



GEORGIA

DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Watershed Protection Branch

2 Martin Luther King, Jr. Drive
Suite 1152, East Tower
Atlanta, Georgia 30334
404-463-1511

April 28, 2021

Honorable Andrea Gibby, Mayor
City of Young Harris
Post Office Box 122
Young Harris, Georgia 30582

RE: Leachate Acceptance Request
Young Harris Water Pollution Control Plant
NPDES Permit No. GA0022462
Towns County, Tennessee River Basin

Dear Mayor Gibby:

The Georgia Environmental Protection Division (EPD) is in receipt of your letter notifying our office that the City intends to accept and treat up to 25,000 gal/day of leachate at the Young Harris Water Pollution Control Plant (WPCP).

Please note that, in accordance with Section 391-3-6-.08(2)(u)(1) of the Rules for Water Quality Control, an industrial user (i.e., landfill) is considered a significant industrial user and a pre-treatment permit is required prior to discharging to the City's WPCP, if any of the following thresholds are exceeded:

1. Any industrial user that discharges an average of 25,000 gallons per day or more of process wastewater to the publicly-owned treatment work (POTW), or
2. Any industrial user that contributes a process waste stream which makes up 5 percent or more of the average dry weather hydraulic capacity of the POTW, or
3. Any industrial user that contributes a process waste stream which makes up 5 percent or more of the average dry weather organic capacity of the POTW.

Based on the current permitted flow of 0.24 MGD, it appears that at least one of the above thresholds will be exceeded if the Young Harris WPCP accepts up to 25,000 gal/day of leachate from a landfill. Unless the amount of leachate received by the City is reduced accordingly, the landfill owner should contact Ms. Whitney Fenwick, Manager of the Industrial Permitting Unit at 470-607-3078 or whitney.fenwick@dnr.ga.gov to inquire about submitting a pre-treatment permit application.

Alternatively, if the amount of leachate is reduced below the pre-treatment criteria, in accordance with the requirements listed in Part I.A.4 of the above-referenced permit, EPD requires that the City submit additional information for review regarding the quality and quantity of untreated leachate received. Prior to receiving leachate, the City must submit a report indicating the daily volume and the anticipated impact of the leachate on the effluent quality from the Young Harris WPCP. Additionally, the report should include the analytical results from at least one representative leachate sample for the following parameters:

- | | |
|---------------------------------------|--------------|
| 1. Five-day biochemical oxygen demand | 8. Arsenic |
| 2. Total Suspended Solids | 9. Cadmium |
| 3. Ammonia, as N | 10. Chromium |
| 4. Nitrate-nitrite, as N | 11. Copper |
| 5. Total Kjeldahl Nitrogen, as N | 12. Lead |
| 6. Total Phosphorus | 13. Mercury |
| 7. pH | 14. Nickel |
| | 15. Selenium |
| | 16. Zinc |

Please also be aware that if any amount of leachate is received at the facility, then the City's permit may be modified to include additional effluent monitoring requirements such as a priority pollutant scans and whole effluent toxicity (WET) tests to confirm that leachate does not cause or contribute to an exceedance of the Water Quality Standards in the receiving stream.

If you have any questions, please feel free to contact me at (404) 463-1834 or Josh.Hayes@dnr.ga.gov.

Sincerely,



Josh Hayes
Municipal Permitting Unit
Wastewater Regulatory Program

Cc: Mr. Wayne Barrett, The Water Authority (waynebarrett.twa@gmail.com)
Ms. Andrea Gibby, City of Young Harris (andregibby@cityofyoungharris.net)