Georgia Department of Natural Resources

2 Martin Luther King, Jr. Drive, S.E., Suite 1152 East Tower, Atlanta, Georgia 30334-9000
Noel Holcolmb, Commissioner
Carol A. Couch, Ph.D., Director
Environmental Protection Division
404/656-4713

June 27, 2008

Brant Keller, Ph.D.,
Director of the City of Griffin
Public Works Department
Post Office Box T
Griffin, Georgia 30224

RE: City of Griffin- Shoal Creek
Blanton Mill Site
Land Application System (LAS)
Permit No. GA02-036

Dear Dr. Keller:

Pursuant to the Georgia Water Quality Control Act as amended and the Rules and Regulations promulgated thereunder, we have today issued the attached Land Application System permit for the referenced wastewater treatment facility.

Please be advised that on and after the effective date indicated in the attached LAS Permit, the permittee must comply with all the terms, conditions and limitations of this permit.

Sincerely,

Carol A. Couch
Director

CAC/gms
Attachment

08-1337L

PUBLIC NOTICE NOTICE OF APPLICATION FORA NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM PERMIT TO DISCHARGE TREATED WASTEWATER INTO THE WATERS OF THE STATE OF GEORGIA.

The Georgia Environmental Protection Division (EPD) is considering the issuance of an NPDES permit for the following applicant, subject to specific pollutant limitations and special conditions:

City of Griffin, Post Office Box T, Griffin, Georgia, 30224, NPDES Permit No. GA0039063 for the water pollution control plant located on 2940 West Ellis Road, Griffin, Georgia 30224. 1.25 MGD of treated wastewater is to be discharged to Shoal Creek in the Flint River Basin.

Persons wishing to comment on the proposed permit are invited to submit their comments in writing to the EPD address below, within 30 days of this notice. All comments received before or on that date will be considered in the formulation of final determinations for this permit. "City of Griffin- Shoal Creek Water Pollution Control Plant (Spalding County)" should be placed at the top of the first page of comments.

A public hearing may be held if the EPD Director finds a significant degree of public interest in the proposed permit. Additional information regarding public hearing procedures is available by writing the EPD.

A public hearing may be requested. or additional information regarding public hearing procedures is available, by writing the EPD at the address noted below.

The permit application, draft permit, and other information are available for review at 4220 International Parkway, Suite 101, Atlanta, Georgia 30354, between the hours of 8:00 a.m. and 4:30 p.m., Monday through Friday and at City Hall during normal business hours. For additional information contact: Jane Hendricks, Permitting, Compliance and Enforcement Program, Phone (404) 362-2680.

Please bring this to the attention of persons who you know will be interested in this matter.

June 27, 2008

STATE OF GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

LAND APPLICATION SYSTEM PERMIT

PERMIT NO. GA02-036

In accordance with the provisions of the Georgia Water Quality Control Act (Georgia Laws 1964, p. 416, as amended), and the Rules and Regulations promulgated pursuant thereto, this permit is issued to the following:

City of Griffin
Post Office Box T
Griffin, Georgia 30224

is authorized to operate the land application system located at

Shoal Creek-Blanton Mill Site
1600 Blanton Mill Road
Griffin, Georgia (Spalding County)
(Flint River Basin)

This permit is conditioned upon the permittee complying with the effluent limitations, monitoring requirements and other conditions set forth in the permit and with the statements and supporting data submitted with the application and filed with the Environmental Protection Division of the Department of Natural Resources.

This permit is effective on the date signed by the Director of the Environmental Protection Division and is subject to revocation on evidence of noncompliance with any of the provisions of the Georgia Water Quality Control Act or any of the Rules and Regulations promulgated pursuant thereto; or with any presentation made in the above mentioned application or the statements and supporting data entered therein or attached thereto; or with any conditions of this permit.

This permit shall become effective on June 27, 2008. This permit shall expire at midnight, on June 26, 2013.

Signed this 27th day of June 2008.

