

**Public Comments and EPD Responses on Draft Pretreatment Permit
HL-GA Battery Company LLC – Pretreatment Permit No. GAP050374**

Acronyms

CFR – Code of Federal Regulations

DMR – Discharge Monitoring Report

ECHO – Enforcement and Compliance History Online

EPA – Environmental Protection Agency

EPD – Environmental Protection Division

Ga. Comp. R. & Regs. – Georgia Rules and Regulations for the Water Quality Control Act

MGD – Million Gallons Per Day

NPDES – National Pollutant Discharge Elimination System

OMR – Operations Monitoring Report

ORK – Ogeechee Riverkeeper

PFAS – Per- and Polyfluoroalkyl Substances

POTW – Publicly Owned Treatment Works

RO – Reverse Osmosis

WRF – Water Reclamation Facility

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<p>In this initial pretreatment permit, it is vital that EPD is cautious in its approach. As a new facility, EPD has no history of effluent makeup or pollution issues at the site to guide its oversight. As such, close and careful monitoring and oversight is necessary. This is especially important as the applicant’s reporting of the Characterization of Effluent Discharge is not fully provided and is only speculative. Additionally, much of the technical specifications throughout the Bryan County Megasite have not been shared, and potentially novel or innovative battery manufacturing techniques could cause unexpected discharge results. This leaves significant questions about the actual effluent makeup and whether the North Bryan Water Reclamation Facility (NBWRF) will be able to successfully and sufficiently treat the wastewater before discharge. As such, ORK asks that the arbitrary one-month conclusions on the initial monitoring period instead be replaced with an operations-related finish date.</p> <p>The one-month period of increased monitoring in Part I Section A.1.a is too short for EPD to sufficiently monitor a new and unestablished source of effluent. While ORK agrees that an initial period of increased monitoring and reporting frequency is absolutely necessary, the one-month limitation does not appear to be based on any scientific justification or other established timeline and will not allow for sufficient information gathering. Worse, the one-month period starts at the effective date of the permit. It is entirely possible that the HL-GA facility does not operate at all during this one-month period, effectively voiding this period of increased monitoring and providing EPD with no information to help guide its oversight. Further, the permitted discharge location – the NBWRF - is not yet completed and operational. Even if HL-GA does start operating at production levels, which it is not expected to do until “early 2026,” in the first month following the</p>	<p>EPD expects facility production and the associated wastewater flow volumes to gradually ramp up throughout the term of the permit. While EPD expects the volume of wastewater flow to gradually increase, EPD does not expect the type of wastestreams nor their effluent characterization to significantly change. The pretreatment permit will cover discharges of RO concentrate, non-contact cooling water, boiler blowdown, and sanitary wastewater, all of which are non-process wastestreams whose effluent characterization is not intrinsically tied to the battery manufacturing process. EPD, therefore, does not believe the frequency of monitoring must be dependent on a “fully operational” status of the facility.</p> <p>EPD acknowledges the commenter’s concerns that by tying the initial increased monitoring frequency to the effective date of the permit, the permit condition may unintentionally be circumvented if the facility is not able to immediately commence discharge. EPD has therefore adjusted the language to tie the monitoring frequency to the date of the commencement of discharge. Furthermore, to address public concerns regarding the degree of effluent characterization, EPD has increased the duration of the increased monitoring frequency to continue until 90 days following the commencement of discharge. The revised permit language is shown below:</p> <p><i>Part I.A.1.a.</i></p> <p><i>Upon the effective date of the permit and continuing for 90 days following the commencement of discharge, the permittee is authorized to discharge...</i></p> <p><i>Part I.A.1.b.</i></p>

