

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

December 11, 2015

Mr. Chuck Gheesling, Plant Manager
KaMin Performance Fibers
822 Huber Road
Macon, GA 31217

RE: EPD Response to Comments
KaMin Sandersville Mine Pits
NPDES Permit No. GA0038717
Sandersville, Washington County

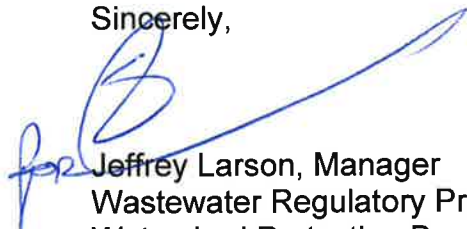
Dear Mr. Gheesling:

Thank you for your comments concerning the reissuance of the NPDES permit for the KaMin Sandersville Mine Pits. Changes have been made to the NPDES permit based on comments received during the public hearing and public comment period for the draft NPDES permit.

The 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,



Jeffrey Larson, Manager
Wastewater Regulatory Program
Watershed Protection Branch

JH/ahd

Attachment

**Public Comments and EPD Responses on Draft NPDES Permit
KaMin Sandersville Mine Pits – Permit No. GA0038717**

COMMENTS RECEIVED	EPD RESPONSE
<p>Monitoring frequency of twice per month is very burdensome since these pits rarely discharge and when they do it's ground and storm water. We request a change to quarterly monitoring.</p>	<p>The submitted NPDES permit application requests a discharge of groundwater and stormwater to surface waters of the State. The sampling frequencies have been established to appropriately characterize and monitor this discharge for flow, total phosphorus and turbidity to the receiving streams.</p>
<p>Request for phosphorus monitoring and limits to be removed because the application indicated low levels of a discharge of phosphorus.</p>	<p>Based on the fact that KaMin has indicated in its NPDES permit application that phosphorus is believed to be present in the effluent discharge, phosphorus monitoring must remain in the permit. This is in accordance with EPD's Strategy for Addressing Phosphorus in NPDES Permitting.</p>
<p>The former permit section B was "Schedule of Compliance" which included instruction on adding new mine pits to the permit. There are no such instructions included in this permit draft.</p>	<p>In accordance with EPD's Revised Antidegradation Analysis Guidelines, amended 2014, Section B of the previous permit was removed from the current draft permit. The revised Antidegradation Guidelines state that applicants requesting new or expanded wastewater point source discharges into any surface water must perform an antidegradation analysis to demonstrate that the discharge is necessary to accommodate important social or economic development. If the permittee would like to add a point source discharge to the permit in the future, an antidegradation analysis and a permit application modification will need to be submitted to EPD.</p>

**Public Comments and EPD Responses on Draft NPDES Permit
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COMMENTS RECEIVED	EPD RESPONSE
<p>In Part I.B.7 a form is mentioned, Form 3320-1, this form could not be found on the EPD website. We would request this form number be deleted and instead replaced with just reference to the DMRs and OMRs.</p>	<p>Form 3320-1 is the EPA and EPD authorized Discharge Monitoring Report (DMR) form that is allowed to be used to submit regulatory monitoring effluent information to EPD. Hence, no changes have been made to this section of the permit.</p>
<p>Part III.B.3 does not apply to the outfalls in this permit.</p>	<p>EPD concurs with the comment and therefore Part III.B.3, Special Condition has been removed from the permit.</p>