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

December 15, 2023

**Via E-Mail**

Environmental Protection Division  
2 Martin Luther King Jr. Drive SW  
1152 East Tower,  
Atlanta, Georgia 30334  
[EPDcomments@dnr.ga.gov](mailto:EPDcomments@dnr.ga.gov)

**Re: Comments on modifications to the City of Guyton's Water Pollution Control Plant LAS Permit (GA)040010)**

To whom it may concern:

Ogeechee Riverkeeper's (ORK) 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 use that information to amplify the voices of those who speak for the watershed. One of ORK's primary roles is as watchdog on new and proposed projects throughout the watershed that could pose a significant threat to its water quality and aquatic environments.

Ogeechee Riverkeeper provides these comments on the City of Guyton's proposed permit modifications for its land application system (LAS) operations at the Guyton Water Pollution Control Plant (WPCP). Due to the availability of alternatives and the location of the proposed expansion, ORK urges the Georgia Environmental Protection Division (GA EPD) to deny the proposed expansion of land application and encourages the City of Guyton to pursue alternatives for treating its wastewater.

1. Utilize available alternatives to prepare for anticipated growth

Rather than seeking this short-term expansion of disposal capacity, the City of Guyton should take a longer-term view of its wastewater capacity and utilize the current and future availability of other wastewater treatment facilities. Guyton, like the rest of Effingham County and the wider North Coastal Georgia region, has seen unprecedented growth in recent years that is only projected to continue. To address long-term needs, ORK encourages the City of Guyton to embrace a regional approach to wastewater management and utilize already-available treatment options rather than pursue the proposed expansion.

Anticipated wastewater treatment capacity growth in the Guyton service area can be met through treatment facilities in the area. Both the Effingham County Wastewater Treatment Facility and the imminent North Bryan Water Reclamation Facility. Effingham County's facility, located on Low Ground Road, is already located close to the City of Guyton and within Guyton's Service Area. Utilizing this nearby resource not only avoids the need to sink more costs into the existing LAS operation, it will avoid many of the water quality and pollution issues associated with wastewater treatment will producing reuse water, reducing pressure on an already-strained Upper Floridan Aquifer and prevent accelerated saltwater intrusion into the region's main drinking water supply. In addition, the North Bryan Water Reclamation Facility will offer a significant amount of wastewater treatment capacity. With a new force main to pass through Effingham County already and a negotiated service agreement<sup>1</sup> allowing the County to acquire treatment capacity, Guyton's additional wastewater needs could easily be met. These two options provide more than enough capacity to meet the City's long-term wastewater treatment needs without having to invest additional funds in a short-term, 0.118 MGD expansion project that could quickly be exhausted.<sup>2</sup>

A long-term view of growth should be at the center of this decision making process. Considering the Hyundai Mega-Site, Hyundai's suppliers and other supporting industries, expansion at the Port of Savannah, and the influx of new residents needed to support these new industries, wastewater treatment demand is certain to increase. Rather than rely on a patchwork of independent approaches that duplicates work and increases costs for all localities, a regional approach should be pursued. Efforts are already underway to make the North Bryan Water Reclamation Facility available for a number of localities. Investing in regionalization of sewer efforts rather than short-term capacity increases through land application or septic systems is much more efficient, will result in less water and land pollution, and allow for future capacity to be expanded. ORK urges state and local decision makers to pursue a regional and comprehensive approach to wastewater management ahead of unprecedented growth.

## 2. Guyton WPCP's spray fields will impact water quality

The location of the Guyton WPCP's spray fields raises water quality concerns. Its adjacency to state waters, location within floodplains, and potential impact to drinking water wells creates concerns for human and ecological health in the area. ORK urges the use of a non-LAS treatment.

First, wetlands share space and surround the existing sprayfields. These state waters play many important roles in the human and natural environments, including flood control, wildlife habitat, and aquifer recharge. These environmental services rely on healthy wetlands. Pollution runoff from sprayfields threatens to harm these wetlands and the services they provide. With the exact locations of the spray fields are not clearly delineated in the Location Map in the Guyton WPCP's draft permit, it is not clear the extent that direct spray activities may be occurring in these wetlands.<sup>3</sup> If spray activities are occurring directly in these state waters, a National Pollution Discharge Elimination

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<sup>1</sup> Approved by Effingham County during the July 12, 2023 Board of Commissioners meeting. Approved by Bryan County during the August 8, 2023 Board of Commissioners meeting.

