



# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

## ENVIRONMENTAL PROTECTION DIVISION

**Richard E. Dunn, Director**

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**EPD Director's Office**

2 Martin Luther King, Jr. Drive  
Suite 1456, East Tower  
Atlanta, Georgia 30334  
404-656-4713

JAN 18 2017

Mr. David Walker, General Manager  
Griffin Industries LLC  
508 Highway 80 East  
East Dublin, Georgia 31027

RE: Permit Issuance  
Griffin Industries LLC  
GAJ010491  
East Dublin, Laurens County

Dear Mr. Walker:

Thank you for your comments concerning the application submitted by Griffin Industries LLC for the reissuance of your land treatment system permit. The Environmental Protection Division (EPD) has performed a detailed technical review and has carefully considered the comments received by EPD during the public comment period for the draft permit.

Attached is EPD's response to comments received during the public comment period. In addition, EPD has made some modifications to the draft permit. A list of those changes can be found in the attached permit addendum.

EPD has determined that the permit meets all necessary requirements and is protective of the environment. Therefore, EPD has issued the permit.

We appreciate your interest in this matter and your continuing support for Georgia's environmental programs.

Sincerely,



Jeff Larson, Assistant Branch Chief  
Watershed Protection Branch

JL\awl

Attachment: Reponse to Comments and Factsheet Addendum

cc: East Central District Office – Glenn Treadwell (via e-mail)

**EPD Response to Comments on Draft LAS Permit  
Griffin Industries LLC – GAJ010491**

<b>COMMENTS RECEIVED</b>	<b>EPD RESPONSE</b>
<p>Condition Part I.A.1.z.: Griffin Industries objected to the specific inclusion of waste products from or mention of such as “from rendering of animal products” in the definition of “Sewage.” Griffin continues to find that the definition of “sewage” to be disrespectful of businesses involved with “the rendering of animal products.” Griffin requests no further action on this permit condition.</p>	<p>The definition of “sewage” in the permit comes from the Official Code of Georgia annotated, Section 12-5-22. The permit condition will remain unchanged.</p>
<p>Condition Part I.A.2.d.: Griffin Industries commented, “As mentioned in previous correspondence, the irrigation flow meter cannot be “calibrated, “ it can only be tested. Hence, Griffin assumes that the flow meter is considered to be an “approved alternate technology,” and therefore, Griffin is only required to test annually by qualified personnel, as set forth in permit condition Part I.A.2.d. Griffin requests no further action on this permit condition, other than to request the GEPD to please respond if this is not what the GEPD intended.</p>	<p>EPD concurs with the assumption and the permit condition will remain unchanged.</p>
<p>Condition Part I.A.4.: The draft permit states that the “Permittee shall develop and implement procedures to ensure adequate year-round sludge disposal.” As previously noted, Griffin does not practice year-round sludge disposal. Sludge disposal practices are on an as needed basis every several years when sludges needs to be removed from the wastewater treatment ponds. Griffin requests no further action on this permit condition.</p>	<p>The permit condition requires the permittee to ensure that sludge can be disposed of at all times. The permit condition will remain unchanged.</p>

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<b>COMMENTS RECEIVED</b>	<b>EPD RESPONSE</b>
<p>Condition Part II.A.1.a. &amp; b.: The draft permit conditions are bifurcated into two regulatory “stages”. The second draft permit is still bifurcated into the two phases (original and expanded spray fields). However, Griffin requests no further action on this permit condition.</p>	<p>The first stage in the permit is to allow for the disposal of wastewater to the originally permitted spray fields at the current limits. The second stage in the permit is to allow for an expansion at the facility and the addition of spray fields. The permit conditions will remain unchanged.</p>
<p>Condition Part II.A.1.b.1.: The GEPPD revised the permit in the second draft and removed the concentration limit and provided a Total Nitrogen mass loading limit of 27.3 pounds per month per acre (lbs/month/acre), which is equivalent to the 2,752.2 lbs/month on 100.8 acres that Griffin requested. Griffin assumes that the “Sliding Scale” allows Griffin to utilize a twelve-month rolling average of Total Nitrogen applied in order to assure that the design nitrogen uptake rate monthly average of 27.3 lbs/acre is never exceeded. Griffin requests no further action on this permit condition, other than to request the GEPPD to please respond if this is not what the GEPPD intended.</p>	<p>The monthly limit is based on the nitrogen uptake rate by the cover crop on an annual basis. If the monthly average is maintained at 27.3 pounds per month on a rolling average, then the effluent limit will be achieved. The permit condition will remain changed.</p>
<p>Condition Part II.A.1.b.1.: The GEPPD did not revise the monitoring schedule in the table for total nitrogen, TKN, pH, and ammonia. Griffin continues to respectfully disagree with the GEPPD with the need for monthly monitoring as required in the permit condition. Griffin is willing to concede and accept the monthly monitoring. Griffin requests no further action on this permit condition.</p>	<p>The permit condition will remain unchanged.</p>

