



**GEORGIA**  
DEPARTMENT OF NATURAL RESOURCES

**ENVIRONMENTAL PROTECTION DIVISION**

**Richard E. Dunn, Director**

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**EPD Director's Office**  
2 Martin Luther King, Jr. Drive  
Suite 1456, East Tower  
Atlanta, Georgia 30334  
404-656-4713

JAN 23 2018

Mr. Robert Gregory, Plant Manager  
Bon L Manufacturing Co.  
PO Box 428  
Newnan, Georgia 30264

RE: Permit Issuance  
Bon L Manufacturing Co.  
Permit No. GA0000507  
Newnan, Coweta County


Dear Mr. Gregory:

Pursuant to the Georgia Water Quality Control Act, as amended, the Federal Clean Water Act, as amended, and the Rules and Regulations promulgated thereunder, we have issued the attached permit for the above-referenced facility.

Your facility has been assigned to the following EPD office for reporting and compliance. Signed copies of all required reports shall be submitted to the following address:

Environmental Protection Division  
Watershed Protection Branch  
Watershed Compliance Program  
2 Martin Luther King Jr. Drive, Suite 1152  
Atlanta, Georgia 30334

Please be advised that on and after the effective date indicated in the permit, the permittee must comply with all terms, conditions, and limitations of the permit. If you have questions concerning this correspondence, please contact Ian McDowell at 404.232.1567 or [ian.mcdowell@dnr.ga.gov](mailto:ian.mcdowell@dnr.ga.gov).

Sincerely,  
  
Richard E. Dunn  
Director

RED:IM

Enclosure(s)

cc: EPD Watershed Compliance Program, Shea Buettner ([shea.buettner@dnr.ga.gov](mailto:shea.buettner@dnr.ga.gov))  
Bon L Manufacturing Company, Janette Courtney ([janette.courtney@bonnellaluminum.com](mailto:janette.courtney@bonnellaluminum.com))

Permit No. GA0000507  
Issuance Date: JAN 23 2018



# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

## ENVIRONMENTAL PROTECTION DIVISION

### National Pollutant Discharge Elimination System Permit

In accordance with the provisions of the Georgia Water Quality Control Act (Georgia Laws 1964, p. 416, as amended), hereinafter called the State Act; the Federal Water Pollution Control Act, as amended (33 U.S. C. 1251 et seq.), hereinafter called the Federal Act; and the Rules and Regulations promulgated pursuant to each of these Acts,

Bon L Manufacturing Co.  
P.O. Box 428  
Newnan, Georgia 30264

is issued a permit to discharge from a facility located at

25 Bonnell Street  
Newnan, Georgia 30263  
Coweta County

to receiving waters

Unnamed Tributary of Mineral Springs Branch in the Chattahoochee River Basin.

in accordance with effluent limitations, monitoring requirements and other conditions set forth in the permit.

This permit is issued in reliance upon the permit application signed on September 18, 2017, any other applications upon which this permit is based, supporting data entered therein or attached thereto, and any subsequent submittal of supporting data.

This permit shall become effective on February 01, 2018.

This permit and the authorization to discharge shall expire at midnight January 31, 2023.



Richard E. Dunn, Director  
Environmental Protection Division

**PART I**

**A.1. Effluent Limitations and Monitoring Requirements**

a. Upon the effective date of this permit and continuing for 48 months, the permittee is authorized to discharge from outfall number 001<sup>1</sup> – Treated Groundwater.

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristics (Units)	Discharge Limitations				Monitoring Requirements <sup>2</sup>		
	Mass Based (lbs/day)		Concentration Based (mg/L)		Measurement Frequency	Sample Type	Sample Location
	Daily Avg.	Daily Max.	Daily Avg.	Daily Max.			
Flow (MGD)	Report	Report	--	--	Daily	Instant	Final Effluent
Total Suspended Solids	301	301	--	--	2/Month	Grab	Final Effluent
Cadmium, Total	Report <sup>3</sup>	Report <sup>3</sup>	Report <sup>3</sup>	Report <sup>3</sup>	2/Month	Grab	Final Effluent
Copper, Total	Report <sup>3</sup>	Report <sup>3</sup>	Report <sup>3</sup>	Report <sup>3</sup>	2/Month	Grab	Final Effluent
Nickel, Total	Report <sup>3</sup>	Report <sup>3</sup>	Report <sup>3</sup>	Report <sup>3</sup>	2/Month	Grab	Final Effluent
Zinc, Total	Report <sup>3</sup>	Report <sup>3</sup>	Report <sup>3</sup>	Report <sup>3</sup>	2/Month	Grab	Final Effluent
Selenium, Total	Report <sup>3</sup>	Report <sup>3</sup>	Report <sup>3</sup>	Report <sup>3</sup>	2/Month	Grab	Final Effluent
Total Phosphorus	--	--	Report	Report	1/Month	Grab	Final Effluent
Chronic Whole Effluent Toxicity <sup>4</sup>	Report <sup>4</sup>	Report <sup>4</sup>	--	--	Annual	Composite	Final Effluent

The pH shall not be less than 6.0 standard units nor greater than 8.5 standard units and shall be monitored daily by grab sample.

- <sup>1</sup> There shall be no discharge of floating solid or visible foam other than trace amounts.
- <sup>2</sup> All the parameters must be monitored, at a minimum, at the measurement frequency stated above if there is any discharge. If there is no discharge, state such in the discharge monitoring report in accordance with the reporting requirements in Part 1.D of this permit.
- <sup>3</sup> See Schedule of Compliance Part III.B, of this permit.

- 4 WET testing shall be conducted annually and the results submitted to the EPD in accordance with Part I.D of this permit. The testing must comply with the most current U.S. Environmental Protection Agency (EPA) chronic aquatic toxicity testing manuals. The referenced document is entitled Short-Term Methods of Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms, 4th Edition, U.S. EPA, 821-R-02-013, October 2002. Definitive tests must be run on the same samples concurrently using both an invertebrate species (i.e., *Ceriodaphnia dubia*) and a vertebrate species (i.e., Fathead Minnow, *Pimephales promelas*) and shall include a dilution equal to the facility's instream waste concentration (IWC) of 100%.

- b. Effective 48 months from the effective date of the permit and continuing until the expiration date of this permit, the permittee is authorized to discharge from outfall number 001<sup>1</sup> – Treated Groundwater.

Such discharges shall be limited and monitored by the permittee as specified below:

Effluent Characteristics (Units)	Discharge Limitations				Monitoring Requirements <sup>2</sup>		
	Mass Based (lbs/day)		Concentration Based (mg/L)		Measurement Frequency	Sample Type	Sample Location
	Daily Avg.	Daily Max.	Daily Avg.	Daily Max.			
Flow (MGD)	Report	Report	--	--	Daily	Instant	Final Effluent
Total Suspended Solids	301	301	--	--	2/Month	Grab	Final Effluent
Cadmium, Total	0.00025	0.00141	0.00039	0.00217	2/Week	Grab	Final Effluent
Copper, Total	0.00472	0.00627	0.00725	0.00963	2/Week	Grab	Final Effluent
Nickel, Total	0.0215	0.0323	0.0331	0.0497	2/Week	Grab	Final Effluent
Zinc, Total	0.0736	0.0736	0.1130	0.1130	2/Week	Grab	Final Effluent
Selenium, Total	0.00325	0.00488	0.0050	0.00750	2/Week	Grab	Final Effluent
Total Phosphorus	--	--	Report	Report	1/Month	Grab	Final Effluent
Chronic Whole Effluent Toxicity <sup>3</sup>	Report <sup>3</sup>	Report <sup>3</sup>	--	--	Annual	Composite	Final Effluent

The pH shall not be less than 6.0 standard units nor greater than 8.5 standard units and shall be monitored daily by grab sample.

- <sup>1</sup> There shall be no discharge of floating solid or visible foam other than trace amounts.
- <sup>2</sup> All the parameters must be monitored, at a minimum, at the measurement frequency stated above if there is any discharge. If there is no discharge, state such in the discharge monitoring report in accordance with the reporting requirements in Part 1.D of this permit.

- <sup>3</sup> WET testing shall be conducted annually and the results submitted to the EPD in accordance with Part I.D of this permit. The testing must comply with the most current U.S. Environmental Protection Agency (EPA) chronic aquatic toxicity testing manuals. The referenced document is entitled Short-Term Methods of Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms, 4th Edition, U.S. EPA, 821-R-02-013, October 2002. Definitive tests must be run on the same samples concurrently using both an invertebrate species (i.e., *Ceriodaphnia dubia*) and a vertebrate species (i.e., Fathead Minnow, *Pimephales promelas*) and shall include a dilution equal to the facility's instream waste concentration (IWC) of 100%.

**B. Monitoring**

**1. Representative Sampling**

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge. The permittee shall maintain a written sampling plan and schedule onsite.

**2. Sampling Period**

- a. Unless otherwise specified in this permit, quarterly samples shall be taken during the periods January-March, April-June, July-September, and October-December.
- b. Unless otherwise specified in this permit, semiannual samples shall be taken during the periods January-June and July-December.
- c. Unless otherwise specified in this permit, annual samples shall be taken during the period of January-December.

**3. Monitoring Procedures**

Analytical methods, sample containers, sample preservation techniques, and sample holding times must be consistent with the techniques and methods listed in 40 CFR Part 136. The analytical method used shall be sufficiently sensitive. EPA-approved methods must be applicable to the concentration ranges of the NPDES permit samples.

**4. Detection Limits**

All parameters will be analyzed using the appropriate detection limits. If the results for a given sample are such that a parameter is not detected at or above the specified detection limit, a value of "NOT DETECTED" will be reported for that sample and the detection limit will also be reported.

**5. Recording of Results**

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

- a. The exact place, date, and time of sampling or measurements, and the person(s) performing the sampling or the measurements;
- b. The dates and times the analyses were performed, and the person(s) performing the analyses;
- c. The analytical techniques or methods used;
- d. The results of all required analyses.

**6. Additional Monitoring by Permittee**

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the calculation and reporting of the values required in the Discharge Monitoring Report. Such increased monitoring frequency shall also be indicated. EPD may require, by written notification, more frequent monitoring or the monitoring of other pollutants not required in this permit.

**7. Records Retention**

The permittee shall retain records of all monitoring information, including all records of analyses performed, calibration and maintenance of instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a minimum of three (3) years from the date of the sample, measurement, report or application, or longer if requested by EPD.

**8. Penalties**

The Federal Clean Water Act and the Georgia Water Quality Control Act provide that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under this permit, makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance shall, upon conviction, be punished by a fine or by imprisonment, or by both. The Federal Clean Water Act and the Georgia Water Quality Control Act also provide procedures for imposing civil penalties which may be levied for violations of the Act, any permit condition or limitation established pursuant to the Act, or negligently or intentionally failing or refusing to comply with any final or emergency order of the Director of EPD



**C. Definitions**

1. The "daily average" mass means the total discharge by mass during a calendar month divided by the number of days in the month that the production or commercial facility was operating. Where less than daily sampling is required by this permit, the daily average discharge shall be determined by the summation of all the measured daily discharges by weight divided by the number of days sampled during the calendar month when the measurements were made.
2. The "daily maximum" mass means the total discharge by mass during any calendar day.
3. The "daily average" concentration means the arithmetic average of all the daily determinations of concentrations made during a calendar month. Daily determinations of concentration made using a composite sample shall be the concentration of the composite sample.
4. The "daily maximum" concentration means the daily determination of concentration for any calendar day.
5. A "calendar day" is defined as any consecutive 24-hour period.
6. "Bypass" means the intentional diversion of waste streams from any portion of a treatment facility.
7. "Severe property damage" means substantial physical damage to property, damage to treatment facilities that causes them to become inoperable, or substantial and permanent loss of natural resources that can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.
8. "EPD" as used herein means the Environmental Protection Division of the Department of Natural Resources.
9. "State Act" as used herein means the Georgia Water Quality Control Act (Official Code of Georgia Annotated; Title 12, Chapter 5, Article 2).
10. "Rules" as used herein means the Georgia Rules and Regulations for Water Quality Control.

**D. Reporting Requirements**

1. The permittee must electronically report the DMR, OMR and additional monitoring data using the web based electronic NetDMR reporting system, unless a waiver is granted by EPD.
  - a. The permittee must comply with the Federal National Pollutant Discharge Elimination System Electronic Reporting regulations in 40 CFR §127. The permittee must electronically report the DMR, OMR, and additional monitoring data using the web based electronic NetDMR reporting system online at: <https://netdmr.epa.gov/netdmr/public/home.htm>
  - b. Monitoring results obtained during the calendar month shall be summarized for each month and reported on the DMR. The results of each sampling event shall be reported on the OMR and submitted as an attachment to the DMR.
  - c. The permittee shall submit the DMR, OMR and additional monitoring data no later than 11:59 p.m. on the 15th day of the month following the sampling period.
  - d. All other reports required herein, unless otherwise stated, shall be submitted to the EPD Office listed on the permit issuance letter signed by the Director of EPD.
2. No later than December 21, 2020, the permittee must electronically report the following compliance monitoring data and reports using the online web based electronic system approved by EPD, unless a waiver is granted by EPD:
  - a. Sewer Overflow/Bypass Event Reports;
  - b. Noncompliance Notification;
  - c. Other noncompliance; and
  - d. Bypass

**3. Other Reports**

All other reports required in this permit not listed above in Part I.D.2 or unless otherwise stated, shall be submitted to the EPD Office listed on the permit issuance letter signed by the Director of EPD.

**4. Other Noncompliance**

All instances of noncompliance not reported under Part I.B. and Part II. A. shall be reported to EPD at the time the monitoring report is submitted.

## 5. Signatory Requirements

All reports, certifications, data or information submitted in compliance with this permit or requested by EPD must be signed and certified as follows:

- a. Any State or NPDES Permit Application form submitted to the EPD shall be signed as follows in accordance with the Federal Regulations, 40 C.F.R. 122.22:
  1. For a corporation, by a responsible corporate officer. A responsible corporate officer means:
    - i a president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy- or decision making functions for the corporation, or
    - ii. the manager of one or more manufacturing, production, or operating facilities employing more than 250 persons or having gross annual sales or expenditures exceeding \$25 million (in second-quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
  2. For a partnership or sole proprietorship, by a general partner or the proprietor, respectively; or
  3. For a municipality, State, Federal, or other public facility, by either a principal executive officer or ranking elected official.
- b. All other reports or requests for information required by the permit issuing authority shall be signed by a person designated in (a) above or a duly authorized representative of such person, if:
  1. The representative so authorized is responsible for the overall operation of the facility from which the discharge originates, e.g., a plant manager, superintendent or person of equivalent responsibility;
  2. The authorization is made in writing by the person designated under (a) above; and
  3. The written authorization is submitted to the Director.
- c. Any changes in written authorization submitted to the permitting authority under (b) above which occur after the issuance of a permit shall be reported to the permitting authority by submitting a copy of a new written authorization which meets the requirements of (b) and (b.1) and (b.2) above.

