Public Comments on Draft Industrial Stormwater General Permit (GAR050000) and EPD Response

Section	Requested Change	Comment	EPD Response
1.3.1.1.e.vii	Change "…Part 1.3.1.1.e.vii above" to "Part 1.3.1.1.e.vi above"	This section should be changed so that the sections are consistent with each other.	This was a numbering issue. Part 1.3.1.1.e.viii now contains that language, not Part 1.3.1.1.e.vii.
2.1.2.4	Change "14 days" to "30 days" and "45 days" to "90 days."	In the last paragraph, there is reference to corrective actions within 14 days and not to exceed 45 days. This should be modified to reflect 30 and 90 days to be consistent with Part 3.	Corrected the inconsistency.
3.2	Change "…control measures 2.1.2.1 through 2.1.2.9…" to "…control measures 2.1.2.1 through 2.1.2.10…"	This section should be changed so that the sections are consistent with each other.	Corrected the referenced control measures list.
4.3.2	Add 4.3.2.	The permit section numbers run from 4.3.1 to 4.3.3 without a section 4.3.2.	Corrected the section numbering.
6.1.8	Clarification of whether creating an alternative sampling schedule is optional or mandatory and its scope.	This new section requires permittees, if they have not been able to "obtain the required samples and/or analytical results for two consecutive quarters," to create an alternative sampling schedule. Is this mandatory or optional? What if there are not qualifying rain events? What events trigger this requirement?	Yes, if permittees are unable to collect stormwater samples due to the hours of operation or other scheduling difficulties, then they are required to propose an alternative sampling schedule. They must be able to show that the alternative sampling schedule will provide equivalent results to samples collected during operating hours.

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6.2.1.2.c.ii And C.5.1.2	Change "an arithmetic average" to "averaged using a geometric mean calculation." Change "The average of the samples collected during the twelve (12) month period does not exceed the applicable impaired waters benchmark value(s)" to "The average of the samples collected during the twelve (12) month period does not exceed the applicable impaired waters benchmark value(s) except that when biological parameters (i.e. fecal coliform) are averaged for this purpose, the samples shall be averaged using a geometric mean calculation."	Geometric mean calculations are commonly used when values within a set may differ by several orders of magnitude and are more appropriate for fecal coliform measures than arithmetic means.	Due to the sporadic nature of rain events, it is rare that a facility is able to collect 4 samples within a 30 day period, separated by at least 3 days of dry weather. By requiring permittees to collect quarterly samples, there should be sufficient number of rain events per quarter to meet the sampling requirements. We believe that the 4,000 counts/100 ml benchmark is a more reasonable standard as an arithmetic average. For example geometric mean values of 20; 20,000; 20,000; and 20,000 is 3,556 counts/100 ml, which meets the 4,000 standard as a geometric mean. However, clearly three 20,000 counts/100 ml values do not demonstrate effective BMPs. It should also be noted that the permit allows for evaluation of samples based on either an arithmetic average or 75% of samples meeting the benchmark. Thus, the permit already addressed for the variable nature of stormwater samples by allowing for 25% of samples to be disregarded in the evaluation of sample data versus the benchmark or effluent limit.
6.2.2.1	Table 6-1 references 8.J.10. Section 8.J ends at 8.J.9. Please resolve.	Clarify to which section Table 6-1 refers.	Corrected. Table 6-1 should refer to 8.J.8.
8.AA.2.1.10	Change "stormwater conveyances of deposits of abrasive blasting debris…" to "open" or "surface" stormwater conveyances.	If all stormwater conveyances, including manholes and subsurface stormwater conveyances require monthly cleaning, then the affected facilities would feel a significant burden.	All stormwater conveyances, open and closed, need to be cleaned of deposits once per month because both open and closed stormwater conveyances can carry contaminants to municipal systems or waters of the state.
8.J-8.J.8	Consistently identify SIC Code 1423 as either falling in subsector J1 or subsector J3.	Why does the SIC Code move from subsector J1 to J3 and back to J1?	SIC Codes used in Subsector J1 and J3 are now consistent throughout 8.J. SIC Code 1423 is in Subsector J1.
8.J.1.2	Delete the phrase "prior to December 17, 1990."	All reclaimed areas released from reclamation requirements are no longer subject to this permit regardless of when they were released.	This phrase is in US EPA's Multi-Sector General Permit.

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8.J.7	Confirm that SIC Code 1423 samples for TSS at a benchmark level of 100 mg/L and pH as a permit limit between 6.0 and 9.0.	Is it correct that SIC Code 1423 samples for TSS at a benchmark level of 100 mg/L and for pH as an actual permit limit between 6.0 and 9.0?	The TSS is a benchmark, and the pH has an effluent limitation.
C.2.3.1	The TSS benchmark for biota impaired streams should be changed to allow for site-specific alternative benchmarks.	TSS is not an accurate indicator of stream health.	For a general permit, we believe TSS is broadly protective and will allow for restoration of most streams. Individual permits are available to provide the mechanism for a study to create site-specific benchmarks.

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C.2.4.1	Return the benchmark fecal coliform value to the language as written in the 2012 Industrial General Permit.	Reverting back to the 2012 language would remove any obligation for industries to collect four samples within a 30-day period to calculate a geometric mean and would not result in a rollback of benchmark values.	The sampling results obtained from the past several years show that obtaining enough qualifying stormwater samples to calculate a 30-day Geometric mean is rare. The permit recognizes this challenge and allows non-geometric mean. We believe that the threshold of 4,000 counts/100 ml represents a reasonable single sample limit that takes into account the fact that facilities are not benefiting from the Geometric mean average which would allow much greater fecal counts while still meeting benchmark limits. For example, a sample set of 20; 20,000; 200, and 20 counts/100 ml results in a geometric mean of 200 counts/100 ml that meets the geometric mean standard. Stormwater discharges are by their nature intermittent, whereas water quality standards are measured in stream during both storm and non-storm conditions. Single grab samples of stormwater discharges do not necessarily have to meet numeric in stream water quality standards in order for that in stream water quality standard to be met. We recognize the impact of fecal coliform impairment on water quality in the state of Georgia. EPA allows an incremental approach to meeting instream water quality standards, and future benchmarks and effluent limits will be evaluated based on the fecal count reductions realized in the adjacent streams, the ability of permittes to collect data, and evidence of how different sources of fecal coliform impact streams.
Appendix D	Provide an NAICS table.	Many municipalities track businesses using NAICS instead of SIC Code. It would be useful for municipalities to have a conversion table to identify and track industrial business activity within their jurisdiction.	An online conversion tool is provided in Appendix D, as well as a paper reference document.