

## **Georgia Department of Natural Resources**

Environmental Protection Division, Watershed Protection Branch  
4220 International Parkway, Suite 101, Atlanta, Georgia 30354

Reply To:  
NonPoint Source Program  
404/675-6240  
FAX: 404/675-6245

March 21, 2005

Mr. Burns Wetherington and Ms. Katie Kirkpatrick  
Georgia Industry Environmental Coalition  
3200 Town Point Drive, NW, Suite 100  
Kennesaw, Georgia 30144

RE: EPD Response to Comments on Draft NPDES General Permit No. GAR000000

Dear Mr. Wetherington and Ms. Kirkpatrick:

The Georgia Environmental Protection Division (EPD) has received your letter, dated October 22, 2004, submitting formal comments on the proposed NPDES General Permit No. GAR000000 for Storm Water Discharges Associated with Industrial Activity. Your comment letter expressed the Georgia Industry Environmental Coalition (GIEC)'s concerns regarding the imposition of instream ambient water quality standards on storm water discharges from facilities discharging storm water associated with industrial activity to, or within one mile upstream and within the watershed of, stream segments identified as impaired on Georgia's 303(d) list. Your letter also requested that the permit be modified to allow a reasonable generic mixing zone at the point of storm water discharge or use the established U.S. EPA parameter benchmark values.

EPD understands your concerns, and GIEC's participation in the General Permit stakeholder meetings has been greatly appreciated. However, stream segments listed on the 303(d) list have no assimilative capacity for the pollutant(s) of concern and any discharges in excess of the water quality standards would not be adequately protective of Georgia's environment. Please note that the permit only requires an initial storm water sampling program to determine if the facility may be causing or contributing to a violation of water quality standards. Facilities that exceed the applicable standards during the sampling program will be given ample time over the term of the general permit to correct problems and improve the quality of their storm water discharges to acceptable levels before an individual permit is required. In addition, any facility subject to Part III.C of the permit may submit a written justification supporting their case as to why the facility's storm water discharges associated with industrial activity are not causing or contributing to a water quality violation at any time after the initial twenty-four (24) month sampling program has been completed. EPD will give proper consideration to any facility that submits a written justification in accordance with Part III.C of the permit.

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Your comment letter also expressed your support for the current requirements for public access to Storm Water Pollution Prevention Plans (SWP3s). Your support is appreciated.

EPD would like to thank the members of the GIEC for their time and considerable effort put forth in assisting with the issuance of the General Permit. Please find enclosed a copy of the issued permit. If you have any questions regarding the permit, please do not hesitate to contact Chip Scroggs of my staff at (404) 675-6240.

Sincerely,



Lawrence W. Hedges  
Program Manager  
NonPoint Source Program

LWH: cs