Director
Environmental Protection Division

PART I.

A. CONDITIONS

1. DEFINITIONS

a. Division: the Environmental Protection Division of the Department of Natural Resources.

b. Monthly Average: the arithmetic or geometric mean of values for samples collected in a period of 30 consecutive days.

c. Non-restricted Access: landscaped areas where reclaimed wastewater is used for irrigation purposes and public access cannot be controlled and adequate buffer zones cannot be maintained. Reclaimed wastewater used to irrigate non-restricted access areas must be treated to urban water reuse standards.

d. Preapplication Treatment System: the wastewater treatment facility which reduces high strength organic waste to low levels prior to application to the sprayfield area. The preapplication treatment system can consist of a mechanical plant or a pond system.

e. Restricted Access: landscaped areas where reclaimed wastewater is used for irrigation purposes and public access is restricted to specific and controlled periods of time. Wastewater used to irrigate restricted access areas must be pretreated to secondary levels and receive disinfection.

f. Sprayfield: the wetted area of the land application site, excluding the buffer zone.

g. State Act: the Georgia Water Quality Control Act (Official Code of Georgia Annotated; Title 12, Chapter 5, Article 2).

2. MONITORING

a. The permittee shall monitor and record the amount of rainfall at the land application system site on a daily basis.

b. A composite sample shall consist of a minimum of 5 subsamples collected at least every 2 hours for a period of at least 8 hours, and composited proportionately to flow.

c. Flow measurements shall be conducted using the flow measuring device(s) in accordance with the approved design of the facility. If secondary flow measurement device(s) are installed, calibration shall be maintained to ± 10% of the actual flow. Flow shall be measured manually to check the flow meter calibration at a frequency of once of week. If secondary flow instruments are in use and malfunction or fail to maintain calibration as required, the flow shall be computed from

manual measurements or by other method(s) approved by EPD until such time as the secondary flow instrument is repaired.

For facilities which utilize alternate technologies for measuring flow, the flow measurement device must be calibrated semi-annually by qualified personnel.

Records of the calibration checks shall be maintained.

d. Quarterly analyses required in I.B. shall be performed in March, June, September, and December. Analyses required twice per year will be performed in June and December. Analyses required annually will be performed in June.

e. Some parameters must be analyzed to the detection limits specified by the EPD. These parameters will be reported as "not detected" when they are below the detection limit and will then be considered in compliance with the effluent limit. The detection limit will also be reported.

3. SLUDGE DISPOSAL AND MONITORING REQUIREMENTS

Sludge shall be disposed of according to the regulations and guidelines established by the EPD and the Federal Act section 405(d) and (e), and the Resource Conservation and Recovery Act (RCRA). In land applying nonhazardous municipal sewage sludge, the permittee shall comply with the general criteria outlined in the most current version of the EPD "Guidelines for Land Application of Sewage Sludge (Biosolids) at Agronomic Rates" and with the State Rules, Chapter 391-3-6-.17. Before disposing of municipal sewage sludge by land application or any method other than co-disposal in a permitted sanitary landfill, the permittee shall submit a sludge management plan to EPD for written approval. This plan will become a part of the Land Application System Permit upon approval and modification of the permit. The permittee shall notify the EPD of any changes planned in an approved sludge management plan.

If an applicable management practice or numerical limitation for pollutants in sewage sludge is promulgated under Section 405(d) of the Federal Act after approval of the plan, then the plan shall be modified to conform with the new regulations.

The permittee shall develop and implement procedures to ensure adequate year-round sludge disposal. The permittee shall monitor and maintain records documenting the quantity of sludge removed from the facility. Records shall be maintained documenting that the quantity of solids removed from the facility equals the solids generated on an average day. The total quantity of sludge removed from the facility during the reporting period shall be reported each month with the Discharge Monitoring Reports as required under Part I.D.2.of this permit. The quantity shall be reported on a dry weight basis.

