Public Comments and EPD Responses on Draft NPDES Permit
Mount Vernon Mills, Inc. – Permit No. GA0001422

COMMENT RECEIVED	EPD RESPONSE
EPA Comment: The draft permit for Vernon Mill plant should include requirements for the permittee to characterize PFAS constituents in the ash pond discharge to surface waters. Although the permit also includes the discharge of non-contact cooling water, it is our assumption that non-contact cooling water is unlikely to have detectable levels of PFAS. However, it is likely that ash pond discharges may contain detectable levels of PFAS. **Background**: The draft NPDES permit for the Vernon Mills plant located in Chattooga County, GA was received by EPA via email on March 1, 2023. This facility produces, dyes, and finishes broadwoven fabrics, and discharges a maximum of 3.65 MGD of once through non-contact cooling water for air chillers via outfall 001. Ash settling pond wastewater is discharged via outfall 002. The receiving surface waterbody for both outfalls is the Chattooga River, which is in the Coosa River Basin. The previous permit expired on September 30, 2020, and is administratively continued. The facility has an authorized pretreatment permit issued by GA EPD to send other process waters from the facility to the Trion WWTP, which is upstream of the City of Summerville's drinking water intake. Results from EPA sampling in November 2019 identified several PFAS constituents in surface waters and sediments in segments of the Chattooga River Watershed downstream of the City of Summerville's drinking water intake. Although the source of the PFAS was not clearly identified, possible contributing sources include the discharges from the City of Trion WWTP. Based on our current understanding of the treatability, and fate and transport, of PFAS constituents, it is possible that PFAS in process waters from the Vernon Mills facility are being indirectly discharged through the Trion WWTP, as well as being	In September 2021, EPA published the *Multi-Industry Per- and Polyfluoroalkyl Substances (PFAS) Study – 2021 Preliminary Report, EPA-821-R-21-004* which discussed information and data EPA collected on PFAS manufacture, use, control, and discharge by five point source categories. Since this initial report, EPA has initiated detailed studies of PFAS discharges from textile mills, the results of which are summarized in EPA's *Effluent Guidelines Program Plan 15, EPA-821-R-22-004*. Based on the information and data EPA collected as part of these studies, EPA documented that PFAS have been, and continue to be, used by textile mills in the United States as part of their manufacturing processes. Manufacturing operations at the Mount Vernon Mills, Inc. facility in Trion, Georgia consist of production, dyeing, and finishing of broadwoven fabrics (cotton, polyester/cotton, cotton/nylon blends). All process wastewater generated as part of the textile manufacturing operations, however, has historically been discharged to the Town of Trion WPCP (NPDES Permit No. GA0025607) and covered under a separate permit. EPD has approved the Town of Trion's industrial pretreatment program; as the control authority, the Town of Trion issues industrial user permits to indirect dischargers such as Mount Vernon Mills, Inc. Recently, as part of a proposed consent agreement between Mount Vernon Mills, Inc., the Town of Trion, and the Southern Environmental Law Center, representing the Coosa River Basin Initiative, Mount Vernon Mills, Inc. has agreed to eliminate the use of all PFAS by the end of 2023. While the agreement awaits federal court approval, the company has agreed to divert PFAS-containing industrial wastewater to an offsite treatment rather than send it through the Town of Trion's treatment plant.

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directly discharged from the mill's outfalls 001 and 002. EPA believes the inclusion of a PFAS Characterization Study is appropriate for this permit in order to be proactive in protecting the receiving water bodies from adverse impacts on human health and aquatic life from PFAS compounds. Our request for GA EPA to include these requirements align with EPA's December 5, 2022 memo entitled, "Addressing PFAS Discharges in NPDES Permits and Through the Pretreatment Program and Monitoring Programs".	The wastestreams associated with this proposed permit reissuance for NPDES Permit No. GA0001422 do not include wastewater generated as part of the facility's textiles manufacturing operations and are not impacted by the proposed consent agreement. Instead, as discussed further below, the wastewater discharged, pursuant to this permit is non-contact cooling water and ash pond wastewater related to the generation of electricity. As a result, PFAS are not expected to be pollutants of concern. The textile mill operates a steam plant to generate steam for textile processes by combusting either natural gas or coal in four boilers. In accordance with the facility's air permit, each boiler is equipped with a venturi scrubber system which must be operated to control particulate matter and acid gases (HCl and HF) while burning coal. The venturi scrubber systems discharge to the facility's two onsite ash ponds. The two ash ponds were constructed specifically to receive wastewater associated with the venturi scrubber systems and both historically and currently do not receive any process wastewater associated with the textile manufacturing process. Ash pond wastewater is piped directly from the ash ponds to the Chattooga River without commingling with any other facility wastestreams. Although the regulations for steam electric power generating point source dischargers at 40 CFR Part 423 do not apply to the discharges from this facility because generation of electricity is not the predominant source of revenue or principal reason for operation, the wastewater characterization from this outfall most closely resembles the characterization discussed in *Supplemental Technical Development Document for Revisions to the Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Category, EPA-821-R-20-001* (August 2020) and the more recent

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	Technical Development Document for Proposed Supplemental Effluent Limitations Guidelines and Standards for the Steam Electric Power Generating Point Source Category, EPA-821-R-23-005 (February 2023). Neither of these guidance documents provided by EPA identify PFAS as a pollutant of concern in scrubber wastewater. Further, steam electric was not identified as an industry category known or suspected to discharge PFAS in EPA's *PFAS Strategic Roadmap: EPA's Commitments to Action 2021-2024* (October 2021) EPD therefore does not believe that PFAS are pollutants of concern in the discharge from Outfall 002. EPD further notes that at this time there is no US EPA-approved analytical method for sampling for PFAS in effluent or for instream sampling. In August 2021 EPA posted an initial draft of Method 1633, *Analysis of Per- and Polyfluoroalkyl Substances (PFAS) in Aqueous, Solid, Biosolids, and Tissue Samples by LC-MS/MS, EPA-821-D-21-001*. This draft analytical method is being developed by EPA for use in sampling of, *inter alia,* effluent and surface water. A second draft was posted June 2022, and a third draft in December 2022. EPA has announced plans for a fourth draft anticipated for early 2023. As noted in the initial draft, the method "is not required for Clean Water Act compliance monitoring until it has been proposed and promulgated through rulemaking." Once an analytical method is approved by EPA and monitoring begins, information from in-stream sampling may be used to develop in-stream water quality standards for PFAS parameters. EPD may also reopen NPDES discharge permits and revisit its approved pretreatment programs to incorporate additional requirements as well.