GEORGIA
DEPARTMENT OF NATURAL RESOURCES
ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Watershed Protection Branch
2 Martin Luther King, Jr. Drive
Suite 1152, East Tower
Atlanta, Georgia 30334
404-463-1511

Persons who commented on
Draft NPDES Permit No. GA0001198

MAR 19 2020

RE: EPD Response to Comments
Lockheed Martin Aeronautics Company
NPDES Permit No. GA0001198

To Whom it May Concern:

Thank you for your comments regarding the permit issuance for the Lockheed Martin Aeronautics Company NPDES Permit. Attached is a summary of comments from the public and our responses to the issue raised. We appreciate your interest in this matter.

After consideration of your comments, EPD has determined that the permit is protective of water quality standards and we have issued the permit.

If you have any questions, please contact Ian McDowell of my staff at 404-232-1567.

Sincerely,

Audra Dickson, Manager
Wastewater Regulatory Program
Watershed Protection Branch

AHD/im

Attachment: Response to Comments

Public Comments and EPD Responses on Draft NPDES Permit
Lockheed Martin Aeronautics Company – Permit No. GA0001198

COMMENT RECEIVED	EPD RESPONSE
Under A.1. Effluent Limitations and Monitoring Requirements for Outfall 001 (page 3 of 21) lists new monitoring and discharge limit requirements for two trihalomethane compounds, Chlorodibromomethane (0.029 mg/L) and Dichlorobromomethane (0.038 mg/L). We believe that any recent detections of these compounds in the effluent may be the result of periodic water system discharges to the facility sewers to maintain an acceptable chlorine residual in the facility's water system. These chlorine residual management efforts are being modified and will no longer be a direct discharge to the wastewater treatment plant. LM Aero respectfully requests that if consecutive non-detect results are sustained for at least six months of monitoring (or trial period agreed upon in advance by Georgia EPD and LM Aero), that the permit allow for the removal of monitoring these compounds.	The permittee has not provided information at this time that would indicate that the modified chlorine residual management efforts would eliminate the reasonable potential for the formation of the disinfection by-products Chlorodibromomethane and Dichlorobromomethane. At any time during the permit term, the permittee may request a modification of the permit on the basis that there are material and substantial alterations or additions to the permitted facility or activity which justify the application of permit conditions that are different or absent in the existing permit. EPD will evaluate any such request, and where appropriate, reopen the conditions subject to modification.
Under A.2. Effluent Limitations and Monitoring Requirements for Outfalls SP1, SP2, SP3, SP4, SP5 lists new discharge limit requirements for pH not less than 6.0 standard units nor greater than 8.5 standard units. LM Aero understands that the pH limits are water quality-based effluent limits (WQBELs) that reflect the instream Georgia Water Quality Standard for pH. Historic monitoring data at these outfalls shows that in rare instances pH values of 5.75 – 5.99 standard units have been measured. We believe that any pH values below pH, while infrequent, would be impossible to forecast or identify the source because several outfalls have flows that originate from offsite. Additionally, existing retention ponds upstream of the outfalls may naturally contribute acidity from fallen leaves and breakdown of other organic vegetative matter in the ponds. LM Aero respectfully requests lowering the pH limitation to not less than 5.7 standard units.	Data submitted with the permit application indicated a high instream waste concentration due to the contribution of industrial stormwater from the facility to the receiving waterbody; thus effluent limitations of 6.0 s.u. minimum and 8.5 s.u. maximum are appropriate to ensure that Georgia instream water quality standards are met. It is the permittee's responsibility to obtain representative samples of the pH of the permitted effluent to demonstrate compliance with the permit.

Public Comments and EPD Responses on Draft NPDES Permit
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COMMENT RECEIVED	EPD RESPONSE
Under D.1.c. of Reporting Requirements (page 9 of 21) the postmark date of the Discharge Monitoring Report has been moved from the 21st to the 15th day of the month following the reporting period. LM Aero respectfully requests that our current permit's submittal postmark date, the 21st, remain.	EPD has standardized and included in all permit reissuances a discharge monitoring report (DMR) date as the 15th day of the month following the sampling period. The DMR report date provides enough time for samples to be collected and for analytical results to be received, hence the DMR report date will not be modified.