



**GEORGIA**  
DEPARTMENT OF NATURAL RESOURCES

**ENVIRONMENTAL PROTECTION DIVISION**

Richard E. Dunn, Director

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**Watershed Protection Branch**  
2 Martin Luther King, Jr. Drive  
Suite 1152, East Tower  
Atlanta, Georgia 30334  
404-463-1511

May 16, 2017

Persons who commented on Draft NPDES Permit No. GA0004120

RE: EPD Response to Comments  
Southern Nuclear Operating Company  
Hatch Nuclear Plant  
NPDES Permit No. GA0004120

Dear Sir/Madam:

Thank you for your comments regarding the permit issuance for the National Pollutant Discharge Elimination System (NPDES) Permit for Southern Nuclear Operating Company, Hatch Nuclear Plant. Attached is a summary of comments from the public and our responses to the issue raised. In addition, we have attached the Permit Addendum and Permit Fact Sheet Addendum documenting the changes made to the attached permit and fact sheet. 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,

Jeffrey Larson, Manager  
Wastewater Regulatory Program  
Watershed Protection Branch

JL/ahd  
Attachment

**Address List for the Response to Comments for  
Southern Nuclear Operating Company Hatch Nuclear Plant  
Permit No. GA0004120**

Ms. Molly Davis, Branch Chief  
NPDES Permitting and Enforcement Branch  
Water Protection Division  
U.S. EPA Region IV  
The Sam Nunn Federal Center  
61 Forsyth Street, SW  
Atlanta, Georgia 30303

Gregory D. Elmore, Environmental Affairs Manager  
Southern Nuclear Operating Company, Inc.  
42 Inverness Center Parkway  
Birmingham, Alabama 35242

**Public Comments and EPD Responses on Draft NPDES Permit for  
Southern Nuclear Operating Company Hatch Nuclear Plant  
NPDES Permit No. GA0004120**

COMMENTS RECEIVED	EPD RESPONSE
<p>Footnote references to Part III Special Requirements Item number 7 on pages two, three, four and five of the draft permit should be revised reflect Part III Special Requirements Item number 9.</p>	<p>The footnote references on the applicable pages have been revised to reflect the appropriate permit condition in Part III.B of the permit.</p>
<p>For outfall no. 04, the draft permit states the following, “discharges are to contain uncontaminated chiller water blowdown water only.” The term “uncontaminated” has been added from the previous permit. The interpretation of the “uncontaminated” is being interpreted to mean that the discharge contains no priority pollutants or constituents that would violate water quality standards. Please verify this interpretation.</p>	<p>The interpretation is correct. “Uncontaminated” discharges are interpreted as a discharge that does not cause or contribute to an exceedance of applicable water quality standards.</p>
<p>For outfall no. 04, the draft permit contains provisions that chemicals added to these systems are “nonmetallic and biodegradable.” There is no definition of “biodegradable”. The draft continues to specify “other chemicals must be approved by EPD prior to being used by the permittee.” “Other chemicals” is being interpreted to mean any chemicals that are not “non-metallic and biodegradable.” Please verify these interpretations.</p>	<p>The interpretation is correct. If other chemicals will be used that are not “non-metallic or biodegradable” EPD must approve the use of those chemicals prior to their use.</p>

**Public Comments and EPD Responses on Draft NPDES Permit for  
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NPDES Permit No. GA0004120**

