

To: Friends of Barber Creek
From: Lee Becker
Subject: Public Hearing Permit No. GA0038733
May 11, 2006
Barrow County Board of Commissioners Board Room #315
233 E. Broad St., Winder, Georgia
Date: May 5, 2006

At our meeting on May 4, 2006, April Ingle from the Georgia River Network suggested that I develop some brief talking points for people who want them to use at the May 11 hearing.

Here are issues that are drawn from the Briefing Document now on the Friends of Barber Creek website, www.barbercreek.org.

- I. The Barrow County Board of Commissioners requested a permit to discharge 0.5 MGD from a treatment facility under construction, called the Barber Creek Water Reclamation Facility.

Barrow County said it wanted to discharge water into Barber Creek only during cold weather months, when it would not be using the water on the Georgia Club golf course.

The EPD, without any justification, proposes to grant a permit for 1.5 MGD of discharge. Citizens were misled to believe the discharge request was for 0.5 MGD. Barrow County has not demonstrated a record of operation of a plant or the need for additional capacity. Basically, those of us downstream from the plant will not get a chance to review performance before Barrow County tripples capacity from what was requested.

- II. The EPD is requiring Barrow County to treat the effluent from its plant to a very high standard. Yet the behavior of the EPD in this case and in others underscores the potential problems that exist with reuse of treated wastewater.

First, the EPD has never given a permit for use of the Apalachee, which is only about 4 miles from the new plant in Barrow Count. In fact, Oconee County officials have indicated that they believe EPD will never issue such a permit because of its desire to keep the Apalachee pristine.

Second, in its permit for Statham and in its Guidelines for Water Reclamation and Urban Water Reuse, the EPD requires those using the effluent from such a plant to have a permit, to participate in an educational program to learn about reuse water, to not allow the reuse water into dwelling units, to not use the water for swimming, to not use the water on edible crops, and to limit body contact with the water that comes with such activities as washing a car.

We know that children wade in Barber Creek, our pets play in the creek, and we are

forced to enter the creek ourselves on occasion to maintain our property.

Water that requires a permit to handle, that should not be used on edible plants, and that we should avoid touching doesn't belong in Barber Creek.

If the water isn't good enough for the Apalachee, it isn't good enough for Barber Creek.

III. The Permit reflects no concern for the impact of the discharge on stream volume. The discharge permit request is for a wet weather discharge, when the stream often floods. Oconee County officials have estimated that the expanded Rocky Branch being proposed will increase stream volume 0.7 of an inch. An extension of that analysis to the Barrow County permit suggests considerable change in the volume of the stream as a result of the draft permit allowing 1.5 MGD of discharge.

IV. The Permit does not require any backup power source at the new plant, nor does it provide for adequate safeguards so that bypass of the plans does not occur.

The draft permit only says that if Barrow County doesn't comply with the effluent limitations it has to tell the EPD with 24 hours of learning of its problem. If it plans to bypass the plant, it has to give written notice to EPD 10 days in advance. The County has to "take all possible measures to prevent bypassing during routine maintenance..." "Any unplanned bypass must be reported...The permittee may be liable for water quality violations that occur as a result of bypassing the facility." "If the primary source of power is reduced or lost, the permittee shall use an alternative source of power if available to reduce or control discharge to maintain permit compliance." Any noncompliance is grounds for "enforcement action, permit termination, revocation and reissuance, or modification, or denial of a permit renewal application." How can the state shut down a sewage plant that is operating without doing additional harm? In sum, there are real chances of a discharge into Barber Creek of untreated sewage, and very little consequence for the operator of the plant.

V. Statham currently operates a sewage treatment plant that uses an old technology and that has been linked to pollution of the creek by experts at the University of Georgia. Though the EPD earlier suggested it would require Statham to phase out that plant when the new one is approved, the proposed permit does not do that, meaning that the old plant can continue to pollute Barber Creek even when the new one is online.

VI. The new plant in Barrow County is going to serve some Oconee County customers. The two counties signed an agreement to that effect. Yet there has been no coordination of the efforts by the two counties in their plans to build new plants. The expanded Rocky Branch plant in Oconee County, which also is in the permit phase, will be about 10 miles from the Barrow County plant. Oconee County already is talking about the possibility of increasing that plant from the requested 1.0 MGD of discharge to 4.0 MGD of discharge. The EPD should evaluate the plants being planned in both counties at the same time and force the counties to collaborate on their sewage treatment.