



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

JUL 16 2018

Persons who commented on Draft Pretreatment Permit No. GAP050322

RE: EPD Response to Comments
Koyo Bearings NA LLC
Pretreatment Permit No. GAP050322

To Whom it May Concern:

Thank you for your comments regarding the permit issuance for the Koyo Bearings NA LLC permit. Attached is a summary of comments from the public and our responses to the issue raised. 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 Alan Leake of my staff at 404-463-4957.

Sincerely,

Audra Dickson, Manager
Wastewater Regulatory Program
Watershed Protection Branch

AHD/al

Attachment

EPD Response to Comments on Draft Pretreatment Permit
Koyo Bearings NA LLC – Sylvania, GAP050322

COMMENTS RECEIVED.	EPD RESPONSE
Because of numerous spills into Buck Creek that has made Buck Creek into an open sewer from all the raw sewage and heavy metals from industrial and residential wastewater. We the landowners ask that no more wastewater be allowed to be discharged into the City of Sylvania's Waste Treatment plant until the problems are resolved.	The raw sewage spills mentioned in your comments were addressed by EPD and the last reported spills occurred in mid 2015. The issues that caused the spills have been corrected.
Buck Creek is not a flowing stream it is a dry ditch with no flow unless it rains. By Federal Law no effluent from a waste treatment plant can be discharged into a stream with no flow. This has been going on for more than 50 years. The effluent should have been piped to Brier Creek where there is a continuous flow of water. Therefore, this is why we want the permit to be denied to Koyo Bearings until this is resolved.	EPD is unaware of any Federal Regulation prohibiting the discharge of treated wastewater into a "dry ditch". Koyo Bearings is an indirect discharger and does not discharge directly to waters of the state.
We as landowners would like to know how the EPD can issue a permit to a company (Koyo Bearings) to discharge wastewater to a plant (City of Sylvania) without a permit since 2006, this needs to be corrected first!	The City of Sylvania was issued a direct discharge permit, NPDES Permit No. GA0021385, on December 22, 2003. The permit became administratively extended June 27, 2006 as a result of the 2006 TMDL issued by EPA and the subsequent Savannah River Restoration Plan, 5R.
In 1985 the City of Sylvania was given an easement by the landowners to dredge out Buck Creek to keep the >1.0 MGD per day of water flowing to the river. Also attached to the easement was a maintenance agreement to keep the ditch open. They never performed any maintenance on the creek. So it has stopped up and causing many problems such as raw sewage smell from numerous spills over the years, wastewater backing up in peoples yards and going under their houses, also becoming a hazard with all the pathogens and viruses that are present in wastewater. There are also heavy metals present in the land around Buck Creek.	Comment noted. EPD does not have regulatory oversight regarding the easement agreement or local contracts.

EPD Response to Comments on Draft Pretreatment Permit
Koyo Bearings NA LLC – Sylvania, GAP050322

COMMENTS RECEIVED	EPD RESPONSE
The Public Notice is inadequate and infringes upon the Parties' due process of law. In particular, paragraph No. 3 of the newspaper Public Notice requires ordinary citizens to travel to 2 MLK Jr. Dr., Suite 1152, Atlanta, Georgia, 30334 for review of the application, draft permit, and other comments received. The lack of accessibility to pertinent documents which are central to the comments denies the Parties their rights to substantively comment. The EPD failed to include the application, draft permit, and other comments on their website for public review and/or attach the same to the newspaper notice.	The public notice complied with all State and Federal requirements. The draft permit was public noticed by EPD on May 4, 2018; by the permittee on April 23, 2018 & posted in the local newspaper on April 26, 2018. The public notice period was 41 days long.
It is our understanding that approximately .20 MGD of Koyo's processed wastewater is discharged to the City of Sylvania's WPCP in the Savannah River Basin. Given the repetitive history of violations at the City of Sylvania WPCP of the NPDES permit issued to the City's WPCP, any company and/or individual adding to the City's WPCP should be closely monitored since they would inextricably tie to the City's discharge of pollutants.	EPD agrees that all pretreatment permits should be monitored. During the review of the permit application, EPD considered the hydraulic capacity of the City of Sylvania's WPCP to handle Koyo Bearing's wastewater stream. Koyo Bearing is responsible for complying with all limits in the proposed permit.
The Parties believe composite and grab samples should be taken weekly as opposed to monthly or semiannually. In addition, the permit needs to take into account seasonal as opposed to annual testing to consider the seasonal flow into Buck Creek.	The permittee does not discharge directly into a waters of the state. EPD believes the proposed sampling frequencies are appropriate based on the monitoring history and sampling data reported in the permit application.
The Parties believe Buck Creek has residual heavy metals that need to be addressed before permitting which would exacerbate its condition.	The permittee does not discharge directly into a waters of the state. EPD's local limit evaluation indicates that there is no pass through or interference of the City's POTW.

Acronyms

EPD – Environmental Protection Division
WPCP – Water Pollution Control Plant

TMDL – Total Maximum Daily Loading