

**Public Comments and EPD Responses on Draft NPDES Permit
Crisp County Power Commission – GA0050234**

COMMENTS RECEIVED	EPD RESPONSE
<p><u>§316(b) Rule</u></p> <p>EPA requested that the best technology available (BTA) determination for impingement mortality control be evaluated under the design intake water flow through-screen velocity not under the “de minimus” level. Also, include a language to limit 6 – 8 hours of power generation per day.</p>	<p>EPD has removed the “de minimus” language from §316(b) section of the permit rationale because they meet the best technology available (BTA) of 0.5 ft/sec for impingement mortality control in accordance with 40 CFR 125.94(c)(2). Also, the BTA language has been added to page 13 of 16 – Special Requirements of the permit.</p>
<p>Crisp County Power requested that the 6 – 8 hours intake flow limitation in the permit rationale be removed since impingement mortality BTA determination was based on design intake flow not on de minimus level.</p>	<p>EPD has removed the intake flow limitation language from the permit rationale.</p>
<p>EPA requested additional information under 40 CFR 122.21(r) – Application requirements for facilities with cooling water intake structures.</p>	<p>EPD has since submitted the additional information to the EPA, they completed their review and had no further comments.</p>
<p><u>Coal Combustion Residual (CCR)</u></p> <p>EPA requested that a language be included to address unpermitted discharge such as seeps from the ash pond.</p>	<p>The permit does not authorize discharge from the ash pond. However, the CCR structural integrity inspection language is included in the permit. The CCR language is consistent with EPA’s guidance language.</p>