



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

NOV 15 2016

Mr. Steven Nestor
Environmental Compliance Manager
Cobb County Water System
680 South Cobb Drive
Marietta, GA 30060

RE: Comments Received for
Cobb County Noonday Creek
Water Reclamation Facility (WRF)
NPDES Permit No. GA0024988
Cobb County

Dear Mr. Nestor:

We are in receipt of the comments from your staff regarding the permit issuance for the Cobb County Noonday Creek WRF. 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.

Sincerely,

Jeffrey Larson, Assistant Branch Chief
Watershed Protection Branch

JL\jds

Attachment: Response to Comments

cc: Mr. Ernest Earn, Cobb County Water System (ernest.earn@cobbcounty.org)

ATTACHMENT – Response to Comments
Cobb County Noonday Creek Water Reclamation Facility (WRF)
NPDES Permit No. GA0024988
(Cobb County)

Comment #1: The permittee objects to the decreased Ammonia as N limitation of 0.7 mg/L, which complies with the recommended 2013 EPA Ammonia Criteria standard. The permittee objects on the grounds that this standard has not been adopted by EPD.

EPD Response:

The Georgia Environmental Protection Division (EPD) needs to ensure that the discharge from the Noonday Creek Water Reclamation Facility will meet Georgia narrative criteria for toxicity. In 2013, EPA issued Aquatic Life Ambient Water Quality Criteria for Ammonia that are protective of freshwater mussels species found in Georgia. EPD does not plan to adopt the ammonia numeric criteria but does plan to implement it through the narrative toxicity criteria and in NPDES permits as outlined in EPD's NPDES Permitting Strategy for Addressing Ammonia Toxicity (Strategy). The Strategy can be found on the EPD website at:

https://epd.georgia.gov/sites/epd.georgia.gov/files/related_files/site_page/Appendix%2021%20Ammonia%20and%20Nitrogen%20Toxicity%20Strategy%20-%202016.pdf

The EPD permitting strategy addresses the requirement outlined in the 2015 Revised Water Quality Standard Regulations found in 40 CFR 131.20, which states that if a State chooses not to adopt new or revised criteria for parameters for which EPA has published new or updated Clean Water Act Section 304(a) criteria recommendations, then the State shall provide an explanation. The Ammonia Strategy provides the necessary justification for addressing ammonia toxicity in State Waters in lieu of adopting numeric ammonia criteria.