



PO Box 16206  
Savannah, GA 31416  
Phone/Fax: 866-942-6222

[www.ogeecheeriverkeeper.org](http://www.ogeecheeriverkeeper.org)  
*Working Together to Protect the Ogeechee, Canoochee and Coastal Rivers*

March 14, 2023

**Via E-Mail**

Environmental Protection Division  
Watershed Protection Branch  
Wastewater Regulatory Program  
ATTN: August Lutkehus  
2 Martin Luther King Jr. Drive  
Suite 1470A East  
Atlanta, Georgia 30334  
[august.lutkehus@dnr.ga.gov](mailto:august.lutkehus@dnr.ga.gov)

**Re: Comments on Notice of No Significant Impact: City of Pembroke, ARPA Grant No. GA-0010529**

Dear Mr. Lutkehus:

Ogeechee Riverkeeper's mission is to protect, preserve, and improve the water quality of the Ogeechee River basin, including the Canoochee River and the coastal and tidal rivers of Liberty, Bryan, and Chatham Counties. ORK works with local communities to share and collect information on the ecological and cultural importance of rivers and streams throughout the Basin, and uses that information to amplify the voices of those who speak for the watershed. One of our primary roles is as watchdog on new land development projects throughout the watershed that could pose a significant threat to water quality and quantity.

We offer these comments on the Georgia Environmental Protection Division's (GAEPD) determination that no significant impact on the environment will result from this ARPA grant to the City of Pembroke. We appreciate the City's long-term planning efforts, especially in light of expected development and population growth. However, we believe the Environmental Review and Planning Document<sup>1</sup> should be updated to more fully consider the regionalization alternative in light of the regional wastewater treatment expansions planned for North Bryan County. Additionally, GAEPD should delay any decision approving the ARPA grant until reconsidering those updated analyses.

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<sup>1</sup> M.E. Stack Engineering. Jan. 26, 2023. "State Revolving Funds Planning Document - Wastewater Treatment Plant Expansion and Improvements for City of Pembroke, GA."

1. Regionalization offers both short-term and long-term solutions to the City of Pembroke's wastewater needs

The forthcoming regional wastewater treatment system expansions associated with the Bryan County Megasite and expected population growth offer a great opportunity for the City of Pembroke. As noted in news articles<sup>2</sup> and in a recent Bryan County Request for Proposals,<sup>3</sup> this new treatment facility will be located in northern Bryan County itself, very close to Pembroke. The expanded wastewater treatment services and capacity that the Megasite's wastewater treatment project will provide could potentially meet Pembroke's anticipated needs both in the short-term and the long term. We urge both the City of Pembroke and GAEPD to take a harder look at Alternative 2's regionalization analysis.

As stated in the Environmental Review and Planning Document, an existing Master Sewer Plan and regional wastewater network already exists in northern Bryan County. Due to the currently-limited capacity in that system, Pembroke's analysis was that regionalization was not feasible. However, with the announced facilities likely to increase treatment capacity, these assessments should be reconsidered.

Pembroke's short-term needs could be met with a combination of its current facilities and the existing capacity in northern Bryan County. To meet its short-term needs, Pembroke proposes to expand its land application system (LAS) operations to account for "an additional flow of 150,000 GPD for a total of 500,000 [GPD]"<sup>4</sup> of treatment capacity. This would equate to an immediate additional capacity need of 0.15 MGD. While its current LAS system is 85% full, this still leaves some space for additional utilization. When combined with the 0.2 MGD noted in the North Bryan County, regionalization seems to be able to handle the City of Pembroke's immediate, short-term needs.

Regional interconnection will also support long-term capacity needs for the City of Pembroke. While the exact capacity of the announced regional wastewater treatment system is not clear, it is being built with the intention of accounting for the anticipated population growth that Pembroke also expects. Rather than creating multiple parallel treatment systems, regionalization will save on costs, as well as short-term and long-term labor related to construction, operation, and maintenance, and will limit environmental impact. Regionalization will also support cooperation and resource sharing between all interconnected municipalities and the county moving forward with future capacity issues, giving the City of Pembroke and its residents more options when those problems arise.

ORK does not believe this option is technically infeasible and urges the City of Pembroke and GAEPD to reassess Alternative 2 in light of our comments and announced regional plans.

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<sup>2</sup> Savannah Morning News. Aug. 17, 2022. "Hyundai plant: What you need to know about water, sewer infrastructure related to megasite." Available at: <https://www.savannahnow.com/story/news/local/2022/08/17/wastewater-facility-built-wells-dug-hyundai-ev-plant-bryan-county-georgia/10225031002/>.

<sup>3</sup> Bryan County RFP#27691.0082C. "BCMS Regional Pump Station, Force Main, Water Main, and Gravity Sewer." Available at: <https://www.bryancountyga.org/Home/Components/RFP/RFP/1167/28>.

<sup>4</sup> Please note, pg. 12 of 43 - the Environmental Review and Planning Document notes a total capacity of 500,000 "MGD." We believe this is a typo, as the plan only calls for a new 0.5-MGD facility.

2. Land Application System expansion should be avoided

ORK urges the City of Pembroke and GAEPD to reconsider the plans to expand land application beyond current levels. We believe that regionalization offers a better solution, both financially and environmentally, to the existing short-term capacity issue. Regional interconnection could also offer a short-term bridge until the mechanical wastewater treatment plant is built as proposed here. Regardless, the short-term benefit of expanded LAS will be outweighed by its long-term impacts. We oppose any plans to increase or expand the land application system.

ORK does not believe that expanded LAS is a necessary component of this plan. As noted above, it appears that a combination of regionalization and current land application system could be able to handle the City of Pembroke's short-term treatment needs. Early interconnection into the northern Bryan County network can provide some level of immediate capacity need while also opening up options for future capacity expansions throughout the county. The opportunity to utilize future treatment capacity expansions throughout the whole county - planned or otherwise - will also be available, cutting down on the cost of future projects. Regionalization is also likely to be less expensive compared to the full, decades-long lifetime costs related to the expansion, operation, maintenance, and monitoring of an expanded LAS system. Likewise, the reduced land-use, soil contamination, and potential surface and groundwater pollution issues associated with LAS's can be avoided, better supporting the environment in and around Pembroke. Regionalization offers many benefits and avoids many drawbacks of LAS expansion.

Independent of increased treatment capacity related to the Bryan County Megasite, ORK urges regionalization over expanded LAS operations. Even the small amount of additional wastewater treatment capacity could allow Pembroke time to construct its own treatment facility and meet its current and future needs. In the near-term, while wastewater treatment demand is lower than anticipated future needs, regional interconnection could open a potential revenue stream for the City of Pembroke by receiving wastewater from outside of the City. And as mentioned above, interconnection allows Pembroke to have ready-access to other, future wastewater treatment expansion projects that have not yet been planned or announced. This will give the City a better ability to continue supporting its population growth through lower-cost wastewater treatment capacity expansion.

Overall, the benefits of regionalization outweigh the benefits of expanded LAS operations, especially when also considering the environmental impacts. ORK believes regionalization can potentially meet all of its short- and long-term wastewater requirements. However, whatever additional steps the City of Pembroke plans to add wastewater treatment capacity, ORK opposes any LAS expansion.

Thank you in advance for your time and consideration; please let me know if you have any questions: [ben@ogeecheeriverkeeper.org](mailto:ben@ogeecheeriverkeeper.org) or 866-942-6222 x9.

Ben Kirsch, Legal Director  
Ogeechee Riverkeeper