Message

From: Shell, Karrie-Jo [Shell.Karrie-Jo@epa.gov]
Sent: 12/16/2019 6:40:51 PM
To: Hall, Renea [Hall.Renea@epa.gov]
CC: Dollar, Carla [Dollar.Carla@epa.gov]; Hesterlee, Craig [Hesterlee.Craig@epa.gov]
Subject: FW: Request for a copy of the previously issued NPDES permit no. GAU020056 for Dalton Utilities LAS

Renea,

As we discussed this morning, You and others in the DW Section are preparing briefing materials for Mary regarding the results of the PFAS sampling in GA. The results show detectable levels for PFAS compounds in the surface water near the LAS, and you have been tasked with formulating "next steps" for Mary to consider for GA EPD.

One possible discussion topic might be the possible unauthorized point source discharge of SW at the LAS.

Based on information in ICIS, I was not able to find where the LAS site was covered under an NPDES permit for Stormwater. I did find where two of the three POTWs that send effluent to the LAS were apparently covered under a general permit for stormwater. However, I was not able to determine if the LAS site was included in any of these tow GP coverages. If the LAS site is having a discharge of stormwater to waters of the US, that would be a CWA violation.

There is some information onsite that would be helpful in determining if they are violating the LAS permit (i.e., non-NPDES permit that allows them to land apply effluent). See the highlighted text, below.

Please keep me abreast of the upcoming Briefing with Mary, and please include Carla Dollar on the invite. She is the lead NPDES Pretreatment and POTW NPDES staff member.

Karrie-Jo Robinson-Shell, P.E.
Environmental Engineer
US EPA Region 4
Water Protection Division
61 Forsyth Street
Atlanta, GA 30303
(404) 562-9308

From: Shell, Karrie-Jo
Sent: Thursday, September 12, 2019 9:15 AM
To: Armor, Suzanne <Armor.Suzanne@epa.gov>
Cc: Hall, Renea <Hall.Renea@epa.gov>; Chavez, Araceli <Chavez.Araceli@epa.gov>; Castillo, Jairo <Castillo.Jairo@epa.gov>; Smith, Brian <Smith.Brian@epa.gov>; Campbell-Dunbar, Shawneille <Campbell-Dunbar.Shawneille@epa.gov>; Thomas, Chris <Thomas.Chris@epa.gov>
Subject: RE: Request for a copy of the previously issued NPDES permit no. GAU020056 for Dalton Utilities LAS

I am headed over to GA EPD this morning to view hard copies of the records, since the files were too voluminous to send via email. See, below.

1. Operating and Monitoring reports (OMR)
2. Discharge Monitoring Reports (DMR)
3. Design and Development Report (DDR)
4. Any reports that include the required calculation of the Antecedent Precipitation Index (API), which is used to determine soil saturation. Based on the LAS permit (GAJ020056), the facility should not exceed an API value of

3.2 during summer months (May-Oct) and 2.0 during winter months (Nov-April). Please note that the LAS permit does not include units for precipitation (I assume the units are inches.)

5. Any reports that include the required calculation for the Critical Precipitation Intensity (CPI), which the permit requires to monitored on an hourly basis with each precipitation event. It is my understanding that the permit prohibits spray irrigation if the CPI equals, or exceeds, a value of 1.0 inch per hour based on a rainfall of 30 minutes (i.e., 0.5 inches of rainfall in 30 minutes).

Karrie-Jo Robinson-Shell, P.E.
Environmental Engineer
US EPA Region 4
Water Protection Division
61 Forsyth Street
Atlanta, GA 30303
(404) 562-9308

From: Armor, Suzanne <Armor.Suzanne@epa.gov>
Sent: Friday, September 06, 2019 3:19 PM
To: Shell, Karrie-Jo <Shell.Karrie-Jo@epa.gov>
Cc: Hall, Renea <Hall.Renea@epa.gov>; Chavez, Araceli <Chavez.Araceli@epa.gov>; Castillo, Jairo <Castillo.Jairo@epa.gov>; Smith, Brian <Smith.Brian@epa.gov>; Campbell-Dunbar, Shawneille <Campbell-Dunbar.Shawneille@epa.gov>
Subject: RE: Request for a copy of the previously issued NPDES permit no. GAU020056 for Dalton Utilities LAS

Hi, Karrie-Jo:

Did you ever hear back from GAEPD on your questions below re: Loopers Bend?

