paragraphs in Part I.B.
- Part. I.B.7 Removed the DMR form number "3320-1."
- Part I.C Added "Definitions" Section.
- Part I.D Added a new section for Reporting Requirements and revised the language to require electronic reporting as follows:
D. REPORTING REQUIREMENTS
1. The permittee must electronically report the DMR, OMR and additional monitoring data using the web based electronic NetDMR reporting system, unless a waiver is granted by EPD.
a. The permittee must comply with the Federal National Pollutant Discharge Elimination System Electronic Reporting regulations in 40 CFR §127. The permittee must electronically report the DMR, OMR, and additional monitoring data using the web based electronic NetDMR reporting system online at: <https://netdmr.epa.gov/netdmr/public/home.htm>
b. Monitoring results obtained during the calendar month shall be summarized for each month and reported on the

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DMR. The results of each sampling event shall be reported on the OMR and submitted as an attachment to the DMR.

- c. The permittee shall submit the DMR, OMR and additional monitoring data no later than 11:59 p.m. on the 15th day of the month following the sampling period.
- d. All other reports required herein, unless otherwise stated, shall be submitted to the EPD Office listed on the permit issuance letter signed by the Director of EPD.

2. No later than December 21, 2020 the permittee must electronically report the following compliance monitoring data and reports using the online web based electronic system approved by EPD, unless a waiver is granted by EPD:

- a. CWA Section 316(b) Annual Reports;
- b. Bypass Event Reports;
- c. Noncompliance Notification;
- d. Other noncompliance; and
- e. Bypass

3. Other Reports

All other reports required in this permit not listed above in Part I.D.2 or unless otherwise stated, shall be submitted to the EPD Office listed on the permit issuance letter signed by the Director of EPD.

4. Other Noncompliance

All instances of noncompliance not reported under Part I.B. and Part II. A. shall be reported to EPD at the time the monitoring report is submitted.

5. Signatory Requirements

All reports, certifications, data or information submitted in compliance with this permit or requested by EPD must be signed and certified as follows:

- a. Any State or NPDES Permit Application form submitted to the EPD shall be signed as follows in accordance with the Federal Regulations, 40 C.F.R. 122.22
 - 1. For a corporation, by a responsible corporate officer. A responsible corporate officer means:
 - i. a president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision making functions for the corporation, or
 - ii. the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding \$25 million (in second-quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in

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accordance with corporate procedures.

2. For a partnership or sole proprietorship, by a general partner or the proprietor, respectively; or
3. For a municipality, State, Federal, or other public facility, by either a principal executive officer or ranking elected official.
- b. All other reports or requests for information required by the permit issuing authority shall be signed by a person designated in (a) above or a duly authorized representative of such person, if:
 1. The representative so authorized is responsible for the overall operation of the facility from which the discharge originates, e.g., a plant manager, superintendent or person of equivalent responsibility;
 2. The authorization is made in writing by the person designated under (a) above; and
 3. The written authorization is submitted to the Director.
- c. Any changes in written authorization submitted to the permitting authority under (b) above which occur after the issuance of a permit shall be reported to the permitting authority by submitting a copy of a new written authorization which meets the requirements of (b) and (b.1) and (b.2) above.
- d. Any person signing any document under (a) or (b) above shall make the following certification:

"I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Part II.A.1

Modified language to the following:

"Management Requirements

1. **Notification of Changes**
 - a. The permittee shall provide EPD at least 90 days advance notice of any planned physical alterations or additions to the permitted facility that meet the following criteria:
 1. The alteration or addition to a permitted facility may meet one of the criteria for determining whether a facility is a new source in 40 CFR 122.29(b);

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2. The alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. This notification applies to pollutants which are subject neither to effluent limitations in the permit, nor to notification requirements under 40 CFR 122.42(a)(1); or
 3. The alteration or addition results in a significant change in the permittee's sludge use or disposal practices, and such alteration, addition, or change may justify the application of permit conditions that are different from or absent in the existing permit, including notification of additional use or disposal sites not reported during the permit application process or not reported pursuant to an approved land application plan.
- b. The permittee shall give at least 90 days advance notice to EPD of any planned changes to the permitted facility or activity which may result in noncompliance with permit requirements.
 - c. Following the notice in paragraph a. or b. of this condition the permit may be modified. The permittee shall not make any changes, or conduct any activities, requiring notification in paragraph a. or b. of this condition without approval from EPD.
 - d. The permittee shall provide at least 30 days advance notice to EPD of:
 1. any planned expansion or increase in production capacity; or
 2. any planned installation of new equipment or modification of existing processes that could increase the quantity of pollutants discharged or result in the discharge of pollutants that were not being discharged prior to the planned change if such change was not identified in the permit application(s) upon which this permit is based and for which notice was not submitted under paragraphs a. or b. of this condition.
 - e. All existing manufacturing, commercial, mining, and silvicultural dischargers shall notify EPD as soon as it is known or there is reason to believe that any activity has occurred or will occur which would result in the discharge, on a routine or frequent basis, of any toxic pollutant not limited in the permit, if that discharge will exceed (i) 100 µg/L, (ii) five times the maximum concentration reported for that pollutant in the permit application, or (iii) 200 µg/L for acrolein and acrylonitrile, 500 µg/L for 2,4 dinitrophenol and for 2-methyl-4-6-dinitrophenol, or 1 mg/L antimony.
 - f. All existing manufacturing, commercial, mining, and silvicultural dischargers shall notify EPD as soon as it is

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known or there is reason to believe that any activity has occurred or will occur which would result in any discharge on a nonroutine or infrequent basis, of any toxic pollutant not limited in the permit, if that discharge will exceed (i) 500 µg/L, (ii) ten times the maximum concentration reported for that pollutant in the permit application, or (iii) 1 mg/L antimony.