- d. Any person signing any document under (a) or (b) above shall make the following certification:

“I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.”

## **PART II**

### **A. Management Requirements**

#### **1. Notification of Changes**

- a. The permittee shall provide EPD at least 90 days advance notice of any planned physical alterations or additions to the permitted facility that meet the following criteria:
  1. The alteration or addition to a permitted facility may meet one of the criteria for determining whether a facility is a new source in 40 CFR 122.29(b);
  2. The alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. This notification applies to pollutants which are subject neither to effluent limitations in the permit, nor to notification requirements under 40 CFR 122.42(a)(1); or
  3. The alteration or addition results in a significant change in the permittee's sludge use or disposal practices, and such alteration, addition, or change may justify the application of permit conditions that are different from or absent in the existing permit, including notification of additional use or disposal sites not reported during the permit application process or not reported pursuant to an approved land application plan.
- b. The permittee shall give at least 90 days advance notice to EPD of any planned changes to the permitted facility or activity which may result in noncompliance with permit requirements.
- c. Following the notice in paragraph a. or b. of this condition the permit may be modified. The permittee shall not make any changes, or conduct any activities, requiring notification in paragraph a. or b. of this condition without approval from EPD.
- d. The permittee shall provide at least 30 days advance notice to EPD of:
  1. any planned expansion or increase in production capacity; or
  2. any planned installation of new equipment or modification of existing processes that could increase the quantity of pollutants discharged or result in the discharge of pollutants that were not being discharged prior to the planned change

if such change was not identified in the permit application(s) upon which this permit is based and for which notice was not submitted under paragraphs a. or b. of this condition.

- e. All existing manufacturing, commercial, mining, and silvicultural dischargers shall notify EPD as soon as it is known or there is reason to believe that any activity has occurred or will occur which would result in the discharge, on a routine or frequent basis, of any toxic pollutant not limited in the permit, if that discharge will exceed (i) 100 µg/L, (ii) five times the maximum concentration reported for that pollutant in the permit application, or (iii) 200 µg/L for acrolein and acrylonitrile, 500 µg/L for 2,4 dinitrophenol and for 2-methyl-4-6-dinitrophenol, or 1 mg/L antimony.
- f. All existing manufacturing, commercial, mining, and silvicultural dischargers shall notify EPD as soon as it is known or there is reason to believe that any activity has occurred or will occur which would result in any discharge on a nonroutine or infrequent basis, of any toxic pollutant not limited in the permit, if that discharge will exceed (i) 500 µg/L, (ii) ten times the maximum concentration reported for that pollutant in the permit application, or (iii) 1 mg/L antimony.
- g. Upon the effective date of this permit, the permittee shall submit to EPD an annual certification in June of each year certifying whether or not there has been any change in processes or wastewater characteristics as described in the submitted NPDES permit application that required notification in paragraph a., b., or d. of this condition. The permittee shall also certify annually in June whether the facility has received offsite wastes or wastewater and detail any such occurrences.

## **2. Noncompliance Notification**

If, for any reason, the permittee does not comply with, or will be unable to comply with any effluent limitation specified in this permit, the permittee shall provide EPD with an oral report within 24 hours from the time the permittee becomes aware of the circumstances followed by a written report within five (5) days of becoming aware of such condition. The written submission shall contain the following information:

- a. A description of the discharge and cause of noncompliance; and
- b. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate, and prevent recurrence of the noncomplying discharge.

## **3. Facility Operation**

The permittee shall at all times maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee to achieve compliance with the terms and conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems only when necessary to achieve compliance with the conditions of the permit.

**4. Adverse Impact**

The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

**5. Bypassing**

- a. If the permittee knows in advance of the need for a bypass, it shall submit prior notice to EPD at least 10 days (if possible) before the date of the bypass. The permittee shall submit notice of any unanticipated bypass with an oral report within 24 hours from the time the permittee becomes aware of the circumstances followed by a written report within five (5) days of becoming aware of such condition. The written submission shall contain the following information:
  1. A description of the discharge and cause of noncompliance; and
  2. The period of noncompliance, including exact dates and times; or, if not corrected, the anticipated time the noncompliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the noncomplying discharge.
- b. Any diversion or bypass of facilities covered by this permit is prohibited, except (i) where unavoidable to prevent loss of life, personal injury, or severe property damage; (ii) there were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime (this condition is not satisfied if the permittee could have installed adequate back-up equipment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance); and (iii) the permittee submitted a notice as required above. The permittee shall operate the treatment works, including the treatment plant and total sewer system, to minimize discharge of the pollutants listed in Part I of this permit from combined sewer overflows or bypasses. Upon written notification by EPD, the permittee may be required to submit a plan and schedule for reducing bypasses, overflows, and infiltration in the system.

**6. Sludge Disposal Requirements**

Sludge shall be disposed of in accordance with the regulations and guidelines established by EPD, the Federal Clean Water Act, and the Resource Conservation and Recovery Act (RCRA). Prior to disposal of sludge by any method other than co-disposal in a permitted sanitary landfill, the permittee shall submit a sludge management plan to the Watershed Protection Branch of EPD for written approval. For land application of nonhazardous sludge, the permittee shall comply with the applicable criteria outlined in the most current version of EPD's "Guidelines for Land Application of Sewage Sludge (Biosolids) at Agronomic Rates" and with the State Rules, Chapter 391-3-6-.17. EPD may require more stringent control of this activity. Prior to land applying nonhazardous sludge, the permittee shall submit a sludge management plan to EPD for review and approval. Upon approval, the plan for land application will become a part of the NPDES permit upon modification of the permit.

**7. Sludge Monitoring Requirements**

The permittee shall develop and implement procedures to ensure adequate year-round sludge disposal. The permittee shall monitor the volume and concentration of solids removed from the plant. Records shall be maintained which document the quantity of solids removed from the plant. The ultimate disposal of solids shall be reported (in the unit of lbs) as specified in Part I.D of this permit.

**8. Power Failures**

Upon the reduction, loss, or failure of the primary source of power to said water pollution control facilities, the permittee shall use an alternative source of power if available to reduce or otherwise control production and/or all discharges in order to maintain compliance with the effluent limitations and prohibitions of this permit.

If such alternative power source is not in existence, and no date for its implementation appears in Part I, the permittee shall halt, reduce or otherwise control production and/or all discharges from wastewater control facilities upon the reduction, loss, or failure of the primary source of power to said wastewater control facilities.

**9. Operator Certification Requirements**

The permittee shall ensure that, when required, a certified operator is in charge of the facility 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)

**10. Laboratory Analyst Certification Requirements**

The permittee shall ensure that, when required, the person in responsible charge of the laboratory performing the analyses for determining permit compliance is certified in accordance with the Georgia Certification of Water and Wastewater Treatment Plant operators and Laboratory Analysts Act, as amended, and the Rules promulgated thereunder.



**B. Responsibilities**

**1. Right of Entry**

The permittee shall allow the Director of EPD, the Regional Administrator of EPA, and/or their authorized representatives, agents, or employees, upon the presentation of credentials:

- a. To enter upon the permittee's premises where a discharge source is located or in which any records are required to be kept under the terms and conditions of this permit; and
- b. At reasonable times, to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and to sample any substance or parameters in any location.

**2. Transfer of Ownership or Control**

A permit may be transferred to another person by a permittee if:

- a. The permittee notifies the Director of EPD in writing of the proposed transfer at least thirty (30) days in advance of the proposed transfer;
- b. A written agreement containing a specific date for transfer of permit responsibility and coverage between the current and new permittee (including acknowledgement that the existing permittee is liable for violations up to that date, and that the new permittee is liable for violations from that date on) is submitted to the Director at least thirty (30) days in advance of the proposed transfer; and
- c. The Director, within thirty (30) days, does not notify the current permittee and the new permittee of EPD's intent to modify, revoke and reissue, or terminate the permit and to require that a new application be filed rather than agreeing to the transfer of the permit.

**3. Availability of Reports**

Except for data deemed to be confidential under O.C.G.A. § 12-5-26 or by the Regional Administrator of the EPA under the Code of Federal Regulations, Title 40, Part 2, all reports prepared in accordance with the terms of this permit shall be available for public inspection at an office of EPD. Effluent data, permit applications, permittee's names and addresses, and permits shall not be considered confidential.

**4. Permit Modification**

After written notice and opportunity for a hearing, this permit may be modified, suspended, revoked or reissued in whole or in part during its term for cause including, but not limited to, the following:

- a. Violation of any conditions of this permit;
- b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts;
- c. A change in any condition that requires either a temporary or permanent reduction or elimination of the permitted discharge; or
- d. To comply with any applicable effluent limitation issued pursuant to the order of the United States District Court for the District of Columbia issued on June 8, 1976, in Natural Resources Defense Council, Inc. et.al. v. Russell E. Train, 8 ERC 2120(D.D.C. 1976), if the effluent limitation so issued:
  1. is different in conditions or more stringent than any effluent limitation in the permit; or
  2. controls any pollutant not limited in the permit.

**5. Toxic Pollutants**

The permittee shall comply with effluent standards or prohibitions established pursuant to Section 307(a) of the Federal Clean Water Act for toxic pollutants, which are present in the discharge within the time provided in the regulations that establish these standards or prohibitions, even if the permit has not yet been modified to incorporate the requirement.

**6. Civil and Criminal Liability**

Nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance.

**7. State Laws**

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties established pursuant to any applicable State law or regulation under authority preserved by Section 510 of the Federal Clean Water Act.

**8. Water Quality Standards**

Nothing in this permit shall be construed to preclude the modification of any condition of this permit when it is determined that the effluent limitations specified herein fail to achieve the applicable State water quality standards.

**9. Property Rights**

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or local laws or regulations.

**10. Expiration of Permit**

The permittee shall not discharge after the expiration date. In order to receive authorization to discharge beyond the expiration date, the permittee shall submit such information, forms, and fees as are required by EPD at least 180 days prior to the expiration date.

**11. Contested Hearings**

Any person who is aggrieved or adversely affected by an action of the Director of EPD shall petition the Director for a hearing within thirty (30) days of notice of such action.

**12. Severability**

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

**13. Best Management Practices**

The permittee will implement best management practices to control the discharge of hazardous and/or toxic materials from ancillary manufacturing activities. Such activities include, but are not limited to, materials storage, in-plant transfer, process and material handling, loading and unloading operations, plant site runoff, and sludge and waste disposal.

**14. Need to Halt or Reduce Activity Not a Defense**

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

**15. Duty to Provide Information**

- a. The permittee shall furnish to the EPD Director, within a reasonable time, any information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. The permittee shall also furnish upon request copies of records required to be kept by this permit.
- b. When the permittee becomes aware that it failed to submit any relevant facts in a permit application or submitted incorrect information in a permit application or any report to the Director, it shall promptly submit such facts and information.

**16. Duty to Comply**

- a. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Georgia Water Quality Control Act (O.C.G.A. § 12-5-20 et. seq.) and is grounds for enforcement action; for permit termination; revocation and reissuance, or modification; or for denial of a permit renewal application. Any instances of noncompliance must be reported to EPD as specified in Part I. D and Part II.A. of this permit.
- b. Penalties for violations of permit conditions. The Federal Clean Water Act and the Georgia Water Quality Control Act (O.C.G.A. § 12-5-20 et. seq.) provide that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required under this permit, makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance shall, upon conviction be punished by a fine or by imprisonment, or by both. The Georgia Water Quality Control Act (Act) also provides procedures for imposing civil penalties which may be levied for violations of the Act, any permit condition or limitation established pursuant to the Act, or negligently or intentionally failing or refusing to comply with any final or emergency order of the Director.

**17. Upset Provisions**

Provisions of 40 CFR 122.41(n)(1)-(4), regarding "Upset" shall be applicable to any civil, criminal, or administrative proceeding brought to enforce this permit.

### **PART III**

#### **A. Previous Permits**

1. All previous State wastewater permits issued to this facility, whether for construction or operation, are hereby revoked by the issuance of this permit. This action is taken to assure compliance with the Georgia Water Quality Control Act, as amended, and the Federal Clean Water Act, as amended. Receipt of the permit constitutes notice of such action. The conditions, requirements, terms and provisions of this permit authorizing discharge under the National Pollutant Discharge Elimination System govern discharges from this facility.

#### **B. Schedule of Compliance**

1. The permittee shall achieve compliance with the effluent limitations specified for discharges in accordance with the following schedule:
  - a. The effluent limitations and monitoring specified in Part I A.1.a are effective on the effective date of this permit, except as specified below.
  - b. The permittee shall achieve compliance with the cadmium, total; copper, total; nickel, total; zinc, total; and selenium, total limitations specified in Part I A.1.b of this permit in accordance with the following schedule.
    - (i) Beginning on the effective date of this permit and continuing for 48 months, the permittee shall start monitoring and reporting for cadmium, total; copper, total; nickel, total; zinc, total; and selenium, total in accordance with Part I A.1.a of this permit.
    - (ii) Within 48 months of the effective date of this permit, the permittee shall achieve compliance with the cadmium, total; copper, total; nickel, total; zinc, total; and selenium, total limitations specified in Part I A.1.b of this permit.
  - c. The permittee shall submit a written progress report to EPD on June 30<sup>th</sup> and December 31<sup>st</sup> every year describing the status of achieving compliance with Part I A.1.b of this permit. The permittee shall submit the report to the EPD assigned Compliance Office.
2. No later than 14 calendar days following a date identified in the above schedule of compliance, the permittee shall submit either a report of progress or, in the case of specific actions being required by identified dates, a written notice of compliance or noncompliance, any remedial actions taken, and the probability of meeting the next scheduled requirement.

**C. Biomonitoring and Toxicity Reduction Requirements**

1. The permittee shall comply with effluent standards or prohibitions established by section 307(a) of the Federal Act and with chapter 391-3-6-.03(5)(e) of the State Rules and may not discharge toxic pollutants in concentrations or combinations that are harmful to humans, animals, or aquatic life.

