



---

ENVIRONMENTAL PROTECTION DIVISION

**Jeffrey W. Cown, Director**

---

**Watershed Protection Branch**

2 Martin Luther King, Jr. Drive  
Suite 1470, East Tower  
Atlanta, Georgia 30334  
404-463-1511

Honorable Zinda McDaniel, Mayor  
City of Quitman  
Post Office Box 208  
Quitman, Georgia 31643

RE: **Letter of Noncompliance**  
Quitman Water Pollution Control Plant  
LAS Permit No. GAJ020022

Dear Mayor McDaniel:

This letter serves as a Letter of Noncompliance (LON) to the City of Quitman (City) for violations of Land Application System (LAS) Permit No. GA0J020022 (Permit) issued for the Quitman Water Pollution Control Plant (WPCP), Section 391-3-6 of the Georgia Rules and Regulations for Water Quality Control (Rules), and Title 12, Chapter 5 of the Georgia Water Quality Control Act (Act).

A review of the Environmental Protection Division's (EPD) files indicates that from November 2022 to October 2023 the City reported nine (9) effluent violations, five (5) spills of raw sewage into waters of the State, eleven (11) monitoring violations, and one (1) reporting violation from a late partial submittal of a Discharge Monitoring Report (DMR) from November 2022 to October 2023, detailed in Attachment A. EPD alleges that the effluent violations, monitoring violations, reporting violation, and spills of raw sewage are violations of the Permit, Act, and the Rules.

On December 7, 2022, EPD issued a Notice of Violation (NOV) for chronic spills of raw sewage into waters of the State and flow effluent violations at the WPCP. On December 15, 2022, the City submitted a Corrective Action Plan (CAP) detailing projects to resolve the violations. On February 2, 2023, EPD received a communication from the City indicating operation management of the WPCP has changed. Further communication detailed the change in management contributed to the late submittal of the January 2023 DMR, and the monitoring violations detailed in Attachment A. On October 27, 2023, the City submitted a status update of the CAP detailing corrective action for pump stations will be completed by the end of 2023 and implementation of collection system programs are being considered.

DR/MHS

The City must immediately submit the full January 2023 DMR through netDMR. Within sixty (60) days from receipt of this LON please submit an update to the October 27, 2023 response. Please ensure that the update addresses plans to reduce I/I.

EPD will review the submission and any other information the City wishes to provide to determine if further enforcement action, including monetary penalty, is warranted. If you have any questions, please contact Dillon Rodenbaugh at 470-938-3371 or [dillon.rodenbaugh@dnr.ga.gov](mailto:dillon.rodenbaugh@dnr.ga.gov). Your cooperation in this matter is greatly appreciated.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Shahbazaz", written in a cursive style.

Marzieh Shahbazaz, Manager  
Watershed Compliance Program

**Attachment A**

**Table No. 1: Effluent Limit Violations from November 2022 to October 2023**

No.	DMR	Parameter	Permit Limit	Reported Value
1	February 2023	Treatment Pond Flow Weekly (MGD)	1.62	1.7182
2	March 2023	Sprayfield 1 Application Rate (in/wk)	2.5	7.97
3	March 2023	Sprayfield 2 Application Rate (in/wk)	2.5	7.97
4	March 2023	Sprayfield 3 Application Rate (in/wk)	2.5	7.97
5	June 2023	Treatment Pond TSS Concentration (mg/L)	90	105
6	June 2023	Treatment Pond Flow Weekly (MGD)	1.62	2.11
7	July 2023	Sprayfield 2 Application Rate (in/wk)	2.5	3.28
8	July 2023	Sprayfield 4 Application Rate (in/wk)	2.5	3.1
9	July 2023	Sprayfield 5 Application Rate (in/wk)	2.5	2.82

**Table No. 2: Spills of Raw Sewage into Waters of the State from November 2022 to October 2023**

No.	Date	Location	Volume (gallons)	Waterway	Cause
1	8/30/2023	114 Baker St	5000	Ditch	Pipe failure
2	8/30/2023	614 North Walker Street	900	Ditch	Wet weather
3	8/30/2023	WWTP 800 North Essie Drive	1875	Ditch	Wet weather
4	7/11/2023	Quitman WPCP Highland Road	12500	Ditch	Equipment failure
5	6/27/2023	1401 N. Washington Street	3000	Ditch	Pipe failure

**Table No. 3: Monitoring Violations from November 2022 to October 2023**

No.	DMR	Parameter	Permit Limit	Reported Value
1	January 2023	Sprayfield 4 Application Rate (in/wk)	2.5	Not Submitted
2	January 2023	Sprayfield 5 Application Rate (in/wk)	2.5	Not Submitted
3	January 2023	Upgradient Well 1 depth (ft)	Report	Not Submitted
4	January 2023	Midgradient Well 1 depth (ft)	Report	Not Submitted
5	January 2023	Downgradient Well 1 depth (ft)	Report	Not Submitted
6	January 2023	Downgradient Well 2 depth (ft)	Report	Not Submitted
7	January 2023	Downgradient Well 3 depth (ft)	Report	Not Submitted
8	January 2023	Downgradient Well 4 depth (ft)	Report	Not Submitted
9	January 2023	Downgradient Well 5 depth (ft)	Report	Not Submitted
10	February 2023	pH minimum (SU)	Report	Not Sampled
11	February 2023	pH maximum (SU)	Report	Not Sampled

**Table No. 4: Reporting Violations from November 2022 to October 2023**

No.	DMR	Due Date	Submitted Date
1	January 2023	February 15, 2023	May 9, 2023