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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.



December 17, 2019

To: Richard Dunn, Director
Georgia Environmental Protection Division
richard.dunn@dnr.ga.gov

Cc: Audra Dickson, Manager
Wastewater Regulatory Program
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
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
 - 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