If toxicity is suspected in the effluent, EPD may require the permittee to perform any of the following actions:

- a. Acute biomonitoring tests;
  - b. Chronic biomonitoring tests;
  - c. Stream studies;
  - d. Priority pollutant analyses;
  - e. Toxicity reduction evaluations (TRE); or
  - f. Any other appropriate study.
2. EPD will specify the requirements and methodologies for performing any of these tests or studies. Unless other concentrations are specified by EPD, the critical concentration used to determine toxicity in biomonitoring tests will be the effluent instream wastewater concentration (IWC) based on the representative plant flow of the facility and the critical low flow of the receiving stream (7Q10). The endpoints that will be reported are the effluent concentration that is lethal to 50% of the test organisms (LC50) if the test is for acute toxicity, and the no observed effect concentration (NOEC) of effluent if the test is for chronic toxicity.

The permittee must eliminate effluent toxicity and supply EPD with data and evidence to confirm toxicity elimination.



# GEORGIA

DEPARTMENT OF NATURAL RESOURCES

## ENVIRONMENTAL PROTECTION DIVISION

The Georgia Environmental Protection Division proposes to issue an NPDES permit to the applicant identified below. The draft permit places conditions on the discharge of pollutants from the wastewater treatment plant to waters of the State.

**Technical Contact:** Ian McDowell (*ian.mcdowell@dnr.ga.gov*)  
404-232-1567

**Draft permit:**

- first issuance
- reissuance with no or minor modifications from previous permit
- reissuance with substantial modifications from previous permit
- modification of existing permit
- requires EPA review
- designated as a Major facility

### 1.0 FACILITY INFORMATION

**1.1 NPDES Permit No.:** GA0000507

**1.2 Name and Address of Owner/Applicant**

Bon L Manufacturing Co.  
PO Box 428  
Newnan, Georgia 30264  
(Coweta County)

**1.3 Name and Address of Facility**

Bon L Manufacturing Co.  
25 Bonnell Street  
Newnan, Georgia, 30263  
(Coweta County)

**1.4 Location and Description of the discharge (as reported by applicant)**

Outfall ID	Latitude	Longitude	Receiving Waterbody
001	33° 22' 50.14" N (33.380594° N)	84° 49' 17.34" W (84.821483° W)	Unnamed Tributary to Mineral Springs Branch

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## **1.5 Production Capacity – N/A**

## **1.6 SIC Code & Description**

3354 – Aluminum Extruded Products

3471 – Anodizing, Polishing, & Coloring

3341 – Secondary Smelting & Refining of Nonferrous Metals

3446 – Architectural & Ornamental Metal Work

## **1.7 Description of Industrial Processes**

Bon L produces aluminum extrusions for the residential and architectural industries. A secondary aluminum facility, scrap and ingot are used to produce aluminum logs and billet to be extruded. Extrusions are sold as is or are finished on site in an anodizing line and an electrostatic wet paint line.

In addition to the NPDES permit that Bon L Manufacturing Co. holds, the facility also was issued a UIC permit GAW000548 (valid through July 28, 2018) and a Post Closure Care Permit (PCC Permit), HW-087(D), by the Georgia EPD. This PCC permit requires Bon L to operate under a corrective action plan to remediate groundwater at the site (primarily for chlorinated volatile organic compounds). Bon L is currently treating the groundwater via a pump and treat network and discharging the treated groundwater to an unnamed tributary of Mineral Springs Branch under its extended NPDES permit. The pump and treat system has not removed enough VOC's to provide a significant reduction of the contaminant plume on site and additionally is not able to treat metals contamination in the groundwater. To address the continuing issues at the site, the permittee has worked with EPD on an Integrated RCRA/NPDES Compliance Strategy Work Plan (Appendix C). The permittee plans to utilize in-situ groundwater treatment alternatives in order to meet groundwater protection standards as defined in their PCC permit and to phase out pump and treat operations. A compliance schedule has been included in this permit to allow time for the permittee to implement and optimize this treatment method, with the expectation that Bon L could discontinue discharge of treated groundwater, facilitating compliance with both its NPDES and PCC Permits.

## **1.8 Description of the Wastewater Treatment Facility**

Bon L will send contaminated groundwater from their recovery wells and hillside spring to an equalization tank. From the EQ tank the groundwater is sent through a bag filter, cartridge filter, and carbon filters for filtration and carbon adsorption treatment. The groundwater is then neutralized with pH treatment and sent to a wet well. From the wet well the treated groundwater is sent to a parshall flume then subsequently discharged to an unnamed tributary of Mineral Springs Branch via NPDES Outfall 001.

All other wastewater associated with plant operations will not be permitted under GA0000507. This wastewater will be covered under the pretreatment permit issued by the City of Newnan, whom has an approved Industrial Pretreatment Program.



Outfall	Operation Description	Treatment Description
001	Treated Groundwater	Filtration, Carbon Adsorption, and Neutralization

**1.9 Type of Wastewater Discharge**

- process wastewater                       stormwater  
 domestic wastewater                       combined (describe)  
 other – Treated Groundwater

**1.10 Characterization of Effluent Discharge as Reported by Applicant**  
 (Form 2C, Section V, Part A only. Please refer to the application for additional analysis)

**1.10.a Outfall No. 001 – Treated Groundwater**

Effluent Characteristics (as Reported by Applicant)	Maximum Daily Value	Average Daily Value
Flow (MGD)	0.078	0.060
Biochemical Oxygen Demand, <sup>5-day</sup> (mg/L)	<5.0	<5.0
Total Suspended Solids (mg/L)	6.0	N/A
Temperature, Winter (°F)	65.3	N/A
Temperature, Summer (°F)	73.0	N/A
Ammonia (mg/L)	<0.2	N/A
Total Phosphorus (mg/L)	N/A	N/A

**2.0 APPLICABLE REGULATIONS**

**2.1 State Regulations**

Chapter 391-3-6 of the Georgia Rules and Regulations for Water Quality Control

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## 2.2 Federal Regulations

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Source	Activity	Applicable Regulation
Industrial	Non-Process Water Discharges	40 CFR 122 40 CFR 125

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Process Water discharges are covered in the pretreatment permit.

## 2.3 Industrial Effluent Limit Guideline(s)

Bon L Manufacturing Co. is an aluminum forming facility and is classified as a primary industry subject to the effluent limitation guidelines (ELGs) established in 40 CFR 467. Bon L's process wastewater is subject to the limitations provided in 40 CFR 467 and is permitted by the pretreatment permit issued by the City of Newnan. The treated groundwater which will be permitted in this NPDES permit does not meet the applicability requirements outlined in the ELG and is therefore not subject to the same federal regulations.

## 3.0 WATER QUALITY STANDARDS & RECEIVING WATERBODY INFORMATION

Section 301(b)(1)(C) of the Clean Water Act (CWA) requires the development of limitations in permits necessary to meet water quality standards. Federal Regulations 40 CFR 122.4(d) require that conditions in NPDES permits ensure compliance with the water quality standards which are composed of use classifications, numeric and or narrative water quality criteria and an anti-degradation policy. The use classification system designates the beneficial uses that each waterbody is expected to achieve, such as drinking water, fishing, or recreation. The numeric and narrative water quality criteria are deemed necessary to support the beneficial use classification for each water body. The antidegradation policy represents an approach to maintain and to protect various levels of water quality and uses.

### 3.1 Receiving Waterbody Classification and Information

Fishing: Propagation of Fish, Shellfish, Game and Other Aquatic Life; secondary contact recreation in and on the water; or for any other use requiring water of a lower quality.

[391-3-6-.03(6)]

Fishing,

1. Dissolved Oxygen - A daily average of 6.0 mg/L and no less than 5.0 mg/L at all times for water designated as trout streams by the Wildlife Resources Division. A daily average of 5.0 mg/L and no less than 4.0 mg/L at all times for waters supporting warm water species of fish.
2. pH - Within the range of 6.0 to 8.5.

3. Bacteria - For the months of May through October, when water contact recreation activities are expected to occur, fecal coliform not to exceed a geometric mean of 200 per 100 mL based on at least four samples collected from a given sampling site over a 30-day period at intervals not less than 24 hours. Should water quality and sanitary studies show fecal coliform levels from non-human sources exceed 200/100 mL (geometric mean) occasionally, then the allowable geometric mean fecal coliform shall not exceed 300 per 100 mL in lakes and reservoirs and 500 per 100 ml in free flowing freshwater streams. For the months of November through April, fecal coliform not to exceed a geometric mean of 1,000 per 100 mL based on at least four samples collected from a given sampling site over a 30-day period at intervals not less than 24 hours and not to exceed a maximum of 4,000 per 100 ml for any sample.
4. Temperature - Not to exceed 90°F. At no time is the temperature of the receiving waters to be increased more than 5°F above intake temperature except that in estuarine waters the increase will not be more than 1.5°F. In stream designated as secondary trout waters, there shall be no elevation exceeding 2°F natural stream temperatures.
5. Toxic Wastes, Other Deleterious Materials - None in concentrations that would harm man, fish, and game or other beneficial aquatic life.

### 3.2 Ambient Information

Outfall ID	7Q10 (cfs)	1Q10 (cfs)	Hardness as CaCO <sub>3</sub> (mg/L)	Annual Average Flow (cfs)	Upstream Total Suspended Solids (mg/l)
001	0.0	0.0	25 <sup>1</sup>	0.0	4

<sup>1</sup> For the Reasonable Potential Analysis calculations, EPD used 25 mg/l as a conservative value.

### 3.3 Georgia 305(b)/303(d) List Documents

Mineral Springs Branch, Reach #031300020506 Newnan Downstream from Bonnell, is listed as Not Supporting the designated use.

Reach Name/ ID #/ Data Source	Reach Location/ County	River Basin/ Use	Criterion Violated	Potential Causes	Extent	Category	Priority	Notes
Mineral Springs Branch R031300020506	Newnan Downstream from Bonnell Coweta County	Chattahoochee Fishing	Bio F	UR	3 miles	4a		TMDLs completed Bio F 2003 & Tax 2003.
1.2.4								

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### **3.4 Total Maximum Daily Load (TMDL)**

There was a TMDL developed for toxicity in Mineral Spring Branch in 2003. This TMDL establishes a wasteload allocation of 1.0 TU<sub>c</sub> for Bon L. The TMDL further states that the allocation does not automatically result in permit limits or monitoring requirements and that GA EPD will determine through its NPDES permitting process whether this discharge has a reasonable potential to be chronically toxic and apply appropriate requirements. After evaluation of the application submitted by Bon L, EPD has made the determination that chronic WET testing shall be conducted annually in the permit reissuance.

In addition, there was a TMDL developed for Biota Impairment in the Chattahoochee River Basin in 2003. This TMDL contains sediment loading allocations, including a waste load allocation of a daily maximum of 301.0 lbs/day TSS and an annual loading of 54.9 tons/year for Bon L. The WLA loads were calculated based on the average measured flow and average daily permitted TSS concentration level.

### **3.5 Wasteload Allocation – (03/16/2017)**

A wasteload allocation request was submitted March 16, 2017 and was completed by the Watershed Planning and Monitoring Program (See Appendix A – Wasteload Allocation).

## **4.0 EFFLUENT LIMITS AND PERMIT CONDITIONS**

### **4.1 Reasonable Potential Analysis (RP)**

Title 40 of the Federal Code of Regulations, 40 CFR 122.44(d) requires delegated States to develop procedures for determining whether a discharge causes, has the reasonable potential to cause, or contributes to an instream excursion above a narrative or numeric criteria within a State water. If such reasonable potential is determined to exist, the NPDES permit must contain pollutant effluent limits and/or effluent limits for whole effluent toxicity. Georgia's Reasonable Potential Procedures are based on Georgia's Rules and Regulations for Water Quality Control (Rules), Chapter 391-3-6-.06(4)(d)5. The chemical specific and biomonitoring data and other pertinent information in EPD's files will be considered in accordance with the review procedures specified in the Rules in the evaluation of a permit application and in the evaluation of the reasonable potential for an effluent to cause an exceedance in the numeric or narrative criteria.

A Reasonable Potential Analysis was performed on the data submitted with the application and the results of those analyses are stated below in the following sections.

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EPD evaluated the data provided in the application and supporting documents. If a pollutant is listed below, EPD determined it was a pollutant of concern and there may be a reasonable potential to cause or contribute to an instream violation of the GA Water Quality Standards. If a pollutant is not listed below, EPD determined that the pollutant is not a pollutant of concern or has determined, based on the data provided in the application, there is no reasonable potential to cause or contribute to an instream violation of the GA Water Quality Standards. An example would be if the applicant reported “not detect,” “below detection limit,” or a value that was below the detection limit for a pollutant.

## 4.2 Applicable Water Quality and Technology Based Effluent Limitations

### Water Quality Based Effluent Limits (WQBELs)

When drafting a National Pollutant Discharge Elimination System (NPDES) permit, a permit writer must consider the impact of the proposed discharge on the quality of the receiving water. Water quality goals for a waterbody are defined by state water quality standards. By analyzing the effect of a discharge on the receiving water, a permit writer could find that technology-based effluent limitations (TBELs) alone will not achieve the applicable water quality standards. In such cases, the Clean Water Act (CWA) and its implementing regulations require development of water quality-based effluent limitations (WQBELs). WQBELs help meet the CWA objective of restoring and maintaining the chemical, physical, and biological integrity of the nation’s waters and the goal of water quality that provides for the protection and propagation of fish, shellfish, and wildlife and recreation in and on the water (*fishable/swimmable*).

WQBELs are designed to protect water quality by ensuring that water quality standards are met in the receiving water and downstream uses are protected. On the basis of the requirements of Title 40 of the *Code of Federal Regulations* (CFR) 125.3(a), additional or more stringent effluent limitations and conditions, such as WQBELs, are imposed when TBELs are not sufficient to protect water quality.

The term *pollutant* is defined in CWA section 502(6) and § 122.2. Pollutants are grouped into three categories under the NPDES program: conventional, toxic, and nonconventional. Conventional pollutants are those defined in CWA section 304(a)(4) and § 401.16 (BOD<sub>5</sub>, TSS, fecal coliform, pH, and oil and grease). Toxic (priority) pollutants are those defined in CWA section 307(a)(1) and include 126 metals and manmade organic compounds. Nonconventional pollutants are those that do not fall under either of the above categories (conventional or toxic pollutants) and include parameters such as chlorine, ammonia, nitrogen, phosphorus, chemical oxygen demand (COD), and whole effluent toxicity (WET).

