

Georgia Department of Natural Resources

Environmental Protection Division • Watershed Protection Branch
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Judson H. Turner, Director

JUN 9 2015

Mr. Jason Ulseth, Riverkeeper
Chattahoochee Riverkeeper
3 Puritan Mill
916 Joseph E. Lowery Blvd. NW
Atlanta, GA 30318

RE: City of Cornelia
Water Pollution Control Plant (WPCP)
NPDES Permit No. GA0021504
Habersham County
Chattahoochee River Basin

Dear Mr. Ulseth:

Thank you for your letter regarding the permit for the City of Cornelia Water Pollution Control Plant. After consideration of your comments received on May 4, 2015, EPD has determined that the permit as drafted is protective of water quality standards and we have issued the permit.

We have included an attachment, which addresses your concerns submitted during the public comment period. We appreciate your interest in this matter.

If you have any questions, please contact Jennifer Goodman of my staff at 404-463-4936 or Jennifer.Goodman@dnr.state.ga.us.

Sincerely,



Jeffrey Larson, Assistant Branch Chief
Watershed Protection Branch

JL\jmg
Attachment: Response to comments

ATTACHMENT – Response to Comments
City of Cornelia
Water Pollution Control Plant (WPCP)
NPDES Permit No. GA0021504
Habersham County

Comment # 1: The effluent limit for total phosphorus in the draft permit conflicts with the loading in the preliminary Lake Lanier TMDL. We request that EPD administratively extend the current permit until the TMDL Implementation Plan is approved, at which time the agency can issue the permit with the proper effluent limits. Alternatively, to provide certainty that the permit is reopened and updated in a timely manner, EPD should include a provision in the draft permit requiring that the permit will be re-opened within 60-days of the TMDL Implementation Plan being approved.

EPD Response:

This permit is a reissuance of the current permit; therefore EPD will not administratively extend the current permit when the permit can be reissued. However, to address your comment regarding the Lake Lanier TMDL, a reopener clause has been included in the permit in Part I.C.12. The reopener clause states that EPD will reopen the permit once a Total Maximum Daily Load (TMDL) for chlorophyll-a has been finalized to address wasteload allocations for the City of Cornelia's discharge.

Comment # 2: The proposed effluent limit for fecal coliform bacteria (200 cfu/100mL) is significantly less stringent than effluent limits for other facilities discharging into Lake Lanier.

EPD Response:

The City of Cornelia WPCP discharges its treated effluent to South Fork Mud Creek, which is a tributary to Mud Creek, Chattahoochee River and Lake Lanier.

South Fork Mud Creek has a designated use classification for fishing. The water quality standard for fecal coliform bacteria is 200 colonies/100mL (geometric mean) over a 30-day period from May – October, and 1000 colonies/100mL (geometric mean) over a 30-day period from November – April. This is protective of waters designated as fishing and is in accordance with the State of Georgia Rules and Regulations for Water Quality Control, Chapter 391-3-6-.03. The limit in the permit also meets the requirement of the 2008 Total Maximum Daily Load (TMDL) for fecal coliform bacteria in the Chattahoochee River Basin. The TMDL recommends that all point source facilities be given an end-of-pipe limit of 200 colonies/100mL (monthly geometric mean).