

# Georgia Department of Natural Resources

Environmental Protection Division • Watershed Protection Branch  
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(404) 463-1511; Fax (404) 656-2453  
Richard E. Dunn, Director

August 26, 2016

Honorable Harold Fowler, Mayor  
City of Richmond Hill  
P.O. Box 250  
Richmond Hill, GA 31324

RE: Comments Received for  
City of Richmond Hill – Sterling Creek  
Water Reclamation Facility (WRF)  
NPDES Permit No. GA0037648  
(Bryan County)

Dear Mayor Fowler:

We are in receipt of the comments from your consultant regarding the permit issuance for the City of Richmond Hill – Sterling 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](mailto:Johanna.Smith@dnr.ga.gov).

Sincerely,



Jeffrey Larson, Assistant Branch Chief  
Watershed Protection Branch

JL\jds  
Attachment: Response to Comments

cc: Mr. Marcus Hobgood, Enviroworx Operations Management ([mhobgood@eomworx.com](mailto:mhobgood@eomworx.com))

**ATTACHMENT – Response to Comments**

City of Richmond Hill – Sterling Creek Water Reclamation Facility (WRF)  
NPDES Permit No. GA0037648  
(Bryan County)

**Comment #1: The permittee would prefer to sample for Biochemical Oxygen Demand (BOD) instead of Carbonaceous Biochemical Oxygen Demand (CBOD).**

EPD Response:

This comment has been noted and the effluent limitations in the permit have been revised from CBOD to BOD. The values of the effluent limitations are consistent with those in the draft permit.

**Comment #2: The Reasonable Potential Analysis included in Attachment B suggests that Total Recoverable Copper monitoring should be included in the permit under both Parts I.B.1. and I.B.2. of the permit. This ensures that the permittee submits sufficient data to perform a Reasonable Potential Analysis in the case that the facility begins operating under B.2. limitations in less than ten (10) months.**

EPD Response:

Total Recoverable Copper monitoring requirements have been included under both I.B.1. and I.B.2. effluent limitations to ensure that the permittee collects adequate data for a Reasonable Potential Analysis after ten months.