



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

Persons who commented on Draft NPDES Permit No. GAP050304

RE: EPD Response to Comments
DRT America, LLC
Pretreatment Permit No. GAP050304

Dear Commenter:

Thank you for your comments regarding the permit issuance for the DRT America, LLC pretreatment permit. Attached is a summary of comments from the public and our responses to the issues raised. In addition, we have attached the Permit and Permit Rational Addendums documenting the changes made to 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 Audra Dickson of my staff at 404-463-4934.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jeffrey Larson".

Jeffrey Larson, Manager
Wastewater Regulatory Program
Watershed Protection Branch

JL/ahd
Attachment

**Public Comments and EPPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

Due to the volume of comments received and the number of topics covered in a comment, EPPD has summarized and grouped comments together based on the topic.

Table of Contents

Acronyms.....	2
General Concerns.....	3
POTW Capacity & Operations.....	8
Water Quality & Environmental Health.....	11
Wastewater Treatment.....	23
Monitoring & Sampling.....	25
National Landmark & Scenic River Designation.....	27
Water Quality Modeling.....	28
Public Awareness & Public Comment Period.....	30
Community Involvement & Environmental Responsibility.....	31
Alternative Treatment & Disposal.....	33
Emergency Conditions.....	34
Drinking Water Concerns.....	35

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

Acronyms

WPCP – Water Pollution Control Plant
NPDES – National Pollutant Discharge Elimination System
WPP – Watershed Protection Plan
BMP – Best Management Practice
TMDL – Total Maximum Daily Loading
LAS – Land Application System
EPD – Environmental Protection Division
EPA – Environmental Protection Agency
POTW – Publicly Owned Treatment Works
BOD₅ – 5-day Biological Oxygen Demand
MCL – Maximum Contaminant Level
OCPSF – Organics, Chemicals, Plastics, and Synthetic Fibers
Rules - Georgia Rules and Regulations of the Water Quality Control Act
USGS – United States Geological Survey
FEMA – Federal Emergency Management Agency
TBEL- Technology Based Effluent Limit
WQBEL- Water Quality Based Effluent Limit
WQS – State of GA Water Quality Standards
PPS – Priority Pollutant Scan
WET – Whole Effluent Toxicity
VOC – Volatile Organic Compound
TDS – Total Dissolved Solids
OMR – Operational Monitoring Report
DMR – Discharge Monitoring Report
GORA – Georgia Open Records Act
MBR – Membrane Bioreactor
CST – Crude Sulfate Turpentine
CFS – Cubic Feet Per Second
GWC – Down-gradient Groundwater Monitoring Well

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPD RESPONSE
General Concerns	
<p>EPD should not issue a pretreatment permit absent a secure plan for wastewater disposal.</p>	<p>EPD considered the capacity of the City of Springfield's WPCP to handle DRT America's wastewater after receipt of DRT America's pretreatment application identifying the City of Springfield's WPCP as the receiving facility. In addition, EPD held meetings with both the city and industry to discuss modifications necessary to the City's plant to accept the pretreated wastewater at the Springfield POTW. In fact EPD proposes to issue a modified permit to the City of Springfield that will adequately process the pretreated effluent from DRT America that includes changes to 1) land application system rates and 2) hydrographic controlled releases from the City's NPDES outfall. DRT America will be responsible for ensuring that limits in the proposed pretreatment permit are not exceeded so that the City of Springfield's WPCP operations are continually protected and that upsets do not occur.</p>
<p>The DRT Permit should be denied.</p>	<p>EPD has evaluated the submitted permit application and supporting documentation and proposed a pretreatment permit in accordance with applicable Federal and State regulations ensuring the permit is legal and enforceable. It is important to note that DRT America must first pretreat its own wastewater and comply with its own set of pretreatment limits so that the City's WPCP is not negatively impacted by DRT America's discharge. The City of Springfield likewise has its own set of effluent limits which are protective of Ebenezer Creek and groundwater at the land application site. Together these two permits ensure protection of water quality standards, human health, and the environment.</p>
<p>Ecotourism is becoming an attraction for residents and outsiders. Any devaluation of the region could impair the future of this activity.</p>	

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPD RESPONSE
<p>Residents living within the region are first caretakers of the area. If they see any doubt/action that authorities undervalue the region, they will give up their interest in the conservation of Ebenezer Creek. If the residents give up and/or leave, the area will be degraded and less monitored. Thus the tax base of Springfield will be hurt in unpredictable ways for the present and future.</p>	
<p>90% of Georgia industries already use the Savannah river system as a dumping ground. We do not need to allow another industry to poison the water.</p>	
<p>I guarantee what EPD is allowing is not legal; however EPD uses its position to rewrite rules or hamper litigation.</p>	
<p>Ebenezer should be protected from toxic substances that could affect the flora, fauna, and ecosystems of Ebenezer Creek. It's not worth the risk to the flora, fauna, and ecosystem to allow this permit.</p>	
<p>Can EPD say with absolute assurance that no chemicals from DRT America will enter my property as any time or point?</p>	

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPD RESPONSE
<p>Any water permit pertaining to Ebenezer Creek, either from DRT America LLC or from other applicants, should not allow the introduction of any constituents, chemicals or otherwise, that do not occur naturally in the waters of Ebenezer Creek and its adjacent wetland systems.</p>	
<p>The creek should be protected so families can continue to fish there.</p>	
<p>Has DRT America discussed future expansion plans, and wastewater needs with EPD?</p>	<p>The DRT America application did not indicate any planned expansions within the next three years at the facility.</p>
<p>Does the Springfield WPCP have an industrial pretreatment program? If not, how will permitting, administration, and monitoring of dischargers to the WPCP be performed and who will be responsible for enforcement?</p>	<p>The City of Springfield does not have an approved pretreatment program. Industrial dischargers to the Springfield WPCP must obtain a pretreatment permit from EPD in accordance with Federal and State regulations. EPD will be responsible for compliance and enforcement of the pretreatment permit.</p>
<p>It is stated that a watershed protection plan was approved in 2016. Is the WPP the guiding document for the action plan to restore Ebenezer? How long have restoration activities been underway and how long do they continue until it is deemed unsuccessful?</p>	<p>The City's Watershed Protection Plan (WPP) was approved in 2016. The WPP describes watershed protection strategies that will be used by the City to restore and protect water quality and maintain the biological integrity of the waters within its watershed assessment area. This is accomplished primarily through the development and implementation of Best Management Practices (BMPs). An important element of the WPP is measuring the effectiveness of the BMPs through a long-term</p>

