

Georgia Department of Natural Resources

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

August 28, 2015

Mr. Larry Yockachonis
City of Waycross WPCP Project Director
ESG Operations, Inc.
Draft NPDES Permit No. GA0020966

RE: Comments Received for
City of Waycross Water Pollution Control Plant
NPDES Permit No. GA0020966
(Ware County)

Dear Mr. Yockachonis:

Thank you for your comments regarding the permit for the City of Waycross Water Pollution Control Plant. After careful consideration of your comments, EPD has today issued the permit.

We have included an attachment, which addresses the comments submitted during the public comment period. We appreciate your interest in this matter.

If you have any questions, please contact Johanna Smith of my staff at 404-656-6937 or Johanna.Smith@dnr.state.ga.us.

Sincerely,



Jeffrey Larson, Manager
Watershed Protection Branch

JL\jds
Attachment: Response to Comments

ATTACHMENT – Response to Comments
 City of Waycross Water Pollution Control Plant (WPCP)
 NPDES Permit No. GA0020966
 (Ware County)

Comment # 1: The phrase, “This is a daily maximum limitation for TRC and shall be analyzed to the specific detection limit of 0.05 mg/L” is missing in the new permit. We would like to have it included.

EPD Response:

Section I.C.3. states that, “[A]ll analytical methods, sample containers, sample preservation techniques, and sample holding times must be consistent with the techniques and methods listed in 40 CFR Part 136. The analytical method used shall be sufficiently sensitive.” This statement implies that whichever analytical method is used to sample TRC, the detection limit should be at least 0.05 mg/L or below to comply with this provision.

Comment # 2: We don’t currently sample for Total or Organic Nitrogen. It would seem easier to just report Nitrate-Nitrite and TKN rather than calculate TN. Confirm that the following analytical methods are sufficient to meet permit requirements.

MONITORING REQUIREMENTS									
PARAMETERS	SAMPLE FREQUENCY	COST	METHOD	UNITS	MDL	Matrix	Preservative	HOLD TIME	CONTAINER
Total Nitrogen	1	0.00	Calculation	mg/l	0.1	WW	<6 C	48 Hours	500 ml HDPE
NO3+NO2	1	60.00	SM 4500-NO D E	mg/l	0.1	WW	<6 C	48 Hours	500 ml HDPE
TKN	1	45.00	SM 4500-NorgC+NH D	mg/l	0.1	WW	<6 C H2SO4	28 Days	500 ml HDPE
Ammonia	1	20.00	SM 4500-NH D	mg/l	0.1	WW	<6 C H2SO4	28 Days	500 ml HDPE
Organic Nitrogen	1	0.00	Calculation	mg/l	0.1	WW	<6 C	28 Days	500 ml HDPE

EPD Response:

All the methods listed in the table above are approved NPDES methods in the federal register.

Total Nitrogen and Organic Nitrogen values are determined by difference (calculation) and will be used for modeling purposes. The MDL values of 0.1 mg/L are sufficient to fulfill this purpose.