We need to circle back up as a team to discuss our next steps on this case. With 3M getting a lot of attention right now, I want to make sure this doesn't get lost in the shuffle since many of us are working both cases.

Thanks,
Suzanne

From: Shell, Karrie-Jo <Shell.Karrie-Jo@epa.gov>
Sent: Thursday, August 29, 2019 10:37 AM
To: Armor, Suzanne <Armor.Suzanne@epa.gov>
Subject: FW: Request for a copy of the previously issued NPDES permit no. GAU020056 for Dalton Utilities LAS

Karrie-Jo Robinson-Shell, P.E.
Environmental Engineer
US EPA Region 4
Water Protection Division
61 Forsyth Street
Atlanta, GA 30303
(404) 562-9308

From: Dickson, Audra <Audra.Dickson@dnr.ga.gov>
Sent: Thursday, August 29, 2019 10:30 AM
To: Shell, Karrie-Jo <Shell.Karrie-Jo@epa.gov>

Cc: Wolfe, Cameron <cameron.wolfe@dnr.ga.gov>; Causse, Benoit <Benoit.Causse@dnr.ga.gov>
Subject: RE: Request for a copy of the previously issued NPDES permit no. GAU020056 for Dalton Utilities LAS

Karrie-Jo,

Correct, based on my limited research and file review, it does not appear a wastewater NPDES discharge permit was ever issued for this site and it has been a LAS system.

I will forward your request to the Compliance Office, as they receive the DMRs and OMRs and have staff locate the design development report in our files.

Please let me know if you have any comments or concerns.

Best Regards

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Audra Dickson | Program Manager
Wastewater Regulatory Program
2 MLK Jr. Drive, Suite 1152 East
Atlanta, GA 30334
OFFICE: (404)-463-4934
EMAIL: audra.dickson@dnr.ga.gov

*Did you know starting **October 1, 2018** you may complete your wastewater and underground injection control applications online using the Georgia EPD Online System? You can access the site **here**.*

From: Shell, Karrie-Jo [mailto:Shell.Karrie-Jo@epa.gov]
Sent: Thursday, August 29, 2019 9:43 AM
To: Dickson, Audra
Cc: Wolfe, Cameron
Subject: RE: Request for a copy of the previously issued NPDES permit no. GAU020056 for Dalton Utilities LAS

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

OK, and thanks for looking into this.

Based on my understanding, your electronic records indicate a high probability that there was never an NPDES permit for the LAS. Is this correct right?

If possible, please send me the following Dalton Utility LAS reports for the past 3 years:

1. Operating and Monitoring reports (OMR)
2. Discharge Monitoring Reports (DMR)
3. Design and Development Report (DDR)
4. Any reports that include the required calculation of the Antecedent Precipitation Index (API), which is used to determine soil saturation. Based on the LAS permit (GAJ020056), the facility should not exceed an API value of 3.2 during summer months (May-Oct) and 2.0 during winter months (Nov-April). Please note that the LAS permit does not include units for precipitation (I assume the units are inches.)
5. Any reports that include the required calculation for the Critical Precipitation Intensity (CPI), which the permit requires to monitored on an hourly basis with each precipitation event. It is my understanding that the permit prohibits spray irrigation if the CPI equals, or exceeds, a value of 1.0 inch per hour based on a rainfall of 30 minutes (i.e., 0.5 inches of rainfall in 30 minutes).

Thanks for your help.

