



SAVANNAH RIVERKEEPER®

P.O. Box 60 Augusta, GA 30903
Phone: 706-826-8991 | Fax: 706-826-8995
Toll Free: 844-263-1415
Email: info@savannahriverkeeper.org
Web: www.savannahriverkeeper.org

GEORGIA DEPARTMENT of
NATURAL RESOURCES
Environmental Protection Division
2 MLK Jr. Drive, Suite 1152E
Atlanta, GA 30334

April 21, 2017

RE: NPDES Permit Issuance – DRT America, LLC

To whom it may concern,

In regards to the NPDES Permit No. GA0020770, Savannah Riverkeeper would like to start by commending Georgia EPD and the City of Springfield for writing such a stringent wastewater treatment permit, which is needed to protect a valuable natural resource. In addition, Savannah Riverkeeper submits the following items on concern for EPD's consideration:

1. The discharge into Ebenezer Creek should not have such an allowed swing in their pH levels. It is a unique and vastly important blackwater system. whose pH should be closer to 5. The permitted pH of the discharge should be closer to 7 to minimize damage to the system. Allowing a pH of up to 8.5 at the large amount of discharge expected creates the scenario that led to the Brier Creek fish kill 4 years ago where the pH of the creek itself was artificially high, and after rains filled the adjacent swamps, their low/normal pH dropped the overall pH too quickly, resulting in a kill of thousands of fish.
2. We have grave concerns for the citizens of Springfield and the issuance of these permits that shift the responsibility of environmental degradation to the taxpayer and away from the company itself. We understand that Springfield needs jobs, but assuming the liability from a company with a 10-page long list of chemicals that they could possibly discharge. We believe a list of actual expected chemicals to be discharged needs to be published for the permitting process.
3. The grab samples and especially the mortality tests are being done far too infrequently. Grab samples should happen daily, and the mortality test should be done quarterly.
4. It is highly likely that added industrial input will create a toxicity issue on the sprayfield that lies directly adjacent to the creek. We have had concerns for years with the increased water which this sprayfield has pushed onto the adjacent landowner's property and swamp. Now, with this added toxic effluent, we have extreme concern for not only the adjacent landowner's property but for what that will mean for the toxicity within the creek.
5. Ebenezer creek is a nationally recognized Scenic River, one of only 4 designated in the state of Georgia, and is one of the most amazing resources Springfield currently has in its possession. It is already an economic driver to the area, with people flocking from hundreds of miles away to float its majestic waters. Tourism is a growing important industry in the area. We believe this currently flawed permit puts those jobs and those economic drivers at risk. Springfield's effluent into the creek has been an issue for years if not decades, especially during low water events when the effluent becomes a large percentage of the creek itself.

We hope these concerns will be sufficiently addressed and the details of the permit be adjusted voluntarily. Savannah Riverkeeper represents and supports the citizens of Springfield and their natural resources and will act in their best interest should these requests not be met.

We look forward to having a conversation about the dire improvements needed in the near future, and urge any other citizens with similar concerns to also voice those to not only the state EPD but to the local municipality as well.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Tonya Bonitatibus', with a stylized flourish at the end.

Tonya Bonitatibus
Riverkeeper/Executive Director
Savannah Riverkeeper