



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

DEC 30 2016

Mr. Mark Williams, Assistant County Manager
Morgan County Board of Commissioners
150 E. Washington Street
Madison, Georgia 30650

RE: Madison Lakes
Land Application System (LAS)
LAS Permit No. GAJ030965
Morgan County

Dear Mr. Williams:

We are in receipt of the comments submitted by your consultant regarding the permit issuance for the Madison Lakes Land Application System. Attached is a summary of the comments received and our responses to the issues raised. In addition, we have attached a rationale 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.

Sincerely,

Jeffrey Larson, Assistant Branch Chief
Watershed Protection Branch

JL\jds

Attachment: Response to Comments

cc: Mr. Christopher Quigley, P.E., Peoples & Quigley, Inc. (cdquigley@mindspring.com)

ATTACHMENT – Response to Comments
Madison Lakes Land Application System
LAS Permit No. GAJ030965
(Morgan County)

Comment #1: The Rationale explains that filtration and ozone disinfection are used for the treatment of wastewater; however, filtration nor ozone disinfection are not used nor needed to meet permits limits.

EPD Response: Comment noted. The application submitted contained a plant flow diagram that was inaccurate and showed filtration and ozone disinfection. EPD has revised the description of the wastewater treatment plant to reflect the current treatment.

Comment #2: The Rationale states that treated wastewater is pumped to a storage pond; however, treated wastewater flows by gravity to a storage pond and is then pumped to sprayfields.

EPD Response: Comment noted. This has been revised in the Rationale Addendum.

Comment #3: The Rationale states that sludge will be sent to Carey Station WRF for further treatment and disposal. Please revise to reflect that sludge will be sent to an EPD-approved facility for further treatment and disposal.

EPD Response: The permit allows for sludge generated at the facility to be delivered to another permitted facility for further treatment and disposal. Refer to Part IV of the permit.

Comment #4: The approved hydraulic loading rate shown in the DDR Concurrence Letter is 0.25 in/hr, not 0.2 in/hr as shown in the Rationale.

EPD Response: The permit allows for an instantaneous application rate of 0.25 in/hr. Refer to Part I.B.3. of the permit. The rationale has been corrected to reflect 0.25 in/hr.

Comment #5: The permittee would like to confirm that no surface water monitoring is required.

EPD Response: An email received on October 6, 2016 clarifying the presence of surface water on-site notes the presence of an intermittent stream south of the site; therefore, surface water monitoring requirements have been included in the permit. Surface water monitoring shall only be required when surface water is present.

Comment #6: BOD and TSS sampling types should be Grab instead of Composite due to low flow conditions at the facility. These changes were previously approved in a letter dated March 6, 2014.

EPD Response: Comment noted. These changes have been reflected in the final permit.

Comment #7: Testing requirements for BOD, Nitrate as N, Total Kjeldahl Nitrogen, and pH should be removed from the Storage Pond Limitations and Monitoring Requirements (Part I.B.3). Due to low flows, these tests offer little to no benefit and should be removed.

EPD Response: The testing requirements referenced above are required for all LAS facilities.