Karrie-Jo Robinson-Shell, P.E.
Environmental Engineer
US EPA Region 4
Water Protection Division
61 Forsyth Street
Atlanta, GA 30303
(404) 562-9308

From: Dickson, Audra <Audra.Dickson@dnr.ga.gov>
Sent: Thursday, August 29, 2019 9:09 AM
To: Shell, Karrie-Jo <Shell.Karrie-Jo@epa.gov>
Cc: Wolfe, Cameron <cameron.wolfe@dnr.ga.gov>
Subject: RE: Request for a copy of the previously issued NPDES permit no. GAU020056 for Dalton Utilities LAS

Karrie-Jo

The permit number referenced appears to be old nomenclature (GAU) that was used to enter LAS permits into our data system and it is no longer used. As permits were reissued we updated the nomenclature for all LAS permits to begin with GAJxxxxxx. The 020056 number is assigned to the GAJ020056 - Dalton Utilities (Riverbend WPCP) Land Application System located at Riverbend Road Dalton, GA 30721.

Please let me know if you have any comments or concerns.

Best Regards

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Audra Dickson | Program Manager
Wastewater Regulatory Program
2 MLK Jr. Drive, Suite 1152 East
Atlanta, GA 30334
OFFICE: (404)-463-4934
EMAIL: audra.dickson@dnr.ga.gov

*Did you know starting **October 1, 2018** you may complete your wastewater and underground injection control applications online using the Georgia EPD Online System? You can access the site **here**.*

From: Shell, Karrie-Jo [mailto:Shell.Karrie-Jo@epa.gov]
Sent: Wednesday, August 28, 2019 10:00 AM
To: Dickson, Audra
Cc: Wolfe, Cameron
Subject: Request for a copy of the previously issued NPDES permit no. GAU020056 for Dalton Utilities LAS

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Audra,

Can you send me a copy of GAU020056 (minor industrial?), which I understand expired on 3/25/2012 and was not renewed by Dalton Utilities? I want to see what types of discharges were covered under this individual permit.

Thanks.

Karrie-Jo Robinson-Shell, P.E.
Environmental Engineer
US EPA Region 4
Water Protection Division
61 Forsyth Street
Atlanta, GA 30303
(404) 562-9308

From: Wolfe, Cameron <cameron.wolfe@dnr.ga.gov>
Sent: Wednesday, August 28, 2019 8:05 AM
To: Shell, Karrie-Jo <Shell.Karrie-Jo@epa.gov>
Cc: Dickson, Audra <Audra.Dickson@dnr.ga.gov>
Subject: Re: Questions regarding the GP coverages for Dalton Utilities under NPDES GAR05000

Here are the NOI and NEE for the two facilities.

Cameron Wolfe

Manager, Stormwater Unit

NonPoint Source Program, Watershed Protection Branch

Georgia Environmental Protection Division

Direct Line 404-651-8511

Cameron.Wolfe@dnr.ga.gov

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

From: Shell, Karrie-Jo <Shell.Karrie-Jo@epa.gov>
Sent: Wednesday, August 28, 2019 7:54:43 AM
To: Wolfe, Cameron <cameron.wolfe@dnr.ga.gov>
Cc: Dickson, Audra <Audra.Dickson@dnr.ga.gov>
Subject: FW: Questions regarding the GP coverages for Dalton Utilities under NPDES GAR05000

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Thanks for your response, Cameron.

EPA's ECHO website shows that the Dalton LAS had a SW permit no. GAU020056, but it expired on 3/25/2012. How are the SW discharges from the LAS currently handled?

Karrie-Jo Robinson-Shell, P.E.
Environmental Engineer
US EPA Region 4
Water Protection Division
61 Forsyth Street
Atlanta, GA 30303
(404) 562-9308

From: Dickson, Audra <Audra.Dickson@dnr.ga.gov>
Sent: Tuesday, August 27, 2019 6:00 PM
To: Shell, Karrie-Jo <Shell.Karrie-Jo@epa.gov>
Subject: Fwd: Questions regarding the GP coverages for Dalton Utilities under NPDES GAR05000

Please find the response from the Stormwater Program below.

