

# Georgia Department of Natural Resources

Environmental Protection Division • Watershed Protection Branch  
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Judson H. Turner, Director

December 30, 2015

Persons who commented on  
Draft NPDES Permit No. GA0050243

RE: Comments Received for  
City of Louisville Forstmann  
Water Pollution Control Plant (WPCP)  
NPDES Permit No. GA0050243  
(Jefferson County)

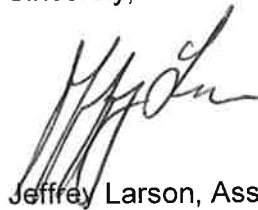
Dear Sir/Madam:

Thank you for your comments regarding the permit issuance for the City of Louisville Forstmann Water Pollution Control Plant. Attached is a summary of comments from the public 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

**Public Comments and EPD Responses on Draft NPDES Permit  
City of Louisville Forstmann WPCP – GA0050243**

COMMENTS RECEIVED	EPD RESPONSE
<p>Will a Sludge Management Plan (SMP) be necessary for operation of the City of Louisville Forstmann Water Pollution Control Plant (WPCP)?</p>	<p>According to the Sludge Addendum submitted with the City of Louisville's permit application for the Forstmann WPCP, sludge produced at the plant will be sent to a permitted municipal landfill for disposal. In accordance with 391-3-6-.17, an SMP is required only when a facility will not dispose of its sludge in a permitted landfill. Because the City of Louisville Forstmann WPCP will send its sludge to a landfill, a SMP is not necessary.</p>
<p>The permit does not require the City of Louisville to reach Phase II operation, as defined on the Fact Sheet-1.7 Description of the Project. Therefore it is possible the City will never reach Phase II, which utilizes a UV disinfection unit. The City could essentially operate under Phase I discharge limits for the duration of the permit and only apply chlorination/dechlorination. The total residual chlorine discharge limit of 0.22 for Phase I is too high. Other NPDES permits issued by the state call for lower concentrations, such as 0.013. We appreciate the City's representatives verbally assuring us that the UV disinfection unit has been ordered and will be installed, however we think EPD should either a) make Phase II a requirement or b) lower the total residual chlorine discharge limit in Phase I.</p>	<p>The calculation of the permit limit for Total Residual Chlorine (TRC) is dependent on the instream waste concentration (IWC) requirements found in EPD's TRC Strategy dated March 15, 2010, the permitted flow of the plant, and the flow of the stream into which it discharges. The larger the IWC, the less dilution is available; thus, a smaller TRC limit is required.</p> <p>In this case, a design flow of 1.0 MGD was used for Phase I Total Residual Chlorine (TRC) effluent limitation calculations. A 7-day, 10-year minimum flow (7Q10 flow) of 30 cubic feet/second was used for the Ogeechee River flow at the location of discharge. EPD's TRC Strategy states that, "where there is reasonable potential to exceed 11 ug/L in the receiving stream, the NPDES permit will be reissued with a numeric TRC limit based upon the 11 ug/L TRC criterion, the 7Q10 of the receiving stream, and the permitted or average flow. If the calculated TRC limit is greater than 0.5 mg/L, the permit will be reissued with a technology-based effluent limit of 0.5 mg/L." The TRC limitation for the City of Louisville Forstmann WPCP was calculated using the following equation:</p> $[TRC]_{\text{Effluent}} = \frac{(Q_{\text{Plant}} + Q_{\text{Stream}}) \times [TRC]_{\text{Stream}}}{Q_{\text{Plant}}}$ <p>The effluent limitation of 0.22 mg/L is less than 0.5 mg/L; therefore, this limit was used in the permit. The City can install UV disinfection at any time provided they notify EPD.</p>

**Public Comments and EPD Responses on Draft NPDES Permit  
City of Louisville Forstmann WPCP – GA0050243**

COMMENTS RECEIVED	EPD RESPONSE
<p>Concerns were raised about the ammonia discharge limit as it directly relates to flow. Another NPDES permit issued by the state called for an ammonia limit of 1.5 mg/L on a 3 MGD flow. The City's new permit will allow 2.0 mg/L on a 1 MGD flow in Phase I, making it more concentrated overall. EPD should decrease the amount of ammonia discharge allowed (monthly and weekly averages) for both Phase I and Phase II, but especially for Phase I.</p>	<p>Ammonia limits in the permit were determined using modeling that considers the design flow of the plant, stream flow at the point of discharge, and external factors (pH and temperature) in the stream. Plant flow is not the sole consideration in the calculation of ammonia permit limits.</p> <p>The ammonia permit limits are protective of instream dissolved oxygen (DO) levels and comply with EPD's 2013 Ammonia Criteria.</p>
<p>The Ogeechee Riverkeeper would like access to conduct stream, bacterial, and macroinvertebrate sampling in accordance with Adopt-A-Stream Standards.</p>	<p>Comment noted.</p>
<p>The office of Senator Jesse Stone and the Jefferson County Commission appreciate the efforts of all stakeholders in this process and are excited to support the new City of Louisville Wastewater Treatment Facility and the new Coastal Processing facility. They are significant additions to the City of Louisville economy and both parties look forward to the benefits that the facilities will provide to the community and in the protection of the Ogeechee River Basin.</p>	<p>Comment noted.</p>

**FACT SHEET – Addendum**  
**City of Louisville Forstmann WPCP**  
**NPDES Permit No. GA0050243**  
**Jefferson County**

**APPLICATION FOR REISSUANCE OF A NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT TO DISCHARGE TREATED WASTEWATER INTO WATERS OF THE STATE OF GEORGIA**

Were there any revisions between the draft and final permit?       Yes     No

If yes, specify:

Fact Sheet	Added monitoring requirements for Organic Nitrogen, Nitrate-Nitrite, and Total Kjeldahl Nitrogen once per month.
Part I.B.1.	Added monitoring requirements for Organic Nitrogen, Nitrate-Nitrite, and Total Kjeldahl Nitrogen once per month.
Part I.B.2.	Added monitoring requirements for Organic Nitrogen, Nitrate-Nitrite, and Total Kjeldahl Nitrogen once per month.

The permittee was notified of the revisions from the draft to the final permit.