<sup>2</sup> As an example of how quickly this capacity could be used, a recently proposed 795-unit Planned Unit Development in Bryan County stated it would require 0.229 MGD of wastewater treatment capacity. See DRI #4099 for the Wyndham PUD - Pembroke. Available at: <https://apps.dca.ga.gov/DRI/AppSummary.aspx?driid=4099>.

<sup>3</sup> See Fact Sheet Appendix A "Location Map." Prepared by Alex Gramling, August 2023.

Wetlands appear to be located almost entirely in Zones C, E, and D2-ii. Additionally, wetlands appear in portions of Zones D and D2-ii.

System (NPDES) permit addressing that direct discharge would be required, beyond the LAS nonpoint source permit being considered here. Regardless, runoff is a serious concern and should receive monitoring beyond what is proposed here.

Regarding wetlands, ORK makes three requests. First, that applicants verify the precise locations of their sprayfields and the locations of any wetlands, including both jurisdictional and non-jurisdictional wetlands. Second, if any sprayfields are located within wetlands, ORK asks that the GA EPD require additional NPDES requirements as required by GAC 391-3-6 for discharge into waters of the state. Third, ORK asks that annual wetland water quality monitoring be specifically included in the permit at Part II.C.3.

Another concern of the Guyton WPCP's location is its presence in the floodplain. In Georgia, 'floodplain' is a commonly used shorthand for the "Special Flood Hazard Area," which is described as an "area of high flood risk that is inundated by the 1% annual flood chance."<sup>4</sup> This is the same definition that the Federal Emergency Management Agency (FEMA) uses for its Flood Hazard Zone A designation.<sup>5</sup> FEMA states that these areas have at least a one-in-four chance of flooding over a 30-year period.<sup>6</sup> And as storm frequency and intensity is expected to increase in the coming decades, the possibility of flooding likewise increases. While the application zones are not clearly demarcated, it appears that Guyton WPCP's application Zones C, D, and D2-ii are all at least partially within the floodplain. In addition, both the aeration and storage pond seem to be entirely within the floodplain. A map of the FEMA-designated floodplain is included below in Attachment A.

Flooding at this LAS site presents serious water quality and human health concerns. The wastewater in the storage and aeration ponds as well as what is applied to the lands within the floodplain could easily be swept up in a flood and transported far beyond the Guyton WPCP. The pollutants in these flood waters could easily enter neighboring and nearby properties, homes, and drinking water wells, creating potentially serious health issues for these people. Additionally, water quality, sensitive habitats and wildlife, and recreational spaces are all vulnerable to the negative impacts from these pollutant-laden flood waters. This proposed modification would allow even more wastewater to be applied and, in the event of a flood, impact nearby waters and properties.

ORK makes two requests with regards to floodplain application. First, no new increases in wastewater application should be permitted in Zones within the floodplain. Further, GA EPD should seriously consider denying any and all wastewater discharges in the floodplain - including but not limited to Zones C, D, and D2-ii. In reviewing these proposed modifications, GA EPD has the opportunity and the duty to consider whether current wastewater application meets state and federal standards for ensuring safe and healthy human and natural environments. Second, if the proposed modifications are approved, ORK asks that specific, flood-focused measures be included in the permit. These could include weather-dependent and weather-responsive application procedures, inclusion of floods in Part II.A.12 to accompany spill reporting, and flood damage prevention structures near the ponds, among any other impact-reducing measures that GA EPD sees fit. Through a combination of these measures, pollution impacts from flooding could be reduced or wholly eliminated.

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<sup>4</sup> See GA EPD's 'Floodplain Management' webpage, *available at*: <https://epd.georgia.gov/watershed-protection-branch/floodplain-management>.

<sup>5</sup> See <https://www.fema.gov/glossary/zona>.

<sup>6</sup> FEMA. "Flood Maps." See: <https://www.fema.gov/flood-maps>.

### 3. Bacteria monitoring parameter needed

ORK further requests that bacteria be included as a pollution parameter that is specifically monitored at and around the Guyton WPCP. With wastewater disposal, bacteria is certainly a concern. The permit, however, does not call for bacteria monitoring. To ensure surface and groundwater is not contaminated with bacterial pollution, this permit should require *E. coli* monitoring in the following sections - Treatment Pond discharges in Part I.B.1, Part I.B.2, Part I.B.3; Storage Pond discharges in Part I.B.4; Groundwater in Part I.B.5; and Surface Water in Part I.B.7.

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).