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### Applicable Technology Based Effluent Limits (TBELs)

Technology-based effluent limitations aim to prevent pollution by requiring a minimum level of effluent quality that is attainable using demonstrated technologies for reducing discharges of pollutants or pollution into the waters of the United States. TBELs are developed independently of the potential impact of a discharge on the receiving water, which is addressed through water quality standards and water quality-based effluent limitations. The NPDES regulations at Title 40 of the Code of Federal Regulations 125.3(a) require NPDES permit writers to develop technology-based treatment requirements, consistent with CWA section 301(b), that represent the minimum level of control that must be imposed in a permit. The regulation also indicates that permit writers must include in permits additional or more stringent effluent limitations and conditions, including those necessary to protect water quality.

For pollutants not specifically regulated by Federal Effluent Limit Guidelines, the permit writer must identify any needed technology-based effluent limitations and utilize best professional judgment to establish technology-based limits or determine other appropriate means to control its discharge if there is a reasonable potential to cause or contribute to a violation of the water quality standards.

#### **4.3 Conventional Pollutants**

<b>Pollutants of Concern</b>	<b>Basis</b>
pH	<u>WQBEL</u> The instream waste concentration is 100%. When the instream waste concentration is above 50%, it results in a reasonable potential to cause or contribute to violation of the instream Georgia Water Quality Standard; therefore a limit of 6.0 s.u. to 8.5 s.u has been added.
	<u>TBEL</u> There is no applicable federal technology based effluent limit.
Total Suspended Solids	<u>WQBEL</u> A TMDL for Biota Impairment was established in 2003 and established a daily maximum loading of 301 lbs/day for TSS and an annual loading of 54.9 tons/year (301 lbs/day x 365). Daily average and daily maximum effluent limits of 301 lbs/day have been included in the permit.
	<u>TBEL</u> There is no applicable federal technology based effluent limit.

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#### 4.4 Nonconventional Pollutants

Pollutants of Concern	Basis
Total Phosphorus	<u>WQBEL</u> Per the Strategy for Addressing Phosphorus in NPDES Permitting (the Strategy is available to review on EPD's website) all routine permit reissuances must include phosphorus monitoring.
	<u>TBEL</u> There is no applicable federal technology based effluent limit.

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#### 4.5 Toxics & Manmade Organic Compounds (126 priority pollutants and metals)

Pollutants of Concern	Basis
Cadmium	<u>WQBEL</u> Based on the data provided in the application there is a reasonable potential to cause or contribute to an instream violation of the GA Water Quality Standard for Cadmium.  Mass based effluent limits of 0.00025 lbs/day daily average and 0.00141 lbs/day daily maximum, as well as concentration based effluent limits of 0.00039 mg/L daily average and 0.00217 mg/L daily maximum, have been added to the permit. There is a 48 month compliance schedule to meet the effluent limitations.
	<u>TBEL</u> There is no applicable federal technology based effluent limit.
Copper	<u>WQBEL</u> Based on the data provided in the application there is a reasonable potential to cause or contribute to an instream violation of the GA Water Quality Standard for Copper.  Mass based effluent limits of 0.00472 lbs/day daily average and 0.00627 lbs/day daily maximum, as well as concentration based effluent limits of 0.00725 mg/L daily average and 0.00963 mg/L daily maximum, have been added to the permit. There is a 48 month compliance schedule to meet the effluent limitations.
	<u>TBEL</u> There is no applicable federal technology based effluent limit.

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Nickel

WQBEL

Based on the data provided in the application there is a reasonable potential to cause or contribute to an instream violation of the GA Water Quality Standard for Nickel.

Mass based effluent limits of 0.0215 lbs/day daily average and 0.0323 lbs/day daily maximum, as well as concentration based effluent limits of 0.0331 mg/L daily average and 0.0497 mg/L daily maximum, have been added to the permit. Daily maximum was calculated as 1.5 times the daily average. There is a 48 month compliance schedule to meet the effluent limitations.

TBEL

There is no applicable federal technology based effluent limit.

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Zinc

WQBEL

Based on the data provided in the application there is a reasonable potential to cause or contribute to an instream violation of the GA Water Quality Standard for Zinc.

Mass based effluent limits of 0.0736 lbs/day daily average and 0.0736 lbs/day daily maximum, as well as concentration based effluent limits of 0.113 mg/L daily average and 0.113 mg/L daily maximum, have been added to the permit. There is a 48 month compliance schedule to meet the effluent limitations.

TBEL

There is no applicable federal technology based effluent limit.

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Selenium

WQBEL

Based on the data provided in the application there is a reasonable potential to cause or contribute to an instream violation of the GA Water Quality Standard for Selenium.

Mass based effluent limits of 0.00325 lbs/day daily average and 0.00488 lbs/day daily maximum, as well as concentration based effluent limits of 0.0050 mg/L daily average and 0.0075 mg/L daily maximum, have been added to the permit. Daily maximum was calculated as 1.5 times the daily average. There is a 48 month compliance schedule to meet the effluent limitations.

TBEL

There is no applicable federal technology based effluent limit.

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## 4.6 Calculations for Water Quality Based Effluent Limits

### 4.6.a Instream Waste Concentration (IWC)

#### Outfall 001

$$\text{IWC} = \frac{\text{Effluent Flow (gal/day)}}{\text{Effluent Flow (gal/day)} + 7\text{Q10 (gal/day)}}$$

$$\text{IWC} = \frac{78,000 \text{ (gal/day)}}{(78,000 \text{ (gal/day)} + 0 \text{ (gal/day)})}$$

$$\text{IWC} = 1 \text{ or } 100\%$$

### 4.6.b Metals

See the calculations for applicable metals in Appendix B of Fact Sheet

#### Outfall 001: Cadmium

##### Mass Based Limits

Daily Average Loading = Chronic  $C_T$

$$\text{Chronic } C_T = \frac{\frac{\text{WQC}_{\text{Chronic}} \times (Q_E + 7\text{Q10})}{f_D}}{Q_E}$$

Daily Average = 0.00012 (kg/day)

Daily Average (lbs/day) = 2.2046 x Daily Average (kg/day)

Daily Average (lbs/day) = 2.2046 x 0.00012 (kg/day)

Daily Average: 0.00025(lbs/day)

Daily Maximum Loading = Acute  $C_T$

$$\text{Acute } C_T = \frac{\frac{\text{WQC}_{\text{Acute}} \times (Q_E + 1\text{Q10})}{f_D}}{Q_E}$$

Daily Maximum = 0.00064 (kg/day)

Daily Maximum (lbs/day) = 2.2046 x Daily Maximum (kg/day)

Daily Maximum (lbs/day) = 2.2046 x 0.00064 (kg/day)

Daily Maximum = 0.00141(lbs/day)

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### Concentration Based Limits

Daily Average Concentration = Chronic  $C_T$

$$\text{Chronic } C_T = \frac{\frac{WQC_{\text{Chronic}} \times (Q_E + 7Q_{10})}{f_D}}{Q_E}$$

Daily Average = 0.39 ( $\mu\text{g/L}$ )

Daily Average (mg/L) = 0.001 x Daily Average ( $\mu\text{g/L}$ )

Daily Average (mg/L) = 0.001 x 0.39 ( $\mu\text{g/L}$ )

Daily Average: 0.00039 (mg/L)

Daily Maximum Concentration = Acute  $C_T$

$$\text{Acute } C_T = \frac{\frac{WQC_{\text{Acute}} \times (Q_E + 1Q_{10})}{f_D}}{Q_E}$$

Daily Maximum = 2.17 ( $\mu\text{g/L}$ )

Daily Maximum (mg/L) = 0.001 x Daily Maximum ( $\mu\text{g/L}$ )

Daily Maximum (mg/L) = 0.001 x 2.17 ( $\mu\text{g/L}$ )

Daily Maximum = 0.00217(mg/L)

#### **4.7 Technology Based Effluent Limitation Calculations**

There are several ways to calculate TBELs when developing a case-by-case limitations. EPD can use an approach consistent with the statistical approach EPA has used to develop effluent guidelines or they can utilize several other mathematically and statistically accepted approaches depending on characteristics of the data. In general, EPD utilizes EPA's "NPDES Permit Writer Manual," September 2010, Section 5.2.3, "Case-by-Case TBELs for Industrial Dischargers" and EPA's "Technical Support Document for Water Quality Based Toxic Control," March 1991, Section 5.2, "Basis Principles of Effluent Variability," as guidance to develop limits.

If applicable, when there is no federal technology based effluent limit EPD evaluates the effluent data, operating records and discharge monitoring reports to calculate the long term average for the parameter. The long term average is then used to derive the effluent limits.

EPD recognizes there are several ways to calculate technology based limits and, when applicable, may deviate from the general practice.

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#### 4.8 Comparison & Summary of Water Quality vs. Technology Based Effluent Limits

After preparing and evaluating applicable technology-based effluent limitations and water quality-based effluent limitations, the most stringent limits are applied in the permit. Pollutants of concern with an effluent limit of monitor and report are not included in the below table.

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Parameter	WQBELs	TBELs	Explanation
Total Suspended Solids (lbs/day)	301	None	TMDL
pH (s.u.)	6.0 – 8.5	None	WQBEL
Cadmium, Total	0.00026/0.00141 (lbs/day) 0.00039/0.00217 (mg/L)	None	WQBEL
Copper, Total	0.00473/0.00628 (lbs/day) 0.00725/0.00963 (mg/L)	None	WQBEL
Nickel, Total	0.0216/0.0324 (lbs/day) 0.0331/0.0497 (mg/L)	None	WQBEL
Zinc, Total	0.0738/0.0738 (lbs/day) 0.1130/0.1130 (mg/L)	None	WQBEL
Selenium, Total	0.00326/0.00489 (lbs/day) 0.0050/0.00750 (mg/L)	None	WQBEL

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#### 5.0 OTHER PERMIT REQUIREMENTS AND CONSIDERATIONS

##### 5.1 Compliance Schedule

The following 48 month compliance schedule has been included to install additional treatment to meet the new effluent limitations.

1. The permittee shall achieve compliance with the effluent limitations specified for discharges in accordance with the following schedule:
  - a. The effluent limitations and monitoring specified in Part I A.1.a are effective on the effective date of this permit, except as specified below.
  - b. The permittee shall achieve compliance with the cadmium, total; copper, total; nickel, total; zinc, total; and selenium, total specified in Part I A.1.b of this permit in accordance with the following schedule.

- 
- (i) Beginning on the effective date of this permit and continuing for 48 months, the permittee shall start monitoring and reporting for cadmium, total; copper, total; nickel, total; zinc, total; and selenium, total in accordance with Part I A.1.a of this permit.
  - (ii) Within 48 months of the effective date of this permit, the permittee shall achieve compliance with the cadmium, total; copper, total; nickel, total; zinc, total; and selenium, total limitations specified in Part I A.1.b of this permit.

## **5.2 Anti-Backsliding**

The limits in this permit are in compliance with the 40 C.F.R. 122.44(l), which requires a reissued permit to be as stringent as the previous permit.

## **6.0 REPORTING**

The facility has been assigned to the following EPD office for reporting, compliance and enforcement.

Georgia Environmental Protection Division  
Watershed Compliance Program  
2 Martin Luther King Jr. Drive  
Suite 1152 East  
Atlanta, Georgia 30334

### **6.1 E-Reporting**

The permittee is required to electronically submit documents in accordance with 40 CFR Part 127.

## **7.0 REQUESTED VARIANCES OR ALTERNATIVES TO REQUIRED STANDARDS**

Not applicable

## **8.0 PERMIT EXPIRATION**

The permit will expire five years from the effective date.

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## **9.0 PROCEDURES FOR THE FORMULATION OF FINAL DETERMINATIONS**

### **9.1 Comment Period**

The Georgia Environmental Protection Division (EPD) proposes to issue a permit to this applicant subject to the effluent limitations and special conditions outlined above. These determinations are tentative.

Georgia Environmental Protection Division  
Wastewater Regulatory Program  
2 Martin Luther King Jr. Drive  
Suite 1152 East  
Atlanta, Georgia 30334

The permit application, draft permit, and other information are available for review at 2 Martin Luther King Jr. Drive, Suite 1152 East, Atlanta, Georgia 30334, between the hours of 8:00 a.m. and 4:30 p.m., Monday through Friday. For additional information, you can contact 404-463-1511.

### **9.2 Public Comments**

Persons wishing to comment upon or object to the proposed determinations are invited to submit same in writing to the EPD address above, or via e-mail at [EPDcomments@dnr.ga.gov](mailto:EPDcomments@dnr.ga.gov) within 30 days of the initiation of the public comment period. All comments received prior to that date will be considered in the formulation of final determinations regarding the application. The permit number should be placed on the top of the first page of comments to ensure that your comments will be forwarded to the appropriate staff.

### **9.3 Public Hearing**

Any applicant, affected state or interstate agency, the Regional Administrator of the U.S. Environmental Protection Agency (EPA) or any other interested agency, person or group of persons may request a public hearing with respect to an NPDES permit application if such request is filed within thirty (30) days following the date of the public notice for such application. Such request must indicate the interest of the party filing the request, the reasons why a hearing is requested, and those specific portions of the application or other NPDES form or information to be considered at the public hearing.

The Director shall hold a hearing if he determines that there is sufficient public interest in holding such a hearing. If a public hearing is held, notice of same shall be provided at least thirty (30) days in advance of the hearing date.

In the event that a public hearing is held, both oral and written comments will be accepted; however, for the accuracy of the record, written comments are encouraged. The Director or a designee reserves the right to fix reasonable limits on the time allowed for oral statements and such other procedural requirements, as deemed appropriate.

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Following a public hearing, the Director, unless it is decided to deny the permit, may make such modifications in the terms and conditions of the proposed permit as may be appropriate and shall issue the permit.

If no public hearing is held, and, after review of the written comments received, the Director determines that a permit should be issued and that the determinations as set forth in the proposed permit are substantially unchanged, the permit will be issued and will become final in the absence of a request for a contested hearing. Notice of issuance or denial will be made available to all interested persons and those persons that submitted written comments to the Director on the proposed permit.

If no public hearing is held, but the Director determines, after a review of the written comments received, that a permit should be issued but that substantial changes in the proposed permit are warranted, public notice of the revised determinations will be given and written comments accepted in the same manner as the initial notice of application was given and written comments accepted pursuant to EPD Rules, Water Quality Control, subparagraph 391-3-6-.06(7)(b). The Director shall provide an opportunity for public hearing on the revised determinations. Such opportunity for public hearing and the issuance or denial of a permit thereafter shall be in accordance with the procedures as are set forth above.

