

# 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  
Richard E. Dunn, Director

August 31, 2016

Honorable Hobby Stripling, Mayor  
City of Vienna  
PO Box 436  
Vienna, GA 31092

RE: Comments Received for  
City of Vienna North  
Land Application System (LAS)  
LAS Permit No. GAJ020167  
(Dooly County)

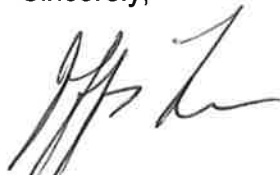
Dear Mayor Stripling:

We are in receipt of the comments from your consultant regarding the permit issuance for the City of Vienna North Land Application System (LAS). Attached is a summary of the comments received 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, EPD has determined that the 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](mailto:Johanna.Smith@dnr.ga.gov).

Sincerely,



Jeffrey Larson, Assistant Branch Chief  
Watershed Protection Branch

JL\jds  
Attachment: Response to Comments

cc: Mr. Michael Bowens, City of Vienna ([michael.bowens@cityofvienna.org](mailto:michael.bowens@cityofvienna.org))  
Mr. Paul Rakel, Sowega Engineering, LLC ([jjprakel@sowega-eng.com](mailto:jjprakel@sowega-eng.com))

**ATTACHMENT – Response to Comments**  
City of Vienna North Land Application System  
LAS Permit No. GAJ020167  
(Dooly County)

**Comment #1: The draft permit calls for continuous flow monitoring of the effluent from the treatment plant. The flow meter is currently located on the influent side of the treatment plant. In Sequencing Batch Reactor (SBR) systems, the influent flow equals the effluent flow. The plant contains appropriate technology for measuring flow, and the facility operators have the appropriate training to calibrate it. The plant currently samples the effluent but is not able to pull a flow-proportional composite. We request that the permit reflect the correct location of flow measurement equipment at the plant.**

EPD Response:

A correction has been made to the permit under Parts I.B.1.a. and I.B.1.b. to reflect that flow measurements may occur at the influent point or effluent point of the treatment facility.

**Comment #2: The draft permit calls for composite sampling of the effluent from the SBR basins to the holding pond; however, the facility does not include a flow meter between the SBR basins and the holding pond. The effluent line is a 24” DIP that runs underground from the SBR basins into the holding pond and remains full constantly. The discharge from an SBR is at a constant rate during decant; therefore we propose using an automatic sampler to pull equal-sized samples beginning 10 minutes after the decant stage of an SBR begins and continuing to pull a sample every 10 minutes until the decant cycle is complete. The automatic sampler will be controlled by the SBR controls.**

EPD Response:

EPD requests that the permittee ensure each SBR is sampled and the results flow-weighted to achieve an accurate sample result for each parameter required in the permit. EPD also reminds that permittee that composite samples must comply with the definitions found in the permit. If performed correctly, EPD finds this method of sampling acceptable.

**Comment #3: Under the rationale section of the draft permit you state the sludge is dewatered then land applied. This is not the case. The digested sludge is pumped out of the digester to a spreader truck and land applied wet.**

EPD Response:

The Sludge Addendum submitted with the permit application identified dewatering as part of the sludge handling process. The permittee submitted a revised Sludge Addendum on July 1, 2016 reflecting the correct sludge handling process, and this correction has been noted in the attached Fact Sheet Addendum.

**Comment #4: The rationale states the City is adding 34.8 wetted acres divided into four (4) fields. The city is actually adding 40 wetted acres divided into two (2) fields.**

EPD Response:

According to the drawings included with the Design Development Report (DDR) submitted for expansion of the LAS, each of the two larger sprayfields has two spray zones within it, creating 4 spray areas. The phrase “4 sprayfields” in the rationale refers to these areas. The word “sprayfields” has been replaced with “zones” to note that 4 zones are located within 2 sprayfields in the Fact Sheet Addendum. Furthermore, a revised DDR citing the corrected

wetted acreage was submitted and approved by EPD on July 5, 2016. The corrected acreage is noted in the Fact Sheet Addendum.

**Comment #5: In Part 2.A.12.d,e,f,&g - Notice Concerning Endangering Waters of the State: Each of these sections references only (c)(a-b)...,which is a typo in itself, of (c)(2)(a-d) to be reported or posted regarding a Spill/Major Spill. The old permit required all four (a-d) as minimum report items for Spills/Major Spills. This is simply a typo and should read (c)(2)(a-d) for each of the sections in Part 2.A.12.d,e,f,&g.**

EPD Response:

This comment has been noted and corrected in the final permit.