Public Comments and EPD Responses on Draft Pretreatment Permit
SNF Holding Company – Permit No. GAP050246

COMMENT RECEIVED	EPD RESPONSE
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 IPP. Specifically, SNF's direct NPDES discharge permit and its coverage under Georgia's General Permit for Storm Water Discharge are not affected by this boiler-plate condition.	The permittees interpretation is correct. Part III.A.1 of the proposed permit applies only to the previous issuance of industrial pretreatment permit no. GAP050246. The permit condition does not extend to NPDES no. GA0046582 or coverage under EPD's General NPDES Permit for Storm Water Discharges Associated with Industrial Activity.