#### **9.4 Final Determination**

At the time that any final permit decision is made, the Director shall issue a response to comments. The issued permit and responses to comments can be found at the following address:

<http://epd.georgia.gov/watershed-protection-branch-permit-and-public-comments-clearinghouse-0>

#### **9.5 Contested Hearings**

Any person who is aggrieved or adversely affected by the issuance or denial of a permit by the Director of EPD may petition the Director for a hearing if such petition is filed in the office of the Director within thirty (30) days from the date of notice of such permit issuance or denial. Such hearing shall be held in accordance with the EPD Rules, Water Quality Control, subparagraph 391-3-6-.01.

Petitions for a contested hearing must include the following:

1. The name and address of the petitioner;
2. The grounds under which petitioner alleges to be aggrieved or adversely affected by the issuance or denial of a permit;
3. The reason or reasons why petitioner takes issue with the action of the Director;
4. All other matters asserted by petitioner which are relevant to the action in question.

## **Appendix A – Wasteload Allocation**



**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

Memorandum

Date: March 16, 2017  
 To: Josh Welte  
 Through: Audra Dickson  
 From: Ian McDowell  
 Subject: Permit Information Request for Reasonable Potential of Stream  
 Bon L Manufacturing Co.  
 NPDES Permit No. GA000057  
 Coweta County, Chattahoochee River Basin

This is a request for permit information for the reasonable potential of the stream for the reissuance of the above referenced facility.

**Wastewater Regulatory Program**  
*(Duplicate this section for each outfall)*

Outfall No.: 001	Lat/Long: 33.380594° N, 84.821483° W
Name of Receiving Waters: Unnamed Tributary to Mineral Springs Branch	River Basin: Chattahoochee River Basin
Average Flow (mgd): 0.060	Maximum (Design) Flow (mgd): 0.078
Summer Temperature (max): N/A	Winter Temperature (max): 21.10 °C

**Watershed Planning and Monitoring Program**

Please provide the following items about the receiving stream and indicate "NA" if an item does not apply.

- 7Q10 0 cfs
- 1Q10 0 cfs
- Mean Annual Stream Flow 0.2 cfs
- Receiving Stream Hardness 35 mg/L as CaCO3
- Upstream TSS 4 mg/L



## **Appendix B – Reasonable Potential Analysis**

## Reasonable Potential Analysis for Freshwater

Permit Name: Bon I. Manufacturing Co.  
NPDES Permit No. GA0000507

**Stream Data:**

Receiving stream Hardness:	25	mg/L
Upstream TSS:	4	mg/L
7Q10:	0.00	ft <sup>3</sup> /s
	0	gal/day
1Q10:	0.00	ft <sup>3</sup> /s
	0	gal/day

**Effluent Data:**

Flow	78,000	gal/day
TSS	6.00	mg/L
Instream TSS:	6.00	mg/L
Acute Dilution factor:	1.00	
Chronic Dilution factor:	1.00	

**Water Quality Criteria:**

Mean annual streamflow at discharge:	0.20	ft <sup>3</sup> /s
	129,254	gal/day
Dilution factor:	2.657	
IWC	100	

$$IWC = \frac{Flow \left( \frac{gal}{day} \right)}{Flow \left( \frac{gal}{day} \right) + 7Q10 \left( \frac{gal}{day} \right)}$$

**Acute Water Quality Criteria (WQC<sub>Acute</sub>)**

Metal	K <sub>10</sub>	α	f <sub>D</sub>	Maximum effluent C <sub>T</sub> (μg/L)	Instream C <sub>D</sub> (μg/L)	WQC <sub>Acute</sub> (μg/L)	Action needed?
Arsenic	4.80.E+05	-0.729	0.00	0.00	0.00	340.00	no
Cadmium	4.00.E+06	-1.131	0.240	11.80	2.83	0.52	yes
Chromium III	3.36.E+06	-0.930	0.00	0.00	0.00	183.07	no
Chromium VI	3.36.E+06	-0.930	0.00	0.00	0.00	16.00	no
Copper	1.04.E+06	-0.744	0.38	755.00	285.29	3.64	yes
Lead	2.80.E+06	-0.800	0.00	0.00	0.00	13.88	no
Mercury	NA	NA	NA	0.0000	0.0000	1.40	no
Nickel	4.90.E+05	-0.572	0.49	50.50	24.57	144.92	no
Zinc	1.25.E+06	-0.704	0.32	5790.00	1852.69	36.20	yes

$$Acute \text{ Dilution Factor} = \frac{1Q10 \left( \frac{gal}{day} \right) + Flow \left( \frac{gal}{day} \right)}{Flow \left( \frac{gal}{day} \right)}$$

**Chronic Water Quality Criteria (WQC<sub>Chronic</sub>)**

Metal	K <sub>10</sub>	α	f <sub>D</sub>	Average effluent C <sub>T</sub> (μg/L)	Instream C <sub>D</sub> (μg/L)	WQC <sub>Chronic</sub> (μg/L)	Action needed?
Arsenic	4.80.E+05	-0.729	0.00	0.00	0.00	150.00	no
Cadmium	4.00.E+06	-1.131	0.240	11.80	2.83	0.09	yes
Chromium III	3.36.E+06	-0.930	0.00	0.00	0.00	23.81	no
Chromium VI	3.36.E+06	-0.930	0.00	0.00	0.00	11.00	no
Copper	1.04.E+06	-0.744	0.38	755.00	285.29	2.74	yes
Lead	2.80.E+06	-0.800	0.00	0.00	0.00	0.54	no
Mercury	NA	NA	NA	0.0000	0.0000	0.012	no
Nickel	4.90.E+05	-0.572	0.49	50.50	24.57	16.10	yes
Zinc	1.25.E+06	-0.704	0.32	5790.00	1852.69	36.50	yes
Selenium	NA	NA	NA	11.60	11.60	5.00	yes

$$f_D = \frac{1}{1 + K_{10} \times TSS_{Inst}(mg/L)^{0.110} \times 10^{-6}}$$

$$Instream \ C_D = \frac{Effluent \ C_T \ (mg/L) \times f_D}{DF} \ \text{mg/L}$$

$$Chronic \ \text{Dilution Factor} = \frac{7Q10 \left( \frac{gal}{day} \right) + Flow \left( \frac{gal}{day} \right)}{Flow \left( \frac{gal}{day} \right)}$$

**Total Recoverable Effluent Limit**

Metal	C <sub>S</sub> (μg/L)	Chronic C <sub>T</sub> (μg/L)		Acute C <sub>T</sub> (μg/L)	
		30-Day Avg	30-Day Avg	Daily Max	Daily Max
Arsenic	0.0	N/A	N/A	N/A	N/A
Cadmium	0.0	0.39	0.00025	2.17	0.00141
Chromium III	0.0	N/A	N/A	N/A	N/A
Chromium VI	0.0	N/A	N/A	N/A	N/A
Copper	0.0	7.25	0.00472	9.63	0.00627
Lead	0.0	N/A	N/A	N/A	N/A
Mercury	0.0	N/A	N/A	N/A	N/A
Nickel	0.0	33.08	0.0215	N/A	N/A
Zinc	0.0	114.06	0.0742	113.14	0.0736
Selenium	0.0	5.00	0.00325	--	--

$$(1) \ Acute \ C_T = \frac{WQC_{Acute} \times (Q_E + 1Q10) - (1Q10 \times C_S)}{Q_E}$$

$$Chronic \ C_T = \frac{WQC_{Chronic} \times (Q_E + 7Q10) - (7Q10 \times C_S)}{Q_E}$$

$$(2) \ Acute \ C_T = \frac{WQC_{Acute} \times (Q_E + 1Q10)}{Q_E}$$

$$Chronic \ C_T = \frac{WQC_{Chronic} \times (Q_E + 7Q10)}{Q_E}$$

**NOTES:**

- (1) Chronic and acute total recoverable metal effluent concentration (C<sub>T</sub>) from EPA 823-B-96-007, June 1996, page 33:
- (2) Assuming background dissolved metal concentration (C<sub>S</sub>) in the stream is 0 μg/L, equations above become:

**NOTES:**

- \*Water Quality Criteria (WQC) from State of Georgia Rules and Regulations 391-3-6-.03.
- \*If the calculated instream concentration is less than 50% of the instream water quality criteria, then the constituent will be considered not to be present at levels of concern in the effluent and it will not be included in the permit.
- \*If the calculated instream concentration is 50% or more of the instream water quality criteria, then a permit limit for that constituent will be placed in the permit.

# **Appendix C – Integrated RCRA/NPDES Compliance Strategy Workplan**

**BONNELL PRETREATMENT PERMITTING SCHEDULE**

ID	Task Name	Calendar days	Start	Finish	2017	2018	2019	2020	2021
1	Bonnell Pretreatment Permitting Schedule	1687 days	8/12/16	3/26/21	[Gantt bar spanning from 8/12/16 to 3/26/21]				
2	Pretreatment Permit	999 days	8/12/16	9/15/17	[Gantt bar spanning from 8/12/16 to 9/15/17]				
3	Prepare and submit pretreatment permit application to Newnan Utilities	235 days	8/12/16	4/3/17	[Gantt bar spanning from 8/12/16 to 4/3/17]				
4	Newnan Utilities issued first draft pretreatment permit	0 days	7/3/17	7/3/17	[Milestone diamond at 7/3/17]				
5	Bonnell provided comments on first draft pretreatment permit	0 days	7/14/17	7/14/17	[Milestone diamond at 7/14/17]				
6	Newnan Utilities issued second draft pretreatment permit	0 days	8/4/17	8/4/17	[Milestone diamond at 8/4/17]				
7	Bonnell provided comments on second draft pretreatment permit	0 days	8/15/17	8/15/17	[Milestone diamond at 8/15/17]				
8	Newnan Utilities issue final pretreatment permit	0 days	9/15/17	9/15/17	[Milestone diamond at 9/15/17]				
9	Discharge Industrial wastewater to Newnan Utilities	0 days	9/15/17	9/15/17	[Milestone diamond at 9/15/17]				
10	NPDES Permit	1584 days	2/1/17	3/28/21	[Gantt bar spanning from 2/1/17 to 3/28/21]				
11	Implement wastewater treatment system infrastructure improvements	151 days	2/1/17	7/1/17	[Gantt bar spanning from 2/1/17 to 7/1/17]				
12	Submit NPDES permit modification application to EPD	0 days	7/31/17	7/31/17	[Milestone diamond at 7/31/17]				
13	Submit signed NPDES permit modification application and gantt chart to EPD	0 days	9/13/17	9/13/17	[Milestone diamond at 9/13/17]				
14	EPD issue revised NPDES permit	0 days	9/15/17	9/15/17	[Milestone diamond at 9/15/17]				
15	Revised/Vacate NPDES Permit	0 days	3/26/21	3/26/21	[Milestone diamond at 3/26/21]				
16	RCRA Permit	1499 days	1/17/17	2/23/21	[Gantt bar spanning from 1/17/17 to 2/23/21]				
17	Submit RCRA - NPDES Compliance Strategy Report	0 days	1/17/17	1/17/17	[Milestone diamond at 1/17/17]				
18	Submit Temporary Authorization to EPD detailing alternative remedial strategy	0 days	10/6/17	10/6/17	[Milestone diamond at 10/6/17]				
19	Receipt of Temporary Authorization approval from EPD	0 days	12/8/17	12/8/17	[Milestone diamond at 12/8/17]				
20	Implement alternative remedial strategy under Temporary Authorization	152 days	12/13/17	5/11/18	[Gantt bar spanning from 12/13/17 to 5/11/18]				
21	Submit RCRA Part B Permit Modification request	0 days	12/15/17	12/15/17	[Milestone diamond at 12/15/17]				
22	Receipt of RCRA Part B Permit Modification approval from EPD	0 days	6/18/18	6/18/18	[Milestone diamond at 6/18/18]				
23	Implement elements of the RCRA Part B Permit Modification	189 days	6/19/18	12/24/18	[Gantt bar spanning from 6/19/18 to 12/24/18]				
24	Complete 4 quarters of effectiveness monitoring	278 days	1/1/19	10/1/19	[Gantt bar spanning from 1/1/19 to 10/1/19]				
25	Submit RCRA Part B Permit Modification request for remedy optimization	0 days	4/10/20	4/10/20	[Milestone diamond at 4/10/20]				
26	Receipt of RCRA Part B Permit Modification approval from EPD	0 days	10/12/20	10/12/20	[Milestone diamond at 10/12/20]				
27	Implement elements of the RCRA Part B Permit Modification	134 days	10/13/20	2/23/21	[Gantt bar spanning from 10/13/20 to 2/23/21]				

Pretreatment Permitting Schedule  
Bon L Manufacturing Co.  
Newnan, GA

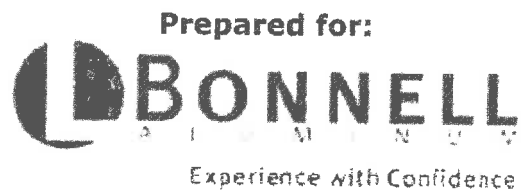
Project: Bonnell Pretreatment Permitting  
Date: 9/12/17

Task  Milestone  Summary  Progress

**ATTACHMENT 3**

**INTEGRATED RESOURCE CONSERVATION AND RECOVERY ACT  
(RCRA)/NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM  
(NPDES) COMPLIANCE STRATEGY WORK PLAN**

**BONNELL ALUMINUM  
NEWNAN, GEORGIA**



**BON L MANUFACTURING COMPANY**

**25 BONNELL STREET  
NEWNAN, GEORGIA 30263**

**MAY 5, 2016**

**PREPARED BY:**



**AMEC FOSTER WHEELER ENVIRONMENT & INFRASTRUCTURE, INC.  
1075 BIG SHANTY ROAD NW, SUITE 100  
KENNESAW, GEORGIA 30144**

**INTEGRATED RCRA/NPDES COMPLIANCE STRATEGY WORK PLAN**

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**INTEGRATED RCRA/NPDES COMPLIANCE STRATEGY WORK PLAN**

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**INTEGRATED RCRA/NPDES COMPLIANCE STRATEGY WORK PLAN**

**ACRONYMS AND ABBREVIATIONS**

<b>ACRONYM</b>	<b>DEFINITION</b>
Amec Foster Wheeler	Amec Foster Wheeler Environment & Infrastructure, Inc.
Bon L	Bon L Manufacturing Company
CFR	Code of Federal Regulations
CSM	Conceptual Site Model
EPD	Georgia Environmental Protection Division
GAC	Granular activated carbon
GWPS	Groundwater Protection Standard
GWTS	Groundwater Treatment System
HSS	Hillside Spring
ISCO	In-Situ Chemical Oxidation
LPC	Low Point Collector
MNA	Monitored Natural Attenuation
NPDES	National Pollutant Discharge Elimination System
P&T	Pump-and-treat
PCC Permit	Post Closure Care Permit – September 29, 2014
PCE	Tetrachloroethene
PRB	Passive reactive barrier
RCRA	Resource Conservation and Recovery Act
RW	Recovery well
Site	Bon L Newnan Georgia Facility
S.U.	Standard units
SUO	Sewer Use Ordinance
SWMU	Solid Waste Management Unit
USEPA	United States Environmental Protection Agency
VOC	Volatile organic compounds
Work Plan	Integrated RCRA/NPDES Compliance Strategy Work Plan
ZVI	Zero-valent iron

## **SECTION 1 INTRODUCTION**

### **1.1 SITE BACKGROUND**

Bon L Manufacturing Co. (Bon L) has been an aluminum extruder and fabricator of custom aluminum extrusions for over sixty years. Bon L products are used in buildings, structures, automotive, consumer goods, electrical, machinery, and equipment for a variety of applications.

