

**Public Comments and EPD Responses on Draft NPDES Permit
Custom Profiles, Inc. – NPDES Permit No. GA0037842**

COMMENTS RECEIVED	EPD RESPONSE
<p>The draft permit is to discharge contact cooling water of a plastic molding and forming industrial category performing plastic extrusion processes. The draft permit included quarterly monitoring for all nitrogen-containing pollutants (Ammonia, TKN, Organic Nitrogen, and Nitrate-Nitrite). Our concern is that this level of monitoring is not warranted for our industry. The Plastics Molding and Forming Effluent Guidelines and Standards (40 CFR § 463) Development Document identified TKN as being detected 32 times from 38 samples between the concentration ranges of ND – 1.15 mg/L (Table VI-19, page 140, EPA Development Document for Effluent Limitations, Final, Dec. 1984). However, the final effluent guidelines do not require TKN testing because EPA did not consider it a constituent of concern.</p> <p>The industry has already completed recent wastewater monitoring in October 2022 and submitted data to the Department, which indicated values of non-detection for Ammonia and nitrate-nitrite. A non-detect result demonstrates no reasonable potential to cause or contribute to instream water quality violations. The same monitoring data showed TKN and Organic Nitrogen sampling results of 0.29 mg/L, only slightly greater than the detection limit of 0.20 mg/L. Since TKN is a function of Ammonia and Organic Nitrogen, and Ammonia is non-detect, Organic Nitrogen equals 0.29 mg/L. At a proposed flow rate of 0.133 MGD, 0.29 mg/L represents about 0.32 lbs/day. The industry contends that this value of less than half a pound per day is most likely caused by natural background sources from the well water in the watershed and is not related to the activities occurring now or in the future. The quarterly</p>	<p>As part of the permit development process the permit writer must consider both technology standards and water quality based standards. The effluent limitation guidelines at 40 CFR 463 are technology-based standards. EPA's decision not to include technology-based nutrient limitations despite the presence of ammonia and TKN identified in most samples does not impact water quality-based considerations.</p> <p>On April 5, 2022, EPA issued a memorandum titled "Accelerating Nutrient Pollution Reductions in the Nation's Waters which included a strategy to utilize EPA's Clean Water Act authorities to drive progress, innovation, and collaboration. In response, EPD is developing a comprehensive nutrient permitting strategy. The nutrient permitting strategy will build on <i>Georgia's Plan for the Adoption of Water Quality Standards for Nutrients (2013)</i> [Nutrient WQS Plan], analyze available ambient and permitted discharge data, determine limiting factors, and develop a reasonable potential analysis for total nitrogen and total phosphorus. EPD is requiring monitoring from NPDES discharges containing nitrogen constituents to advance State and National objectives to address nutrient pollution and to develop numeric water quality standards in accordance with Georgia's Nutrient WQS Plan.</p> <p>As part of these water quality based considerations, EPD considered nutrient results reported in the application. The original application submittal indicated the presence of ammonia but did not include sampling for any other nitrogen-containing constituents. At the request of Custom Profiles, EPD allowed the facility to conduct a one-time sampling event for</p>

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<p>testing of all nitrogen-containing pollutants (Ammonia, TKN, organic nitrogen, and nitrate-nitrite) does not seem reasonable without cause.</p> <p>The permit states that monitoring for ammonia, TKN, organic Nitrogen, and nitrate-nitrite has been included in calculating total nitrogen, quantifying nutrient loadings in the Suwanee River Basin, and in providing information for the development of appropriate numeric or narrative effluent limitations (page 32, draft permit).</p> <p>To meet the Department's desire to develop appropriate numeric and narrative effluent limitations. The industry suggests a special condition for one-time testing of all nitrogen-containing pollutants during a specified period in the permit cycle. However, requiring the industry to sample pollutants not present in the processes for the entire five-year permit cycle is an undue burden. We respectfully request that the Department remove the sampling requirements and amend the permit with a special condition for one-time testing.</p>	<p>nutrients to demonstrate the absence of these parameters. The results of the sampling event indicated the presence of nitrogen-containing constituents in the final effluent. EPD must consider the pollutants detected in the final point source discharge to surface waters, regardless of whether the source is the groundwater used or if it is added by the facility's processes.</p> <p>Due to the presence of nitrogen-containing constituents, EPD included monitoring for ammonia, TKN, organic nitrogen, nitrate-nitrite, and total nitrogen to determine nutrient speciation and to quantify loadings in the Suwanee River Basin. When analyzing discharge data, determining nutrient speciation, quantifying loadings, and evaluating reasonable potential, EPD must account for the variability of pollutant levels within the effluent. EPD contends that a one-time sampling event is not sufficient to characterize the variability of nutrients in the wastestream. EPD determined that a quarterly monitoring requirement for nitrogen-containing pollutants would adequately characterize the wastestream without placing undue burden on the permittee.</p>