Ben Kirsch, Legal Director  
Ogeechee Riverkeeper

## Attachment A

### FEMA Flood Map Service Center<sup>7</sup>

#### Search Results—Products for EFFINGHAM COUNTY

[Show ALL Products »](#)

The flood map for the selected area is number **13103C0250E**, effective on **3/16/2015**

#### DYNAMIC MAP



PRINT MAP/  
FIRMette

#### MAP IMAGE



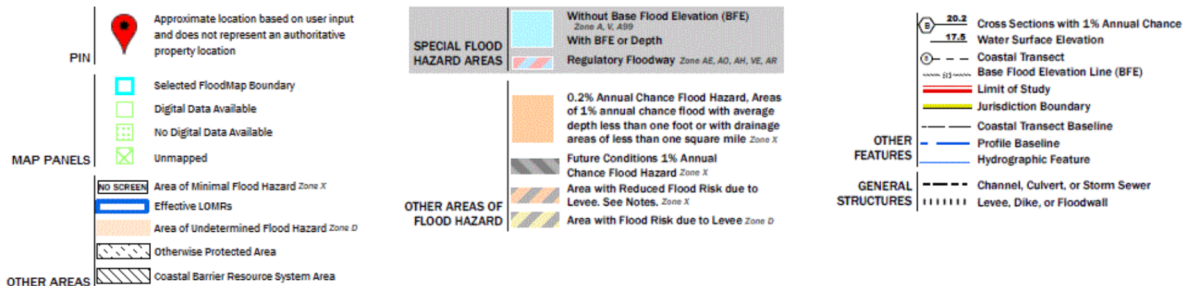
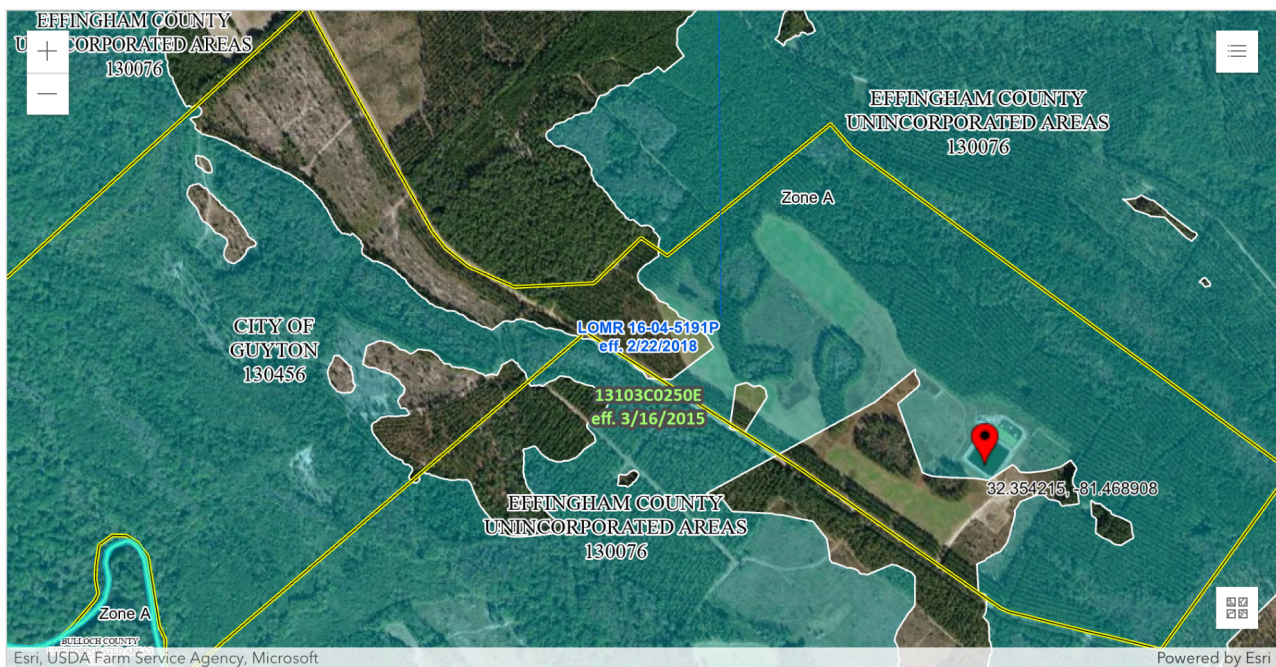
DOWNLOAD  
FIRM PANEL

#### Changes to this FIRM [?](#)

- Revisions (2)
- Amendments (0)
- Revalidations (1)

You can choose a new flood map or move the location pin by selecting a different location on the locator map below or by entering a new location in the search field above. It may take a minute or more during peak hours to generate a dynamic FIRMette.

[Go To NFHL Viewer »](#)



<sup>7</sup> Obtained from: <https://msc.fema.gov/portal/search>. Last Visited - December 15, 2023.