- g. Upon the effective date of this permit, the permittee shall submit to EPD an annual certification in June of each year certifying whether or not there has been any change in processes or wastewater characteristics as described in the submitted NPDES permit application that required notification in paragraph a., b., or d. of this condition. The permittee shall also certify annually in June whether the facility has received offsite wastes or wastewater and detail any such occurrences.”

Part II.A.7 Changed the reporting reference in the paragraph from “Part I.B.2.” to “Part I.D”.

Part III.B.9 Added language for a Temperature Study, requiring temperature monitoring and submittal of temperature monitoring data.

Part III.D Modified the impoundment integrity language to the following:

“Impoundment Integrity

Imminent impoundment failure conditions shall be reported **immediately** to the designated local entity in the County with responsibility for emergency management and EPD’s 24 hour Emergency Response contact.

- 1. Operation and Maintenance
 - a. The following impoundments that are used to hold or treat wastewater and associated waste materials shall be operated and maintained to prevent the discharge of pollutants to waters of the united states, except as authorized under this permit, as follows:
 - i. Ash Pond 2
 - ii. Ash Pond 3
 - iii. Ash Pond 4
 - b. When practicable, piezometers or other appropriate instrumentation shall be installed as a means of assessing impoundment integrity.
 - c. Within 90 days of the effective date of this permit, the permittee shall submit a report that identifies and shows the location of all pipes, utilities or other penetrations through or beneath the impoundment(s). A Georgia-registered professional engineer must certify in the report what, if any, pipes, utilities, and penetrations exist and their condition. The report must address these penetrations and provide an inspection frequency and method of evaluation for them.
- 2. Inspections

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- a. Inspections of dams, dikes and toe areas for erosion shall, at a minimum, include observations of:
 - i. Cracks or bulges;
 - ii. Subsidence;
 - iii. Wet or soft soil;
 - iv. Changes in geometry;
 - v. Elevation of the impounded water and freeboard, depth of sediment and slurry;
 - vi. Changes in vegetation such as being overly lush;
 - vii. Obstructive vegetation and trees;
 - viii. Animal burrows;
 - ix. Changes to liners (if applicable);
 - x. Spillway integrity; and
 - xi. Any other changes which may indicate a potential compromise to impoundment integrity.
 - b. All impoundments shall be inspected at least **weekly** by qualified personnel with knowledge and training in impoundment integrity.
 - c. All impoundments shall be inspected annually by a State-registered professional engineer or professional geologist with knowledge and training in impoundment integrity.
 - d. The findings of each inspection shall be documented in a written inspection report and the personnel conducting the inspection will certify that the inspection occurred.
 - e. The certified inspection report shall be submitted to EPD annually on June 30th.
3. Corrective Measures
- a. For Category I structures or structures regulated under the Safe Dams Act, the permittee shall coordinate with EPD (EPD's Safe Dams Unit, EPD assigned Compliance Office, and EPD's Emergency Response Contact) and the permittee's Engineer of Record **immediately (within 24 hours)** after discovering any changes that may be signs of an imminent impoundment failure, or potentially significant compromise to the structural integrity of the impoundment; such as, but not limited to, significant increases in seepage or seepage carrying sediment, or as the formation of large cracks, slumping, or new wet areas not related to recent precipitation.
 - b. For structures not regulated by the Safe Dams Act, the permittee shall retain a qualified professional and coordinate with EPD (EPD's Safe Dams Unit, EPD assigned Compliance Office, and EPD's Emergency Response Contact) **immediately (within 24 hours)** after discovering any changes that may be signs of an imminent impoundment failure, or potentially significant compromise to the structural integrity of the impoundment; such as, but not limited to, significant increases in seepage or seepage carrying sediment or the formation of large cracks, slumping, or new wet areas not related to recent precipitation.
 - c. The permittee shall begin the corrective measures agreed upon by EPD and the permittee **within 60 days** of first observing any other issues which may have long term impacts on the structural integrity of the impoundment, such as trees growing on the

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impoundment or vegetation blocking spillways, culverts or other drainage pathways.

4. Reporting and Recordkeeping Requirements
 - a. **Within 5 days** of discovering conditions that indicate a potentially significant compromise to the structural integrity of the impoundment, the permittee must notify EPD (EPD's Safe Dams Unit and EPD assigned Compliance Office) in writing, describing the findings of the inspection, corrective actions taken, and expected outcomes.
 - b. The permittee shall maintain records of all impoundment inspection and maintenance activities, including corrective actions made in response to inspections and all other activities undertaken to repair or maintain the impoundments referenced in this permit. All records shall be retained, and made available to State or Federal inspectors upon request.
 - c. The permittee shall submit an **annual report** to EPD by June 30th, summarizing findings of all monitoring activities, inspections and corrective measures pertaining to the structural integrity, operation and maintenance of all impoundments referenced in this permit.
 - d. All pertinent impoundment permits, design, construction, operation, and maintenance information, including but not limited to: plans, geotechnical and structural integrity studies, copies of permits, associated documentation of certifications by all qualified personnel, State-registered professional engineers, professional geologists, and regulatory approvals, shall be retained and made available to State or Federal inspectors upon request.
 - e. The permittee shall maintain the applicable certification and training records of the personnel that conducted the inspections required under this Section.
5. Upon the State of Georgia's promulgation of the Resource Conservation and Recovery Act, 40 CFR Parts 257 and 261, for the disposal of Coal Combustion Residuals, EPD may modify the permit to revise or remove any or all of the language in Part III.D of this permit."

The permittee has been made aware of these changes.