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPD RESPONSE
<p>It is stated that the TMDL for dissolved oxygen developed in 2000 was replaced by a 5R plan.</p>	<p>The statement in the City of Springfield’s proposed fact sheet is incorrect. The City’s fact sheet has been amended by stating that the requirements in the TMDL for Ebenezer Creek still apply. The permit does not allow any discharge of oxygen demanding compounds during critical dry weather conditions.</p>
<p>There is a lack of regulatory framework to have the regulatory oversight that is needed for this permit.</p>	<p>EPA originally published the General Pretreatment Regulations on June 26, 1978. These regulations, as amended, establish the necessary regulatory framework for oversight of pretreatment facilities. EPA has delegated the authority to the State of Georgia to implement the pretreatment program.</p>
<p>The permit should include adaptive management during the permit term.</p>	<p>EPD has the authority to modify, suspend, revoke, or reissue the permit in whole or in part during its term should cause arise.</p>
<p>Is there a number to call to report any incidents or concerns?</p>	<p>The EPD assigned compliance office is the Coastal District Office. The phone number for the Coastal District Office, located in Brunswick, is (912) 264-7284. The EPD Emergency Response number is 1-800-241-4113.</p>

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPD RESPONSE
<p>How has DRT begun planning in 2014 and we are just learning about this wastewater permit in 2017?</p>	<p>EPD and DRT America are responsible for notifying the public through public notice once a draft permit is ready for public comment. The public hearings hosted for the City of Springfield and DRT America were designed to provide additional information to the public and to receive public comment regarding the proposed permits.</p>
<p>The Ogeechee River doesn't look anything like it did before King America was permitted and it will be the same case here.</p>	<p>Comment noted. This permit is for DRT America who will discharge to the City of Springfield's WPCP and not directly to State waters.</p>
<p>There should be no discharging into the creek. DRT should only operate if they can pump wastewater to the Savannah treatment plant or somewhere else.</p>	<p>DRT America will discharge to the City of Springfield's WPCP and not to the creek.</p>
<p>Public property owners have the power to shut down the creek if need be.</p>	<p>Comment noted.</p>
<p>The wastewater is running from the Springfield spray field and converting my land into wetlands.</p>	<p>The 2009 iteration of the City's LAS Permit No. GA02-032 included requirements for the City to develop a plan to ensure that operation of the land application system does not substantially increase groundwater levels on adjacent properties. The City submitted a mounding analysis along with an operational plan in 2016. The mounding analysis determined that, among the onsite monitoring wells, the maximum LAS-induced groundwater mounding would occur at GWC-4. Accordingly, EPD included limitations in the permit to maintain a minimum depth to water in monitoring well GWC-4 of 36" and 54" during winter and</p>

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPD RESPONSE
	<p>summer months, respectively. Based on a comparison of historical application rates and groundwater levels, this strict standard will reduce mounding within the irrigation area and within the LAS buffer zone adjoining the adjacent down-gradient properties. Although the permitted flow to the sprayfield is 0.542 MGD and the application rate is up to 2.5 in/week, the limiting parameter for the LAS operation will be the water table elevations.</p>
<p>The Springfield permit application does not have the box checked indicating it is receiving industrial waste.</p>	<p>The City of Springfield's NPDES permit application for the WPCP has indicated it does not receive industrial waste. The City will begin receiving industrial waste once DRT America is online. Hence, the box at the time should not have been checked.</p>
<p>Pages 3-4 of the Permit Rationale should be modified to say "conversion factor" instead of "conversation factor" and the conversion factor should not include 'time' as a unit.</p>	<p>The fact sheet has been modified to reflect the suggested changes.</p>
<p>POTW Capacity & Operations</p>	
<p>Satellite imagery of the POTW's absorption field appears to show eutrophication, indicating excess BOD pass-through. An increase in BOD₅ contribution becomes problematic for the DO TMDLs for Ebenezer Creek and the Savannah River.</p>	<p>No satellite imagery was included with the submitted comment for EPD. Based on the available data, EPD has determined there is not a concern for eutrophication on the POTW's sprayfields and that DRT America's BOD₅ limitations are protective of the POTW and the environment.</p>

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAPP050304**

COMMENTS RECEIVED	EPD RESPONSE
<p>The wide range of acceptable pH could affect the POTW's treatment and further inhibit its aeration treatment.</p>	<p>The pH limitations set forth in DRT America's permit are in accordance with the local Sewer Use Ordinance, Federal 403 Regulations, and State Regulations which are all designed to be protective of facility operations.</p>
<p>The permit lacks an evaluation of the capacity of the Springfield WPCP to handle the industrial flow.</p>	<p>The capacity for the City of Springfield's WPCP to receive industrial waste was evaluated after the submittal of DRT America's pretreatment application and during the permitting process for both DRT America and the City of Springfield's WPCP. There is adequate capacity to handle the additional flow.</p>
<p>The Springfield WPCP cannot/fails to reasonably demonstrate that it can suitably handle this kind and amount of industrial waste.</p>	<p>Based on the industrial pretreatment application, benzene is not expected to be present in DRT America's effluent. The low levels of Toluene in DRT America's effluent are expected to drop out during treatment at the POTW. In addition, before discharge to the City of Springfield WPCP toluene is limited to a daily average of 28 µg/L and a daily maximum of 74 µg/L. These limitations are more stringent than the current instream water quality criteria of 5,980 µg/L and the MCL of 1,000 µg/L for drinking water.</p>
<p>What provisions are there for treating the effluent of DRT America at the Springfield WPCP particularly benzene and toluene?</p>	<p>DRT America is classified under the Organics, Chemicals, Plastics, and Synthetic Fibers (OCPSF) point source category for which federal regulations have been promulgated in 40 CFR 414. EPA evaluated OCPSF facilities across the nation and established technology-based effluent limitations that must be included in the permit. Nitrobenzene is not expected to be present in DRT America's wastestream, however a</p>
<p>What concentrations of nitrobenzene are expected in the DRT America wastestream and can the acceptable concentrations of nitrobenzene be lowered to a concentration below those that interfere with the aeration capacity in sewage treatment.</p>	<p>DRT America is classified under the Organics, Chemicals, Plastics, and Synthetic Fibers (OCPSF) point source category for which federal regulations have been promulgated in 40 CFR 414. EPA evaluated OCPSF facilities across the nation and established technology-based effluent limitations that must be included in the permit. Nitrobenzene is not expected to be present in DRT America's wastestream, however a</p>

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPD RESPONSE
<p>That portion of Springfield's domestic wastewater that holds DRT America's wastewater should be diverted from the LAS.</p>	<p>technology-based effluent limit has been included in the permit in accordance with federal regulations.</p> <p>The City of Springfield's WPCP is not designed and operated to keep domestic and industrial wastestreams separate. DRT America's pretreated wastestream is sent to the City's WPCP where it is further treated prior to land application. Land application is an important and viable component of the City's treatment system.</p>
<p>The proposed maximum daily discharges of 2.5 MGD for the WPCP are too high when the quantity of discharged effluent is a large percentage of the total flow. Current release schedules and limits should be retained.</p>	<p>The City of Springfield's proposed WPCP permit allows the City to discharge up to 2.5 MGD (3.9 cfs) maximum. The average annual stream flow is 92 cfs. The USGS gauge recorded flows as high as 500 cfs during the period 1990-2016. The instream wastewater concentration (IWC) is 4% or less under these streamflow conditions.</p> <p>Additionally, the rationale for the hydraulic capacity increase is the conservation of mass loadings. The permit includes more stringent limits to compensate for the higher flowrates. Overall no additional pollutant loading has been permitted to the creek.</p>
<p>There should be more assurances that aeration can be properly conducted at the POTW.</p>	<p>EPD evaluated DRT America's pretreatment application and conducted a local limits analysis to determine that limits are protective of POTW operations. Local limits /and sewer use ordinance requirements are designed to be protective of the POTW. It is also the responsibility of the City of Springfield to provide proper aeration for its wastewater treatment system at all times.</p>