In accordance with provisions of the Georgia Hazardous Waste Management Act, the Bon L facility in Newnan, GA (Site) (Figure 1-1, Site Location Map) was issued a Post Closure Care Permit (PCC Permit), HW-087(D), by the Georgia Environmental Protection Division (EPD) in April 1992. This permit was issued for post closure care of five regulated units; the Aluminum Hydroxide Land Treatment Unit, the Chromium Hydroxide Landfill, the Tank Farm Unit, and the Hazardous Waste Management Area, which includes the Chromium Hydroxide Sand Drying Beds and Surface Impoundment Unit (Figure 1-2, Site Plan Map). The Permit has been maintained since 1992, and the most recent PCC Permit was issued to Bon L on September 29, 2014.

Since 1993, Bon L has followed an accepted corrective action plan to remediate groundwater at the Site. These activities have been intended to meet applicable groundwater protection standards (GWPS) primarily for chlorinated volatile organic compounds (VOCs) as defined in Bon L's PCC Permit.

Bon L is currently capturing groundwater at the Site via an extensive groundwater pump-and-treat (P&T) network and discharging the treated groundwater to an unnamed tributary of Mineral Springs Branch under National Pollutant Discharge Elimination System (NPDES) Permit GA0000507 via Outfall 001, as shown on Figure 1-2, Site Plan. The most recent NPDES Permit GA0000507 was issued to Bon L on September 20, 2010, for the discharge of process wastewater and treated groundwater. The NPDES Permit was set to expire August 31, 2015. A timely permit renewal application was submitted on February 27, 2015, to the EPD Industrial Permitting Unit. A preliminary Draft NPDES Permit was transmitted to Bon L on December 23, 2015. Bon L provided EPD with comments to the Draft NPDES Permit on January 12, 2016. The current 2010 NPDES Permit has been administratively extended. The administratively extended NPDES Permit has only one permitted outfall, Outfall 001, the final plant discharge.

### **1.2 PURPOSE AND OBJECTIVES**

Bon L is committed to compliance with the various environmental regulations related to its operations and has implemented extensive efforts at the Newnan facility related to achieving compliance, including water reuse, wastewater minimization, and groundwater remediation. Bon L is committed to maintaining

compliance with its permits and believes that a joint coordination between the RCRA and NPDES Programs will facilitate overall compliance for the Site.

There is no practical or economical way to treat the industrial process wastewater to meet the proposed ammonia limits. Therefore, Bon L is seeking to divert the industrial process wastewater and storm water portion of the discharge to Newnan Utilities under an Industrial Wastewater Pre-treatment Permit. Bon L is negotiating with Newnan Utilities to achieve this goal.

Without the industrial process wastewaters in the discharge, Bon L anticipates being able to meet the ammonia limit at Outfall 001 if the discharge is only composed of groundwater, although some additional treatment may be required. However, the proposed low limits for metals would require major modifications to the groundwater treatment system. Analytical results indicate metals concentrations in the discharged effluent are associated with the groundwater and not the industrial process wastewaters. Therefore, Bon L is preparing to evaluate treatment and discharge options for the groundwater.

Although groundwater P&T methods have removed substantial quantities of VOC contaminants from the subsurface at the Site, it has not significantly reduced the overall extent of the contaminant plume at the Site. Figure 1-3, Tetrachloroethene (PCE) Contour Map, depicts the extent of PCE groundwater impacts at the Site as observed in September 2015. Bon L recognizes it is unlikely that the GWPS will be met at the Site within a reasonable timeframe relying solely on a P&T remedy and has been working with the Land Protection Branch to implement a more aggressive approach to remediate groundwater.

As outlined in Bon L's approved PCC Permit renewal application, Bon L has conducted seven rounds of in-situ chemical oxidation (ISCO) since 2012 by injecting sodium permanganate into the groundwater in the Packing/Loading area within the facility where the highest concentrations of VOCs are observed in groundwater. While the ISCO injections have been effective, Bon L plans to further optimize the remedy Site-wide through evaluation and implementation of in-situ groundwater treatment alternatives to meet the GWPS. Due to the significant resources associated with installing a new groundwater treatment system, Bon L's ability to implement more effective remedies to meet the GWPS would likely be hampered. By further optimizing and increasing effectiveness of the groundwater remedy with a departure from P&T, Bon L could discontinue discharge of treated groundwater facilitating compliance with both its NPDES and PCC Permits.

Bon L has prepared this Integrated RCRA/NPDES Compliance Strategy Work Plan (Work Plan) to facilitate compliance with both programs and meet the following objectives:

- develop planned activities to support groundwater remedy optimization,
- develop planned activities necessary to support diversion of the industrial process wastewater to Newnan Utilities, and

- provide a schedule for implementation of the Work Plan and submittal of a recommendations report for both the RCRA and NPDES programs.

## **SECTION 2 RCRA WORK PLAN**

### **2.1 BACKGROUND**

Groundwater impacts at the Site are primarily related to Solid Waste Management Unit (SWMU) 49, PCE Degreasing Unit. Bon L is currently working with EPD's risk assessment group to finalize GWPS for this SWMU as the GWPS for SWMU 49 are yet to be determined. Bon L has submitted a baseline risk assessment to EPD with calculated remedial goal options (Amec Foster Wheeler, 2016). Once the risk assessment is finalized, a permit modification will be needed to incorporate the GWPS for SWMU 49 into the PCC Permit. Approved remedial goals are necessary to support optimization of the groundwater remedy and ultimately meeting the GWPS. In addition to the risk assessment, Bon L has outlined tasks in the following Sections that are necessary to support remedy optimization.

### **2.2 CONCEPTUAL SITE MODEL UPDATE**

A conceptual site model (CSM) presents the current understanding of Site conditions. With an up-to-date CSM, an integrated remedial approach can be formulated for groundwater. The following tasks are proposed to update the CSM:

- improve Site-wide potentiometric surface information,
- develop detailed hydrogeologic geologic cross sections,
- evaluate groundwater chemistry for attenuation mechanisms, and
- identify potential metals source(s) in the Groundwater Treatment System (GWTS).

Developing a Site-wide potentiometric surface map(s) based on existing data and more extensive data will provide more detailed information regarding groundwater flow direction and velocity. Detailed geologic cross-sections will provide information regarding subsurface geology and assist in identifying preferred zones for groundwater movement. Further evaluation of groundwater water chemistry provides information regarding subsurface groundwater attenuation mechanisms. Detailing potential sources of metals in the GWTS will focus the remedial alternatives evaluation. This information will be integrated into a comprehensive approach to optimize the remedy to meet the GWPS.

#### **2.2.1 Site-Wide Potentiometric Surface Map Evaluation**

Potentiometric surface maps are developed for each semi-annual groundwater monitoring event. In general, these potentiometric surface maps are prepared using groundwater elevations from 59 existing monitoring wells: 38 groundwater monitoring wells (as listed in the PCC Permit) plus 21 monitoring wells sampled to monitor progress of the ISCO injections in the Packing/Loading area of the Site.

For the Site-wide potentiometric surface evaluation, the database will be expanded to include groundwater elevations from those same 59 monitoring wells plus an additional 21 monitoring wells listed as "Maintenance Only" in the PCC Permit. Additionally, groundwater elevations from the piezometers adjacent to the recovery wells (RWs) will also be collected and utilized in preparation of the Site-wide potentiometric surface maps as depicted in Figure 2-1, Groundwater Elevation Well Locations. Evaluating groundwater potentiometric surfaces in this manner provides more detailed information with respect to groundwater movement and allows for evaluation of groundwater drawdown near the RWs to evaluate the effectiveness of the current system.

Three Site-wide potentiometric surface maps will be developed in this manner to account for variations in the groundwater surface and movement. Data was collected during the first semi-annual groundwater monitoring event conducted in March 2016 to develop the first Site-wide potentiometric surface map. Similar data will be collected in June 2016 and September 2016 for development of the second and third potentiometric surface maps.

### **2.2.2 Develop Detailed Hydrogeological Cross Sections**

Subsurface soil profiles will be evaluated from available boring logs to develop three cross sections as shown in Figure 2-2, Proposed Cross Sections. One cross section (A-A'-A'") will begin at MW73S (in the Packing/Loading area) and continue along the direction of groundwater flow toward MW90D. The second cross section (B-B') will begin at MW45S (located west of the Aluminum Hydroxide Land Treatment Unit) and continue approximately perpendicular to groundwater flow toward MW92D. The third cross section (C-C') will begin at MW21D and continue along the north side of Washington Road to MW17D.

Data from monitoring wells, RWs and piezometers will be utilized in development of the cross-sections. In the event that data gaps are identified, a direct-push investigation or some other technique will be performed to furnish the required data. Cross sections A-A'-A' and B-B' will provide important information regarding subsurface lithology that will support understanding the groundwater flow pattern(s) through the Site. Cross Section C-C' will support understanding the subsurface lithology along the downgradient portion of the groundwater plume. This information will assist in identifying a remedial technology that may be implemented along the north side of Washington Road. These cross sections will support the development of a comprehensive approach to optimize the remedy to meet the GWPS.

### **2.2.3 Water Chemistry Evaluation**

Understanding groundwater conditions, including whether the subsurface conditions are primarily aerobic or anaerobic, will be helpful in evaluating remedial technology alternatives to more effectively address groundwater impacts. To evaluate water

chemistry conditions, groundwater quality parameters will be collected from select monitoring wells during the March 2016 and September 2016 groundwater monitoring events. The wells identified for collection of groundwater quality parameters are shown in Figure 2-3, Groundwater Quality Parameter Well Locations, and a summary of the planned analyses is provided in Table 2-1, Groundwater Quality Parameters. The groundwater quality parameter findings will be evaluated to determine whether the subsurface conditions are aerobic or anaerobic. In addition, potential variations of the aerobic/anaerobic conditions will be evaluated throughout the Site. A more complete understanding of groundwater conditions will provide insight into improved remedial alternatives.

Additionally, to further evaluate effectiveness of the ISCO injections, samples will be collected from select wells to evaluate residual permanganate in downgradient wells.

#### **2.2.4 Identify Metals Source in the Groundwater Treatment System**

The existing GWTS collects groundwater from twelve RWs and the Hillside Spring (HSS)/Low-Point Collector (LPC). Groundwater from these recovery wells and the HSS/LPC is treated via granular activated carbon (GAC) prior to discharge. Preliminary testing of the effluent from the existing GWTS indicates that some metals concentrations may exceed the proposed discharge limits as outlined in the Draft NPDES Permit. An evaluation to identify the source of the metals in the effluent will determine if the metals source is localized. Identification of potential sources will assist in evaluating whether an alternative remedial strategy may be beneficial in these areas. This evaluation will also support development of a remedial alternative that may allow the continued operation of the GWTS with a subset of RWs or HSS/LPC while maintaining compliance with the proposed metal discharge limits.

To determine the source of potential metals impacts, groundwater samples from the RWs, the HSS/LPC, and the GWTS influent and effluent will be analyzed for total metals concentrations (cadmium, copper, zinc, and selenium), total suspended solids, and pH. Analytical results from the groundwater samples collected from the recovery wells and HSS/LPC will be utilized to potentially identify a subset of wells that may continue to operate within the pending discharge limits while remedial alternatives are being evaluated. Samples will be collected monthly for six consecutive months beginning in April 2016.

#### **2.2.5 Develop CSM**

Using the information described above, an updated CSM will be developed. The updated CSM will be used to support the remedial strategy optimization.

## **2.3 REMEDIAL STRATEGY OPTIMIZATION**

The current remedial strategy utilizes groundwater P&T and ISCO with sodium permanganate to reduce VOC concentrations in Site groundwater. The overall strategy will be evaluated and optimized as follows:

1. Bon L will evaluate historical PCE concentration trends.
2. Bon L will prepare a groundwater model.
3. Bon L will evaluate alternative remedial technologies and propose a viable alternative.

### **2.3.1 Historical PCE Concentration Trend Evaluation**

Historical PCE concentration trend plots will be prepared to evaluate the remedial progress and current Site conditions, and to identify areas where the remedial efforts can be focused. Time trend plots will be prepared for each well in the current sampling schedule in accordance with Table IV of the PCC permit.

The time trend plots will be evaluated for trend, trend significance, and asymptotic conditions using regression analysis based on the techniques as described in Chapter 6 of *Methods for Evaluating the Attainment of Cleanup Standards, Volume 2: Groundwater* (United States Environmental Protection Agency [USEPA], 1992). PCE concentrations will also be compared to the applicable GWPS.

### **2.3.2 Groundwater Model Preparation**

A groundwater model of the Site will be developed. The model will allow examination of current groundwater conditions, allow testing of proposed changes to the system, aid in improving the CSM, and help clarify the remedial decision-making processes. The modeling will be performed with a three-dimensional, finite difference groundwater flow model that uses the MODFLOW code to solve the finite-difference equations. MODFLOW is a valuable and widely accepted standard for groundwater modeling. After the flow model is calibrated to pumping and non-pumping data sets, fate and transport modeling of PCE will be performed using the MT3DMS code.

Specific objectives of the groundwater modeling are to:

- simulate groundwater and contaminant flow paths and travel times under pumping and non-pumping conditions;
- quantify contaminant mass discharge;



- evaluate plume migration, receptor risk, and natural attenuation potential under different remedial scenarios; and
- evaluate potential future remedies, such as additional in-situ source treatment/reduction, downgradient in-situ groundwater treatment, monitored natural attenuation (MNA), or optimized groundwater recovery.

