

# Georgia Department of Natural Resources

Environmental Protection Division • Watershed Protection Branch  
2 Martin Luther King Jr. Drive • Suite 1152 East • Atlanta • Georgia 30334  
(404) 463-1511; Fax (404) 656-2453  
Judson H. Turner, Director

August 27, 2015

Ms. Jessica Sterling, Watershed Protection Specialist  
Chattahoochee Riverkeeper  
3 Puritan Mill  
916 Joseph E. Lowery Blvd. NW  
Atlanta, GA 30318

RE: Newnan Utilities – Wahoo Creek  
Water Pollution Control Plant (WPCP)  
NPDES Permit No. GA0031721  
Coweta County  
Chattahoochee River Basin

Dear Ms. Sterling:

Thank you for your email regarding the permit for the Newnan Utilities – Wahoo Creek Water Pollution Control Plant. After consideration of your comments received on July 2, 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.ga.gov](mailto:Jennifer.Goodman@dnr.ga.gov).

Sincerely,



Jeffrey Larson, Assistant Branch Chief  
Watershed Protection Branch

JL\jmg  
Attachment: Response to comments

**ATTACHMENT – Response to Comments**

Newnan Utilities – Wahoo Creek  
Water Pollution Control Plant (WPCP)  
NPDES Permit No. GA0031721  
Coweta County

**Comment # 1: Why are there monthly effluent limits for ammonia and BOD and why are they so much higher in January – April, but lower in the summer and fall?**

EPD Response:

The assimilative capacity of a stream is dependent on the flow in the stream and the water temperature. In the winter, the stream flows are typically higher and the water temperature is colder, so there is more available assimilative capacity.

**Comment # 2: I noticed, there are seasonal criteria for dissolved oxygen (DO), and the limit for January – March is the lowest I have seen in a permit (2.0 mg/L). I realize that it's colder, so DO is not much of an issue, but this facility is discharging a large amount of wastewater into a fairly small stream. What is the reasoning for such a low effluent limit?**

EPD Response:

Instream DO is predicted by the GA DOSAG model for Wahoo Creek. The model employs a Streeter-Phelps equation which uses background DO, temperature, flow rate, and effluent DO to determine instream DO deficit downstream of the discharge. With higher instream flow during the months of January – March, instream DO is above 5 mg/L at an effluent DO of 2 mg/L.