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<p>permit’s effective date, it will not be able to discharge to the NBWRF, given the receiving facility has yet to begin its own operations. As such, the one-month initial monitoring period could easily become entirely pointless and fail to achieve its goals of information gathering and demonstrating initial compliance.</p> <p>ORK suggests that the initial monitoring period described in Part I Section A.1.a be directly tied to the facility’s actual operations. To gather the most relevant information and demonstrate compliance, this period of increased monitoring should take into account ‘fully operational’ conditions and discharge to the NBWRF. A truly reflective effluent characterization profile can only be gathered once the facility is fully operating. Starting from ‘fully operational’ conditions, the permittee should be required to monitor and report the effluent under Part I Section A.1.a requirements until it can demonstrate one month of continuous and consecutive compliance with all of the discharge limitations.</p> <p>Proposed language changes for Part I Section A.1.a:</p> <p>Upon the effective date of the permit and continuing until confirmation of one month of consecutive compliance with discharge limitations following full operational conditions at the facility, the permittee is authorized to discharge...</p> <p>Proposed language changes for Part I Section A.1.b:</p> <p>Effective following confirmation of one month of consecutive compliance with discharge limitations following full operational conditions at the facility and continuing until the expiration date of the permit, the permittee is authorized to discharge...</p>	<p><i>Effective 91 days after the commencement of discharge and continuing until the expiration date of the permit, the permittee is authorized to discharge...</i></p> <p>The purpose of the increased monitoring is to inform the Characteristics of Discharge report and to characterize initial wastewater treatment system performance. The increased monitoring frequency will complement the Characteristics of Discharge report required by Part III.C.4 of the permit, which is due 90 days from the commencement of discharge. EPD will evaluate the Characteristics of Discharge report and determine if the report includes significant information derived from the effluent testing which would justify the application of different permit conditions, and may subsequently modify the permit to address these conditions.</p> <p>The increased monitoring frequency is not contingent on a period of demonstrated compliance because EPD believes that monitoring frequency included in Part I.A.1.b of the permit is sufficient to characterize the effluent quality and to assess and assure compliance with the permit. Notably, however, Part I.B.6 of the permit does allow EPD to require more frequent monitoring, and this condition may be used in conjunction with an enforcement action to address permit violations should they occur.</p> <p>The revisions to the draft permit to increase the duration of the initial monitoring frequency and to tie the duration of the increased monitoring to the date of the commencement of discharge instead of the effective date of the permit constitute a minor modification to the draft permit in</p>

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<p>Waiting for full operations and requiring demonstration of compliance will ensure that any unexpected or unforeseen issues with operating a new facility will be frequently and closely monitored, allowing for quicker responses and less pollution ultimately entering the aquatic environment. ORK urges EPD to add these suggested changes or implement similar changes that will achieve the same goals before issuing this permit</p>	<p>accordance with 40 CFR 122.63, and do not require a reopening of the public comment period under 40 CFR 124.14.</p> <p>In accordance with the pretreatment regulations at 40 CFR 403.12(g)(3), “The Control Authority (Georgia EPD) shall require that frequency of monitoring necessary to assess and assure compliance by industrial users with applicable Pretreatment Standards and Requirements.” Furthermore, in accordance with Ga. R. & Regs. 391-3-6-.08(8)(d)(1), “Any industrial user authorized by a pretreatment permit issued pursuant to the Act may be subject to such monitoring, recording and reporting requirements as may be reasonably required by the Control Authority...” When establishing parameter monitoring requirements in the proposed pretreatment permit, EPD determined the applicable national pretreatment standards and local limits, evaluated the capacity of the publicly-owned treatment works, and considered the nature of the proposed wastestreams. The EPD believes the resulting monitoring schema in the proposed pretreatment permit will characterize the effluent quality and provide data which is representative of the conditions occurring during the reporting period. In addition, the monitoring schema requires monitoring at frequencies necessary to assess and assure compliance with the permit.</p>
<p>Testing needs to be increased, then it can be tapered off to a lower baseline frequency once the facility has proven that testing is done adequately and they can maintain compliance for a certain amount of time.</p>	<p>This comment is similar in nature to those expressed in the immediately preceding comment; please see the response provided above.</p>
<p>ORK requests an explanation as to why mass-based concentrations [sic] are not included in Part I Section A.1.a. or A.1.b. Unlike the HMGMA</p>	<p>EPD has incorporated local limits in this proposed pretreatment permit in accordance with 40 CFR 403.5 and Ga. R. & Regs. 391-3-6-.08(3).</p>

