

**Public Comments and EPD Responses on Draft Pretreatment Permit
VLS Environmental Solutions, LLC – Pretreatment Permit No. GAP050369**

COMMENT RECEIVED	EPD RESPONSE
<p>The Notice of Application of December 17, 2024, for Pretreatment Permit Issuance of Permit No.: GAP050369, Facility Name: VLS Environmental Solutions, LLC, has some location errors.</p> <p>It says, River Basin: Suwanee</p> <p>However, the Facility Address included, 188 Rip Wiley Rd, Fitzgerald, Georgia 31750, is in the Satilla River Basin, upstream of Satilla Creek, in HUC 12-030702010101, according to USGS. (https://apps.nationalmap.gov/viewer/)</p> <p>Also, the Notice says:</p> <p>Receiving Waters: Fitzgerald Water, Light and Bond Commission – C.A. Newcomer Jr. WWTP</p> <p>According to EPD's Watershed Protection Branch – Lists: https://epd.georgia.gov/watershed-protection-branch-lists</p> <p>in the list of Wastewater Permits in Effect (Excel Format) [Revised October 2022]:</p> <p>https://epd.georgia.gov/document/document/ga-epd-wastewater-permit-inventory-october-2022xlsx/download</p> <p>that WWTP, permit number GA0047236, is at 31.680521, - 83.247547, 201 Edward Rd, Fitzgerald, Georgia, 31750.</p>	<p>When identifying the River Basin associated with a pretreatment permit, it is EPD's standard practice to report the River Basin associated with the POTW which receives the proposed industrial wastewater discharge instead of the River Basin associated with the facility's location. This process allows EPD to accurately identify which River Basin will ultimately receive the wastewater discharge since facilities operating under a pretreatment permit do not directly discharge to Waters of the State in the vicinity of the facility. The draft pretreatment permit placed on public notice for VLS Environmental Solutions, LLC identifies the receiving POTW as Fitzgerald Water, Light and Bond Commission's C.A. Newcomer Jr. WWTP. This POTW is located at 201 Edward Rd, Fitzgerald, Georgia 31750 with facility coordinates of (31.247547, -83.247547). The receiving POTW discharges to Turkey Creek (formerly known as Turkey Branch) and is located within the Turkey Creek Subwatershed (HUC 12-031102020602) in the Suwanee River Basin. No corrections to the records are required.</p>

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<p>While that list says that location is in the Suwannee Basin, USGS says it is in the Ocmulgee River Basin, upstream from Otter Creek, in HUC 12-030701040801.</p> <p>Please correct the appropriate records.</p>	