



ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Watershed Protection Branch
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OCT 10 2017

Jesse Demonbreun-Chapman
Executive Director & Riverkeeper
Coosa River Basin Initiative
408 Broad Street
Rome, GA 30161

RE: EPD Response to Comments
International Paper – Rome Mill
NPDES Permit No. GA0001104

Dear Mr. Demonbreun-Chapman:

Thank you for your comments regarding the permit issuance for the International Paper – Rome Mill NPDES permit. Attached is a summary of your comments and our responses to the issues raised. 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 Ian McDowell of my staff at 404-232-1567.

Sincerely,

A handwritten signature in blue ink, appearing to read "JL", is written over a faint, larger signature.

Jeffrey Larson, Manager
Wastewater Regulatory Program
Watershed Protection Branch

JL/IM
Attachment

**Public Comments and EPPD Responses on Draft NPDES Permit
International Paper – Rome Mill Permit No. GA0001104**

Acronyms

EPD – Environmental Protection Division
TMDL – Total Maximum Daily Loading
Plan G – Reference to 2015 Alabama-Coosa-Tallapoosa River Basin Master Water Control Manual
ELG – Effluent Limit Guideline for Pulp, Paper, and Paperboard, 40 CFR Part 430
TBEL- Technology Based Effluent Limit
WQBEL- Water Quality Based Effluent Limit
BAT – Best Available Technology Economically Achievable
BPT – Best Practicable Control Technology Currently Available
NPDES – National Pollutant Discharge Elimination System
BOD₅ – 5-day Biological Oxygen Demand
Permittee – International Paper – Rome Mill
Rules - Georgia Rules and Regulations for the Water Quality Control Act

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COMMENTS RECEIVED	EPD RESPONSE
<p>Request for extension of public comment period until August 31st.</p>	<p>The public notice complied with all State and Federal requirements and the public comment period will not be extended.</p> <p>The draft permit was public noticed on June 30, 2017 by EPD. In addition a public notice was posted at the county courthouse and a notice was published in the Rome News-Tribune on July 3, 2017 by the permittee.</p>
<p>It appears that EPD has failed to complete this modeling project and is now relinquishing responsibility for modeling to the permit holder and providing the permit holder with an additional seven years to fix a problem that was first identified more than a decade ago. The impartiality of this modeling must be clearly guaranteed prior to the acceptance of this permit.</p>	<p>The permittee has committed to help integrate the EPD RIV-1 model and the Lake Weiss model to update the modeling of dissolved oxygen effects in the region. EPD will be conducting the river modeling; and the permittee will be conducting the lake modeling. The permittee will have periodic meetings with EPD during model development. EPD will oversee the modeling and will review the final model for accuracy and impartiality before approval. The permittee intends to have this modeling used to revise the Coosa River DO TMDL and their permit limits. If the permittee does not conduct the modeling, the permit limits given in the 2004 Coosa River DO TMDL will be retained.</p>
<p>Though a waste load allocation of 2,200 lbs/day was first recommended in the 2004 Total Maximum Daily Load Evaluation for the Coosa River for Dissolved Oxygen, EPD has for 13 years failed to incorporate this limit in IP's permit. EPD is now providing IP with an additional seven years to come into compliance. More immediate action is needed to address this ongoing pollution that contributes to low oxygen levels in the Coosa River and Weiss Lake. Continued delays are</p>	<p>Since 2004, the Coosa River DO measured at the state line has improved, to the point that the 17 mile segment on the Coosa River from Beach Creek to the state line has been removed from the list of impaired waters on the draft 2016 305(b)/303(d) list.</p> <p>The permittee has committed to help integrate the EPD RIV-1 model and the Lake Weiss model to update the modeling of dissolved oxygen effects in the region. EPD believes that the updated models as well as new Plan G minimum flow targets set by the U.S. Army Corp of</p>

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<p>simply not acceptable.</p>	<p>Engineers, may be used to revise the 2004 TMDL for the Coosa River for Dissolved Oxygen.</p> <p>The seven year compliance schedule outlined in the draft permit allows time for model development and TMDL revisions, as well as time for the permittee to secure funding, design, and construct a treatment system to meet their wasteload allocation.</p> <p>In the interim (within 12 months of the effective date of the permit), the permittee is restricted to demonstrated performance levels during years where water quality standards for dissolved oxygen were being met at the State Line. The new limits are stricter during the critical summer months.</p>
<p>The proposed permit does not improve upon the 1997 permit's dissolved oxygen requirements despite the fact that the Coosa River is known to suffer from low dissolved oxygen levels as noted in the 2004 TMDL. The proposed permit includes a minimum dissolved oxygen level of 2.0 mg/L in the effluent of Outfalls Nos. 001, 002, and 005. This permit requirement is not consistent with other NPDES permits nearby, including the City of Rome Blacks Bluff and Coosa Water Pollution Control Plants (6.0 mg/L). What is the justification for the less stringent dissolved oxygen standard for IP effluent?</p>	<p>The minimum dissolved oxygen limit of 2.0 mg/L is based on the wasteload allocation in the 2004 TMDL for the Coosa River for Dissolved Oxygen, and is based on the treatment technology used by the facility to treat their waste.</p>
<p>The proposed permit does not improve upon the 1997 permit's total suspended solids requirements. They</p>	<p>The permittee's facility is a primary industry for which EPA has developed Effluent Limit Guidelines (ELGs) that establish technology-</p>