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<p>draft permit (No.: GAP050365), EPD does not include these concentration parameters [sic].</p>	<p>EPD determined that both concentration-based and mass-based effluent limitations are appropriate for categorical process wastewater and these effluent limitations were included at internal outfall number 01A for HMGMA. The HL-GA Battery Company facility, however, does not discharge categorical process wastewater to the POTW, and thus the permit does not include effluent limitations applicable to categorical process wastewater.</p>
<p>ORK requests an explanation as to why HL-GA appears to be required to monitor for more pollutants that [sic] HMGMA is required to monitor (compare the list of pollutants in each permit’s Part I Section A.1.a as well as HMGMA Part I Section A.2.a).</p>	<p>The proposed pretreatment permit for HL-GA Battery Company LLC (Permit No. GAP050374) includes the same parameter monitoring requirements for the final effluent at Part I.A.1 of the permit as those included in the proposed pretreatment permit for Hyundai Motor Group Metaplant America LLC (Permit No. GAP050365) for the final effluent at Part I.A.2 of the permit. The proposed pretreatment permit for HMGMA also includes sampling required at an internal monitoring point, as is reflected in Part I.A.1 of that permit.</p>
<p>ORK requests an explanation as to why pH is not required to be monitored in Part I Section A.1.a. or A.1.b.</p>	<p>The proposed permit includes pH effluent limitations and monitoring requirements in Part I.A.1.a of the permit (Permit Page 4 of 24) and in Part I.A.1.b of the permit (Permit Pages 6 & 7 of 24).</p>
<p>PFAS parameters should be added to the monitoring requirements for this facility. PFAS present a long-term pollution and human health concern. Determining the presence of this pollution in wastewater not only helps to prevent its introduction into the aquatic environment through treatment, prevention, and mitigation measures, but it also helps to pinpoint potential sources of PFAS in need of remediation. This is especially important for this new source of industrial wastewater. To</p>	<p>There are currently no instream water quality standards for PFAS in Georgia or federal pretreatment standards. Additionally, there is currently no promulgated 40 CFR § 136 analytical method for PFAS in raw groundwater, wastewater, and sludge. EPD has therefore determined that PFAS monitoring should not be required in the proposed pretreatment permit.</p>

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<p>gather this information, a PFAS monitoring parameter should be added to multiple permit terms. Quarterly monitoring of a broad selection of PFAS will allow the operators and EPD to respond quickly to the discovery of PFAS in the wastewater. To achieve this, ORK suggests adding PFAS to the following permit terms:</p> <p>Part I Section A.1.a - (Permit Page 2 of 24)</p> <ul style="list-style-type: none"> ○ Effluent Characteristic = Per- and polyfluoroalkyl substances (PFAS) (parts per trillion, or nanograms) ○ Discharge Limitation = [TBD] ○ Measurement Frequency = One Day/Quarter ○ Sample Type = Grab ○ Sample Location = Final Effluent <p>Part I Section A.1.b - (Permit Page 5 of 24)</p> <ul style="list-style-type: none"> ○ Effluent Characteristic = Per- and polyfluoroalkyl substances (PFAS) (parts per trillion, or nanograms) ○ Discharge Limitation = [TBD] ○ Measurement Frequency = One Day/Quarter ○ Sample Type = Grab 	
<p>There are already too many discharges into the Ogeechee River and there should be no additional developments along the river. There are already at least 67 municipalities already sending wastewater to the Ogeechee River and the river has risen and has issues with flooding. My canoe business cannot operate at these high water levels, and the Savannah-Ogeechee Canal has suffered flooding which has destroyed a boardwalk and required the clearing and digging of ditches to drain our firebreaks. We live in the low country and before we know it, we are going to all go under.</p>	<p>The proposed pretreatment permit for HL-GA Battery Company LLC is for an indirect discharge. Wastewater generated at the facility will not be discharged directly to the Ogeechee River but will instead be conveyed to the North Bryan WRF for further treatment and eventual discharge to the Ogeechee River.</p> <p>The NPDES permit for the North Bryan WRF (Permit No. GA0050326) was issued on December 1, 2023, and the POTW was permitted to discharge to the Ogeechee River at an initial flow rate of 4.0 MGD</p>