Pond treatment systems are required to report the total quantity of sludge removed from the facility only during the months that sludge is removed.

B.1. TREATMENT POND SYSTEM

The weekly average effluent flow from the wastewater treatment facility to the storage pond must not exceed 2.8 MGD. Influent shall refer to the influent to the facility and effluent shall refer to the discharge from the treatment pond to the storage pond. Monitoring shall be performed by the permittee for the parameters and at the frequency listed below:

Parameters	Discharge Limitation Monthly Average, mg/l unless otherwise specified	Monitoring Requirements	
		Measurement Frequency	Sample Location
Flow (MGD)	2.25	Seven Days/Week	Effluent
Biochemical Oxygen Demand (5-Day)	50	Two Days/Month	Influent and Effluent
Total Suspended Solids	90	Two Days/Month	Influent and Effluent
pH, standard units	--	Three Days/Week	Effluent
Nitrate-Nitrogen	--	Once/Month	Effluent

Continuous recording measurements are required for effluent flow monitoring. If influent flow monitoring is required, instantaneous flow measurements are acceptable.

B.2. STORAGE POND MONITORING

Influent shall refer to the influent to the storage pond and effluent shall refer to the discharge from the storage pond to the sprayfields. Monitoring shall be performed by the permittee for the parameters and at the frequency listed below:

Parameters	Monitoring Requirements	
	Measurement Frequency	Sample Location
Flow (MGD)	Seven Days/Week	Effluent
Biochemical Oxygen Demand (5-Day)	One/Week	Effluent
Total Suspended Solids	One/Week	Effluent
pH, standard units	One/Week	Effluent
Nitrate-Nitrogen	One/Month	Effluent

Continuous recording measurements are required for effluent flow monitoring.

B.3. SOIL MONITORING REQUIREMENTS

Representative samples shall be collected from each major soil series present within the spray field area. The samples shall be analyzed in accordance with the latest edition of Methods of Soil Analysis (published by the American Society of Agronomy, Madison, Wisconsin) or other methods approved by the Division. The soil samples shall be analyzed for the parameters and at the frequency listed below:

Parameter	Measurement Frequency
pH, standard units	One/Year
Cation Exchange Capacity	If pH changes by one unit
Percent Base Saturation	If pH changes by one unit
Soil Fertility Test*	One/Year

*This testing is to be done in December of each year. The soil fertility testing is to include soil pH and phosphorus, potassium, calcium, magnesium, zinc, and manganese using the Mehlich I extraction procedure.

Where there are categorical and/or significant industrial discharges to the sewer system, the permittee may be required, upon written notification by the Division, to sample for additional parameters. These parameters may include heavy metals and organic compounds.

B.4. GROUNDWATER MONITORING REQUIREMENTS

Groundwater leaving the land application system boundaries must not exceed maximum contaminant levels for drinking water. The groundwater shall be monitored from each groundwater monitoring well by the permittee for the parameters and at the frequency listed below:

Parameter	Measurement Frequency
Depth to Groundwater	One/Month
pH, standard units	One/Month
Electrical Conductivity	One/Month
Nitrate-Nitrogen	One/Month
Fecal Coliform Bacteria	One/Six Months

Where there are categorical and/or significant industrial discharges to the sewer system, the permittee may be required to sample for additional parameters. These parameters may include heavy metals and organic compounds.

B.5. SURFACE WATER MONITORING

The water quality of any surface water adjacent to or traversing the land application site shall be monitored. Grab samples collected upstream and downstream of the sprayfield area shall be monitored for the parameters and at the frequency listed below:

Parameter	Measurement Frequency
Biochemical Oxygen Demand (5-Day)	One/Quarter
Suspended Solids	One/Quarter
Dissolved Oxygen	One/Quarter
pH, standard units	One/Quarter
Fecal Coliform Bacteria	One/Quarter
Nitrate-Nitrogen	One/Quarter

C. APPLICATION RATES

The wetted sprayfield area of the land application system shall consist of 520 acres. The hydraulic wastewater loading to the sprayfield area must not exceed the rate established and approved by the Division. The design application rate is 2.5 inches per week (inches/week). The instantaneous application rate is 0.25 inches per hour (inches/hour). Any request for a higher loading rate must be submitted to the Division for approval.

