

## ATTACHMENT A

### Public Comments

Dalton Utilities

Whitfield Mountain View Acres Water Pollution Control Plant

NPDES Permit No. GA0047848

**Comment No. 1:** *“Section B.1 contains a table that establishes the discharge monitoring limitations for the outfall referenced above. This table specifies both a monthly and weekly average for total residual chlorine (TRC). Footnote 1 to the table states that the TRC limit listed in the table is also a daily maximum limit. It appears that a permit violation will exist any time a TRC is recorded above 0.03 mg/L, regardless of the weekly/monthly average. Dalton Utilities would also like to point out that having a weekly/monthly average discharge limitation for TRC seems redundant if a daily maximum limit has been established at 0.03 as well. Dalton Utilities is analyzing TRC with a spectrophotometric DPD method (Hach Method 8167) which is equivalent to EPA Method 330.5. Therefore, Dalton Utilities respectfully requests that GA EPD reconsider the maximum daily limit of 0.03 mg/L.”*

**EPD Response:** A daily maximum effluent limit for total residual chlorine (TRC) ensures a maximum TRC level is continuously maintained to prevent acute toxicity to the receiving stream. EPD has determined that monthly and weekly averages are not adequate for preventing and monitoring acute toxicity in the receiving stream and have removed them from the permit.

**Comment No. 2:** *“Section D.2 requires that Dalton Utilities electronically report various compliance monitoring data and reports to GA EPD no later than December 21, 2020. Currently, these systems do not exist; therefore, Dalton Utilities respectfully requests that GA EPD grant a waiver for these requirements.”*

**EPD Response:** By December 21, 2020, EPD will have developed online web based electronic reporting systems for the compliance monitoring data required in Part I.D.2 The waiver cited in Part I.D.2 of the permit only applies to permittees who are unable to report electronically once EPD has developed these online reporting systems.