COMMENTS RECEIVED	EPD RESPONSE
<p>Request to add the term "hazardous" to the beginning of the Sludge Disposal Requirements on page 10 of the draft permit.</p>	<p>Part II.A.6 of the permit requires the permittee to dispose of sludge in accordance with the regulations and guidelines established by EPD and the Federal Clean Water Act, Section 405(d) and (e), and the Resource Conservation and Recovery Act (RCRA). The permit condition applies to the disposal of nonhazardous and hazardous sludge. The permit condition will remain unchanged.</p>
<p>Request to add the word "chemical" to the first sentence in Part III.B.2 on page 14, so it reads "Any chemical metal cleaning wastes...rather an, "Any metal cleaning wastes..."</p>	<p>The word "chemical" has been included to Part III.B.2.</p>
<p>The permit does not address the sewage treatment plant effluent that discharges via outfall 01F. The permit should be revised to include the appropriate permit conditions or explain that no monitoring or limits apply.</p>	<p>Outfall no. 01F, sewage treatment plant, is an internal outfall and combines with several other internal discharges prior to the final discharge to the receiving water body through outfall no. 01, Final Plant Discharge. The regulations do not impose effluent limits on internal outfalls for sewage treatment plants. The submitted application, EPA Form 3510-2C, reported the average flow from internal outfall no. 01F as 8 gallons per minute. The average flow from outfall no. 01, as reported on the application, is 16,500 gallons per minute. The discharge flow of outfall no. 01F is 0.05% of the final discharge flow from outfall no. 01.</p> <p>For outfall no. 01 the permittee characterized the effluent and provided data for the constituents commonly evaluated for domestic waste (oxygen demanding constituents, nutrients, fecal coliform and total residual chlorine). Based on EPD's evaluation of the data for outfall no.</p>

**Public Comments and EPD Responses on Draft NPDES Permit for  
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COMMENTS RECEIVED	EPD RESPONSE
	<p>01, there is no reasonable potential for the discharge to cause or contribute to an instream water quality violation for oxygen demanding constituents, nutrients, fecal coliform or total residual chlorine. No additional permit conditions have been included in permit.</p>
<p>Due to the nature of the facility, the permit fact sheet should be expanded to include results of the reasonable potential analysis and information regarding the receiving water body.</p>	<p>The fact sheet has been updated to provide additional information, including the results of the reasonable potential analysis and information for the receiving water body.</p>
<p>The permit fact sheet should explain why the permit application does not include sampling results for outfalls 004, 01J and 02B, which all appear to discharge to storm drains and waters of the State.</p>	<p>The permit application has been revised to include sampling results for outfalls 004, 01J and 02B. EPD has evaluated the submitted data and updated the permit and fact sheet as necessary.</p>

**Permit Addendum**

**Name of Facility** Hatch Nuclear Plant

**NPDES Permit No.** GA0004120

Were there any revisions between the draft proposed NPDES permit placed on public notice and the final proposed NPDES permit? If yes, specify:  Yes  No

Part I.A.1 Added the word “external” to describe the outfall location.

Added columns in the effluent limit table to account for mass based effluent limits.

Added a footnote requiring all parameters listed in the effluent table be sampled if there is any discharge.

Revised footnote references to account for changes in the numbering of Special Conditions in the permit.

Part I.A.2 Combined outfalls with the exact same effluent limits. Applicable outfalls are as follows: internal outfalls 01A, 02A, 01B, 02C and external outfalls 01J and 02B.

Added daily average concentration limits from total recoverable chromium and total recoverable zinc.

Added pH limits and monitoring requirements.

Added a footnote requiring all parameters listed in the effluent table be sampled if there is any discharge.

Added a requirement, stating there should be no discharge of floating solids or visible foam in other than trace amounts for discharges directly to the river.

Revised footnote references to account for changes in the numbering of Special Conditions in the permit.

Removed footnote regarding increased monitoring frequencies if chromium and zinc are used.

**Permit Addendum**

Part I.A.3 Removed paragraph and combined requirements into Part I.A.2.

Part I.A.4 Removed paragraph and combined requirements into Part I.A.2.

Part I.A.5 Revised the Paragraph no. from “5” to “3”.

Added the word “internal” to describe the outfall location.

Added a requirement, stating there should be no discharge of floating solids or visible foam in other than trace amounts for discharges directly to the river.

Revised the footnote regarding the Nuclear Regulatory Commission.

Revised footnote references to account for changes in the numbering of Special Conditions in the permit.

Part I.A.6 Revised the Paragraph no. from “6” to “4”.

Added the word “internal” to describe the outfall location.

Added a requirement, stating there should be no discharge of floating solids or visible foam in other than trace amounts for discharges directly to the river.

Revised footnote references to account for changes in the numbering of Special Conditions in the permit.

Part I.A.7 Revised the Paragraph no. from “7” to “5”.

Added the word “internal” to describe the outfall location.

Added a requirement, stating there should be no discharge of floating solids or visible foam in other than trace amounts for discharges directly to the river.