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPD RESPONSE
<p>How much effluent does DRT America discharge, how much goes to Springfield, and does Springfield have the capacity to take the effluent.</p>	<p>DRT America will be permitted to discharge a daily average flow of 0.056 MGD and a daily maximum 0.112 MGD of effluent to the City of Springfield. The capacity for the City of Springfield's WPCP to receive industrial waste was evaluated after the submittal of DRT America's pretreatment application. There is adequate capacity at the City plant to further treat DRT America's discharge.</p>
<p>Some of the DRT America pollutants could cause problems with Springfield's operations.</p>	<p>DRT America is classified under the Organics, Chemicals, Plastics, and Synthetic Fibers (OCPSF) point source category for which federal regulations have been promulgated in 40 CFR 414. The DRT America pretreatment permit is compliant with 40 CFR 414 OCPSF regulations and 40 CFR 403 general pretreatment regulations which ensure discharge to a POTW does not cause interference with POTW operations.</p> <p>Additionally, EPD evaluated DRT America's pretreatment application and conducted a local limits analysis to ensure that limits were protective of POTW operations and water quality.</p>
<p>Water Quality & Environmental Health</p>	
<p>Further discharge sources should not be allowed when Ebenezer Creek is already impaired for dissolved oxygen levels and pH as they will only exacerbate the problem and possibly create new ones (i.e. pollutant buildup, fish kills, etc.).</p>	<p>To accommodate DRT America's effluent EPD proposed an increase in the hydraulic capacity at the City of Springfield WPCP. The rationale for the hydraulic capacity increase is the conservation of mass loadings. The permit includes more stringent limits to compensate for the higher flowrates. Overall no additional pollutant loading has been permitted to the creek.</p>

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPD RESPONSE
<p>The Port of Savannah has worked for a long time to gain approval to deepen and widen the Savannah River and build a containment area to add water when oxygen is low. Will that be enough to offset low oxygen levels that this permit might cause?</p>	<p>In addition, in comparison to the City's previous permit issued in 2002, the proposed City of Springfield WPCP permit will have reduced nutrient loads and the maximum pH of 8.5 s.u. has been reduced to 7.5 s.u. to further protect Ebenezer Creek.</p>
<p>The risk of accidental spills and releases is too high and the damage it could cause to Ebenezer Creek, which is a low-flow system incapable of flushing itself, is too much to justify permitting DRT America.</p>	<p>The City of Springfield WPCP is equipped to handle the proposed BOD₅ loading from DRT America's effluent and no adverse effects on dissolved oxygen are expected. Furthermore, the proposed City of Springfield's WPCP permit features a more stringent dissolved oxygen minimum limit of 6.0 mg/L which is more protective of dissolved oxygen levels in Ebenezer Creek than the previous permit issued in 2002.</p>
<p>How were the historic conditions and eutrophication of Ebenezer Creek and the documented impairments of the Savannah River taken into consideration when issuing the permit?</p>	<p>Best Management Practice (BMP) language is included in the proposed DRT America Permit to ensure that the risk of accidental spills and releases is avoided to further protect Ebenezer Creek.</p>
<p>We need to be very careful that the creek doesn't return to being eutrophic with the introduction of more wastewater.</p>	<p>For the proposed City of Springfield WPCP permit, the permitted loading for ammonia was decreased from 3,459 kg/year to 830 kg/year to ensure nutrient loading to the creek is addressed. Monitoring for Total Phosphorus, Ortho-Phosphate, Total Kjeldahl Nitrogen, Organic Nitrogen, and Nitrate-Nitrite monitoring has been included in the permit to quantify nutrient loading to Ebenezer creek and establish a future nutrient management plan. DRT America is not expected to add significant nutrient loading to the City's POTW.</p>

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAPP050304**

COMMENTS RECEIVED	EPD RESPONSE
<p>What is the supporting rationale and plan for evaluating and reporting impacts of the permit?</p>	<p>The City of Springfield's proposed WPCP permit requires priority pollutant scans (PPS) and whole effluent toxicity (WET) tests to be conducted on its discharge to Ebenezer Creek. EPD may require more frequent monitoring, or monitoring of other pollutants not specified in the permit if they are suspected. In addition, the City of Springfield's proposed WPCP permit has been revised to include a requirement for the City to conduct one PPS and one WET test within 120 days of the effective date of the DRT America permit. EPD expects these tests to be sufficient for identify any possible impact to Ebenezer Creek.</p>
<p>What kind of monitoring will occur to ensure the point source discharge or other discharge is free from the chemicals found in the DRT America wastewater?</p>	
<p>What are the protections set in place to protect the Creek and its ecosystem?</p>	
<p>What assurances does the public have that the pre-treated chemicals to be released will not negatively impact the environment, groundwater or surface water quality within the Ebenezer Creek watershed?</p>	
<p>EPD should conduct a more thorough analysis and assessment of planned operations by DRT America in order to identify, quantify, and exclude introduction of any levels of pollutants to Ebenezer Creek systems.</p>	<p>DRT America has provided data to the EPD on wastewater characteristics based on their technical expertise and familiarity with plant operations/technology associated with this activity. Although toluene is the only volatile organic chemical expected, DRT America must sample for all constituents listed in 40 CFR 414 Organics, Chemicals, Plastics, and Synthetic Fiber (OCPSF) category.</p>
<p>EPD should do everything within its purview and scope of operations to avoid any compromise of the integrity of natural systems and processes by preventing deleterious agents from entering the waste stream as well as by recommending the strictest and most</p>	<p>If wastewater characteristics do not reflect what was reported in the application, EPD has the authority to modify, suspend, revoke, or reissue the pretreatment permit in whole or in part.</p>

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPD RESPONSE
<p>advanced treatment methods for implementation by DRT America.</p>	<p>The levels of pollutants permitted to discharge through the DRT America pretreatment permit and City of Springfield WPCP proposed NPDES permit are protective of the Ebenezer Creek system.</p>
<p>The release of these contaminants may make the fish harmful for human consumption.</p>	<p>Of the permitted volatile organic compounds included in DRT America’s permit, only toluene is expected in DRT America’s final effluent. Long term accumulation levels were considered for toluene. When released to surface waters, toluene rapidly volatilizes to air. With a half-life of around 5 hours, EPD does not expect that toluene will impact Ebenezer Creek. In the soil, toluene biodegrades. Toluene also experiences anaerobic degradation. With high levels of degradation and the small concentrations of permitted toluene, EPD believes toluene will also not impact the soil.</p>
<p>The effects of deleterious chemical pollutants on the health of these forests, as well as other communities of the swamps, should be assessed and delineated prior to granting of this permit.</p>	
<p>Has EPD considered the long-term accumulation levels of Toluene because of “site-specific conditions”?</p>	
<p>How will the permitted VOC’s affect the creek’s waters?</p>	
<p>Toluene which will be left in the water from DRT is a known carcinogen; DRT should be required to remove all pollutants from their water before it is discharged.</p>	<p>Toluene is limited to a daily average of 28 µg/L and a daily maximum of 74 µg/L. These limitations are more stringent than the current instream water quality criteria of 5,980 µg/L and the MCL of 1,000 µg/L for drinking water.</p> <p>Toluene is not expected to be present in the Springfield WPCP discharge to Ebenezer Creek or in the groundwater as a result of DRT America’s discharge. The currently proposed limits are protective of the</p>

