



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Watershed Protection Branch

2 Martin Luther King, Jr. Drive
Suite 1152, East Tower
Atlanta, Georgia 30334
404-463-1511

Ms. Jen Hilburn
Altamaha Riverkeeper
P.O. Box 4122
Macon, GA 31208

DEC 19 2017

RE: EPD Response to Comments
Draft Groundwater Withdrawal Permit No. 151-0001
Rayonier Performance Fibers – Jesup Plant

Dear Ms. Hilburn:

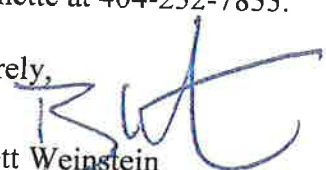
Thank you for your comments regarding the draft permit notice for modification and renewal of Rayonier Performance Fiber's Groundwater Withdrawal Permit No. 151-0001. We appreciate your interest in this matter.

- The industrial process at the Jesup Plant requires more water than a traditional pulp and paper mill because of the cellulose specialty products it produces, many of which are used for food and pharmaceutical manufacturing.
- Previous permit issuances to Rayonier have established that this is a reasonable and beneficial use of the water resource.
- EPD continues to encourage Rayonier and other water users to identify and implement water conservation measures, invest in water conservation technology, and improve processes to maximize reuse.
- The permit limits for Rayonier historically allowed a maximum withdrawal of 82.00 million gallons per day (mgd). Over time, EPD has reduced Rayonier's withdrawal permit limits to the current 74.000 mgd monthly average, and 68.000 mgd annual average. These limits will not be increased in this permit action.
- Rayonier Performance Fibers maintains National Pollutant Discharge Elimination System permit No. GA0003620, issued 12/29/2015 which regulates their allowable discharges to the Altamaha River. They are required to submit regular reports to EPD, under open Consent Order No. EPD-WQ-4837.

After consideration of your comments, EPD has determined that the addition of one well without an associated increase in withdrawal permit limits will not adversely affect other water users.

If you have any questions, please contact Bill Frechette at 404-232-7833.

Sincerely,


Bennett Weinstein
Water Supply Program Manager
Watershed Protection Branch

**Public Comments and EPD Responses on Draft Groundwater Withdrawal Permit
Rayonier Performance Fibers - Jesup Plant – Permit No. 151-0001**

COMMENTS RECEIVED	EPD RESPONSE
<p>Riverkeeper believes that the draft permit violates Georgia law because it exceeds any reasonable limit on the amount of water withdrawn. As you know, this is by far the largest industrial withdrawal in the State. Up to 74 million gallons of water can be withdrawn each day, even in times of severe drought. At a time when citizens everywhere are forced to conserve, this permit lets Rayonier continue to withdraw truly ridiculous amounts of water.</p> <p>This problem is exacerbated when one thinks about the obscene way in which Rayonier returns this water to the basin. Each day up to 60 million gallons is discharged directly into the Altamaha River in the form of grossly discolored and highly offensive smelling effluent. It is hard to conceive of a more environmentally objectionable transaction than the one in which Rayonier takes out huge amounts of our pure water and sends it back to our river in a disgusting form. Finally, it is unacceptable that Rayonier Advanced Materials continue to threaten the health of our communities and economies that so heavily depend on utilization of aquifer water.</p> <p>EPD should consider restricting Rayonier AM's withdrawal limit to one more reflective of the industry and less impactful to our coastal community's drinking water.</p>	<p>The industrial process at the Jesup Plant requires more water than a traditional pulp and paper mill because of the cellulose specialty products it produces, many of which are used for food and pharmaceutical manufacturing.</p> <p>Previous permit issuances to Rayonier have established that this is a reasonable and beneficial use of the water resource.</p> <p>EPD continues to encourage Rayonier and other water users to identify and implement water conservation measures, invest in water conservation technology, and improve processes to maximize reuse.</p> <p>The permit limits for Rayonier historically allowed a maximum withdrawal of 82.00 million gallons per day (mgd). Over time, EPD has reduced Rayonier's withdrawal permit limits to the current 74,000 mgd monthly average, and 68,000 mgd annual average. These limits will not be increased in this permit action.</p> <p>Rayonier Performance Fibers maintains National Pollutant Discharge Elimination System permit No. GA0003620, issued 12/29/2015 which regulates their allowable discharges to the Altamaha River. They are required to submit regular reports to EPD, under open Consent Order No. EPD-WQ-4837.</p>