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	<p>monthly average, with permitted expansions up to 8.0 MGD monthly average. This permit is not changing the discharge limits at the North Bryan WRF.</p>
<p>The water quality is not right in the Ogeechee River and the permit needs to be denied. In 2011 we had a fish kill and after that nobody wanted to go in the river. Additionally, the dissolved oxygen and pH have been off at the Savannah-Ogeechee Canal for several years. Finally, a woman tested the water near Morgan’s Bridge, and it was off too.</p> <p>I do not trust the treatment of this wastewater being taken away, then treated twice, then eventually discharging into the Ogeechee River. We live right downriver, and everybody downriver will be affected.</p>	<p>As part of the pretreatment permit development, EPD conducted a local limits evaluation and established effluent limitations that will prevent the discharge of pollutants at levels that will pass through the North Bryan WRF and cause or contribute to an instream violation of Georgia Water Quality Standards in the Ogeechee River.</p> <p>The approved 2024 Integrated 305(b)/303(d) Report which reports water quality in Georgia does not identify violations of the dissolved oxygen or pH Georgia Water Quality Standards for the applicable segments of the Ogeechee River in the vicinity of the North Bryan WRF nor at the Savannah-Ogeechee Canal. EPD has not received information to validate the claims of water quality violations in the Ogeechee River. EPD is available to accept water quality complaints at askEPD@gaepd.org and water quality data should be submitted to the TMDL Modeling and Development Unit. Additional information on submitting data can be found at: https://epd.georgia.gov/https%3A/epd.georgia.gov/assessment/water-quality-georgia#toc-guidance-for-submitting-data-for-305-b-303-d-integrated-report</p>
<p>The facility is hauling some of its wastewater offsite, where is this going? Additionally, if they can haul everything else offsite then they should haul this wastewater offsite too.</p>	<p>HL-GA Battery Company LLC is an indirect discharger, and an analysis of alternative discharge methods is not required under Georgia law when evaluating a pretreatment permit application.</p>

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	<p>As part of HL-GA Battery Company’s pretreatment application the following liquid wastes/sludge generated by the facility were identified as receiving treatment at an offsite third-party facility:</p> <p>Waste Name: Cathode Slurry Hazardous Waste</p> <p>Treatment & Disposal Method: Incineration</p> <p>Facility Name: Clean Earth Facility Address: 4132 Pompano Road, Charlotte, NC 28216</p> <p>Facility Name: Geocycle, LLC Facility Address: 2175 Gardner Blvd, Holly Hill, SC 29059</p> <p>Waste Name: Waste Electrolyte</p> <p>Treatment & Disposal Method: Waste Treatment</p> <p>Facility Name: Clean Earth Facility Address: 4132 Pompano Road, Charlotte, NC 28216</p> <p>Waste Name: Anode & Cathode Nonhazardous Waste</p> <p>Treatment & Disposal Method: Land Disposal</p> <p>Facility Name: Republic Services Facility Address: 5105 Morehead Road, Concord, NC 28027</p> <p>Facility Name: Great Oak Landfill Facility Address: 3597 Old Cedar Falls Road, Randleman, NC 27317</p>

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	<p>Facility Name: Anson County Landfill Facility Address: 375 Dozer Drive, Polkton, NC 28135</p> <p>Treatment & Disposal Method: Incineration</p> <p>Facility Name: Geocycle, LLC Facility Address: 2175 Gardner Blvd, Holly Hill, SC 29059</p> <p>Facility Name: Giant Resource Recovery Facility Address: 654 Judge St., Harleyville, SC 29448</p> <p>Waste Name: Anode & Cathode Nonhazardous Waste Treatment & Disposal Method: Recycling</p> <p>Facility Name: SC Waste Management Facility Address: 13775 E. Wade Hampton Blvd, Greer SC 29651</p> <p>All wastes will be hauled offsite by the following waste hauling company:</p> <p>Name: Green Rock Strategies, LLC Address: 1640 Meeting Street Road, Suite 207, Charleston, SC 29405</p>
<p>We have protected fish like sturgeon in the Ogeechee River, and the river is not being protected.</p>	<p>The proposed pretreatment permit for HL-GA Battery Company LLC is for an indirect discharge. Wastewater generated at the facility will not be discharged directly to the Ogeechee River but will instead be conveyed to the North Bryan WRF (NPDES Permit No. GA0050326) for further treatment. As a result, the indirect discharge does not directly impact sturgeon in the Ogeechee River. Furthermore, EPD has evaluated the submitted permit application and supporting documentation and</p>