**Public Comments and EPPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPPD RESPONSE
	City's WPCP, human health, and the environment.
Can the public be assured that odor in the water, and possible taste of fish caught within the DRT America discharge area, will not be negatively affected by the discharge?	DRT America does not discharge to Ebenezer Creek. DRT America's effluent is sent to the City of Springfield's WPCP for additional treatment. The City of Springfield's WPCP effluent characteristics should not be altered significantly and no odor or taste concerns are expected.
I fear this permit could create a cancer cluster or severely damage this area for future generations. Especially with the chance of land applied water contaminating wells.	The City of Springfield's proposed WPCP permit includes conditions/limits for groundwater monitoring at down-gradient wells as well as soil monitoring to ensure LAS operations are safely conducted.
The Watershed Protection Demonstration Project recommended that wastewater discharge to Ebenezer Creek be eliminated and LAS adjacent to the Ebenezer Creek can still runoff to the creek.	The Watershed Protection Demonstration Project (WPDP) analysis indicated that a reduction of nutrient loading to Ebenezer Creek was required. The publication advocated the use of a LAS system to completely eliminate nutrient loading to Ebenezer Creek.
The EPPD should follow recommendations from the Ebenezer Creek Watershed Protection Demonstration Project and disallow direct discharges into Ebenezer Creek.	The City of Springfield does not (and has not) had the capacity to land apply all the wastewater. The proposed City of Springfield WPCP permit will retain the ability to discharge to Ebenezer Creek. To achieve the goal of nutrient reduction referenced in the WPDP, the permitted loading for ammonia was decreased from 3,459 kg/year to 830 kg/year to ensure nutrient loading to the creek is addressed. Monitoring for Total Phosphorus, Ortho-Phosphate, Total Kjeldahl Nitrogen, Organic Nitrogen, and Nitrate-Nitrite monitoring has been included in the permit to quantify nutrient loading to the creek and to

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPD RESPONSE
	establish a future comprehensive nutrient management plan.
I am concerned with the history of kills and non-compliance in the surrounding area and the risk of an accident destroying Ebenezer Creek.	Conditions in both the DRT America and proposed City of Springfield permit address accidental spills and include best management practices (BMPs) in order to avoid spills to the site or to the creek.
Will the effluent from DRT America kill fish? There should be a pond with fish at the plant to assure that the effluent is safe.	DRT America does not directly discharge to Ebenezer Creek. Whole Effluent Toxicity (WET) testing will be conducted as part of the City of Springfield's proposed WPCP permit to evaluate potential chronic toxicity to fish and invertebrates.
The pH is too high to be dumped in the blackwater creek.	DRT America does not directly discharge to Ebenezer Creek. However, the maximum pH in the City of Springfield's proposed WPCP permit was decreased from 8.5 to 7.5 standard units. A 36-month schedule has been included to comply with the new limit.
The minimum creek flow requirements should not be lowered to 3.0 cfs and should be kept at 6.0 cfs.	The minimum Ebenezer Creek streamflow can be lowered from 6.0 to 3.0 cfs due to the higher level of wastewater treatment at the City's POTW and the resulting lower effluent permit limits prior to discharge.
A total dissolved solids (TDS) limit should be included in the permit.	Based on EPD's evaluation of the application and submitted data, which indicates the presence of very few pollutants, there would be no need to include a total dissolved solids (TDS) limit as an indicator of additional constituents in the discharge. In addition, the City will conduct priority pollutant scans and if a need for a TDS limit is indicated the permit can be reopened.

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAPP050304**

COMMENTS RECEIVED	EPD RESPONSE
<p>The permit should specify which of the list of 45 chemicals are permitted to flow into the POTW and which are not.</p>	<p>DRT America is classified under the Organics, Chemicals, Plastics, and Synthetic Fibers (OCCPSF) point source category for which federal regulations have been promulgated in 40 CFR 414. EPA evaluated OCCPSF facilities across the nation and established technology-based effluent limitations that must be included in the permit. The list of actual expected chemicals to be discharged was provided to EPD in the pretreatment permit application. Of the 45 OCCPSF chemicals listed in the permit, only Toluene is expected to be present in the industry's effluent. Toluene is limited to a daily average of 28 µg/L and a daily maximum of 74 µg/L. These limitations are more stringent than the current instream water quality criteria of 5,980 µg/L and the maximum MCL of 1,000 µg/L for drinking water.</p> <p>Toluene is not expected to be present in the Springfield WPCP discharge to Ebenezer Creek or in the groundwater.</p>
<p>Any other substances expected to be in the effluent which were not explicitly listed in the application should be included.</p>	<p>With respect to the OCCPSF category, EPA has done extensive research, characterizing pollutants with the potential for adverse environmental or health concerns in order to develop the list of conventional, non-conventional, and priority pollutants that must be permitted and sampled.</p>
<p>EPD should consider consolidating the Springfield LAS with the land application wastewater system that Effingham county uses to alleviate the burden on Ebenezer Creek.</p>	<p>The consolidation of the City of Springfield LAS with the Effingham County LAS is a decision that would need to be investigated and proposed by local officials.</p>

**Public Comments and EPPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPPD RESPONSE
<p>Toluene kills microbes and has the potential to upset the POTW's treatment process.</p>	<p>The potential for toluene to cause pass-through interference to a POTW was considered before EPA's promulgation of effluent limit guidelines (40 CFR 414) for the Organics, Chemicals, Plastics, and Synthetic Fibers (OCPSF) point source category. Permitted toluene levels are not expected to have the potential to upset POTW operations.</p>
<p>Does the DRT America industry and City of Springfield's expanded POTW discharge permit comply with the coastal Georgia regional water management plan and how has EPPD evaluated compliance?</p>	<p>As long as the City of Springfield and DRT America comply with their applicable limits and permit conditions, the facilities would be considered as operating in accordance with the resource management strategies contained in the coastal Georgia regional water plan.</p>
<p>I am concerned about the possible runoff from the spray fields as well as the possibility of groundwater contamination if industrial wastewater is leaking into the water table.</p>	<p>A land application system (LAS) is designed as a zero point source discharge system used for the land disposal of treated wastewater. Industrial wastewater will be pretreated prior to discharge to the City of Springfield's WPCP and further treated through the City's wastewater treatment facility and land application system. Both permits contain effluent limits and conditions that are protective of surface water and groundwater. Runoff is not expected to be of concern with proper operation of the City's LAS.</p>
<p>Under Riparian law DRT America does not have permission to have chemicals from their facility to enter my surface water or groundwater. Steps to address seepage from the LAS does not alter the fact that subterranean channels have already been formed.</p>	<p>The City of Springfield's proposed WPCP permit includes conditions/limits for groundwater monitoring at down-gradient wells as well as soil monitoring to ensure all LAS operations are protective of human health and the environment.</p>

