



**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 28 2016

Mr. David Moore, Senior Operations Specialist  
ESG Operations, Inc.  
6400 Peake Road  
Macon, Georgia 31210

RE: Comments Received for  
City of Douglas Southeast  
Water Pollution Control Plant (WPCP)  
NPDES Permit No. GA0024431  
Coffee County

Dear Mr. Moore:

We are in receipt of your comments regarding the permit issuance for the City of Douglas Southeast WPCP. 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 Kim Hembree of my staff at 404-463-4937 or [kim.hembree@dnr.ga.gov](mailto:kim.hembree@dnr.ga.gov).

Sincerely,

Jeffrey Larson, Assistant Branch Chief  
Watershed Protection Branch

JL\kbh

Attachment: Response to Comments  
Fact Sheet Addendum

**ATTACHMENT – Response to Comments**  
City of Douglas Southeast Water Pollution Control Plant (WPCP)  
NPDES Permit No. GA0024431  
Coffee County

**Comment No. 1:** “Part 1.B of the draft permit requires monitoring of mercury once per month. Part 1.C.11 requires monitoring of mercury three (3) times during the first year of the permit. We request that Part 1.B be revised to reflect the monitoring required in Part C.11.”

**EPD Response:** The permittee was required to analyze for Mercury using Method 1631E instead of Method 245.1. After the draft permit was issued, the permittee submitted results of five mercury tests from December 2012 to December 2014 using Method 1631E. The results were evaluated and it was determined by EPD that a reasonable potential for mercury did not exist. Therefore, all mercury monitoring requirements have been removed from the final permit.

**Comment No. 2:** “Section 3.10 (c) of the permit rationale states that monitoring ortho phosphate once per month is adequate for stream monitoring purposes; however, the Part 1.B of the draft permit requires monitoring for this parameter once per week. We request that Part 1. B be revised to indicate the monitoring frequency indicated in the permit rationale.”

**EPD Response:** The final permit has been corrected to require orthophosphate monitoring once per month.

**Comment No. 3:** “Part III.A.3.g of the permit requires publishing industries in significant noncompliance with pretreatment requirements in July of each year. Part III B. 1. identifies the permit year as running from October thru September. We request that Part III A.3.g be revised to reflect publication of industries in SNC in October of each year.”

**EPD Response:** This comment has been noted and the change made according to the permittee’s preference.