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	proposed a pretreatment permit that is protective of water quality standards and the environment.
Where the facility has violated the laws, they should be expected to pay fines to the full amount. While policy and a lack of planning on all levels of government has contributed to problems at the site, this should not be used as an excuse for the State of Georgia to reduce the fines.	<p>Comment Noted.</p> <p>At this time, EPD has not identified any violations nor initiated any enforcement actions for the proposed wastewater discharge from HL-GA Battery Company LLC. EPD follows an escalating enforcement process, consistent with the requirements of O.C.G.A. 12-2-2 and EPD’s Enforcement Monitoring Strategy and Water Quality Penalty Assessment Guidance. EPD will address any violations of these permits following those established procedures.</p>
While the liquid waste from production will be containerized and shipped off-site, the potential for discharge still exists. The difference in the existing battery manufacturing subcategory for pretreatment and the operations in this specific battery facility are noted. However, EPA is undertaking a study to determine the necessary updates to this pretreatment category. Until such time, there is an existing subcategory for lithium-ion batteries, which is what the facility will manufacture. This rule has not been rescinded, and as such, the pretreatment category of battery manufacturing, subcategory E for lithium batteries, is appropriate and should be applied to this permit. Citing 40 CFR 461.50.	The applicability statement for 40 CFR 461, Subpart E – Lithium Subcategory states “This subpart applies to discharges to waters of the United States and introduction of pollutants into publicly owned treatment works from the manufacturing of lithium anode batteries.” The lithium-ion battery manufacturing process at HL-GA Battery Company LLC uses graphite/carbon black anodes, not lithium anodes, hence the subpart does not apply. Furthermore, HL-GA Battery Company LLC hauls process wastewater from its battery manufacturing operations to an off-site centralized waste treatment facility, and this pretreatment permit covers non-process wastestreams only. Therefore, there will be no introduction of pollutants associated with the manufacturing of batteries into a POTW.
The frequency of priority pollutant scans should be increased from twice per year to monthly, especially since there is no baseline monitoring	In accordance with the pretreatment regulations at 40 CFR 403.12(g)(3), “The Control Authority (Georgia EPD) shall require that frequency of

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<p>report available for the waste to be discharged, only an estimated waste characterization, which appears to exclude known elements of RO brine. Once a permit-duration’s worth of data is collected, it may be appropriate for EPD to lessen the frequency with the first permit renewal process.</p>	<p>monitoring necessary to assess and assure compliance by industrial users with applicable Pretreatment Standards and Requirements.” Furthermore, in accordance with Ga. R. & Regs. 391-3-6-.08(d)(1), “Any industrial user authorized by a pretreatment permit issued pursuant to the Act may be subject to such monitoring, recording and reporting requirements as may be reasonably required by the Control Authority...” When establishing parameter monitoring requirements in the proposed pretreatment permit, EPD determined the applicable national pretreatment standards and local limits, evaluated the capacity of the publicly-owned treatment works, and considered the nature of the proposed wastestreams (i.e., non-process wastewaters). Where effluent limitations were established for specific priority pollutants, the monitoring frequency for that parameter is already more frequent than “semiannual”. (See Part I.A.1.a and Part I.A.1.b of the permit) EPD determined that the remainder of the priority pollutants did not require effluent limitations due to either the treatment capacity of the POTW or their believed absence in the discharge. For these pollutants, EPD believes that a “semiannual” monitoring frequency will characterize the effluent quality and provide data which is representative of the conditions occurring during the reporting period. In addition, the monitoring schema requires monitoring at frequencies necessary to assess and assure compliance with the permit.</p>
<p>The records retention requirement should be changed to five years to match the duration of the permit.</p>	<p>The three year records retention schedule included in Part I.B.7 of the permit complies with the minimum recordkeeping requirements established in 40 CFR 403.12(o) and Ga. R. and Regs. 391-3-6-.08(8)(d)(2) .</p>