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPD RESPONSE
<p>It's illogical to add industrial effluent from DRT America into Springfield's wastewater system during a period when the water quality is already scheduled to be degraded for three years (not considering the industrial contribution) if their revised permit is approved.</p>	<p>A 36-month compliance schedule has been included in the City of Springfield's proposed WPCP permit to allow time for the City to evaluate the treatment process, secure funding, and make the necessary upgrades to meet the more stringent limits. The concentration and mass loading permit limits for the first 36 months were not "downgraded". They are the same as the ones in the 2002 iteration of the permit.</p> <p>In addition, to accommodate the connection of DRT America's effluent, EPD proposed an increase in the hydraulic capacity at the City of Springfield WPCP. The rationale for the hydraulic capacity increase is the conservation of mass loadings. Overall no additional pollutant loading has been permitted to the creek. Calculations are included in the City's fact sheet for its NPDES permit.</p>
<p>Over the last eight years what percentage of Springfield's wastewater has been disposed of by direct discharge? Going forward what percentage will be direct discharge? What percentage of DRT America's chemicals will go to direct discharge vs land application.</p>	<p>Operational Monitoring Reports (OMRs) and Discharge Monitoring Reports (DMRs) for the City of Springfield's WPCP may be reviewed at the EPD Coastal District office. EPD cannot speculate on the method of treatment selected by the City during its daily operations.</p>
<p>Is it worth the risk to permit industrial wastewater from DRT America considering the Air Permit, already granted, will have a negative effect on the low pH creek's acidity?</p>	<p>DRT America does not directly discharge to Ebenezer Creek. However, the proposed City of Springfield WPCP permit includes pH limits that are protective of Ebenezer Creek.</p> <p>EPD is not aware of, and the commenter has not provided, any evidence that air emissions of VOC will affect creek acidity.</p>

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPD RESPONSE
<p>Has a priority pollutant scan been run on the feedstock and results of the treatability study?</p>	<p>With respect to priority pollutant scans, it is the City of Springfield's responsibility to conduct priority pollutant scans and WET analysis to adequately characterize the quality of its effluent.</p>
<p>What data on wastewater characteristics is available (e.g. BOD, COD, TSS, Oil & Grease, Temperature, pH)? How will they adjust pH?</p>	<p>Information regarding DRT America's wastewater characteristics and treatment methods was submitted to EPD as part of DRT America's pretreatment permit application. The application may be reviewed at the EPD Atlanta Branch office.</p>
<p>How much color (brown) should be expected in the effluent and will this impact the City of Springfield plant?</p>	<p>Color is not a pollutant of concern based on the data submitted in the pretreatment application.</p>
<p>EPD should recommend special conditions be incorporated into any permit in the watershed to reduce non-point source pollution including investment and implementation of: septic system management and reduction of new septic systems, land use planning and buffer protection, reduction of the application of phosphorus and nitrate-based chemicals that can pollute the creek, removal and prevention of trash and litter into the waterbody, and third-party monitoring of surface water quality.</p>	<p>To address comprehensive watershed protection, the City of Springfield's proposed permit contains a Watershed Protection Plan which addresses non-point sources of pollution.</p>

**Public Comments and EPPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPPD RESPONSE
<p>EPPD should investigate the potential effects of differences in stream flow characteristics (due to ‘backwater swamp’ flooding regime and slowing of stream flows in the downstream direction) between the outfall point and throughout the lower section of the creek in regards to the following parameters: transport speed, direction, and distance of effluents, residence time of pollutants (particularly slowly degrading deleterious chemicals) in the water column, deposition to and accumulation of pollutants in sediments of the creek bottom and swamp floors, and the degree and rates of absorption of pollutants by swamp flora (particularly tupelo gum and cypress).</p>	<p>These investigations would provide valuable information about the fate, transport, and effects of constituents in Ebenezer Creek. However, such investigations do not exist and therefore were not available in the NPDES discharge.</p>
<p>The WPCP discharge load is zero during dry weather. What are the parameters for dry weather? Please clarify that zero discharge is only a recommendation and not a requirement?</p>	<p>In the proposed City of Springfield WPCP permit, zero discharge during dry weather (i.e., streamflow below 3 cfs) is a requirement, not a recommendation. Any discharge from the City of Springfield during low streamflow conditions (i.e., streamflow below 3 cfs) will be a permit violation.</p>
<p>With regards to increasing the flow during high water levels in Ebenezer Creek to ensure the facility does not exceed permit levels, what happens during a prolonged drought period?</p>	<p>The City of Springfield WPCP permit allows for the City to distribute reuse water to customers and to land apply reuse water to the sprayfields. The facility is also equipped with a pond which provides more than 30 days of storage at design flow conditions.</p>
<p>How often have discharges to Ebenezer occurred in the past 3 years and how many gallons were discharged per</p>	<p>Operational Monitoring Reports (OMRs) and Discharge Monitoring Reports (DMRs) for the City of Springfield’s WPCP may be reviewed</p>

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPD RESPONSE
occurrence. What has been the average Kg/day?	at the EPD Coastal District office in Brunswick, Georgia.
How will DRT America share monitoring data and information regarding their operations?	DRT America will electronically submit monthly Operational Monitoring Reports (OMRs) and Discharge Monitoring Reports (DMRs) to EPD via NetDMR. All data is available for review at EPD's Coastal District office.
Sodium Hydroxide (strong caustic), Hydrogen Peroxide (strong oxidant), and Toluene (a known carcinogen) are present in the effluent and shouldn't be sprayed on the land.	With industrial pretreatment and municipal treatment these constituents are not expected to be in the City of Springfield's effluent at levels of concern nor effect groundwater.
Where is the sludge taken to and disposed of?	Sludge from DRT America will be taken to an off-site landfill.
How much groundwater is drawn on a daily basis to keep plant in operation and where from?	DRT America will use 102,000 gpd of water from the Public Water Supply. Water is purchased from the City of Springfield and there are no groundwater wells at the DRT America site.
Will VOC's in the air permit cause acid rain that could get in the wastewater as well.	The term "acid rain" generally refers to the regional (not site-specific) issue of lowered pH in rainwater due to accumulated NOx and SO2 emissions (not VOC) from multiple fossil fuel-burning sources. Acid rain regulations are not delegated to EPD Water Branch and thus are beyond the scope of this permit review.

