

**Richard E. Dunn, Director**

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

**OCT 10 2017**

Mr. Tim Putala, Environmental Manager  
548 Langboard Road  
Willacoochee, Georgia 31650

RE: EPD Response to Comments  
Timber Products Processing Facility  
Pretreatment Permit No. GAP050245

Dear Mr. Putala:

Thank you for your comments regarding the permit issuance for the Timber Products Processing Facility permit. Attached is a summary of your comments and our responses to the issue raised. We appreciate your interest in this matter.

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

If you have any questions, please contact Alan Leake of my staff at 404-463-4957.

Sincerely,



Jeffrey Larson, Manager  
Wastewater Regulatory Program  
Watershed Protection Branch

JL/awl  
Attachment

EPD Response to Comments on Draft Pretreatment Permit  
Langboard MDF – GAP050245

COMMENTS RECEIVED	EPD RESPONSE
<p>(1) If Langboard MDF is required to monitor one (1) time per month, why is the listed “Daily Average” different from the listed “Daily Maximum” and how can a facility be out of compliance when the Daily Maximum value is higher than the Daily Average value?</p>	<p>The effluent limits for total phosphorus and TKN are based on the effluent data collected over a period of time. As explained in the factsheet, EPD evaluated the demonstrated performance of the facility from January 1, 2015 to October 31, 2016.</p> <p>The long term mean and standard deviation of the data set is used in an online calculation sheet derived from Engineering Statistics Handbook by NIST/Sematch, to determine tolerance intervals for a normal distribution. This calculation gives us an upper one-sided tolerance interval based on a 95<sup>th</sup> percentile. This upper one-sided tolerance interval is the monthly average limit. To determine the daily maximum, in accordance with EPA guidance we multiple the monthly average limit by 1.5. This is why for these two pollutants, the daily average is different from the daily maximum.</p> <p>After considering the comment received and internal discussions, EPD has determined that at least 2 samples should be required in order to have a daily average requirement. Therefore, the permit has been changed from once per month to twice per month.</p>
<p>(2) Denali Trimble (Georgia EPD Coastal District), Compliance Officer for Langboard MDF, provided me with an electronic version of the Operation Monitoring Report (OMR) and Langboard has been using this form for compliance reporting with no issues whatsoever. This electronic document cannot be revised, and when monitoring one (1) time per month the spreadsheet calculates the Daily Average and the Daily Maximum as the same value for all monitoring parameters, because these values are based on the monitoring frequency. If you were to perform additional monitoring and list them on the spreadsheet, it</p>	<p>The OMR Form is not a State or Federal standard form and can be modified, if agreeable with the EPD facility Compliance Officer.</p>

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<p>would calculate the Daily Average and Maximum differently based on the multiple values for each parameter entered on the form. If this is the form provided by Georgia EPD to use for compliance monitoring, and the calculations of the Daily Average and Daily Maximum are strictly tied to the monitoring frequency, then this supports the claim by Langboard MDF that the Daily Average and Daily Maximum values should be the same for all monitoring parameters listed in draft permit GAP050245, since the proposed monitoring from Georgia EPD is one (1) time per month.</p>	
<p>(3) Langboard MDF feels that the proposed values for “Daily Average” and “Daily Maximum” Concentration listed in the tables in Part I A.1 and Part I A.2 (pages 2 and 3 of the draft permit), should be the same for Flow (MGD), BOD<sub>5</sub>, TSS, Total Phosphorus, and TKN. The Daily Average values should be raised to match the Daily Maximum values for all parameters.</p>	<p>The flow rate in the permit is based on the information given in the permit application that was submitted to EPD. The average flow was not the same as the maximum flow.</p> <p>The TSS and BOD<sub>5</sub> limits are based on the allowable values given in the receiving POTW’s Sewer Use Ordinance and can’t be increased.</p> <p>The total phosphorus and TKN limits are based on the procedures explained above in the EPD response to comments.</p>
<p>(4) Langboard MDF would like to know how Georgia EPD will handle enforcement for compliance issues when a Daily Maximum value has NOT been exceeded but a Daily Average value has been?</p>	<p>EPD expects the permittee to comply with the permit at all times. If non-compliance occurs, EPD may take appropriate enforcement action.</p>