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<p>remain identical to limit outlined in the 1997 permit. The Clean Water Act requires that permit holders treat effluent using the “Best Available Technology Economically Achievable.” Have technological advancements in the proceeding 20 years not reached a point where IP could remove additional suspended solids from the effluent?</p>	<p>based effluent limits (TBELs) for pollutants of concern. Facility operations at the Rome Mill are subject to 40 Code of Federal Regulations Part 430 Subpart C Pulp, Paper, and Paperboard Effluent Guidelines that establishes Best Practicable Technology (BPT) and Best Available Technology (BAT) Economically Achievable. The limits for total suspended solids comply with the production-based BPT and BAT limitations established in the current Guidelines. Production based effluent limitations for unbleached kraft facilities are determined by multiplying the amount of product produced at the facility by the established multiplying factors in the Guidelines. The proposed permit retains the previous TSS limits, despite an increase in production at the facility effectively requiring more stringent treatment.</p>
<p>The Weiss Lake TMDL requires that NPDES permit holders in Georgia reduce their phosphorus discharges by 30 percent. While it appears that the permit may succeed in reducing phosphorus levels 30 percent over 2005 discharge levels, the proposed permit continues to allow significant discharges of phosphorus from Outfall No. 001 while imposing no limit on the amount of phosphorus that may be discharged from Outfall No. 002 or Outfall No. 005</p> <p>The limit imposed for Outfall No. 001 amounts to about 0.75 mg/L. While this limit is below the 1 mg/L limit imposed on the Coosa Basin’s municipal wastewater treatment plants, it is well above what is technologically achievable.</p>	<p>No phosphorus data is available from Outfall Nos. 002 or 005 to implement the 30% reduction from 2005 phosphorus levels outlined in the Weiss Lake TMDL. Furthermore, Outfall No. 005 is an emergency outfall with intermittent discharges. Total Phosphorus and Ortho-Phosphorus monitoring was included to help characterize the wastestreams in accordance with EPD’s Strategy For Addressing Phosphorus in NPDES Permitting.</p> <p>The Total Phosphorus limit imposed on Outfall 001 satisfies the 30% reduction required by the Weiss Lake TMDL and satisfies EPD’s Strategy for Addressing Phosphorus. The production process itself does not generate phosphorus; however, phosphorus is added to the system to facilitate BOD₅ removal. Further restriction may inhibit the facility’s ability to remove BOD₅ from its effluent.</p>

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<p>EPD staff members have told us that this 1 mg/L for the Coosa Basin is merely a starting point, and that eventually, facilities downstream of Lake Allatoona would be required to meet more stringent phosphorus limits. We were told this several years ago and now EPD is providing a 24-month compliance schedule for meeting the phosphorus limits outlined in this permit.</p> <p>The permit should include more stringent phosphorus limits similar to those imposed on facilities upstream of Lake Allatoona and the 24-month compliance schedule should be shortened.</p>	<p>In 2008, Alabama and EPA established a Total Maximum Daily Load (TMDL) for Nutrient Impairment for Weiss Lake. The TMDL is the WQBEL analysis for the Chattooga and Coosa Rivers. The TMDL requires a 30% reduction in total phosphorus loads and a total target growing season median of 0.06 mg/L at the Coosa River Georgia-Alabama State line and a total target growing season median of 0.16 mg/L at the Chattooga River Georgia-Alabama State line.</p> <p>In 2011, Georgia EPD began implementing its Total Phosphorus Strategy within the Coosa River Basin. Since implementation of the Total Phosphorus Strategy, data shows the total phosphorus levels in the Coosa River at the Alabama-Georgia State line are at, or below, 0.06 mg/L. It is believed that applying the Total Phosphorus Strategy and Weiss Lake TMDL to applicable NPDES point source dischargers in the Coosa River basin will result in compliance with the Weiss Lake TMDL.</p> <p>The Total Phosphorus limit imposed on Outfall 001 satisfies the 30% reduction required by the Weiss Lake TMDL and EPD's current Strategy for Addressing Phosphorus.</p> <p>EPD believes that 24 months is a reasonable amount of time for the facility to come into compliance with the more stringent phosphorus limits.</p>
<p>The TMDL for Fecal Coliform in the Coosa River was set over ten years ago. Sanitary waste has been included in IP's wastewater for over a decade with no limits on these bacteria. Furthermore, the management of sanitary</p>	<p>EPD believes that 24 months is a reasonable amount of time for the permittee to assess the contribution of fecal coliform from non-human sources, as a result of having large ponds that attract wildlife. It also allows time to design a solution to achieve compliance, secure funding,</p>

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<p>waste and Fecal Coliform is nothing new and has well documented methods and technologies for compliance. The compliance schedule for Fecal Coliform in Outfall 001 should be shortened to no more than 12 months.</p>	<p>and complete necessary upgrades, as needed.</p>
<p>The existing permit and the proposed permit lack limit on the amount of wastewater that can be discharged to the Coosa River and Smith Cabin Creek. What is EPD's explanation for not including numeric limit for flow?</p>	<p>EPD does not regulate flow for industrial discharge permits, unless there is a specific WQS that could be violated by the return load to the receiving stream. EPD encourages permittees to return flows of treated wastewater to the receiving waters.</p>