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAPP050304**

COMMENTS RECEIVED	EPD RESPONSE
Wastewater Treatment	
<p>Where has this chemical processing technique been used before and is the proposed wastewater treatment process proven effective in such conditions?</p>	<p>DRT in France has used this process previously to produce terpenes, as have several US companies. This wastewater treatment process is an appropriate method for treating the wastes from this OCPSF facility. A membrane bioreactor is a combination of micro/ultrafiltration and a suspended growth bioreactor that is widely used. In the technical development document published in 1987 for the OCPSF category, EPA investigated and acknowledged the potential for ultrafiltration to be used for OCPSF wastewater treatment.</p>
<p>Has DRT America undertaken a treatability study to verify that the Membrane Bioreactor (MBR) system will meet limit and will the results of the study be provided?</p>	<p>Raw materials are crude sulfate turpentine, 50% Caustic, 50% Hydrogen Peroxide. No solvents are used in the industrial process.</p>
<p>Further information should be provided on the nature of the raw material (feedstocks), solvents, solutions, and other chemical constituents used in the industrial processes.</p>	<p>Raw materials are crude sulfate turpentine, 50% Caustic, 50% Hydrogen Peroxide. No solvents are used in the industrial process.</p>
<p>A chemical engineer I consulted indicated the airborne sulfur from DRT America may have negative structural impact on their materials/outdoor concrete pipes. Are any concrete pipes planned in the construction of DRT America's effluent disposal?</p>	<p>No concrete pipe is used before treatment. After biological treatment, the method of transporting the pretreated water to the POTW is through concrete pipes. However, there will be very little airborne sulfur as the plant is regulated by its air operating permit and will be controlled by a thermal oxidizer and scrubber.</p>
<p>How large is the equalization tank? What type of MBR system is proposed: hollow fiber, flat plate, or tubular? What membrane material?</p>	<p>The equalization tank is 75,000 gallons. The MBR system is a flat plate design. Membrane material is made of polyether sulfone.</p>

**Public Comments and EPPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPPD RESPONSE
<p>What is the hydraulic retention time in the aeration tank? What solids retention time (sludge age) would there be in the system? What mixed liquor/suspended solids concentration is planned? Is nutrient addition planned? Is foam suppression planned? What type of aeration system would they use?</p>	<p>The retention time in the aeration tanks is two days at full capacity (70,000 Gal). DRT America will generate approximately 590 lbs of sludge per day. The mixed liquor / suspended solids concentration will be 1.3%. Urea solution will be used as nutrient as needed. Foam suppression is not planned at this time. Air blowers will be used for aeration.</p>
<p>For boiler blowdown will there be concentrated salt brine? If so how will that slug load be discharged to the pretreatment or the City of Springfield system?</p>	<p>There will be a brine solution produced with approximately 550 gallons per day commingled with the other waste streams discharged to the City. No impact is expected.</p>
<p>What is the purpose of the sulfides (to remove smell or taste?) is this a concern?</p>	<p>Sulfides are generated by the SO2 removal after the Thermal Oxidizer, which reduces sulfur emissions to the air. They are sold back to Paper Mills for beneficial use in their process. Sulfides are not used at DRT America.</p>
<p>What comes in, how is it processed, what is the variability in the feedstock. Where is it all going, what about the stormwater permit?</p>	<p>The feedstock is crude sulfate turpentine, a co-product of pulp mills. It is processed primarily through vacuum distillation. While the concentrations of the terpenes in the CST might vary slightly from mill to mill, the overall constituents will remain the same. Material is purchased and accepted for use based upon specified criteria. Pretreated water is proposed to be discharged to the city of Springfield's POTW. Rainwater is collected and discharged after testing to the infiltration ponds located on-site.</p>

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPD RESPONSE
Monitoring & Sampling	
<p>Local conditions should be considered including the conductance of studies and assessments that focus on factors that depend upon, influence, and are affected by water quality and of sources in the watershed that contribute to the creek.</p>	<p>There is sufficient information on local conditions to develop a wasteload allocation and thus propose a permit that is protective of human health and the environment.</p>
<p>Measures should be taken to monitor the chemical composition of the soil and the runoff from the spray fields to assure that absorption of the pollutants is efficient.</p>	<p>EPD outlines Soil Monitoring Requirements in Part I B.4.4 of the proposed City of Springfield WPCP permit. EPD expects these conditions to be sufficient for assessing the quality of LAS operations.</p>
<p>Does EPD sample Ebenezer Creek adjacent to the Springfield LAS site as well as the actual LAS site? If so, please provide data collected as well as time taken, protocol used, prevailing conditions, and sampling intervals.</p>	<p>EPD does not sample Ebenezer Creek adjacent to the Springfield LAS site. EPD determined that the distance between the LAS site and Ebenezer Creek was large enough that monitoring of Ebenezer Creek at this location was not required. However, the City may elect to perform upstream and downstream sampling. The City's WPP also has a monitoring site at Ebenezer Creek.</p>
<p>The DRT America permit should not be granted until a comprehensive study is undertaken on the creek.</p>	<p>Comment noted.</p>

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPD RESPONSE
<p>EPD should review and share any surface or groundwater monitoring that has occurred to provide a baseline of water quality to be upheld.</p>	<p>All data regarding surface and groundwater monitoring is available for review at EPD's Coastal District office.</p>
<p>Is there a system established for real time monitoring of water quality that will allow for quick response?</p>	<p>Ebenezer Creek is contained within the City's Watershed Protection Plan.</p>
<p>Will flooded ground around Ebenezer Creek be tested for contamination when the water subsides?</p>	<p>The City of Springfield's proposed WPCP permit requires priority pollutant scans (PPS) and whole effluent toxicity (WET) tests that EPD expects to be sufficient to determine possible toxicity downstream of the discharge.</p>
<p>There is a lack of baseline monitoring especially for a new type of technology in the U.S.</p>	<p>DRT America is classified under the Organics, Chemicals, Plastics, and Synthetic Fibers (OCPSE) point source category for which federal regulations have been promulgated in 40 CFR 414. EPA evaluated OCPSE facilities across the nation and established technology-based effluent limitations (TBELs) that must be included in the permit. DRT America is subject to TBELs based on the best available demonstrated technologies. As such, DRT is required to use either the recommended technology on which the TBELs were derived or an equivalent technology of equal or greater removal efficiency.</p>

