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
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404-463-1511

Mr. David Clark, Director
Fulton County Public Works Department
141 Pryor Street S.W.
Suite 6001
Atlanta, GA 30303

RE: Big Creek Water Reclamation Facility (WRF)
NPDES Permit No. GA0024333
(Fulton County)

Dear Mr. Clark:

We are in receipt of your comments on the draft permit for the Big Creek WRF. Attached is a summary of the comments received and our responses to those comments.

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 Benoit Causse of my staff at 404-463-4958 or *benoit.causse@dnr.ga.gov*.

Sincerely,

Jeffrey Larson, Assistant Branch Chief
Watershed Protection Branch

JL\bsc
Attachment: Response to Comments
cc: Mr. OP Shukla, Fulton County (*OP.Shukla@fultoncountyga.gov*)

ATTACHMENT
Response to Comments
Fulton County Department of Public Works
Big Creek Water Reclamation Facility
NPDES Permit No. GA0024333
(Fulton County)

Comment # 1: Replace "Water Pollution Control Plant" with "Water Reclamation Facility".

EPD Response:

Facility name has been revised as requested.

Comment # 2: Include "Escherichia coli" in the definition of monthly average (Part I.A.1.b.)

EPD Response:

This omission has been corrected. We also included Escherichia coli in the weekly average definition (Part I.A.1.c).

Comment # 3: Allow the week to begin at 6:00a.m. Sunday and end at 6:00a.m. the following Sunday (Part I.A.1.c).

EPD Response:

Part I.A.1.c has been revised as requested.

Comment # 4: Include "Escherichia coli" for the reporting requirements (Part I.A.1.d.).

EPD Response:

This omission has been corrected.

Comment # 5: Replace "chlorination" with the word "disinfection" in Part I.A.1.f.

EPD Response:

Part I.A.1.f has been revised as requested.

Comment # 6: It is requested that sewage sludge generated at the facility be allowed to be sent to a third-party for further processing for beneficial reuse.

EPD Response:

In accordance with Section 391-3-6-.17 of the Rules and Regulations for Water Quality Control, the proposed sludge management plan (SMP) to deliver sludge to a third party for further treatment and ultimate disposal is subject to a 30-day public comment period. Since language

was not included in the draft permit, it cannot be added to the permit at this time. Please contact Benoit Causse of my staff if you wish your permit to be modified. A 30-day public comment period will be required.

Comment # 7: Delay the instream temperature limitation and monitoring implementation schedule to January 1, 2017 to allow more time for the U.S. Geological Survey (USGS) to install monitoring gauges in the Chattahoochee River.

EPD Response:

The instream temperature limitation is currently in effect (Refer to Part I.C.11 of your permit issued on May 1, 2012); therefore, the limit will be applicable on the effective date of the reissued permit. However, we have no objections to postpone the more stringent monitoring requirements (continuous monitoring) to allow more time for USGS to install the gauges. Language in the permit has been modified to require weekly monitoring until December 31, 2017 and continuous monitoring on January 1, 2018 and after.

Comment # 8: It is requested that after the first four quarterly chronic WET tests within the first year of operating under the 38 MGD permit have been completed, that the chronic WET testing requirement be one test a year.

EPD Response:

Annual WET tests have been added to the monitoring requirements.

Comment # 9: It is requested that after the first three priority pollutant scans within the first year of operating under the 38 MGD permit have been completed, that the priority pollutant scan requirement be one test a year.

EPD Response:

Annual Priority Pollutant Scans have been added to the monitoring requirements.

Comment # 10: It is requested that the local limits review and evaluation requirement be changed to be allowed to be conducted and submitted to EPD once every five years.

EPD Response:

40 CFR Part 122.44(j)(2)(ii) requires that publicly-owned treatment works (POTWs) provide a written technical evaluation of the need to revise local limits following permit issuance or reissuance. Although the federal regulations do not specify a timeframe for submittal, it has been determined that allowing up to five years after permit reissuance is not acceptable. The permit has been revised to require the written technical evaluation to be submitted within 30 months of the effective date of the permit.