

**Public Comments and EPD Responses on Draft NPDES Permit
SNF Holding Company – Permit No. GA0046582**

COMMENT RECEIVED	EPD RESPONSE
SNF disagrees with Georgia Environmental Protection Division's (GEPD) position that there is a reasonable potential for the SNF discharge to cause or contribute to a violation of the instream water quality standard and criteria for temperature. GEPD cites permit application data in its basis for the permit's thermal limits. However, those data are below 90-degrees or representative of an internal outfall only. Given the limited volume and nature of the SNF discharge, GEPD's position on thermal limits is unsupported and unreasonable – particularly when considered in connection with other permitting decisions GEPD has made with respect to these receiving waters.	The current NPDES permit, issued on September 15, 2015 includes numeric effluent and instream limitations for temperature Effluent limitations have been retained in this proposed permit in accordance with the antibacksliding requirements of the Clean Water Act Section 402(o) which states a permit may not be renewed, reissued, or modified to contain effluent limitations which are less stringent than the comparable effluent limitations in the previous permit. As stated in Section 3.1 of the fact sheet, the designated use of the receiving water body is fishing and the water quality standard for temperature is, "not to exceed 90°F. At no time is the temperature of the receiving waters to be increased more than 5°F above intake temperature except that in estuarine waters the increase will not be more than 1.5°F" Though the discharges were reported to be below 90°F, the daily maximum values provided in the application for the external outfalls were both over 89.9°F, and an internal outfall which is estimated to make up 88% of the flow to outfall 002 was reported to have a daily maximum value of 104°F (refer to Sections 1.10.2 and 1.10.3 of the fact sheet. Additionally, during the permit renewal process EPD reviewed discharge monitoring data and held several meetings with the permittee. It was disclosed the downstream sampling location was not representative, as the ambient temperature was taken downstream of another permitted facility's outfall; hence, the downstream data was not included in the review process. Based on the existing temperature limits in the 2015 permit and information provided by the permittee, EPD continues to believe there is a reasonable potential for the discharges to cause or contribute to an instream water quality standard violation for temperature. Part III.B of the proposed permit, provides the permittee a 60 month compliance schedule to meet several effluent limits, refer to Section 5.1 of the fact sheet detailing the schedule. EPD may reevaluate the effluent

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	limits upon completion of the compliance schedule and after additional representative effluent and ambient data has been collected.
Condition I.A.2.a., Footnote 3; Condition 1.A.2.b., Footnote 3; Condition I.A.3.a., Footnote 3; and Condition I.A.3.b., Footnote 3; Consistent with Condition I.A.1.a. Footnote 4 and Condition I.A.1.b. Footnote 3, please insert the word “approximately” as it is infeasible to fill all sample containers, obtain temperature and flow measurements, etc. at exactly the same time.	The applicable permit conditions have been updated to include the word “approximately” and approximately has been defined to mean within one hour.
Condition I.A. Please note that as SNF proceeds with segregating storm water at the facility the location of the outfall(s) for process water may change. As previously discussed with GEPD, we will notify you of changes, if any, in the location (latitude and longitude) of the process water outfalls. We anticipate that these outfall(s), if moved, would be near or between the location of the current Outfalls 002 and 003.	Comment noted. Notification of change should be provided in accordance with Part II.A.1. of the proposed permit.
Condition I.D.2: This new condition lists a date prior to the effective date for the renewed permit. SNF cannot retroactively comply with a new condition. Please change the beginning of this condition to, “Upon the effective date of this permit, the permittee...”	The federal NPDES Electronic Reporting Rule, 40 CFR Part 127 was published in October 2015 and then revised on January 4, 2021. The Phase II compliance date was updated from December 21, 2020 to December 21, 2025. The proposed permit has been updated to reflect the new date.
Condition III.A.1.: We are assuming that this condition, regarding “All previous State wastewater permits issued to this facility...are hereby revoked...” applies only to the previous versions of this NPDES discharge permit. Specifically, SNF’s direct Industrial Pretreatment	The permittees interpretation is correct. Part III.A.1 of the proposed permit applies only to the previous issuance of NPDES permit no. GA0046582. The permit condition does not extend to the industrial pretreatment permit, permit no. GAP050246 or coverage under EPD’s

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Permit and its coverage under Georgia's General Permit for Storm Water Discharge are not affected by this boiler-plate condition.	General NPDES Permit for Storm Water Discharges Associated with Industrial Activity.
Summary Page – First Paragraph: The maximum flowrate of 0.137 MGD listed in the first paragraph of the Summary Page for the draft permit is incorrect. The flowrate of 0.137 MGD is the current NPDES permit average flowrate limit for an internal outfall 002A. Outfall 002A discharges through outfall 002 which includes other discharge flows. Plus, SNF Riceboro discharges water through outfall 003. Data submitted in our permit application indicates a discharge flow in the order of 0.174 MGD (total of average flows from outfalls 002 and 003) to 0.435 MGD (total of maximum flows from outfalls 002 and 002.) Modeling completed to support the discharge limits for the SNF Riceboro facility used a flowrate of 0.3 MGD process wastewater flow.	Upon review, the flow value listed on the summary page was the total design flow provided in Section I. of Application Part I. The proposed permit summary page has been revised to reflect the total maximum flow provided in Section V of Application Form 2C, which is 0.435 MGD.
Summary Page – Changes to Effluent Limitations for Outfalls 002 and 003: The numerical limits for outfalls 002 and 003 are correctly shown. However, the months for “summer” are incorrectly denoted as “November-April”. These months should be “May-October”.	The typographical error has been corrected in the proposed permit.
Fact Sheet, Section 2.2: As indicated in Section 2.3, 40 CFR 414 is not applicable to the discharges covered under this permit.	The typographical error has been corrected in the proposed permit.
Fact Sheet, Section 3.2: Please confirm if the 10 mg/L value for upstream total suspended solids (TSS) indicated in the table footnote is correct or if it is necessary to include this footnote in Section 3.2. We are unable to determine the basis for this value. A TSS value of 20 mg/L is shown on the spreadsheet in Appendix B of the Fact Sheet.	Section 3.2 of the fact sheet provides the correct total suspended solids value for use in the Reasonable Potential Analysis (RPA) calculations when data is unavailable and this value is 10 mg/L. The RPA found in Appendix B of the fact sheet has been updated and this change does not impact the results of the RPA.

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Fact Sheet, Section 4.5, Temperature: The correct Georgia Rule citation for temperature for waters designated for “Fishing” is 391-3-6-.03(c)(iv) (not paragraph (a)(v), which is for drinking water supplies. Rule 391-3-6-.03(c)(iv) states, “Temperature: Not to exceed 90°F. At no time is the temperature of the receiving waters to be increased more than 5°F above intake temperature except that in estuarine waters the increase will not be more than 1.5°F.”	The typographical error has been corrected in the proposed fact sheet.