

**Public Comments and EPD Responses on Substantial Modifications to
The City of Hartwell Industrial Pretreatment Program – LAS Permit No. GAJ020114**

COMMENT RECEIVED	EPD RESPONSE
<p>The modification request for decreasing the frequency of monitoring and increasing the allowed zinc concentration is short on justifications for the request. The request indicates that pretreatment flows have been discontinued so that total flows are down but does not indicate what those flows were nor the processes they resulted from. The request also does not indicate which flow is continuing or what process that flow is from. Additional information is needed so that an informed decision about permit changes can be made by EPD.</p>	<p>The following operations have ceased at the facility resulting in an elimination of associated wastewater flows: rod manufacturing (i.e. chrome plating, threading, grinding and cutting rods for shocks), shock assembly (i.e. preparation of parts, painting, assembly lines, testing, etc.), valve assembly, stamping, and piston banding. Additionally, associated processes related to rolling, coating, and cutting of steel tubing for assembly have stopped, but draw over mandrel (DOM) operations will restart later in 2021. DOM is associated with coating and cutting tubes in preparation for shock assembly at another location. The groundwater remediation processes will remain in operation.</p> <p>The elimination of the operations discussed above have resulted in a reduction of flows from a monthly average of 181,000 gpd in March 2020 to a monthly average of 8,355 gpd in January 2021. The closure of several processes and the reduction of loading to the City of Hartwell wastewater treatment facility justifies the reduction of monitoring frequency for certain parameters.</p> <p>Finally, while the permitted zinc concentrations will increase, the overall loading to the wastewater treatment facility will decrease. Zinc will be present at higher concentrations due to the elimination of several non-zinc/low-zinc bearing wastestreams. The overall permitted loading of zinc to the treatment works will be reduced from 1.32 lbs/day to 0.59 lbs/day and remains lower than categorical effluent limitations and within the approved local limits.</p>