### **2.3.3 Alternative Remedial Technology Evaluation**

Alternative remedial technologies that could potentially increase the effectiveness and efficiency of the overall remedial strategy and eliminate the need for NPDES discharge of treated groundwater will be evaluated. Additionally, technologies that may allow the existing GWTS to meet the metals concentrations proposed in the Draft NPDES Permit will be evaluated. The alternative technologies and implementation areas will be guided by the results of the updated CSM, trend evaluation, and transport modeling. The potential remedial technologies listed below are meant to provide examples of the types of alternatives that may be evaluated to support remedy optimization. Other potentially feasible remedies will also be evaluated as deemed appropriate.

#### **2.3.3.1 Focused Permanganate Injections**

Sodium permanganate injections are ongoing in the Packing/Loading area of the Site. However, there may be opportunities to focus the injections and improve the effectiveness based on the updated CSM. Additionally, focused injections downgradient of the Packing/Loading area, including areas south of Washington Road, will be considered as a strategy for additional downgradient protection.

#### **2.3.3.2 Passive Reactive Barriers**

Passive Reactive Barriers (PRBs) will be considered downgradient of the Packing/Loading area as well as further downgradient near Washington Road. Near the Packing/Loading area, the PRB would likely be a conventional, excavated or trenched PRB filled with zero-valent iron (ZVI), GAC, mulch, or other acceptable barrier. A PRB near Washington Road would likely consist of an injection barrier utilizing permanganate candles or ZVI injections to reduce PCE migration south of Washington Road.

#### **2.3.3.3 GWTS Upgrade**

Additionally, if a more effective in-situ remedy is not identified and the metals source is not localized, the P&T system may need to continue to operate. Therefore, ion exchange technology or an equivalent technology also will be evaluated as a potential treatment process for decreasing metals concentrations in

the GWTS effluent to meet the Draft NPDES Permit limits if groundwater P&T is continued at the Site.

## **2.4 PERMIT MODIFICATION**

Upon completion of the CSM update and the remedial strategy optimization evaluation, a recommendations report will be prepared and submitted to EPD. Additionally, Bon L will submit a Class III RCRA Permit Modification Request to incorporate the optimized remedy for SWMU 49 into the PCC Permit. Due to the administrative requirements associated with Class III Permit Modification request, Bon L may additionally request a temporary authorization to begin implementation of the alternative remedy so as to not delay the implementation schedule while working through the permit modification process with EPD.

## **SECTION 3 NPDES WORK PLAN**

### **3.1 BACKGROUND**

As described in Section 1.1, Site Background, Bon L's 2010 NPDES permit has been administratively extended pending EPD approval of the overall Site compliance strategy. This section provides background and the planned steps related to NPDES compliance.

#### **3.1.1 2010 NPDES Permit**

The 2010 NPDES permit has only one permitted outfall, Outfall 001, the final plant discharge. Bon L is permitted to discharge clean reverse osmosis permeate and treated groundwater to Outfall 001. The only current discharge limit for Outfall 001 is for pH to be from 6.0 to 8.5 standard units (S.U.)

#### **3.1.2 Draft NPDES Permit**

The Draft NPDES Permit would allow Bon L to discharge treated recovery well groundwater, aluminum extrusion wastewater, and storm water to Outfall 001. The Draft NPDES Permit has added new compliance criteria to Outfall 001 as shown in Table 3-1, Draft NPDES Permit Outfall 001 Effluent Limitations.

Unlike previous permitting cycles, Bon L is now considered a categorical discharger under the USEPA 40 Code of Federal Regulations (CFR) Part §467 Aluminum Forming Point Source Category, Subpart C Extrusion Subcategory. As such, EPD created a new internal outfall, Outfall 001-A as the compliance determination point for the applicable categorical standard. The Draft NPDES Permit would allow Bon L to discharge treated aluminum extrusion wastewater and storm water through Outfall 001-A. The Draft NPDES Permit has added new compliance criteria for Outfall 001-A as shown in Table 3-2, Draft NPDES Permit Outfall 001-A Effluent Limitations.

### **3.2 NPDES ACTION PLAN IMPLEMENTATION**

As described previously, the existing Bon L wastewater treatment systems are not designed to treat the wastewater generated at the Site to the new compliance criteria set by EPD in the Draft NPDES Permit. Bon L proposes the following steps to support compliance with NPDES.

### **3.2.1 Process Wastewater**

#### **3.2.1.1 Pre-Treatment Permit**

Bon L proposes to segregate treated groundwater and process wastewater and divert the process wastewater to Newnan Utilities. Bon L will obtain a Newnan Utilities pre-treatment permit for the process wastewater stream. Based on communications between Bon L and Newnan Utilities, Newnan Utilities has indicated a willingness to accept Bon L's process wastewater. Newnan Utilities has requested additional testing of the process wastewater during a three-month period to verify compatibility with the Newnan Utilities wastewater treatment plant capacity and compliance with the Sewer Use Ordinance (SUO). Bon L has currently initiated this process wastewater sampling.

#### **3.2.1.2 Wastewater Treatment System Modifications**

Based on the results of the sampling program discussed in Section 3.2.1.1, the wastewater treatment system may need to be modified to meet Newnan Utilities SUO criteria. Bon L will modify the system as necessary to meet the SUO.

#### **3.2.1.3 Divert Process Wastewater**

Upon completion of the tasks detailed in Sections 3.2.1.1 and 3.2.1.2, Bon L will commence discharging process wastewater to Newnan Utilities.

### **3.2.2 Optimize Groundwater Remedy**

In addition to diverting the process wastewater to Newnan Utilities, the second component of the NPDES Compliance Strategy is optimizing the groundwater remedy as outlined in Section 2.2 to increase corrective action effectiveness and meet the GWPS. Optimization of the groundwater remedy also is necessary to facilitate NPDES compliance.

## **3.3 NPDES PERMIT REVISION**

Upon EPD approval of the proposed activities set forth in this Work Plan, the Draft NPDES Permit can be issued with an appropriate compliance timeline. After Bon L completes the process wastewater diversion to Newnan Utilities and the remedial strategy optimization, the new NPDES Permit will be revised or vacated, as appropriate.

## **SECTION 4 REPORTING AND SCHEDULE**

### **4.1 REPORTING**

The data and results from the activities described in Sections 2 and 3 will be documented in a report to EPD. The report will include conclusions based on the results and recommendations for potential changes to the remedial strategy. The report will also include an implementation schedule for groundwater remedy optimization and process wastewater diversion to support compliance with the Draft NPDES Permit. In addition to the recommendations report, Bon L also plans to submit a Class III Part B RCRA Permit Modification Request incorporating the alternative remedial strategy into their RCRA Permit.

### **4.2 SCHEDULE**

Upon approval of this Work Plan, Bon L will implement the task elements described in Section 2 and 3 including the collection of additional data to support both the remedy optimization for groundwater and pre-treatment permit for process wastewater. It is estimated that data collection for these efforts will be complete in September 2016. The recommendations report will be submitted to EPD within 120 days after receipt of final laboratory data.

## **SECTION 5 REFERENCES**

Amec Foster Wheeler, 2016, Bon L Manufacturing Company Groundwater Risk Assessment. Amec Foster Wheeler, March 2016

USEPA, 1992, Methods for Evaluating the Attainment of Cleanup Standards, Volume 2, Groundwater. U.S. Environmental Protection Agency, July 1992.

**FIGURES**

**TABLES**



**TABLE 2-1: GROUNDWATER QUALITY PARAMETERS  
Bon L Manufacturing Company, Newnan, GA**

<b>PARAMETER</b>	<b>METHOD</b>
Dissolved Oxygen	Field Measured
Oxidation-Reduction Potential	Field Measured
Temperature	Field Measured
Conductivity	Field Measured
pH	Field Measured
Permanganate	Field Measured

Prepared By: MPL 04/25/16

Checked By: LSM 04/25/16

**TABLE 3-2: DRAFT NPDES PERMIT OUTFALL 001-A EFFLUENT LIMITATIONS  
Bon L Manufacturing Company, Newnan, Georgia**

PARAMETER	DISCHARGE LIMITATIONS			
	MASS BASED (lbs/day)		CONCENTRATION BASED (mg/L)	
	DAILY AVERAGE	DAILY MAX	DAILY AVERAGE	DAILY MAX
Flow	Report	Report	-	-
Chromium	0.70	4.09	Report	Report
Cyanide	0.51	2.80	Report	Report
Zinc	1.91	10.4	Report	Report
Aluminum	8.47	73.4	Report	Report

PREPARED BY/DATE: MLR 04-14-16  
CHECKED BY/DATE: ASN 04-25-16

Notes:

The pH shall not be less than 6.0 standard units nor greater than 8.5 standard units.  
Information based on the draft permit issued by the Georgia Environmental Protection Division on December 23, 2015.

Acronyms:

mg/L - Milligrams Per Liter  
lbs/day - Pounds Per Day



**Bon L Manufacturing  
Newnan, GA**

**Site Location Map**

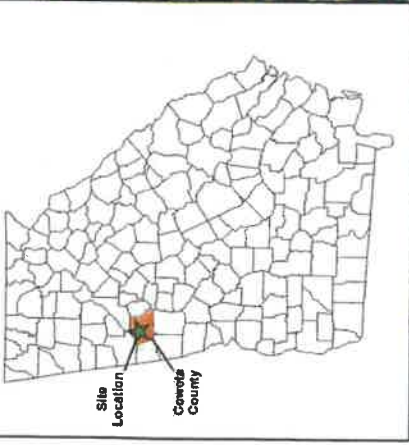
Prepared By:  
John Collins

Checked By:  
Project Manager  
8/21/2009

**Figure  
1-1**



Source: Layer: Google Street, Earth, Copyright: Google, Inc. 2008, USGS, Aerial, Geographical, Newnan, GA. USGS, Google, and the City User Community



**Legend**

Approximate Site Boundary







- Legend**
- NPDES Outfall 001
  - Hillside Spring Location
  - Monitoring Well Location
  - Recovery Well Location
  - Property Line
  - Stream
  - Building Outlines
  - Regulated Unit
  - Fenceline

Note:  
All site features are approximate.



Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, IGN, USDA, USGS, AER, GeoIntelligence, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

**Bon L Manufacturing**  
Newnan, GA

Site Plan Map

Prepared By:  
JRH/09/11/16

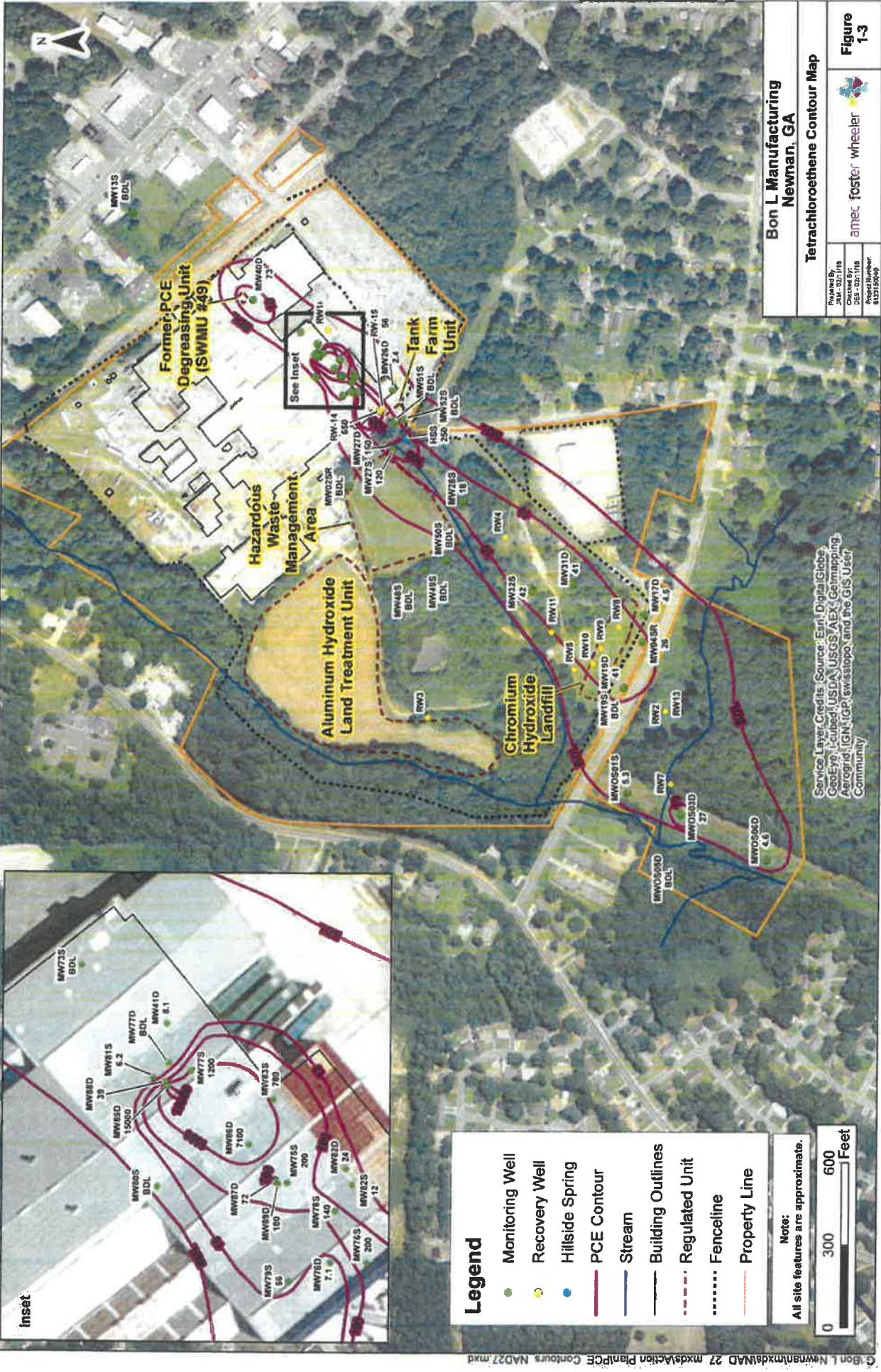
Checked By:  
WFL/09/11/16

Project Number:  
012150070

Figure 1-2







G:\Bon L Newnan\mxd\WAD 27 mxd>Action Plan\PCE Contours NAD27.mxd

**Legend**

- Monitoring Well
- Recovery Well
- Hillside Spring
- PCE Contour
- Stream
- Building Outlines
- Regulated Unit
- ..... Fenceline
- Property Line

Note:  
All site features are approximate.



Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, IGN, USDA, USGS/AEX, Geomatics, Aergrid, IGN, IGP, Swisstopo, and the GIS User Community

**Bon L Manufacturing**  
Newnan, GA

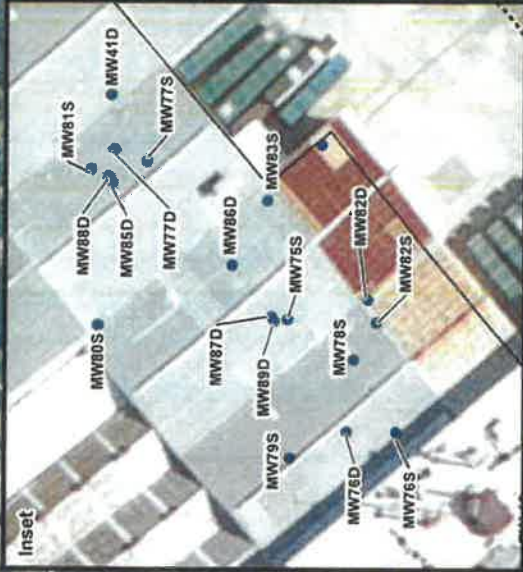
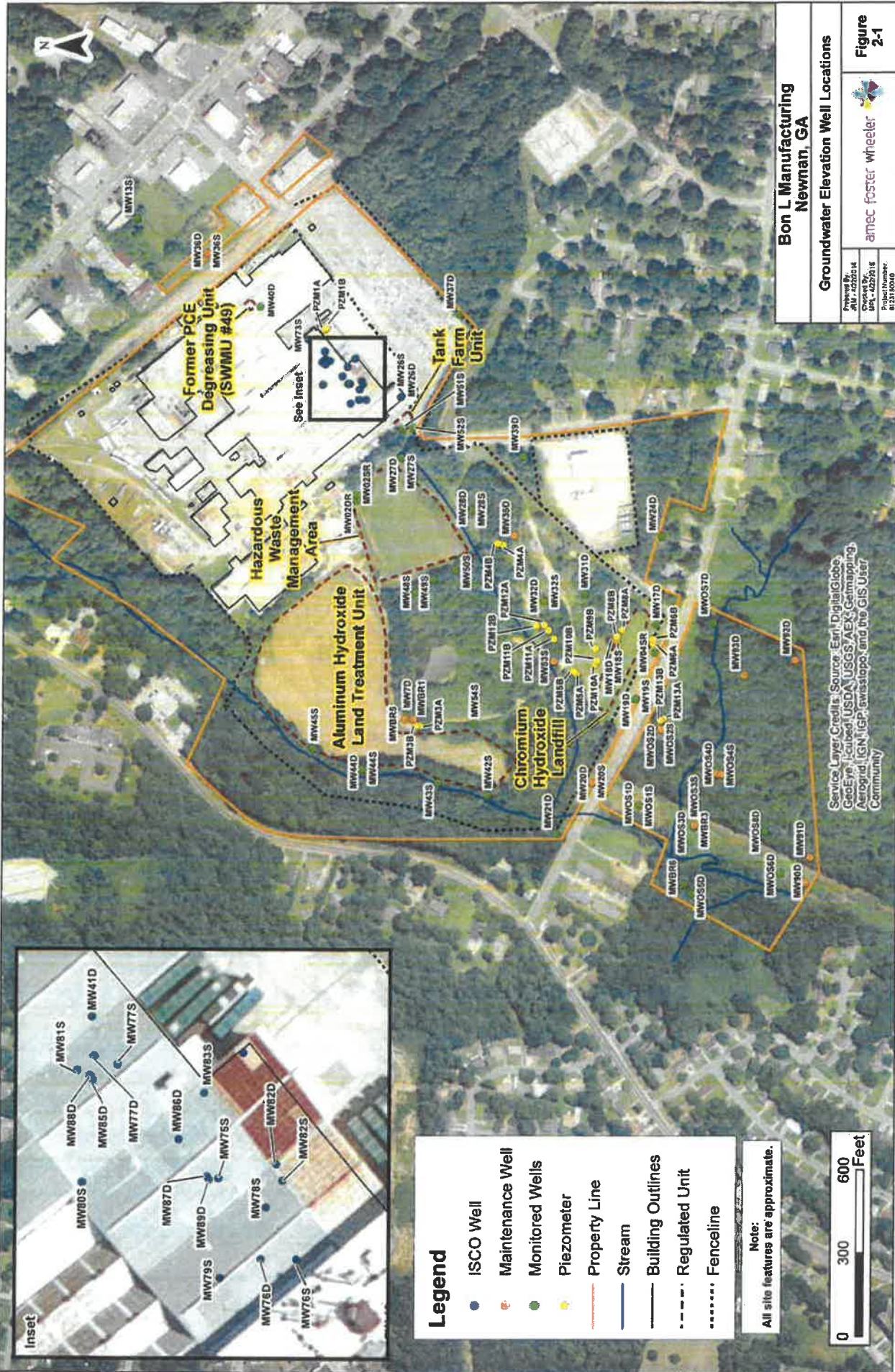
**Tetrachloroethene Contour Map**

Prepared By:  
JAL 02/11/16  
Checked By:  
PCC 03/11/2016  
812015949



**Figure 1-3**





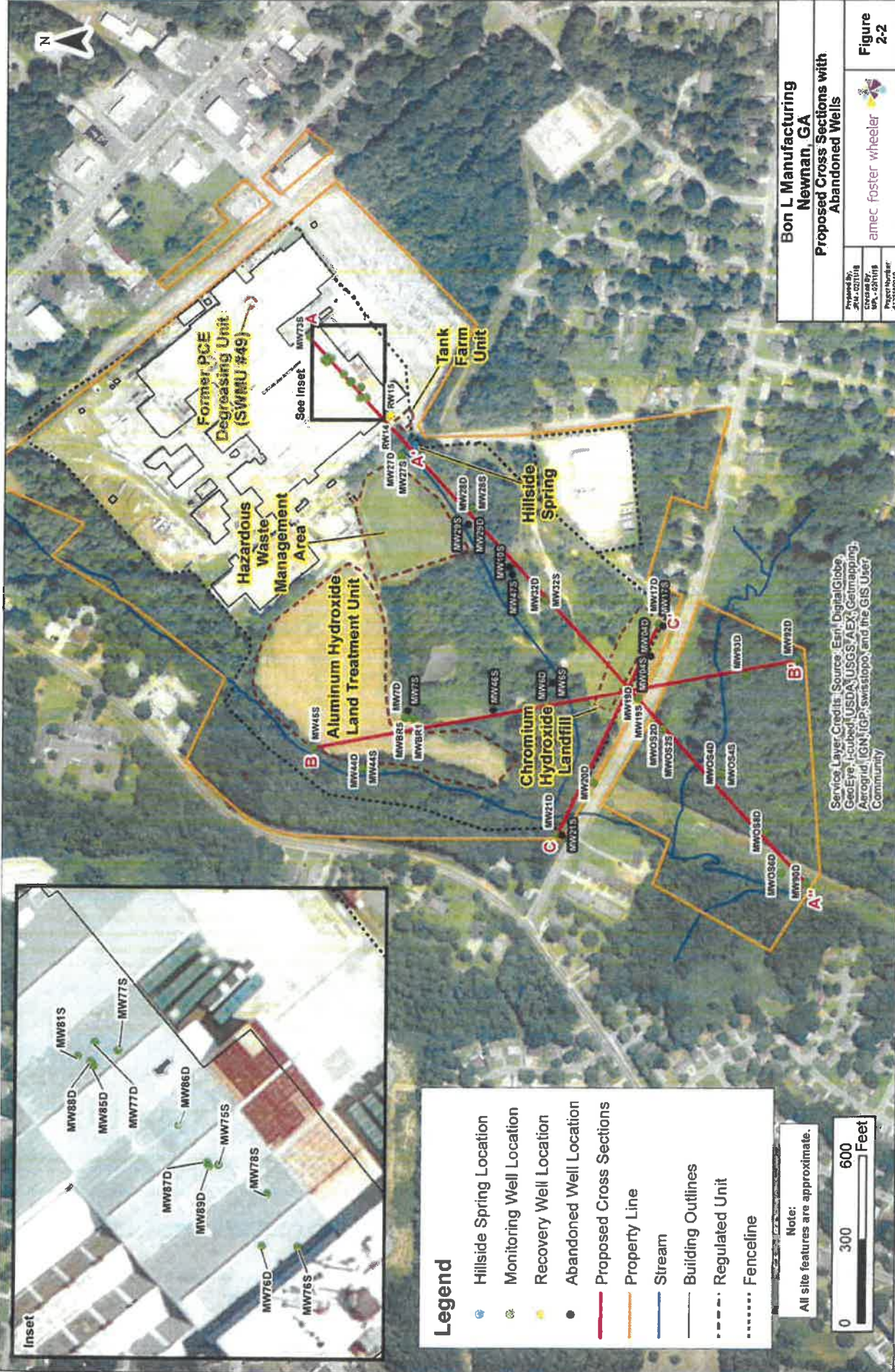
- Legend**
- ISCO Well
  - Maintenance Well
  - Monitored Wells
  - Piezometer
  - Property Line
  - Stream
  - Building Outlines
  - - - Regulated Unit
  - ..... Fenceline

Note:  
All site features are approximate.



Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, IGN, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGH, Swisstopo, and the GIS User Community





**Bon L. Manufacturing  
Newnan, GA**

**Proposed Cross Sections with  
Abandoned Wells**

Prepared by: JRM - 02/21/18  
 Created by: JRM - 02/21/18  
 Project Number: 17278000

amec foster wheeler

**Figure  
2-2**

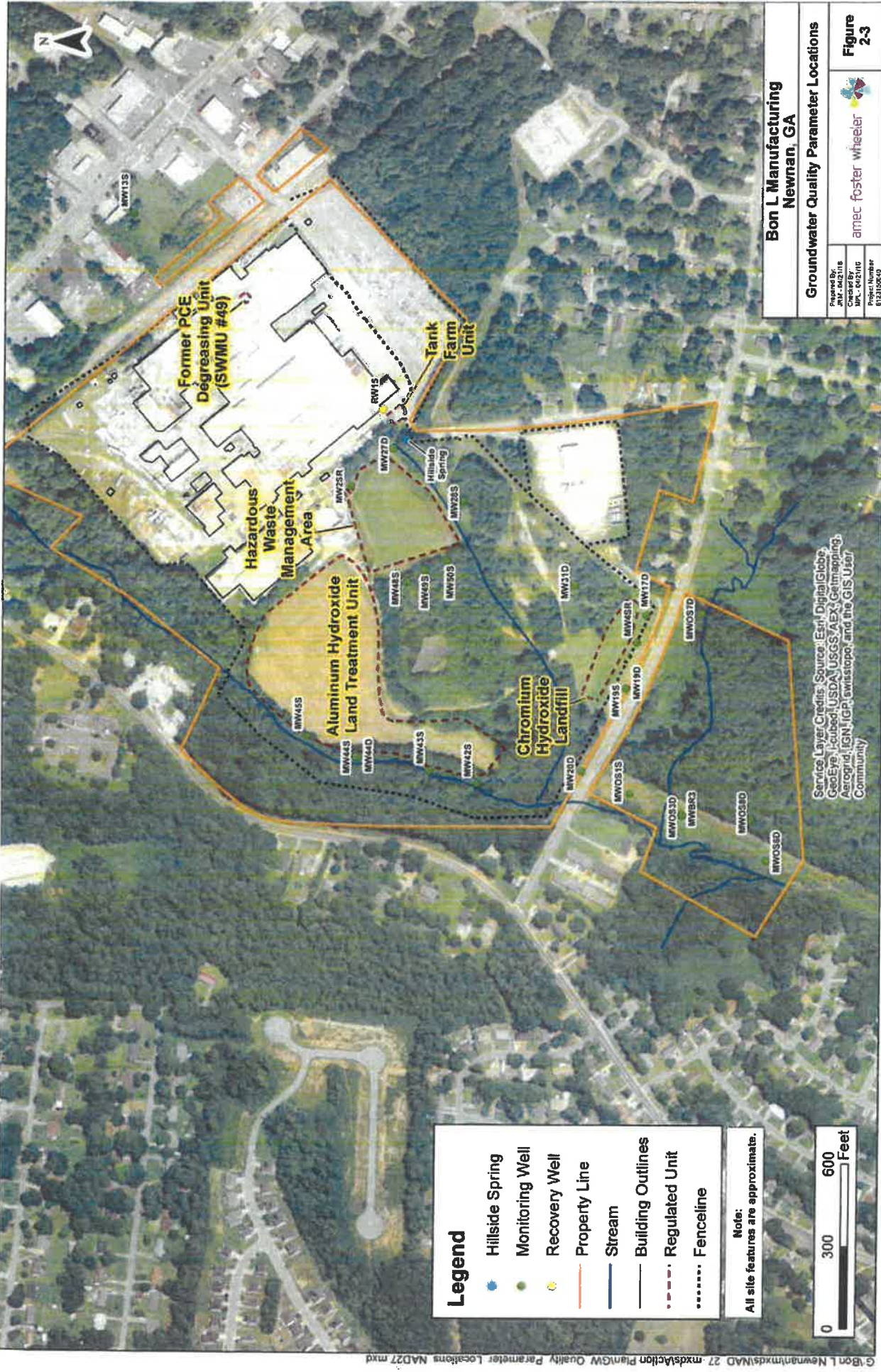
Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, IGN, GeoEye, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, Swisstopo, and the GIS User Community

- Legend**
- Hillside Spring Location
  - Monitoring Well Location
  - Recovery Well Location
  - Abandoned Well Location
  - Proposed Cross Sections
  - Property Line
  - Stream
  - Building Outlines
  - - - Regulated Unit
  - - - - - Fence Line






Note:  
All site features are approximate.







**Legend**

-  Hillside Spring
-  Monitoring Well
-  Recovery Well
-  Property Line
-  Stream
-  Building Outlines
-  Regulated Unit
-  Fenceline

**Note:**  
All site features are approximate.



**Bon L Manufacturing**  
Newnan, GA

**Groundwater Quality Parameter Locations**

Prepared By: JMR - mhz116	 amec foster wheeler	<b>Figure 2.3</b>
Created By: JMR - mhz116		
Approved By: RHS/2020		

Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, IGN, USDA, USGS/ALEX, GeoEye, Aerogrid, IGN, IGP, Swisstopo, and the GIS User Community