**Public Comments and EPPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPPD RESPONSE
National Landmark & Scenic River Designation	
<p>EPPD should take in to consideration the national significance of the Ebenezer Creek Swamp National Natural Landmark as they review the permit application.</p>	<p>Comment noted.</p> <p>Ebenezer Creek is designated as a “Scenic River” by the Georgia Scenic Rivers Act of 1969. This states that within the portion of Ebenezer Creek from Long Bridge on County Road S 393 to the Savannah River no dam, reservoir, or other structure impeding the natural flow of the waterway shall be constructed, operated, or maintained in such river or section of river so designated as a scenic river, unless specifically authorized by an Act of the General Assembly.</p>
<p>Ebenezer Creek is designated as a Georgia Wild and Scenic River and as a National Natural Landmark and discharge should not be authorized which could cause an alteration of natural water quality and damage the ecosystem.</p>	<p>This designation is separate from waters designated as a scenic river or wild river in 391-3-6-.03(6) of the official Rules and Regulations of the State of Georgia. As such, the condition “there shall be no alteration of natural water quality from any source” is not applicable to Ebenezer Creek. The official designated use of Ebenezer Creek given in 391-3-6-.03(13) is “fishing,” the proposed permit complies with this “fishing” use designation.</p>
<p>An interoffice memo David Word (1991) of GA EPPD wrote that “we will not permit any discharges into these segments (of Georgia wild and scenic rivers).” It is recommended that EPPD follow this advice in regard to Ebenezer.</p>	<p>Comment noted. However, EPPD has evaluated the submitted permit application and supporting documentation and proposed a permit in accordance with the applicable Federal and State regulations ensuring the permit is legal, enforceable, and protective of human health and the environment.</p>
<p>Ebenezer Creek and basin, as a historical marker for the foundation of Effingham County and its heritage centered at the conjunction of Ebenezer Creek and the Savannah River, should be conserved in its integrity.</p>	<p>Comment noted. However, EPPD has evaluated the submitted permit application and supporting documentation and proposed a permit in accordance with the applicable Federal and State regulations ensuring the permit is legal, enforceable, and protective of human health and the environment.</p>

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPD RESPONSE
<p>EPD should consider the substantial investment that has been made to protect the natural and historical resources as well as the recreational and educational opportunities, before granting a permit.</p>	
<p>Considering that Ebenezer Creek is a Scenic River and National Natural Landmark, I request that EPD consult with EPA on this permit.</p>	<p>The City of Springfield's proposed WPCP permit was sent to the EPA on March 19, 2017 for review and all EPA comments were satisfactory addressed.</p>
Water Quality Modeling	
<p>Were the unique flow characteristics (backflow, "back and forth immobility"), taken into account in the modeling?</p>	<p>A steady-state water quality model, GA DOSAG, capable of determining the fate of conventional pollutants from a municipal wastewater treatment plant, such as biochemical oxygen demand and ammonia, and their effect on instream dissolved oxygen concentrations was used to evaluate the wasteload allocation for the Springfield discharge to Ebenezer Creek. The model included estimated low stream flow velocities to represent the flow characteristics of Ebenezer Creek, but did not simulate flow reversals.</p>
<p>Was the contribution from ongoing development and non-point sources included in the modeling?</p>	<p>The model included background concentrations for conventional pollutants that originate from existing sources, but did not include any nonpoint source pollutants from land use changes or ongoing development.</p>

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPD RESPONSE
<p>What sorts of models have been conducted to ensure the pollutants discharged into the creek will not build up and degrade the water quality over time?</p>	<p>GA DOSAG, the steady-state water quality model used to develop the wasteload allocation, assumes conventional pollutants do not accumulate over time.</p>
<p>Even if they propose discharging into the creek when the water is high, where does it go when we go weeks without rain and the depth gauge is at four feet for a few weeks?</p>	<p>During periods when a discharge to Ebenezer Creek is not allowed, the effluent will be directed to the land application system until stream flows in Ebenezer Creek are equal to or greater than 3.0 cubic feet per second (cfs).</p>
<p>At high flows the creek flows backwards, where did EPD come up with its flow values? We should be broadcasting all wastewater.</p>	<p>The water quality model included estimated low stream flow (3 cfs) developed using an iterative approach to represent the flow characteristics of Ebenezer Creek, but did not simulate flow reversals.</p>
<p>There is no flow at Ebenezer Creek and the pollutants won't flow out of it.</p>	<p>During periods when a discharge to Ebenezer Creek is not allowed, the effluent will be directed to the land application system until stream flows in Ebenezer Creek are equal to or greater than 3 cubic feet per second. At these flows, GA DOSAG assumes pollutants discharged to the creek are moved through the system and do not accumulate over time.</p>

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPD RESPONSE
Public Awareness & Public Comment Period	
<p>EPD should extend the public comment period and postpone regulatory decisions on DRT America’s pretreatment permit application until more information and data is collected and all public concerns are investigated and resolved.</p>	<p>EPD granted an extension to the comment period up until close of business May 26th, 2017 based on comments received.</p>
<p>The comment period should be extended at least 2 weeks or more appropriately 30 days, and petition for extension will be passed around then given to EPD.</p>	<p>Federal and State guidelines for public notice require public notice documentation to be posted for thirty (30) days at the entrance of a local public location (usually the county courthouse) and to be published for one day in one or more newspapers of general circulation in the area affected by the discharge.</p> <p>DRT America posted the public notice in the Savannah Morning News on March 21st and March 28th, 2017. A public notice was also published in the Effingham Herald on March 29th, 2017. Additionally, public hearing information was published on April 4th, 2017 in the Savannah Morning News.</p> <p>EPD also posted Public Notice No. 2017-06 ML to announce an Industrial Pretreatment Permit Public Hearing for DRT America.</p>
<p>EPD needs to develop and employ methods, processes and tools that notify and involve the public and stakeholders in the permitting process in effective, transparent, and easily accessible fashions.</p>	

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPD RESPONSE
<p>The opaqueness of the public notice process and of the permit documents gives support to the need to postpone action on the permit in order to rewrite it, taking into consideration all comments, and to conduct another public comment period.</p>	<p>EPD has complied with all Federal and State public notice and documentation requirements during the permit issuance process.</p>
<p>WTOC should advertise on 6:00 every day for 5 days before the hearing.</p>	
<p>The EPD should deny and withdraw the draft permit until public concerns are investigated and resolved.</p>	<p>Comments received during the public notice period and public hearings have been reviewed by the EPD and revisions to the permit package were made.</p>
<p>Why didn't the commissioners or representatives notify the public of the permit?</p>	<p>Comment noted. EPD recommends consulting the individual officials regarding this matter.</p>
<p>Community Involvement & Environmental Responsibility</p>	
<p>A technical/citizen advisory group should be created.</p>	<p>The public would need to consult directly with DRT America and the City of Springfield on the creation of a technical/citizen advisory group.</p>
<p>The permit should specify that DRT America holds responsibility for the cost of cleanup and not the</p>	<p>DRT America must comply with the conditions and limits outlined in their pretreatment permit upon the permit's effective date. EPD will take</p>

**Public Comments and EPPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPPD RESPONSE
<p>county's taxpayers.</p>	<p>the necessary enforcement actions if violations occur and it is the responsibility of DRT America to pay any penalties or complete any corrective actions required by that enforcement action.</p>
<p>If the permit is issued a permit condition should be included requiring the applicant to provide sufficient funds to support a "performance bond" to pay for any fines, clean-up activities, and third-party water quality sampling and assessment.</p>	
<p>Who is liable/responsible for any environmental problems?</p>	
<p>Your proposal is a cost feature that could be resolved by sharing, facilitating and it is the responsibility of DRT America to offer ideas and proposals for lowering their pollution.</p>	<p>DRT America is required to comply with the limits and conditions established in their pretreatment permit. These requirements are established to be protective of human health and the environment.</p>
<p>DRT America should come together with the community and representatives from Savannah to form a plan to protect this watershed.</p>	<p>Comment noted.</p>