D. MONITORING AND REPORTING

1. REPRESENTATIVE SAMPLING

Samples and measurements taken for the purpose of monitoring shall be representative of the volume and nature of the monitored waste stream. The permittee shall maintain a written sampling and monitoring schedule.

2. REPORTING

Monitoring Report Forms shall be completed each month with the monitoring results, signed by a principal executive officer or ranking elected official, or by a duly authorized representative of that person who has the authority to act for or on behalf of that person, and submitted to the Division, postmarked no later than the 15th day of the month following the reporting period. Monitoring results for parameters analyzed less frequently than once per month shall be submitted to the Division postmarked no later than the 15th day of the month following the specified reporting period. The Division may require the reporting of additional monitoring results by written notification. Signed copies of these and all other reports required herein shall be submitted to the following address:

Georgia Environmental Protection Division
Permitting, Compliance and Enforcement Program
4220 International Parkway, Suite 101
Atlanta, Georgia 30354

3. MONITORING PROCEDURES

Analytical procedures, sample containers, sample preservation techniques and sample holding times must be consistent with the techniques and procedures approved pursuant to 40 CFR Part 136, unless other techniques and test procedures have been specified in this permit.

4. RECORDING OF RESULTS

For each measurement of sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

1. The exact place, date, and time of sampling, and the person(s) collecting the samples;

2. The dates and times the analyses were performed;

3. The person(s) who performed the analyses;

4. The analytical procedures or methods used; and

5. The results of all required analyses.

5. ADDITIONAL MONITORING BY PERMITTEE

If the permittee monitors any pollutant at, or in addition to, the location(s) designated herein more frequently than required by this permit, the permittee shall analyze all samples collected using approved analytical methods, and the results of such monitoring shall be included in the calculation and reporting of the values required in the Monitoring Report Forms. Such increased monitoring frequency shall also be indicated. The Division may require by written notification, more frequent monitoring or the monitoring of other pollutants not specified in this permit.

6. RECORDS RETENTION

The permittee shall retain records of:

a. All laboratory analyses performed including sample data, quality control data, and standard curves;

b. Calibration and maintenance records of laboratory instruments;

c. Calibration and maintenance records and recordings from continuous recording instruments;

d. Process control monitoring records;

e. Facility operation and maintenance records;

f. Copies of all reports required by this permit;

g. All data and information used to complete the permit application; and

h. All monitoring data related to sludge use and disposal.

These records shall be kept for at least three years. Sludge handling records must be kept for at least five years. Either period may be extended by EPD written notification.

7. WATERSHED ASSESSMENT AND WATERSHED PROTECTION PLAN

Upon the issuance date of this permit, the permittee must conduct a watershed assessment and develop a watershed protection plan for all the watersheds that are contained within the permittee's Assessment Area. The Assessment Area is defined as all basins or subbasins that are served by the facility and for the watersheds contained within the permittee's jurisdictional boundaries. The watershed assessment should include a study to document baseline water quality

and identify stressors which affect the quality of the water resources in the area. The scope of the work for the watershed protection plan must include defining what steps will be necessary to improve and ultimately meet water quality standards. At a minimum, the watershed assessment should include the following:

Watershed Assessment

a. Develop a plan for the monitoring and assessment of all streams in the Assessment Area. This should include parameters to be monitored, monitoring frequencies, and other data to be collected.

b. Determine methods for identifying waters not supporting designated water uses.

c. Identify water resource concerns and priority issues for the Assessment Area.

Watershed Protection Plan

The permittee must develop a watershed protection plan that reflects the findings of the watershed assessment.