Audra

Get Outlook for iOS

From: Wolfe, Cameron <cameron.wolfe@dnr.ga.gov>
Sent: Tuesday, August 27, 2019 4:11:20 PM
To: Dickson, Audra <Audra.Dickson@dnr.ga.gov>; Truszczynski, Anna <anna.truszczynski@dnr.ga.gov>
Subject: Re: Questions regarding the GP coverages for Dalton Utilities under NPDES GAR05000

Dalton Utilities - Riverbend WWTP: Industrial Stormwater General Permit coverage In Effect based on NOI filed on 6/30/2017 and subsequently approved.

Dalton Utilities - Loopers Bend WWTP: Industrial Stormwater General Permit coverage In Effect based on NEE filed on 6/30/2017. The NEE and subsequently approved.

Cameron Wolfe
Manager, Stormwater Unit
NonPoint Source Program, Watershed Protection Branch
Georgia Environmental Protection Division
Direct Line 404-651-8511
Cameron.Wolfe@dnr.ga.gov

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

From: Dickson, Audra <Audra.Dickson@dnr.ga.gov>
Sent: Tuesday, August 27, 2019 2:29:58 PM
To: Wolfe, Cameron <cameron.wolfe@dnr.ga.gov>; Truszczynski, Anna <anna.truszczynski@dnr.ga.gov>
Subject: FW: Questions regarding the GP coverages for Dalton Utilities under NPDES GAR05000

Cameron,

Can you please provide me with an update regarding the current status of the two facilities listed below?

Please let me know if you have any comments or concerns.

Best Regards

GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Audra Dickson | Program Manager
Wastewater Regulatory Program
2 MLK Jr. Drive, Suite 1152 East
Atlanta, GA 30334
OFFICE: (404)-463-4934
EMAIL: audra.dickson@dnr.ga.gov

*Did you know starting **October 1, 2018** you may complete your wastewater and underground injection control applications online using the Georgia EPD Online System? You can access the site **here**.*

From: Shell, Karrie-Jo [mailto:Shell.Karrie-Jo@epa.gov]
Sent: Tuesday, August 27, 2019 11:57 AM
To: Dickson, Audra
Subject: FW: Questions regarding the GP coverages for Dalton Utilities under NPDES GAR05000

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Is there a separate SW permit for the Land Application System, LAS permit no. GAJ020056?

Karrie-Jo Robinson-Shell, P.E.
Environmental Engineer
US EPA Region 4
Water Protection Division
61 Forsyth Street
Atlanta, GA 30303
(404) 562-9308

From: Shell, Karrie-Jo
Sent: Tuesday, August 27, 2019 11:29 AM
To: Dickson, Audra <Audra.Dickson@dnr.ga.gov>
Subject: Questions regarding the GP coverages for Dalton Utilities under NPDES GAR05000

The following information was obtained from a spreadsheet from GA EPD's website (below) and consist of a list of facilities with SW associated with industrial activity. Can you please let me know the status of GP coverages for each? Specifically, have they been issued coverage?

	2101 RIVERBEND ROAD			
DALTON UTILITIES - RIVERBEND WWTP	DALTON, GA 30721	Whitfield	4211	Notice of Intent

DALTON UTILITIES - LOOPERS BEND WWTP	924 LOOPERS BRIDGE ROAD DALTON, GA 30720	Whitfield	4212	No Exposure Exclusion

https://epd.georgia.gov/npdes-industrial-storm-water-general-permits

Karrie-Jo Robinson-Shell, P.E.
Environmental Engineer
US EPA Region 4
Water Protection Division
61 Forsyth Street
Atlanta, GA 30303
(404) 562-9308