



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

MAR 22 2018

Mr. Brian Rindt, P.E.
Rindt-McDuff Associates, Inc.
334 Cherokee Street
Marietta, Georgia 30060

RE: EPD Response to Comments
Premier Yarn Dyers
Pretreatment Permit No. GAP050316


Dear Mr. Rindt:

Thank you for your comments regarding the permit issuance for Premier Yarn Dyers. Attached is a summary of your comments and our responses to the issue raised. In addition, we have attached the Permit Addendum and Permit Fact Sheet Addendum documenting the changes made to the attached permit. 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 Christopher Douglas of my staff at 404-463-0932 or email at christopher.douglas@dnr.ga.gov.

Sincerely,


Audra Dickson, Manager
Wastewater Regulatory Program
Watershed Protection Branch

AD/cd
Attachment

**Public Comments and EPD Responses on Draft Pretreatment Permit
Premier Yarn Dyers – Permit No. GAP040316**

COMMENTS RECEIVED	EPD RESPONSE
<p>Color samples should be composite rather than grab.</p>	<p>EPD has reviewed the provided discharge flow data and determined the permittee can feasibly collect composite samples. The sample type has been revised to composite.</p>
<p>There is no restraining condition in the permit regarding foam or surfactants.</p>	<p>EPD has added the following condition in Part I.A.1.a of the permit, “There shall be no discharge of floating solids or visible foam in other than trace amounts.”</p>
<p>There is no limitation on ozone cooling water, and, the “ozone cooling water” is included in the discharge from outfall 001. In other words, the cooling water the cooling water could conceivably be used to dilute the effluent.</p>	<p>As stated in 40 CFR 122.2, <i>Process wastewater</i> is defined as “any water which, during manufacturing or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product.” Since the “cooling water” comes into direct contact with ozone, it is being classified as process wastewater.</p>
<p>The DRAFT permit goes into some detail with regard to the discharge of “toxic pollutants” (Part 2.A.1.e&f) There is no definition of “toxic pollutant”.</p>	<p>Part II.B.5 of the permit references Section 307(a) of the Federal Clean Water Act. Section 307(a) references 40 CFR 401.15 which contains the list of all toxic pollutants. The definition of “toxic pollutants” has not been added to the permit.</p>