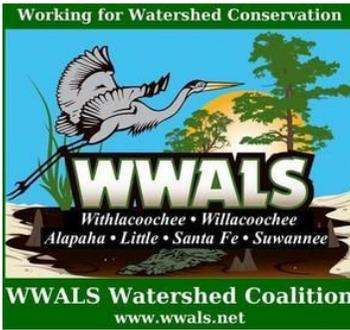


December 17, 2019



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WWALS is an IRS 501(c)(3)  
nonprofit charity est. June 2012.

*Mission: WWALS advocates for conservation and stewardship of the Withlacoochee, Willacoochee, Alapaha, Little, Santa Fe, and Suwannee River watersheds in south Georgia and north Florida through education, awareness, environmental monitoring, and citizen activities.*



To: Richard Dunn, Director  
Georgia Environmental Protection Division  
[richard.dunn@dnr.ga.gov](mailto:richard.dunn@dnr.ga.gov)

Cc: Audra Dickson, Manager  
Wastewater Regulatory Program  
[Audra.Dickson@dnr.ga.gov](mailto:Audra.Dickson@dnr.ga.gov)

Re: Valdosta record raw sewage spill, December 2019, NPDES Permit [GA0033235](#)

Dear Director Dunn,

Suwannee Riverkeeper for WWALS Watershed Coalition asks the Georgia Environmental Protection Division (GA-EPD) to require the City of Valdosta to do the items numbered below. Except for Item 1, all items apply equally to Valdosta's NPDES Permits [GA0033235](#) and [GA0020222](#), and they apply not only to this one record-largest Valdosta raw sewage spill, but also to all spills and to preventative and followup measures..

1. Apply stricter enforcement this time. There is an outcry from downstream for punitive fines after this record Valdosta raw sewage spill, which was larger than all two dozen Valdosta spills of last December put together, and 3.45 times larger than Valdosta's previous largest spill since 2015, when there was no rain. [wwals.net/issues/vww/valdosta-spills/#vldrecord2019](http://wwals.net/issues/vww/valdosta-spills/#vldrecord2019)
2. Require Valdosta to notify agencies, the media, and affected people and organizations in a much more timely and complete manner. As a Valdosta Daily Times editorial of December 12, 2019, says: "EDITORIAL: Fully, quickly disclose sewage spills: Valdosta must do better:?" [https://www.valdostadailytimes.com/opinion/editorials/editorial-fully-quickly-disclose-sewage-spills-valdosta-must-do-better/article\\_25d14284-2c82-5c63-b233-f048238a8cc9.html?fbclid=IwAR3w12GA-xESbq4JlnjU5XqMXcoZGob8LUeBIUp2T2GGTBtmAwZ492fjGeU](https://www.valdostadailytimes.com/opinion/editorials/editorial-fully-quickly-disclose-sewage-spills-valdosta-must-do-better/article_25d14284-2c82-5c63-b233-f048238a8cc9.html?fbclid=IwAR3w12GA-xESbq4JlnjU5XqMXcoZGob8LUeBIUp2T2GGTBtmAwZ492fjGeU)
  - a. Require Valdosta to inform GA-EPD, Florida state agencies such as the Florida Department of Environmental Protection (FDEP), Department of Health (FDOH), Suwannee River Water Management District (SRWMD), and nearby counties such as Brooks and Lowndes Counties, Georgia and Hamilton and Madison Counties, Florida, as well as WWALS Watershed Coalition, as soon as a spill is discovered.
  - b. Require Valdosta to compose and distribute a detailed press release the same day as the spill is discovered, if at all possible. Almost 24 hours after this most recent and record-largest incident is not good enough.
  - c. Require Valdosta to set up an email notification system that citizens can sign onto so they can be notified when a spill occurs and for updates thereafter.
3. Require Valdosta to publish its own water quality testing results as soon as it has them, on its own website, and to put that data into the Georgia Adopt-A-Stream database in a similarly timely manner.
4. Require Valdosta to publish its plans and procedures for preventing such spills.
5. Require Valdosta to publish its logs of what actually happened related to those plans and procedures, leading up to, during, and after that spill.
6. Require Valdosta to help to organize and to fund where necessary a process for tracking any future Valdosta sewage spills down the affected streams, including but not limited to Sugar Creek and the Withlacoochee River, Mud Swamp Creek, the Alapahoochee River, and the Alapaha River, and the Suwannee River.
7. Require Valdosta to fund an alternative water supply (not in plastic bottles) for those whose wells are affected by Valdosta sewage in Hamilton and Madison Counties, Florida.
8. Require Valdosta to reimburse for extra costs due to this an any future spills, of Hamilton and Madison Counties, Florida, the state of Florida, and other parties, including but not limited to:
  - a. Water quality testing in rivers, creeks, and springs
  - b. Well testing, both for drinking water and for agricultural irrigation
  - c. Aquatic wildlife monitoring in rivers and springs
  - d. Wildlife monitoring on land

- e. Detecting and monitoring any related plumes of contamination underground
9. Require Valdosta to continue frequent, regular, water quality monitoring downstream at least as far as the state line, preferably weekly, at least monthly.
  - a. Including require Valdosta to resume water quality testing at Horn Bridge at the Georgia-Florida line.
  - b. Including require Valdosta to publish the results of its own testing as soon as they are available, on its own website, and with Georgia Adopt-A-Stream.
10. Require Valdosta to fund an educational campaign via a vehicle such as the Florida Counties Rivers Task Force to inform the public when the rivers are clean, when they are not, and where. Valdosta continues to fail to comprehend that every spill affects the entire Suwannee River Basin, adding to the stigma that causes people to stay off the rivers, even upstream, which is why even Columbia and Alachua Counties, Florida, are part of that Task Force. To reduce that stigma, far fewer and smaller wastewater spills from Valdosta would help, along with all the other numbered items above. However, much damage has already been done, and ongoing monitoring and public education is also needed.

There is also a growing sentiment downstream for legal action against Valdosta. WWALS member Deanna Mericle, who lives on the Withlacoochee River in Hamilton County, Florida, articulates that sentiment:

*“As a person living downstream on the Withlacoochee River in Florida, I feel shat upon by Valdosta over and over. I cannot drink the water from my well. I worry about the health of the river itself and the animals that live in it and drink from it. We in Florida were patient while Valdosta was improving their wastewater plant, which apparently was not adequate since we still have spills when it rains heavily. But this time it was not a rain event. It was gross negligence. I am out of patience. I believe it is time for legal action.”*

Back in March 2015, WWALS helped organize a meeting with the City of Valdosta and interested parties, including Deanna and Chris Mericle. <http://wwals.net/?p=7061>

At that time, four and a half years ago, we thought that lawsuits against Valdosta would merely take away from funds needed to fix the problems. Yet tens of millions of dollars later with two new Wastewater Treatment Plants and a Force Main system, one of that system’s Pump Stations failed when there was not even any rain, causing Valdosta’s record-largest raw sewage spill. We have had to think again, and at this time it appears that it may take lawsuits to get Valdosta to think again.

GA-EPD already has the equivalent of a lawsuit against Valdosta, in the form of a [Consent Order](#). Others may file other legal actions soon.

However, GA-EPD can require all of the numbered items above. For some of them, GA-EPD is the only organisation that can require them.

Thank you for your consideration.

For the rivers and the aquifer,

John S. Quarterman  
Suwannee RIVERKEEPER®  
/s  
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