



FOUR WATERS ENGINEERING, INC.
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December 19, 2025

Patrick Daugherty
Georgia Department of Natural Resources
Environmental Protection Division
2 Martin Luther King, Jr. Drive, Suite 1470A
Atlanta, Georgia 30334

Re: North Mainland Water Reclamation Facility Antidegradation Analysis – Resubmittal #1
EPD #: 2025-097

Dear Mr. Daugherty:

We have addressed the received comments as indicated below and are resubmitting the above referenced project to the Georgia Department of Natural Resources for review and approval.

1. Proposed project location – Please provide an exhibit in the appendices showing location of proposed plant, effluent pipe, and outfall. Include outfall coordinates on the map.

Response: At this time, we are unable to provide a single outfall location. The design phase of the project will evaluate which of the three WLAs outfall options is the most viable and appropriate for the project. However, a figure has been provided showing the proposed plant location, potential outfall pipe routes, and potential outfall locations in the appendices as Figure 7. Once a final outfall location is selected, a route will be determined based on easements and constructability.

2. Permit Limits – Reference is made throughout the report to the May 19, 2025 WLA. Please include a copy of the WLA in the appendices.

Response: A copy of the WLA received on May 19, 2025, has been provided in the appendices.

3. Land treatment system alternative – The pretreatment process costs under this alternative are the same as the treatment cost for the discharge alternative (advanced treatment). For the purposes of the land treatment alternative, the Commission should evaluate pre-treatment technology that is capable of meeting the limits established in EPD guidelines for spray irrigation on restricted sites (50 mg/L BOD5 and 90 mg/L TSS). Please clarify or revise cost as needed.

Response: As requested, the treatment costs for land application systems was reevaluated and updates were made to remove advanced treatment, clarify costs for chemical treatment for chlorine disinfection system, and reduction of concrete and masonry costs to address the reduction in basin and foundations. This reduced the total

capital costs by approximately \$2,000,000. The updated cost estimates have been included in the appendices.

4. 100% reuse alternative – Although this alternative may not be feasible, distribution of reuse water must still be promoted within the service area (i.e., “partial” reuse) to comply with EPD’s coastal plan for preventing or limiting saltwater intrusion in the Glynn County sub-zone.
 - a. Confirm in the report that the Commission has adopted ordinance(s) requiring all new developments to install purple pipe reuse lines in accordance with EPD’s Coastal Georgia Water & Wastewater Permitting Plan for Managing Saltwater Intrusion, 2006 (page 36). If it is not the case, please indicate when such ordinance will be adopted.

Response: BGJWSC has not currently adopted an ordinance requiring all new developments to install purple pipe. However, there are neighboring developments interested in using reuse water for irrigation.

- b. Section 2.1.B. states that distributing reuse water to the North Glynn Sports Complex is not a viable alternative because it is located 7 miles from the proposed treatment plant and would require crossing the highway.
 - i. Figure 1 in the appendices shows that the Complex is within approximately 3 miles of the proposed plant. Please clarify.

Response: The Sports Complex is within a three-mile radius of the proposed plant. However, the pipeline which would be installed to reach the Sports Complex would need to be approximately 7 miles long, following existing roadways.

- ii. Will any sewer lines be installed to serve areas across the highway? If this is the case, clarify why distribution reuse line(s) cannot be installed at the same time.

Response: Based on the proposed North Mainland WPCP service area (shown in the figure provided in response to Comment 5), forcemains crossing under I-95 will not be necessary. Any growth east of I-95 will continue to be conveyed to the existing Academy Creek WPCP. A reuse main could be installed but would be considered a major crossing and is not necessary or warranted by the proposed service area.

- iii. What is the estimated water need of the Sports Complex (summer period)? Provide a cost estimate to serve the North Glynn Sports Complex.

Response: The estimated water need of the Sports Complex for irrigation is 1,278 gallons per day (gpd) during the summer period. This would bring the total irrigation usage, and thereby potential reuse usage, to 7,978 gpd. This would not use a significant amount of the 1.5 MGD phase 1 capacity of the

WPCP. A cost estimate for the design and construction of a reuse main to serve the North Glynn Sports Complex has been included as a separate item from the 100% Reuse cost estimate in the appendices.

5. Flow projections – Provide a map showing the anticipated service area for the proposed plant. Include the area(s) currently served by Academy Creek WPCP that will be rerouted to the North Mainland WRF. Do not include marsh land/conservation area (i.e., non-developable areas)

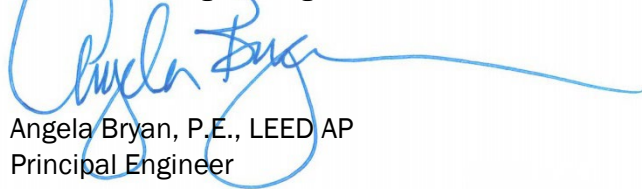
Response: A figure has been provided in the appendices as Figure 8 showing the anticipated service area for the proposed plant without any conservation areas, including the areas that are currently served by the Academy Creek WPCP that are intending to be rerouted to the new North Mainland WRF.

6. Certification (Section 5.) – This section should be signed by permit applicant.

Response: Section 5 has been updated to be signed by the permit applicant.

Please contact me at 904-414-2400 ext. 51, or via email at abryan@4weng.com should you require additional information or have any questions.

With best regards,
Four Waters Engineering, Inc.



Angela Bryan, P.E., LEED AP
Principal Engineer

Attachment