



**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 23 2016

Mr. Kevin McBurnett, City Manager  
City of Emerson  
PO Box 300  
Emerson, GA 30137

RE: Henry Jordan  
Water Pollution Control Plant (WPCP)  
NPDES Permit No. GA0026115  
(Bartow County)

Dear Mr. McBurnett:

We are in receipt of the comments from your consultant on the draft permit for the Henry Jordan WPCP. Attached are our responses to those 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 Benoit Causee of my staff at 404-463-4958 or [benoit.causee@dnr.ga.gov](mailto:benoit.causee@dnr.ga.gov).

Sincerely,

Jeffrey Larson, Assistant Branch Chief  
Watershed Protection Branch

JL\bsc

Attachment: Response to Comments

cc: Mr. Christopher Quigley, P.E., Peoples & Quigley, Inc. ([cdquigley@pandqinc.com](mailto:cdquigley@pandqinc.com))

**ATTACHMENT**  
**Response to Comments**  
City of Emerson – Henry Jordan WPCP  
NPDES Permit No. GA0026115  
(Bartow County)

**Comment # 1: The City wants the ability to send sludge to a landfill.**

EPD Response:

The permit allows for the disposal of sludge in a sanitary landfill. Refer to Part I.A.2.

**Comment # 2: Delay implementation of the Watershed Protection Plan (WPP) until plant is permitted for 1.0 MGD. The City strongly disagrees with DNR policy to require implementation of the WPP below 1.0 MGD. Georgia Law (OCGA §12-5-23) clearly states that facilities under 1.0 MGD are not required to have a plan. This arbitrary requirement imposes an undue financial burden on the city. We understand that this was approved for the City of Crawford under a similar circumstance.**

EPD Response:

The City of Emerson received authorization to operate at the expanded flow of 0.45 MGD on September 16, 2010. A condition for the expansion from 0.172 to 0.45 MGD was to have an approved WPP and to implement the plan. The WPP has been approved. The proposed permit includes the same conditions that were in the previous permit for plan implementation.

**Comment # 3: Revise plant operator certification requirements to match GA Rules 391-3-6-.12.**

EPD Response:

Plants providing reuse water require a Class I operator; therefore, the draft permit included the following requirements for operator certification:

Permit Section	Permitted Flow	Operator Certification
Part I.B.2	0.85 MGD + reuse	Class I
Part I.B.3	1.0 MGD + reuse	Class I
Part I.B.4	1.5 MGD + reuse	Class I

We have since been informed by your consultant that the City may delay construction of the reuse distribution system; therefore, we have revised the permit format and operator requirements as follow:

Permit Section	Permitted Flow	Operator Certification
Part I.B.2	0.85 MGD	Class III
Part I.B.3	1.0 MGD	Class III
Part I.B.4	1.5 MGD	Class II
Part I.B.5	Reuse	Class I

A Class I operator will be required once the City start distributing reuse water under Part I.B.5 of the permit.