

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

July 15, 2015

Persons who commented on
Draft NPDES Permit No. GA0024368

RE: EPD Response to Comments
Sage Automotive Interiors –
Avalon Plant
GA0024368
Toccoa, Stephens County

Dear Participant/Commenter:

Thank you for your comments concerning the reissuance of the NPDES permit for Sage Automotive Interiors – Avalon Plant. Changes have been made to the permit based on comments received during the public hearing and 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,



Jeff Larson, Assistant Branch Chief
Watershed Protection Branch



JL/ay
Attachment

**Public Comments and EPD Responses on Draft NPDES Permit
Sage Automotive Interiors –Avalon Plant – Permit No. GA0024368**

COMMENTS RECEIVED	EPD RESPONSE
<p><u>Part I, B.2.a Reporting</u> The facility requests that an OMR not be required in addition to the monthly DMR.</p>	<p>OMR reporting is required by all individual NPDES permits in the State of Georgia. The OMR requirement will not change because EPD needs the data to ensure compliance with the permit.</p>
<p><u>Part II, A.1.g. Management Requirements – Notification of Changes</u> The facility request Part II, A.1.g. be removed as a requirement in the permit.</p>	<p>Part II, A.1.g Management Requirements – Notification of Changes will not change. This condition is included to ensure permit compliance.</p>
<p><u>Part II, A.9. and A.10 Management Requirements – Operator Certification and Laboratory Analyst Certification Requirements</u> A Wastewater Industrial Operator License will meet the Operator Certification Requirement and Laboratory Analyst Certification Requirements for this permit and facility.</p>	<p>The Wastewater Industrial Operator License will meet the requirement for Laboratory Certification Requirements for pH and temperature analysis.</p>

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COMMENTS RECEIVED	EPD RESPONSE
<p><u>Part III, C.1. Compliance Schedule – Fecal Coliform</u></p> <p>The facility requests that the schedule of compliance for Fecal Coliform be extended to twelve (12) months of monitor and report before having to comply with the limits of the draft permit.</p>	<p>Per Georgia Rule 391-3-6.06(10)(a)&(b) a compliance schedule must be set with interim requirements no longer than nine (9) months. This requirement will not change.</p>
<p><u>Part III, C.2. Compliance Schedule – Total Recoverable Copper</u></p> <p>The facility requests that the schedule of compliance for Total Recoverable Copper be changed to include sampling for total recoverable copper and hardness concurrently once a month for a period of ten (10) months beginning the effective date of this permit.</p>	<p>Per Georgia Rule 391-3-6.06(10)(a)&(b) a compliance schedule must be set with interim requirements no longer than nine (9) months. This requirement will not change.</p>
<p><u>Part III, C.3. Compliance Schedule – Total Recoverable Lead</u></p> <p>The facility requests that the schedule of compliance for Total Recoverable Lead be removed as well as any permit limit for lead.</p>	<p>The permit has been changed to require three additional months of monitoring for Total Recoverable Lead since there were sampling results for six (6) additional lead monitoring events included with the comments. Currently, there is not a lead limit in your permit.</p>

Response to Comments for Sage Automotive Interiors – Avalon Plant Address List
Permit No. GA0024368
Permit Issuance Date: August 1, 2015

Jennifer Mapes, Corporate Environmental Director
Sage Automotive Interiors
601 Brooks Street
Abbeville, SC 29620