



GEORGIA
DEPARTMENT OF NATURAL RESOURCES

ENVIRONMENTAL PROTECTION DIVISION

Richard E. Dunn, Director

Watershed Protection Branch

2 Martin Luther King, Jr. Drive
Suite 1152, East Tower
Atlanta, Georgia 30334
404-463-1511

SEP 26 2017

Ms. Dennisse Diaz, Branch Chief
NPDES Permitting and Enforcement Branch
Water Protection Division
U.S. EPA Region IV
The Sam Nunn Federal Center
61 Forsyth Street, SW
Atlanta, Georgia 30303

RE: EPD Response to Comments
Aerospace Defense Coatings of Georgia
NPDES Permit No. GA0050248

Dear Ms. Diaz:

Thank you for your comments regarding the permit issuance for Aerospace Defense Coatings of Georgia. Attached is a summary of your comments and our responses to the issues raised. In addition, we have attached the Permit Addendum and Permit Rational Addendum documenting the changes made to the attached permit. We appreciate your interest in this matter.

After consideration of your comments, EPD has determined that the permit is protective of water quality standards and we have issued the permit.

If you have any questions, please contact Audra Dickson of my staff at 404-463-4934.

Sincerely,

Jeffrey Larson, Manager
Wastewater Regulatory Program
Watershed Protection Branch

JL/ahd
Attachment

**Public Comments and EPD Responses on Draft NPDES Permit for
Aerospace Defense Coatings of Georgia
NPDES Permit No. GA0050248**

COMMENTS RECEIVED	EPD RESPONSE
<p>To clarify the length of time the facility is allowed a compliance schedule.</p>	<p>In Part III.B of the permit the following language has been included, “The permittee must start-up all pollution control equipment required to meet the conditions of its permits before beginning to discharge and must meet all permit conditions within the shortest feasible time, which may not exceed 90 days”, in accordance with Georgia Rules and Regulations; Chapter 391-3-6-.06 (e) 4.</p>
<p>It is recommended that WET testing be required for this facility with an established limit in the limitations table, including a [suggested] minimum frequency of “whence discharge to waters of the State occurs, samples and testing for WET criteria shall be performed.” At this frequency there should be no burden on the facility unless and until there is an actual discharge. It also allows GA to maintain enforceability of water quality criteria in the permit.</p>	<p>A requirement to perform a Whole Effluent Toxicity test when a discharge to waters of the State occurs has been included in the permit.</p>
<p>The metals data provided from the application included Copper and Zinc values which showed RP when we ran the RPA for them using GA’s WQS criteria.</p>	<p>There are technology based effluent limits (TBELs) for zinc and copper from 40 CFR 433 Subpart A in the draft permit. The water quality based effluent limits (WQBELs) obtained from the Reasonable Potential Analysis are more stringent than the TBELs and zinc and copper limits have been changed in the permit. The new copper limits are 0.000044 lbs/day and 0.000051 lbs/day, daily average and daily maximum; respectively, and 0.0024 mg/L and 0.0028 mg/L, daily average and daily maximum; respectively. The new zinc limits are 0.00075 lbs/day and 0.00075 lbs/day, daily average and daily maximum; respectively, and 0.041 mg/L and 0.041 mg/L, daily average and daily maximum; respectively. The permit has been modified to reflect the suggested changes.</p>

**Public Comments and EPD Responses on Draft NPDES Permit for
Aerospace Defense Coatings of Georgia
NPDES Permit No. GA0050248**

COMMENTS RECEIVED	EPD RESPONSE
<p>The EPA prefers the terminology of “<i>sufficiently sensitive</i>” techniques when referring to test methods for compliance criterion. Is there any way this language can be included in the permit(s)?</p> <p>“For any metals monitored during any portion of the limits determination process, measurement will be by the “<i>most appropriate</i>” (<i>emphasis added</i>) analytical technique approved by the U.S. EPA which provides a measurement of the portion of the metal present which may cause toxicity to aquatic life in the receiving stream.”</p>	<p>Part I.B.3 of the draft permit states, “The analytical method used shall be sufficiently sensitive”. EPD believes this language is adequate to ensure the permittee uses the applicable analytical test method</p>
<p>From a Google Earth review of the surrounding site for this facility, there appears to be large piles of debris and/or exposed material storage to the rear of the building. Because of this, industrial stormwater BMPs are suggested for inclusion in the permit, or if Stormwater GP coverage has already been permitted at this site with a Notice of Coverage (NOC), that tracking number for the NOC might be included into the permit for clarity that EPD has assessed that issue.</p>	<p>The permittee has coverage under the General Permit for Storm Water Discharges Associated with Industrial Activity effective on June 1, 2017. EPD does not believe the inclusion, or reference or another NPDES or other environmental permits are necessary.</p>