

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

November 30, 2015

Mr. Tim Chitwood, Wastewater Plant Superintendent
City of Lavonia
PO Box 564
Lavonia, GA 30553

RE: City of Lavonia
Water Pollution Control Plant (WPCP)
NPDES Permit No. GA0038661
Franklin County
Savannah River Basin

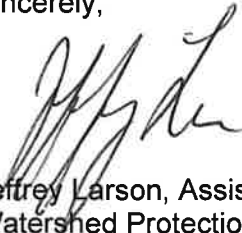
Dear Mr. Chitwood:

Thank you for your email regarding the permit for the City of Lavonia Water Pollution Control Plant. EPD received your comments that requested we make a couple of corrections to the permit based on your review.

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.

Sincerely,



Jeffrey Larson, Assistant Branch Chief
Watershed Protection Branch

JL\jmg
Attachment: Response to comments

ATTACHMENT – Response to Comments
City of Lavonia
Water Pollution Control Plant (WPCP)
NPDES Permit No. GA0038661
Franklin County

Comment # 1: On the Fact Sheet section 3.4a) in regards to Mercury, we did the requested testing for Mercury using EPA 1631E and updated the spaces on the application with that data. The updated application was sent to you on 6-19-2015 by email. Please review that data and remove the Mercury requirement from the new permit if those numbers are within the allowable range.

EPD Response:

Mercury monitoring has been removed from the permit as the permittee submitted the appropriate data with the application and there is no reasonable potential for Mercury to cause or contribute to a water quality standards violation in the receiving stream. The fact sheet has been updated to reflect this change.

Comment # 2: On page 5 of the Draft Permit under Flow, why is the measurement frequency 5 Days/Week instead of 7 Days/Week since it is continuous recording and we will have the data?

EPD Response:

The measurement frequency for flow has been changed from five days/week to seven days/week as requested by the permittee.

Comment # 3: On the same page under Total Phosphorus as P, those limitations are significantly lower than what the levels that we have been reporting are averaging. Will we be given a compliance schedule to reach those levels? We currently do not have any provision in our process to achieve that kind of reduction and will have to design and install one?

EPD Response:

The permit contains a Total Phosphorus effluent limitation of 1.33 mg/L for 0.75 MGD and 1.0 mg/L for 1.32 MGD. These limits were based on EPD's April 2010 Strategy for addressing Phosphorus Loadings in State Waters. A 24-month compliance schedule has been included in the permit for the new Total Phosphorus limits in the B.1. effluent limitations.