



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

www.ogeecheeriverkeeper.org
Working Together to Protect the Ogeechee, Canoochee and Coastal Rivers

May 30, 2023

Via E-Mail

Environmental Protection Division
2 Martin Luther King Jr. Drive SW
1152 East Tower,
Atlanta, Georgia 30334
EPDcomments@dnr.ga.gov

Re: Comments on modifications to the Sandersville Water Pollution Control Plant NPDES Permit (GA0032051)

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 Sandersville Water Pollution Control Plant's proposed permit modifications for its NPDES permit, its Sludge Management Plan, and its potential for accepting industrial wastewater. Our focus is on its potential to accept per- and polyfluoroalkyl substances, also known as PFAS.

PFAS are a group of chemicals widely used in beneficial products. They break down extremely slowly over time, earning the nickname "forever chemical," and they have the propensity to accumulate in people, animals, and the environment. While they have properties that are very useful in industry and consumer products, these chemicals are known to have negative health impacts on human health, including increased risk of cancer, weakened immune systems, developmental impacts, and decreased fertility, among other known and unknown risks. As such, the U.S. Environmental Protection Agency (EPA) is in the process of establishing limitations and restrictions on the discharge of PFAS.¹

¹ For more information, please visit the EPA's "PFAS Strategic Roadmap," available at: https://www.epa.gov/system/files/documents/2021-10/pfas-roadmap_final-508.pdf

In anticipation of the EPA's forthcoming rules, ORK urges the Georgia Environmental Protection Division (EPD) to include PFAS monitoring in this permit and all subsequent wastewater discharge permit and sludge management plans. Specifically, in Part IV of this permit, ORK requests that total PFAS be included as a monitoring parameter reported in mg/kg.

Thank you in advance for your time and consideration; please let me know if you have any questions:
ben@ogeecheeriverkeeper.org.

Ben Kirsch, Legal Director
Ogeechee Riverkeeper