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<p>As a member of the public, I request an extension of the public comment period for HL-GA Battery Company LLC. Residents who live not only in Bryan County, but in the counties surrounding Hyundai Motor Group Metaplant America LLC, are already being greatly affected & will continue to be greatly affected by Hyundai Motor Group Metaplant America LLC and related manufacturing facilities on this site. Protecting our groundwater and our rivers is crucial in sustaining our environment, our agricultural, our recreational activities, and in supplying safe drinking water for our wells.</p> <p>This portion of Georgia is extremely rural in nature, and advertising such crucial information via local newspaper and posting notice at a local courthouse is antiquated and falls short of meeting the needs of the community. Neither neighbors that I have spoken to, nor I, were aware of the public notice sessions for Hyundai Motor Group Metaplant America LLC or HL-GA Battery Company LLC until after the fact. Word of mouth is the primary means of communication in these small towns, and the notice that was provided very simply did not reach those that it was intended to reach.</p> <p>If the deadline for public comment cannot be extended as requested, please know that our community supports and relies heavily on the detailed work and advocacy of the Ogeechee Riverkeeper. Please place great consideration on the comments that they have made regarding this matter.</p>	<p>EPD has complied with all Federal regulations at 40 CFR 124.10 and State regulations at Ga. Comp. R. & Regs. 391-3-6-.26 for the public notice of the draft pretreatment permit for HL-GA Battery Company LLC and the associated public hearing held on July 16, 2025.</p> <p>HL-GA Battery Company LLC posted public notice for the draft permit and public hearing at the Bryan County Courthouse on June 12, 2025, and additionally in the Bryan County News and Savannah Morning News on the same day. EPD also posted Public Notice No. 2025-11ML on June 16, 2025, which is available for review on EPD’s website and additionally distributed via mailing list.</p> <p>Interested persons may also subscribe to the public notice mailing list by visiting EPD’s website at:</p> <p>https://epd.georgia.gov/watershed-protection-branch-public-announcements/subscribe-watershed-protection-branch-updates</p> <p>EPD received 12 public comment submissions containing 18 comments and has taken all under consideration. EPD does not believe that an extension of the comment period is warranted.</p>
<p>I am writing to voice my strong and unwavering opposition to the proposed industrial pretreatment permits for HL-GA Battery Company and Hyundai Metaplant to discharge industrial wastewater into the North Bryan Water Reclamation Facility.</p>	<p>HL-GA Battery Company LLC has not commenced discharges to the North Bryan WRF and, at this time, EPD has not identified any violations nor initiated any enforcement actions for the proposed wastewater discharge from the facility. EPD has a range of enforcement</p>

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<p>This is absolutely unacceptable. These companies want to release hundreds of thousands of gallons of industrial waste daily — and the track record already speaks for itself. Hyundai Metaplant has previously failed to meet safe standards, discharging metals like zinc and copper that were so dangerous, they had to be shut down in Savannah. And now they want to dump this toxic waste into a new facility in our community?</p> <p>I do not support this, and many others don't either.</p> <p>Allowing this discharge threatens:</p> <ul style="list-style-type: none"> • The Ogeechee River, a vital resource and part of our local ecosystem • Private wells and drinking water that residents rely on daily • The integrity and capacity of a brand-new, unproven treatment plant <p>This is not just a technical permit, this is about the health and safety of Bryan County residents. Once our water is contaminated, there is no turning back. No amount of monitoring or reporting will undo the damage heavy metals can cause to our bodies, our children, and our environment.</p> <p>I urge the EPD to deny these permits completely or, at minimum, to:</p> <ul style="list-style-type: none"> • Establish the strictest possible limits on all pollutants • Require real accountability and enforcement if violations occur 	<p>mechanisms at its disposal to enforce the conditions of the pretreatment permit, including the ability to levy civil penalties.</p> <p>EPD has evaluated the submitted permit application and supporting documentation and proposed a pretreatment permit in accordance with applicable Federal and State laws and regulations, ensuring the permit is legal, enforceable, and protective of water quality standards, human health, and the environment. For example, during the pretreatment permit development, EPD conducted a local limits evaluation and established effluent limitations to prevent pass through or interference of the North Bryan WRF. The pass through element of the analysis prevents the discharge of pollutants at levels that will pass through the North Bryan WRF and cause or contribute to an instream violation of Georgia Water Quality Standards. The interference element of the analysis prevents the discharge of pollutants at levels that would interfere with the operation of the North Bryan WRF, contaminate sludge, cause problems in its collection system, or jeopardize its workers. The permit effluent limitations, therefore, account for the capacity of the North Bryan WRF to receive and treat pollutants such as heavy metals, and reflect the strictest local limits identified that will be protective of the North Bryan WRF operations and of water quality standards, human health, and the environment.</p> <p>This proposed permit will not impact the water quality of private groundwater wells. Additionally, water supply concerns, such as aquifer depletion, are outside the scope of this pretreatment permit issuance.</p> <p>The permit conditions require monitoring at a frequency necessary to characterize the effluent quality and to assess and assure compliance with the permit. The permittee will be required to submit their compliance monitoring data on a monthly basis via an OMR and DMR.</p>

