

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

February 1, 2016

Mr. Cliff Hendrix, Director of Public Works
City of Metter
P.O. Box 74
Metter, GA 30439

RE: Comments Received for
City of Metter
Land Application System (LAS)
LAS Permit No. GAJ020185
(Candler County)

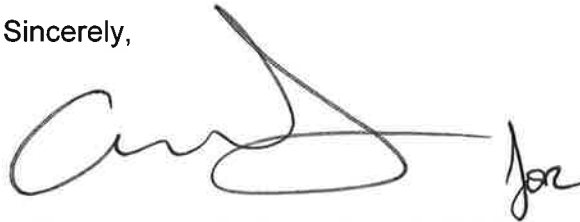
Dear Mr. Hendrix:

Thank you for your comments regarding the permit reissuance for the City of Metter Land Application System (LAS). Attached is a summary of your comments and our responses to the issues raised. In addition, we have attached a fact sheet addendum which documents changes (if any) in the attached permit. We appreciate your interest in this matter.

After consideration of your comments, changes have been made to the permit. The modified permit is protective of water quality standards and we have issued the permit.

If you have any questions, please contact Johanna Smith of my staff at 404-656-6937 or Johanna.Smith@dnr.ga.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jeffrey Larson', with a stylized flourish at the end.

Jeffrey Larson, Assistant Branch Chief
Watershed Protection Branch

JLjds
Attachment: Response to Comments

**Public Comments and EPD Responses on Draft NPDES Permit
City of Metter LAS – GAJ020185**

COMMENTS RECEIVED	EPD RESPONSE
<p>Monitoring effluent from the treatment pond to the storage pond is not pertinent to the permit and will have much added expense. The 2010 permit required sampling of the storage pond influent, not the flow to the sprayfield. In 2011, the City requested that the sampling point for permit compliance be the influent to the sprayfield, and the permit was modified on February 4, 2011. The City requests that the only sampling point be influent to the sprayfield and remove the sampling requirement at the treatment pond effluent.</p>	<p>EPD has reviewed the current permit and facility design and agrees that it is appropriate to sample the discharge from the treatment pond or the storage pond to the sprayfields.</p>
<p>Nitrate as nitrogen is already being monitored in the groundwater, where it matters. We request that the monitoring requirements for the treatment pond effluent and storage pond effluents be removed.</p>	<p>All Land Application Systems (LAS) are required to monitor nitrate in the discharges to their sprayfields. Nitrate, as nitrogen monitoring at the treatment system allows the permittee to identify potential nitrate issues quickly and ensure best management practices are being employed. The facility will be required to monitor nitrate at the sampling points identified in the permit.</p>
<p>Composite samples rather than grab samples for BOD and TSS with have marginal value but much added expense. We request that the composite sampling requirements be changed to grab.</p>	<p>EPD generally requires composite samples for all BOD and TSS samples in permits. Because the City of Metter system is a pond system, however, grab will be sufficient. The sample types for BOD and TSS have been changed to grab.</p>

FACT SHEET – Addendum
City of Metter Land Application System
LAS Permit No. GAJ020185
Candler County

APPLICATION FOR REISSUANCE OF A NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT TO DISCHARGE TREATED WASTEWATER INTO WATERS OF THE STATE OF GEORGIA

Were there any revisions between the draft and final permit? Yes No

If yes, specify:

- | | |
|-----------------------|--|
| Fact Sheet | Combined sampling requirements and effluent limitations from the Treatment Pond and Storage Pond effluents into one sampling location at the influent to the Sprayfields |
| Parts I.B.1. & I.B.2. | Combined sampling requirements and effluent limitations from the Treatment Pond and Storage Pond effluents into one sampling location at the influent to the Sprayfields |
| Parts I.B.1. & I.B.2. | Changed sampling types for BOD and TSS from composite to grab. |

The permittee was notified of the revisions from the draft to the final permit.