



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

Mr. Kevin Jeselnik, Staff Attorney
Chattahoochee Riverkeeper
3 Puritan Mill
916 Joseph E. Lowery Blvd. NW
Atlanta, Georgia 30318

JUN 26 2017

RE: Response to Comments
City of Dahlonega
Water Pollution Control Plant (WPCP)
NPDES Permit No. GA0026077
Lumpkin County

Dear Mr. Jeselnik:

The Georgia Environmental Protection Division (EPD) is in receipt of your comment letter, dated May 15, 2017, regarding the City of Dahlonega WPCP draft permit. After careful consideration of your comments, EPD has determined that the draft permit meets all necessary requirements and is protective of the environment. Therefore, EPD has issued the NPDES permit.

Enclosed is Attachment A, which summarizes the comments received and EPD's responses to the comments. EPD appreciates your interest in this matter.

If you have any questions, please contact Kim Hembree of my staff at 404-463-4937 or kim.hembree@dnr.ga.gov.

Sincerely,

Jeffrey Larson, Assistant Branch Chief
Watershed Protection Branch

JL\kbh

Attachment: Attachment A – Response to Comments

Attachment A
 Response to Comments
 City of Dahlonega Water Pollution Control Plant
 NPDES Permit No. GA0026077
 June 2017

Public Comment	EPD Response
<p>On December 22, 2014 EPD executed a consent order with the facility for permit violations of phosphorus and ammonia. The facility was required to...submit a corrective action plan and compliance schedule that would eliminate permit violations. According to Discharge Monitoring Reports (DMRs) obtained from EPD, from January 2015 - March 2017 the facility has exceeded the monthly average concentration-based effluent limit for Total Phosphorus 6 times. According to EPD files, no additional fines have been issued for these permit exceedances. There are no records on file at EPD of any steps taken by the permittee to comply with the 2014 consent order.</p>	<p>At this time EPD has not executed any additional enforcement actions for DMR violations for this Plant. The Permittee submitted a corrective action plan in accordance with the referenced 2014 Consent Order. This corrective action plan included approximately \$3,000,000 in Plant upgrades. On May 1, 2017 the Permittee notified EPD that all of the plant upgrades were complete. On May 18, 2017 EPD conducted a follow up inspection to see the upgrades at the Plant.</p>
<p>Has the permittee adhered to its compliance schedule and successfully implemented corrective measures? If so, has the permittee explained or can the permittee justify its continued violations of its Total Phosphorus effluent limit.</p>	<p>The permittee completed plant upgrades on May 1, 2017. A review of Discharge Monitoring Report (DMR) shows that the plant met the Total Phosphorus and Ammonia limits for the month of May 2017.</p>
<p>If the permittee has not implemented corrective actions as required by the 2014 consent order, we request an update from EPD on the permittee's efforts to do so, as well as the agency's plan to bring the permittee into compliance.</p>	<p>The Permittee has implemented corrective actions as required by the 2014 Consent Order.</p>
<p>We encourage EPD to examine compliance with effluent limits at this facility and consider adding language to the draft permit to mandate facility upgrades to ensure that the facility is meeting the effluent limits outlined in Part B.1 of the draft permit.</p>	<p>The permittee has implemented corrective actions and completed plant upgrades on May 1, 2017. EPD expects the facility to meet effluent limits on the effective date of the permit.</p>