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

May 1, 2025

Via E-Mail

Georgia Environmental Protection Division
Watershed Protection Branch
2 MLK Jr. Dr., 1470A East Tower,
Atlanta, Georgia 30334
EPDcomments@dnr.ga.gov

Re: NPDES Permit No.: GA004661 for KaMin LLC (McIntyre Pits) - comments on reissuance

To whom it may concern:

Ogeechee Riverkeeper 501(c)(3) (ORK) works to protect, preserve, and improve the water quality of the Ogeechee River basin, which includes the Canoochee River, tributary streams, and all of the streams flowing out to Ossabaw Sound and St. Catherine's Sound. The Ogeechee River system drains more than 5,500 square miles across 20 counties in Georgia. ORK works with local communities to retain the ecological and cultural integrity of rivers, streams, wetlands, and related habitats throughout the Basin. One of ORK's primary roles is as watchdog on permits throughout the watershed that could pose a significant threat to its water quality and aquatic environments.

Ogeechee Riverkeeper requests that the receiving waters where these effluent discharges occur also be monitored. In many of these rivers, streams, creeks and other waterbodies, there are little, if any, existing water quality data. With these missing data, it is difficult, if not impossible, to determine whether the receiving waters have the assimilative capacity to handle the requested effluent discharge. As such, ORK requests that the permittee be required to take water quality samples upstream of the permitted discharge locations, in addition to the required effluent samples.

ORK proposes that for Permit Conditions A.1 through A.22, that each instance of "Sample Location" noted in the tables be revised to "Final Effluent and Receiving Water, Upstream". Samples should occur as frequently as sampling for effluent. In addition, "upstream" should be defined as "a location on the receiving water that is outside of the influence of the outfall or discharge location, so as to avoid any influence on effluent pollutant parameters."

Collecting these receiving water quality samples will have multiple benefits. First, it will inform the Environmental Protection Division about the assimilative capacity of the receiving waters and whether discharges will meet Georgia's water quality standards. Second, it will help to determine current water quality conditions for

waterbodies lacking data. Further, it will provide natural background data for streams with no upstream point or nonpoint sources of pollution. Third, it will allow EPD to more easily identify which outfalls are potentially causing downstream water quality issues.

These simple revisions will ensure that these outfalls comply with Georgia's water quality regulations, that these receiving waters are protected, and that KaMin LLC is a responsible corporate neighbor in the region. We hope EPD will agree with these suggested revisions and adjust the permit accordingly.

Thank you for your time. If you have any questions, please do not hesitate to reach out.

Sincerely,

Adam Heagy
Upper Watershed Representative
Ogeechee Riverkeeper