

**Georgia Department of Natural Resources**

**Environmental Protection Division**

2 Martin Luther King Jr. Drive, Suite 1456, Atlanta, Georgia 30334

Judson H. Turner, Director

(404) 656-4713

December 15, 2015

Mr. Chris Pogson, Plant Manager  
Chemtrade Solutions, LLC  
1580 Columbia Nitrogen Road  
Augusta, GA 30901

RE: EPD Response to Comments  
Chemtrade Solutions, LLC  
NPDES Permit No. GA0002925  
Augusta, Richmond County

Dear Mr. Pogson:

Thank you for your comment concerning the reissuance of the NPDES permit for the Chemtrade Solutions, LLC. Changes have been made to the permit based on comments received during the public comment period for the draft NPDES permit.

The modified permit meets all necessary requirements and is protective of the environment. Therefore, the Environmental Protection Division (EPD) has issued the permit. This determination was made after careful consideration of all the comments received by EPD.

Attached is a summary of comments from the public and our responses to the issues raised. We appreciate your interest in this matter.

Sincerely,



Jeffrey Larson, Manager  
Wastewater Regulatory Program  
Watershed Protection Branch

JH/cn  
Attachment

**Public Comments and EPD Responses on Draft NPDES Permit  
Chemtrade Solutions LLC – Permit No. GA0002925**

| COMMENTS RECEIVED   | EPD RESPONSE  |
|---|---|
| <p>The permittee submitted a comment letter stating that they have an issue with the instream temperature differential measurement location defined as immediately upstream of the discharge and immediately downstream of the discharge in the permit and it is arbitrary.</p> | <p>The instream temperature differential (delta T) monitoring and limit of 5°F is required since the discharge contains heat and the requirement is consistent with the Water Quality Standard Rule 391-3-6-.03(6)(iv).</p> <p>The permittee submitted upstream and downstream sampling location coordinates (Latitude and Longitude) to EPD. EPD has reviewed and amended the sampling location coordinates based on the discharge location. The sampling location coordinates definition has been incorporated into the permit.</p> |