The watershed protection plan will provide for the following:

a. The watershed protection plan will apply to the Assessment Area as defined above. The plan will utilize the information generated in the permittee's watershed assessment to establish a baseline of watershed conditions and to provide ongoing long-term monitoring according to the approved plan to either verify that the plan is effective or to modify the plan such that water quality standards will be achieved.

b. The watershed protection plan must include a schedule for correcting current water quality problems that are causing water quality standards violations. The permittee shall provide ongoing monitoring to verify that the actions taken to correct the water quality problems are effective.

c. The permittee shall develop and put in place best management practices (BMPs) to prevent future water quality standards violations.

d. The plan will provide for ongoing monitoring to verify that the BMPs are working or to provide the information necessary to modify the BMPs to achieve water quality standards.

Compliance Schedule

The permittee shall complete its watershed assessment and develop its watershed protection plan in accordance with the following schedule:

a. Submit a plan for conducting the watershed assessment to EPD for review within nine (9) months of the issuance date of this permit.

b. Begin stream sampling within one (1) month of receiving EPD approval of the watershed assessment plan.

c. Complete the watershed assessment within 3.5 years (42 months) of the issuance date of the permit.

d. Submit an approvable watershed protection plan no later than four years after the issuance date of the permit.

Beginning 15 months from the issuance date of the permit and every 6 months thereafter until EPD approves the permittee's watershed protection plan, the permittee is to submit a report to EPD regarding the progress it has made towards completing its watershed assessment and developing its watershed protection plan. After EPD approval of the watershed assessment plan, the progress reports should include a summary of what stream data has been collected the previous 6 months. This data should be sent in the form of an electronic spreadsheet developed in coordination with EPD. The report should also estimate what percentage of the watershed assessment is complete.

Annual Report

Once the Watershed Protection Plan is approved, each June 30th the permittee is to submit the following to EPD:

a. An annual certification statement documenting that the plan is being implemented as approved. The certification statement shall read as follows: " I certify, under penalty of law, that the watershed protection plan is being implemented. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

b. All watershed plan data collected during the previous year should be submitted in an electronic format. This data shall be archived using a digital format such as a spreadsheet developed in coordination with EPD. All archived records, data, and information pertaining to the watershed protection plan shall be maintained permanently.

c. A progress report that provides a summary of the BMPs that have been implemented and documented water quality improvements. The progress report shall also include any necessary changes to the Watershed Protection Plan.

PART II.

A. MANAGEMENT REQUIREMENTS

1. FACILITY OPERATION

The permittee shall at all times maintain in good working order and operate as efficiently as possible all treatment or control facilities (and related appurtenances) which are installed or used by the permittee to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. Proper operation of the land application system also includes the best management practice of establishing and maintaining a vegetative cover on the sprayfield area.

2. NONCOMPLIANCE NOTIFICATION

If, for any reason the permittee does not comply with, or will be unable to comply with any effluent limitations specified in the permit, the permittee shall provide EPD with an oral report within 24 hours from the time the permittee becomes aware of the circumstances followed by a written report within five (5) days of becoming aware of such condition. The written submission shall contain the following information:

a. A description of the noncompliance and its cause;

b. The period of noncompliance, including the exact date and times; or, if not corrected, the anticipated time the noncompliance is expected to continue; and

c. The steps taken to reduce, eliminate, and prevent recurrence of the non-complying discharge.

3. ANTICIPATED NONCOMPLIANCE NOTIFICATION

The permittee shall give written notice to the EPD at least 10 days before:

a. Any planned changes in the permitted facility; or

b. Any activity which may result in noncompliance with the permit.

4. OTHER NONCOMPLIANCE

The permittee must report all instances of noncompliance not reported under other specific reporting requirements, at the time monitoring reports are submitted. The reports shall contain the information required under conditions of twenty-four hour reporting.

