



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

MAR 04 2017

Ms. Angela Athey, Environmental Engineer
U.S. EPA, Region IV
The Sam Nunn Federal Center
61 Forsyth Street, S.W.
Atlanta, Georgia 30303

RE: EPD Response to Comments
City of Kingsland Water Pollution Control Plant
NPDES Permit No. GA0037800

Dear Ms. Athey:

Thank you for your comments regarding the permit reissuance for the City of Kingsland Water Pollution Control Plant. Attached is a summary of comments from the public and EPD's responses to the issues raised. In addition, we have attached the Permit Addendum documenting the changes (if any) made to the attached permit from the draft 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 Kelli-Ann Sottile of my staff at (404) 463-4945 or Kelli-Ann.Sottile@dnr.ga.gov.

Sincerely,

Jeffrey Larson, Manager
Wastewater Regulatory Program
Watershed Protection Branch

JL/kas

Attachments: Response to Comments, Permit Addendum, Permit

ATTACHMENT – Response to Comments
 City of Kingsland Water Pollution Control Plant (WPCP)
 NPDES Permit No. GA0037800
 (Camden County)

Comment	EPD Response
<p>The 2006 TMDL for Dissolved Oxygen (DO) in the Saint Marys River does not have sufficient documentation to support that the waterbody can assimilate the increased loads that are proposed in the permit.</p>	<p>The TMDL states in Section 5.1 that there is additional assimilative capacity available for increased loads in this segment of the Saint Marys River. Additionally, the TMDL is being revised to increase the WLA for the City of Kingsland's WPCP.</p> <p>The Saint Marys Estuary Model was used to illustrate the effect of the increased load from the expansion of the Kingsland facility, as compared to the reduction from Scrubby Bluff facility, the Saint Marys DO TMDL, and the natural DO of the system.</p> <p>A 10% reduction in the natural DO is typically allowed in the system when the natural is below the standard based on EPA Dissolved Oxygen Criteria. When the natural DO is less than 3.0 mg/L, the allowable criteria only allows for a 0.1 mg/L deficit.</p> <p>The natural DO at river mile (RM) 13 is shown to be 2.36 mg/L. The reduction under the expansion yields a DO of 2.34 mg/L at RM 13, which is equal to that obtained under the 2006 TMDL conditions and within the allowable criteria.</p>
<p>It should be shown that the permit was written with consideration for the 2002 TMDL for Mercury in the Saint Marys River.</p>	<p>The 2002 Mercury TMDL allows for the application of a criteria end-of-pipe wasteload allocation (WLA) for permitted facilities. The City of Kingsland WPCP is assigned a maximum loading of 0.0070 kg/yr.</p> <p>Review of priority pollutant data submitted by the facility indicates that mercury was not detected in the effluent; therefore, additional monitoring is not required at this time. If mercury is measured to levels of concern, then the permittee may be required to perform additional analyses or the permit may be modified to include an effluent limitation for mercury.</p>

<p>It should be shown that the permit limits were written to meet Florida's water quality criteria, as the Saint Marys River is on the border with Florida.</p> <p>Dissolved Oxygen – The DO Standards that apply to the Saint Marys River are those in section (2) of the 62-302.533 document. Florida does not currently apply sections (3) or (4) here.</p>	<p>According to Section 2 Florida DO criteria for Class III waters, the minimum DO levels shall not be below 42% saturation for a daily average, 51% for a weekly average, and 56% for a monthly average.</p> <p>As discussed above, the DO reduction from the City of Kingsland under both the current flow and the expanded flow is within 0.1 mg/L of the natural levels. The discharge under the final permit limits has a negligible impact on DO concentrations in the St. Marys River; therefore, the limits are protective of Florida criteria for DO.</p> <p>The criteria also require monitoring for DO at a frequency of three days per week with a composite sample or ten grab samples per week. The final permit requires monitoring seven days/week by grab sample. In conjunction with the instream monitoring by USGS, EPD believes that this frequency will provide adequate data.</p>
<p>It should be shown that the permit limits were written to meet Florida's water quality criteria, as the Saint Mary's River is on the border with Florida</p> <p>Nutrients – The numeric nutrient criteria for the Upper Saint Marys River Estuary are what apply to the section of the waterbody where the outfall discharges. The current CWA effective standards can be found on page 151 of fl_section62-302.</p>	<p>Florida criteria lists numeric instream limits in the Saint Marys River for Total Phosphorous, Total Nitrogen, and chlorophyll α. In the current permit, the City of Kingsland was required to monitor the effluent for Total Phosphorus, Total Kjeldahl Nitrogen, and Nitrate-Nitrite.</p> <p>The WLA provides a dilution factor for the river of 600 to 1, due to the volume and the tidal influence. Based on the dilution factor and the data reported on discharge monitoring reports (DMRs) from the last 5 years, the City of Kingsland is significantly below Florida's numeric criteria; therefore, numeric limits have not been included in the final permit at this time. The final permit maintains monitoring requirements for Total Phosphorous, Total Kjeldahl Nitrogen, and Nitrate-Nitrite, as well as Organic Nitrogen. If these nutrients are measured at levels of concern, then the permit may be modified to include an effluent limitation.</p>