

Georgia Department of Natural Resources
Environmental Protection Division

Environmental Protection Division • Watershed Protection Branch
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Judson H. Turner, Director

JAN 08 2016

Persons Who Commented on Permit

RE: EPD Response to Comments
Coastal Processing, LLC
Pretreatment Permit No. GAP050305
Louisville, Jefferson County

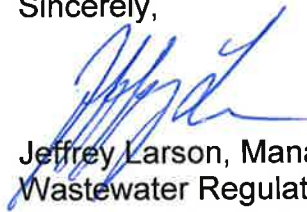
Dear Concerned Citizen(s):

Thank you for your comments concerning the issuance of the pretreatment permit for Coastal Processing, LLC. Changes have been made to the permit based on comments received during the public comment period for the draft pretreatment 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 along with a fact sheet addendum. We appreciate your interest in this matter.

Sincerely,



Jeffrey Larson, Manager
Wastewater Regulatory Program
Watershed Protection Branch

JL/klm
Attachment

**Public Comments and EPD Responses on Draft Pretreatment Permit
Coastal Processing, LLC – Permit No. GAP050305**

COMMENTS RECEIVED	EPD RESPONSE
<p>Is a sludge management plan needed, and is any of the sludge being sent to a landfill?</p>	<p>In accordance with the application, removal of sludge would be performed by a third party. It is not anticipated that sludge will need to be removed for an extended period of time; and it is unlikely that a Sludge Management Plan will be needed during the five year timeframe of this permit.</p> <p>However, if the need for removal of sludge does occur the permittee will need to submit a Sludge Management Plan to the EPD. The Sludge Management Plan would provide protocols to ensure that the sludge would be disposed of in a manner such as to prevent any pollutant from such materials from entering waters of the State or creating an adverse impact on the environment. Handling and disposal of such substances would be in accordance with all applicable State and Federal regulations, including guidelines established by the EPD, the Federal Clean Water Act, and the Resource Conservation and Recovery Act (RCRA).</p>
<p>Would potentially like more monitoring due to the fact the operation is not 24/7 in case there are upsets or potential influxes.</p>	<p>The monitoring frequencies for ammonia and total phosphorus have been increased to once a week to monitor the potential variability of the waste. With the exception of fecal coliform, the monitoring frequency for all other pollutants is standard for pretreatment permits and will remain the same. Upset provisions are addressed by Part II.B.16 of the permit. Coastal Processing will need to ensure that the facility operator is certified in accordance with Georgia State Board of Examiners for Certification of Water and Wastewater Treatment Plant Operators and Laboratory Analysts Rule 43-51-6.(b).</p>
<p>Are there typically limits in pretreatment permits for fecal coliform, so that the removal is not entirely dependent on the City for removal?</p>	<p>Pretreatment permits do not typically have fecal coliform limits.</p>

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COMMENTS RECEIVED	EPD RESPONSE
<p>The office of Senator Jesse Stone and the Jefferson County Commission appreciate the efforts of all stakeholders in this process and are excited to support the new City of Louisville Forstmann Wastewater Treatment Facility and the new Coastal Processing facility. They are significant additions to the City of Louisville economy and both parties look forward to the benefits that the facilities will provide to the community and in the protection of the Ogeechee River Basin.</p>	<p>Comment noted.</p>