5. OPERATOR CERTIFICATION REQUIREMENTS

The permittee shall ensure that the person in responsible charge of the daily operation of this land application system shall be a Class II Certified Operator in accordance with the Georgia Certification of Water and Wastewater Plant Operators and Laboratory Analysts Act, as amended, and specified by Subparagraph 391-3-6-.12 of the Rules and Regulations for Water Quality Control. Operators, other than the person in responsible charge, must obtain certification in Class III operator classification in accordance with the above Act.

6. LABORATORY ANALYST CERTIFICATION REQUIREMENTS

The permittee shall ensure that, when required, the person(s) performing the laboratory analyses for this wastewater treatment plant is a Certified Laboratory Analyst in accordance with the Georgia Certification of Water and Wastewater Treatment Plant Operators and Laboratory Analysts Act, as amended, and the Rules promulgated thereunder.

7. POWER FAILURES

If the primary source of power to this facility is reduced or lost, the permittee shall use an alternative source of power to reduce or control all discharges to maintain permit compliance.

8. ADVERSE IMPACT

The permittee shall take all reasonable steps to minimize or prevent any discharge or sludge disposal which might adversely affect human health or the environment.

9. NOTICE CONCERNING ENDANGERING WATERS OF THE STATE

Whenever, because of an accident or otherwise, any toxic or taste and color producing substance, or any other substance which would endanger downstream users of the waters of the State or would damage property, is discharged into such waters, or is so placed that it might flow, be washed, or fall into them, it shall be the duty of the person in charge of such substances at the time to forthwith notify EPD in person or by telephone of the location and nature of the danger, and it shall be such person's further duty to immediately take all reasonable and necessary steps to prevent injury to property and downstream users of said water.

Spills and Major Spills:

A "spill" is any discharge of raw sewage by a Publicly Owned Treatment Works (POTW) to the waters of the State.

A "major spill" is any discharge of raw sewage that exceeds 10,000 gallons or results in water quality violations in the waters of the State or the discharge of pollutants into waters of the State by a POTW that exceeds the weekly average permitted effluent limit for BOD_5 or TSS by 50 percent or greater for any one day.

"Consistently exceeding effluent limitation" means a POTW exceeding the 30-day average limit for biochemical oxygen demand or total suspended solids for at least five days out of each seven-day period during a total period of 180 consecutive days.

The following specific requirements shall apply to POTW's. If a spill or major spill occurs, the owner of a POTW shall immediately:

a. Notify EPD, in person or by telephone, when a spill or major spill occurs in the system.

b. Report the incident to the local health department(s) for the area affected by the incident.

   The report at a minimum shall include the following:

   1. Date of the spill or major spill;
   2. Location and cause of the spill or major spill;
   3. Estimated volume discharged and name of receiving waters; and
   4. Corrective action taken to mitigate or reduce the adverse effects of the spill or major spill.

c. Post a notice as close as possible to where the spill or major spill occurred and where the spill entered State waters and also post additional notices along portions of the waterway affected by the incident (i.e. bridge crossings, boat ramps, recreational areas, and other points of public access to the affected waterway). The notice at a minimum shall include the same information required in 9 (b)(1-4) above. These notices shall remain in place for a minimum of seven days after the spill or major spill has ceased.

d. Within 24 hours of becoming aware of a spill or major spill, the owner of a POTW shall report the incident to the local media (television, radio, and print media). The report shall include the same information required in 9(b)(1-4) above.

e. Within five (5) days (of the date of the spill or major spill), the owner of a POTW shall submit to EPD a written report which includes the same information required in 9(b)(1-4) above.

f. Within 7 days (after the date of a major spill), the owner of a POTW responsible for the major spill, shall publish a notice in the largest legal organ of the County where the incident occurred. The notice shall include the same information required in 9(b)(1-4) above.

g. The owner of a POTW shall immediately establish a monitoring program of the receiving waters affected by a major spill or by consistently exceeding an effluent limit, with such monitoring being at the expense of the POTW for at least one year. The monitoring program shall include an upstream sampling point as well as sufficient downstream locations to accurately characterize the impact of the