Revised footnote references to account for changes in the numbering of Special Conditions in the permit.

Part I.A.8 Revised the Paragraph no. from “8” to “6”.

Added the word “external” to describe the outfall location.

Added flow monitoring and reporting.

Added a requirement, stating there should be no discharge of floating solids or visible foam in other than trace amounts for discharges directly to the river.

**Permit Addendum**

Revised footnote references to account for changes in the numbering of Special Conditions in the permit.

Part I.A.9 Revised the Paragraph no. from “9” to “7”.

Added the word “external” to describe the outfall location.

Revised the submittal deadline from January and June 30<sup>th</sup> to January and June 28<sup>th</sup>.

Added a requirement stating the discharge may not cause or contribute to a water quality violation.

Revised footnote references to account for changes in the numbering of Special Conditions in the permit.

Part I.B. Relocated the Schedule of Compliance section to Part III.B.

Part I.C Relocated the Monitoring and Reporting sections to Part I.B.

Part I.B Revised the Representative Sampling language.

Added Sampling Period language.

Relocated the Definitions section to Part I.C

Relocated and revised the Reporting Requirements to section Part I.D. Added E-Reporting language and Signatory Requirements.

Part II.A.1 Revised the Notification of Changes language and require annual certifications in June.

Part II.B.16 Added Duty to Comply language.

Part II.B.16 Removed Stormwater Runoff section.

Part III.C Revised format.

Added the word “chemical” to Paragraph 2.

Removed Paragraph 3.

Reformatted Paragraph 4 & 5 to 4a. and 4b.



**Permit Addendum**

Paragraph 8 has been removed.

Paragraphs 12 thru 15 have been removed.

Paragraph 17 has been removed.

Paragraph 19 thru 21 has been removed.

Paragraph 11 has been added to address §316(b) of the Clean Water Act (CWA) & Cooling Water Intake Structures.

Paragraph 12 has been added to requiring a temperature study.

Part III.C Revised the reference to the Chapter of the Rules to 391-3-6-.03(5)(e).

The permittee has been made aware of these changes



# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

## ENVIRONMENTAL PROTECTION DIVISION

### Fact Sheet Addendum

**Name of Facility:** Hatch Nuclear Plant

**NPDES Permit No.:** GA0004120

Were there any revisions between the draft proposed NPDES permit fact sheet placed on public notice and the final proposed NPDES permit fact sheet? If yes, specify:  Yes  No

The Fact Sheet has been revised to include the following sections:

1. Facility Information

1.1 NPDES Permit No.

1.2 Name and Address of Owner/Applicant

1.3 Name and Address of Facility

1.4 Location and Description of the Discharge (As Reported By Applicant)

1.5 Production Capacity

1.6 SIC Code & Description

1.7 Description of Industrial Processes

1.8 Description of the Wastewater Treatment Facility

1.9 Type of Wastewater Discharge

1.10 Characterization of Effluent Discharge As Reported By Applicant

2.0 Applicable Regulations

3. Water Quality Standards & Receiving Waterbody Information

3.1 Receiving Waterbody Classification and Information

3.2 Ambient Information

**Fact Sheet Addendum**

3.3 Georgia 305(B)/303(D) List Document

3.4 Total Maximum Daily Load (Tmdl)

3.5 Wasteload Allocation Date

4. Effluent Limits and Permit Conditions

4.1 Reasonable Potential Analysis (RP)

4.2 Applicable Water Quality and Technology Based Effluent Limitations

4.3 Conventional Pollutants

4.4 Nonconventional Pollutants

4.5 Toxics & Manmade Organic Compounds (126 Priority Pollutants and Metals)

4.6 Calculations For Water Quality Based Effluent Limits

4.7 Technology Based Effluent Limitation Calculations

4.8 Comparison & Summary of Water Quality vs.. Technology Based Effluent Limits

5.0 Other Permit Requirements and Considerations

6.0 Anti-Backsliding

7.0 Reporting

8.0 Requested Variances or Alternatives To Required Standards

9.0 Permit Expiration

10.0 Procedures for the Formulation of Final Determinations

The permittee has been made aware of these changes.