

Response to Comments for Miller Transporters, Inc. Address List  
Permit No. GAP050134  
Permit Issuance Date: July 16, 2015

Mr. Kirk Tucker, Manager  
Miller Transporters, Inc.  
6053 Commerce Court  
Garden City, Georgia 31408

Mr. Charles Draeger, Director of Water Operations  
City of Garden City  
2B Bud Brown Drive  
Garden City, Georgia 31408

**Public Comments and EPD Responses on Pretreatment Permit  
Miller Transporters, Inc. – GAP050134**

| COMMENTS RECEIVED   | EPD RESPONSE  |
|---|---|
| <p><b><u>Pretreatment Permit Effluent Limits</u></b></p> <p>Include effluent limits for BOD<sub>5</sub>, COD, TSS, TKN, N, P, cadmium, chromium, lead, nickel, zinc, arsenic, silver, cyanide, total phenols, benzyl alcohol, bis (2-ethylhexyl) phthalate, naphthalene, acetone, di-n-octyl phthalate, and TTO to the permit</p> | <p>Permits are issued in accordance with the Federal Rules and Regulations and the State of Georgia Water Quality Control Rules and Regulations. The permittee is regulated under the federal Effluent Limit Guideline, 40 CFR Part 422 Transportation Equipment Cleaning, which does not impose monitoring or effluent limits for any of the referenced constituents. Additionally, information provided in the permit application did not indicate that the facility would discharge the referenced constituents at levels of concern to require an effluent limit. Hence, EPD did not require effluent limits for the referenced constituents in the permit.</p>   |
| <p>Prohibit the following constituents from being discharged into the collection system: m, p cresol, ethyl benzene, m.p. xylene, o. xylene, butanone (methyl ethyl ketone), fluoranthene, pyrene, and styrene.</p>   | <p>In a letter dated March 23, 2015, EPD requested the basis for the prohibitions of the constituents to be incorporated into the draft permit. On April 20, 2015, Garden City responded stating that their sewer use ordinance (SUO) was in the process of being updated and EPD should include the limits from the SUO into the permit, however to date the SUO updates have not been completed nor has the SUO been adopted by the City. Additionally, information provided in the permit application did not indicate that the facility would discharge the referenced constituents at levels of concern to require an effluent limit. Part II.B.8 of the permit, states that the permittee is responsible to achieve compliance with any local ordinance whose requirements are more stringent than those contained in the permit. The City may prohibit the referenced constituents in their SUO.</p> |

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| COMMENTS RECEIVED   | EPD RESPONSE   |
|---|--|
| <p><b><u>Pretreatment Permit Conditions</u></b></p> <p>Include flow equalization to prevent slug discharges and the installation of a control manhole for gauging and sampling of industrial wastewater discharges.</p> | <p>Part III.B.1 of the permit, states that the permittee shall not discharge substances in amounts, concentrations or combinations thereof which interfere with the operation of the City of Garden City POTW or cause pass-through of pollutants in violation of the effluent limitations specified in National Pollutant Discharge Elimination System Permit No. GA0031038. Additionally, Part I.B. of the permit requires that samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge.</p> |