**Public Comments and EPPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPPD RESPONSE
Alternative Treatment & Disposal	
<p>The permit should require DRT America to use treated “reuse” wastewater to the maximum extent possible as part of their freshwater withdrawals.</p>	<p>The DRT America pretreatment permit is for regulating treated wastewater discharges. However, EPPD encourages reuse and recycling for any industrial user and the use of best management practices (BMPs) to reduce the discharge of pollutants.</p>
<p>Other treatment options should be considered/required such as DRT installing a closed loop system in which no process water would leave their site or the reuse of water to process their oils.</p>	
<p>What sort of alternative analyses were conducted to determine that disposing industrial wastewater to the City of Springfield’s POTW is the best available option?</p>	<p>New dischargers like DRT America have the option to discharge directly to surface waters (i.e. Ebenezer Creek) or to discharge to a publicly owned treatment works (i.e. City of Springfield’s WPCP). For a new direct discharge to surface waters an Anti-Degradation analysis must be performed. One of the Anti-Degradation requirements is to demonstrate that no reasonable alternatives exist that would provide the needed wastewater capacity without authorizing a new or expanded wastewater discharge into surface waters. In accordance with the above requirement, it was determined that sending DRT America’s industrial wastewater to the City of Springfield’s POTW was the best available option.</p>

**Public Comments and EPPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPPD RESPONSE
<p>It might be better to invest in natural ways to decontaminate the wastewater and recycle it such as ozone treatment, bacterial degradation driven by aeration and supplemented culture or support the biology that is visible in digital aerial images of the place.</p>	<p>EPPD has evaluated the submitted permit application and supporting documentation and proposed a permit in accordance with the applicable Federal and State regulations ensuring the permit is legal, enforceable, and protective of human health and the environment. The MBR is a viable treatment component.</p>
<p>DRT should show that it wants to be a part of the community and invest in the best technology to remove all pollutants.</p>	<p>Comment noted.</p>
<p>Emergency Conditions</p>	
<p>Hurricanes pose a real threat in causing holding ponds to overflow. DRT America has designed a facility with what appears to be two retention ponds near wetlands that need to be moved.</p>	<p>The DRT America site is located outside the 100 year flood zone (1% annual chance flood zone) and is situated in an area of minimal flood hazard according to FEMA's National Flood Hazard Map of the area.</p>
<p>What "fail safe" backups does DRT America have in the event of a natural or manmade disaster, power disruption, and spill control to prevent the disposal of raw industrial wastewater from entering the creek?</p>	<p>DRT America is responsible for spill prevention and containment. Part II.B.13 of the pretreatment permit requires Best Management Practices to control the discharge of hazardous and/or toxic materials from ancillary manufacturing activities. DRT America has a Spill Protection Control and Countermeasure Plan (SPCC) and Emergency Response Plan (ERP). The Plans, as it has the potential to affect waterways will include the following: 1) All spills in the process/storage area drain to</p>

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPD RESPONSE
	<p>secondary containment and will be reprocessed to recover any process fluid; 2) Any potential areas that have the ability to realize a spill/leak in an uncontained area will be stocked with compatible spill absorbent/spill kits; 3)All operations/maintenance personnel have been HAZWOPER trained to the spill response level; 4) Any spill less than 42 gallons will be handled by site personnel; 5) Any spill that exceeds 42 gallons will be contained by site personnel and cleaned-up by a third-party; 6) An event that triggers offsite notification would be defined as a release that exceeds the 42 gallon threshold and impacts a public waterway; and 7) The site's SPCC and Emergency Response Plans will have the following order of notification in the event that may impact offsite waterways/environment: Plant Managers, National Response Center, U.S. EPA/United States Coast Guard, Georgia Emergency Response Commission, Georgia EPD, Georgia Power, Effingham County Sheriff's, Office and Fire Department, Effingham Hospital and Spill Clean-Up Contractor.</p>
<p>What is the contingency plan for pretreatment and discharge, in the case that DRT America's technology fails?</p>	<p>EPD has the authority to modify, suspend, revoke, or reissue the permit in whole or in part during its term should cause arise. This can include the requirement to provide additional treatment.</p>
<p>Drinking Water Concerns</p>	
<p>The City of Savannah and Beaufort-Jasper Water and Sewer Authority request that DRT America or the City of Springfield provide immediate notice to them of any incident or non-compliance as they have drinking water</p>	<p>The City of Springfield's proposed WPCP permit includes language outlining notification requirements for major spills. For major spills the owner of the POTW must notify the EPD, local health department, post a notice, contact local media, establish a monitoring program, and</p>

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAP050304**

COMMENTS RECEIVED	EPD RESPONSE
intakes downstream of the POTW.	within 24 hours of a major spill provide notice to every county, municipality, or other public agency whose public water supply is within a distance of 20 miles downstream and to any others which could be potentially affected by the major spill.
What discharge related coordination and reporting protocols are in place for downstream drinking water intakes (e.g. City of Savannah, Bluffton)?	The discharge of DRT America's effluent to the City of Springfield, and subsequently to Ebenezer Creek from the City of Springfield's WPCP is protective of applicable in-stream water quality standards. Of the 45 OCPSF chemicals listed in the permit, only Toluene is expected to be present in DRT America's effluent. Toluene is limited to a daily average of 28 µg/L and a daily maximum of 74 µg/L in the DRT America permit. These limitations are more stringent than the current instream water quality criteria of 5,980 µg/L and the MCL of 1,000 µg/L for drinking water. Toluene is not expected to be present in the Springfield WPCP discharge to Ebenezer Creek or in the groundwater.
Do any of the pollutants in the discharge by DRT America have the potential to degrade the water quality of the Savannah River and Abercorn Creek, especially in regard to withdrawals of water for the water supply for the City of Savannah? (Bottom line is that no further degradation of source waters for the City of Savannah should be allowed).	
In what manner does each of these chemicals affect water as pertains to its safety and cleanup costs for use in drinking?	
The Savannah River is an important drinking water source for the region and the watershed needs to be protected.	EPD has evaluated the submitted permit application and supporting documentation and proposed a permit in accordance with the applicable Federal and State regulations ensuring the permit is legal, enforceable, and protective of human health and the environment.
The chemicals in the wastewater could contaminate the drinking water for resident and wildlife alike.	

**Public Comments and EPD Responses on Draft Pretreatment Permit
DRT America, LLC – Permit No. GAPP050304**

COMMENTS RECEIVED	EPD RESPONSE
<p>If the City of Savannah wishes, or needs to, extend their water intake farther upstream towards Ebenezer Creek, how will the pollutant loads from DRT America affect the quality of water available to the City of Savannah?</p>	<p>The segment of Ebenezer Creek to which the City of Springfield discharges has a designated use of fishing. EPD has proposed a permit that will meet Georgia's WQS and is protective of the fishing designated use.</p>