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<ul style="list-style-type: none"> Put the burden of proof on these companies to show they will not harm our water <p>Our community is not a dumping ground. We deserve clean water, safe air, and strong leadership that protects us — not industrial polluters looking for the cheapest and easiest solution.</p> <p>If you're not aware, heavy metals like lead, copper, and zinc are highly toxic and extremely dangerous when released into our water systems. These pollutants do not break down, they accumulate in the environment, our food, and our bodies. Long term exposure, even at low levels, can lead to serious health problems including brain and nervous system damage, developmental delays in children, liver and kidney damage, and increased cancer risk. These metals also devastate ecosystems, killing aquatic life and contaminating soil and groundwater for years to come. Most wastewater treatment plants, especially new or smaller facilities, are not equipped to fully remove heavy metals, and any system failure puts the entire community at risk. Once contamination occurs, it is incredibly difficult — and in many cases, impossible to reverse. Allowing this kind of discharge is reckless and unacceptable.</p>	<p>The public may view the facility's compliance monitoring data by accessing EPA's Enforcement and Compliance History Online (ECHO) website at: https://echo.epa.gov/</p>
<p>Given past violations involving excess metals and improper wastewater handling, I urge the Georgia EPD to:</p> <ul style="list-style-type: none"> Establish strict limits on metals like copper, zinc, and lead in the permits. Require frequent testing and public reporting of wastewater discharges. 	<p>The pretreatment permit for HL-GA currently includes discharge limitations on Total Copper, Total Zinc and Total Lead. Effluent limitations for those metals are required in accordance with 40 CFR 433.17 pretreatment standards for new sources. In addition, the more stringent local limits have been included in the permit.</p> <p>EPD does not include specific enforcement responses in permits. EPD follows an escalating enforcement process, consistent with the</p>

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<ul style="list-style-type: none"> • Include clear enforcement actions if permit terms are violated. • Ensure the new North Bryan Water Reclamation Facility has the capacity and oversight to handle industrial wastewater safely. • Protect the Ogeechee River and local wells from potential contamination or aquifer depletion. 	<p>requirements of O.C.G.A. 12-2-2 and EPD’s Enforcement Monitoring Strategy and Water Quality Penalty Assessment Guidance. EPD will address any violations of these permits following those established procedures.</p>
<p>In the late nineteenth century, the Harbor and Safety Act of 1899, the first federal rules in managing wastewater, became law in these United States. The science of that time was "the solution to pollution is dilution" which the state of Georgia adopted in 1948 and continues to use to this day by setting acceptable limits of harmful biological and chemical elements in wastewater discharge.</p> <p>This is the twenty-first century, that scientific principle is outdated and should no longer apply. I ask the Georgia Department of Natural Resources, Environmental Protection Division to take into consideration this century's science in cleaning industrial and municipal wastewater back to the state it was before it became wastewater. As I taught generations of youth in Boy Scouting over two and a half decades to “leave no trace” the Georgia Department of Natural Resources Environmental Protection Division EPD should also create rules of wastewater treatment which “leaves no trace.”</p> <p>Our society has the ability to clean wastewater back to the pristine state it was before that water was used but wastewater treatment comes at a cost to an industry or a municipality. To protect future water in the geo-hydrological cycle in Georgia there should be no heavy biological, metal or chemical compounds in wastewater discharges. All wastewater discharged into an Atlantic Slope river spends weeks in a coastal estuary</p>	<p>The proposed pretreatment permit for HL-GA Battery Company LLC is for an indirect discharge. Wastewater generated at the facility will not be discharged directly but will instead be conveyed to the North Bryan WRF (NPDES Permit No. GA0050326) for further treatment. EPD has evaluated the submitted permit application and supporting documentation and proposed a pretreatment permit in accordance with applicable Federal and State laws and regulations ensuring the permit is legal, enforceable, and protective of water quality standards, human health, and the environment.</p>

**Public Comments and EPD Responses on Draft Pretreatment Permit
HL-GA Battery Company LLC – Pretreatment Permit No. GAP050374**

COMMENT RECEIVED	EPD RESPONSE
<p>before entering the Atlantic Ocean. The nine estuaries along Georgia’s coast are in dire shape due to several reasons, lack of freshwater, chemicals in the river water, sea level rise and other factors.</p> <p>I ask those in charge of permitting to consider protecting Georgia’s coastal commercial and recreational fisheries in the estuaries along with future generations river and drinking water by creating permits to return wastewater to the same state it was before it became wastewater.</p> <p>The science to do this exists today, but it comes at a cost. At some point in time the Georgia Department of Natural Resources Environmental Protection Division needs to develop rules to better protect the environment, not the economy. I firmly believe what University of Georgia distinguished Professor of Ecology, Dr. Eugene P. Odum, once told me, “to have a healthy economy you must have a healthy ecology for a healthy ecology will support a healthy economy.”</p>	