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<b>COMMENTS RECEIVED</b>	<b>EPD RESPONSE</b>
<p>Condition Part II.A.1.b.3.: Griffin still asserts that permit condition Part II.A.1.b.3. is inconsistent with the monitoring frequency and the flow unit (MGD). However, in the spirit of cooperation, Griffin is willing to concede and accept the language as is. Griffin requests no further action on this permit condition.</p>	<p>The permit condition will remain unchanged.</p>
<p>Conditions Part II.A.2.a. &amp; b.: The GEPD reduced the monitoring wells requiring monthly monitoring, to MW-2A and the to -be -installed MW-2D, with the remainders going back to quarterly. Griffin appreciates this indication from the GEPD; however, Griffin must continue to object to the monitoring of any monitoring wells on a monthly basis, as being truly unnecessary and overly burdensome. As previously commented, the variations in groundwater nitrate concentrations are very slow to change. The last 12 years of sampling and testing data have borne out this fact with certainty. The groundwater sampling is a third-party contracted activity due to the complexity of sampling and mandated protocols that must be followed, and this comes at significant cost to Griffin. Quarterly sampling of all of the monitoring wells allows the facility to continue using a third-party contractor to conduct the sampling. Griffin respectfully requests all groundwater monitoring to remain quarterly.</p>	<p>The frequency of the permit condition has been changed to require quarterly sampling for all groundwater monitoring wells</p>
<p>Condition Part II.A.2.a. &amp; b.: The GEPD revised the draft permit to allow 180 days to accomplish the installation of monitoring well MW-2D. However, the deadline for installing MW-2D is still presented as 120</p>	<p>The language in Part V. A.3. and Part A.2.a.2.b. on page 14 of the permit has been revised to 180 days.</p>

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<b>COMMENTS RECEIVED</b>	<b>EPD RESPONSE</b>
<p>days in permit condition Part V .A.3. Griffin requests that permit condition Part V . A.3 also be updated to reflect the 180 day requirement.</p>	
<p>Condition Part II.A.4.: Griffin has long conducted stream sampling for nitrates, pH, specific conductivity, temperature, and turbidity on a voluntary basis and does not object. However, the permit condition added dissolved oxygen (DO), biochemical oxygen demand (BOD), and TKN to the analytes. The target indicator of impact from a nitrogen bearing LAS is nitrate. The addition of DO, BOD, and TKN to the requirements is unnecessary and burdensome. A decrease in DO can be attributed to increased natural oxygen demanding substances such as fall foliage and/or a decrease in the natural aeration capacity of the stream. Griffin does not have control over the natural aeration capacity of the stream. Griffin requested that the requirement for DO, BOD, and TKN monitoring be removed from the stream monitoring requirements. Griffin again respectfully requests that these additional parameters be removed.</p>	<p>The addition of DO, BOD, and TKN allows EPD to monitor and observe the implementation of the BMPs being employed and the impact, if any, from the LAS to the surface waterways. The permit condition will remain unchanged.</p>
<p>Condition Part I.A.3.b.: With regard to the use of the online NetDMR application for submittal of DMRs and OMRs, it is Griffin's understanding that this is a requirement for National Pollutant Discharge Elimination System (NPDES) permit holders at this time. Griffin requests this permit condition be removed until such time as the monitoring report can be submitted via the NetDMR system, or revised accordingly.</p>	<p>As stated in Part I.A.3.a., the permittee shall continue to submit DMRs by mail. As stated in Part I.A.3.b., if the permittee chooses to use NetDMR, the permit allows an opportunity to do so. Griffin is not required to use NetDMR and this permit condition will remain unchanged.</p>

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<b>COMMENTS RECEIVED</b>	<b>EPD RESPONSE</b>
<p>Condition Part V.A.2.: Griffin submitted a revised DDR on June 14, 2016, to include the new 2.98 million-gallon anaerobic pond (to be new #1 Pond). The revised DDR was approved by the GEPPD on June 20, 2016. Griffin sincerely requests that the revised DDR for the new anaerobic pond be included in the permit and fact sheet that accompanies the permit.</p>	<p>Part V.A.2. of the permit and the associated section in the factsheet has been revised to reflect the approved June 2016 DDR.</p>