



**Richard E. Dunn, Director**

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

OCT 25 2017

Mr. Louis A. Zeller, Executive Director  
Blue Ridge Environmental Defense League  
PO Box 88  
Glendale Springs, North Carolina 28629

RE: EPD Response to Comments  
Elba Liquefaction Company L.L.C.  
NPDES Permit No. GA0050254

Dear Mr. Zeller:

Thank you for your comments regarding the permit issuance for the Elba Liquefaction Company L.L.C. NPDES 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 Whitney Fenwick of my staff at 404-656-2795.

Sincerely,

Jeffrey Larson, Manager  
Wastewater Regulatory Program  
Watershed Protection Branch

JL/wf  
Attachment

**Public Comments and EPD Responses on Draft NPDES Permit  
Elba Liquefaction Company – Permit No. GA0050254**

<b>COMMENTS RECEIVED</b>	<b>EPD RESPONSE</b>
<p align="center"><u>General Comments</u></p> <ol style="list-style-type: none"> <li>1. Liquefied natural gas plants present hazards to water quality and public safety.</li> <li>2. The EPD’s permitting of the annual discharge of over five million gallons of liquid demineralization concentrate, nitrogen plant condensate and air compressor condensate plus mercury and other toxic pollutants does not meet anti-degradation policy or promote improved water quality in the Savannah River. The EPD must reject the draft permit and include pollution monitoring, recordkeeping and control which meet federal standards.</li> </ol>	<p>EPD has evaluated the submitted permit application and supporting documentation and proposed a permit in accordance with the applicable Federal and State regulations ensuring the permit is legal, enforceable, and protective of human health and the environment.</p>
<p align="center"><u>Comments Regarding Facility Location</u></p> <ol style="list-style-type: none"> <li>1. The National Pollutant Discharge Elimination System (NPDES) permit requested by Elba Liquefaction Company is for their existing liquefied natural gas plant. The plant is located just off of East President Street/Island Parkway, just a few miles from downtown Savannah and 800 yards from Whitney Elementary School. (See map on page 2.)</li> <li>2. Finally, the location of an LNG plant in close proximity to a city of 145,000 people and an elementary school indicates appalling judgement on the part of both the company in locating at the site and the state in permitting the facility.</li> </ol>	<p>The map included with the comments indicates the location as 100 Elba Island Rd. The facility address listed on the EPA NPDES Application Form 1 submitted by Elba Liquefaction Company L.L.C. and on the draft permit cover page is 1 Elba Island Rd. 1 Elba Island Road is located on an island between the Savannah River and South Fork Savannah River approximately 3.7 miles from Eli Whitney Elementary School, and approximately 6.4 miles from Savannah City Hall.</p>

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<p align="center"><u>Comments on Permit Development</u></p> <p>LNG hazards include entrainment and impingement of aquatic organisms from cooling water, flammability after re-vaporization into a gaseous state, thermal discharges of water used in regasification and freezing.</p>	<p>In the State of Georgia Industrial Permit Application Addendum submitted to EPD, Elba Liquefaction Company L.L.C. indicated this facility will not be utilizing a cooling water intake structure withdrawing cooling water from waters of the State.</p> <p>The EPA NPDES Form 2D application submitted does not indicate there will be any discharges of heated water. EPD expects the discharge to be cooler than ambient water temperature.</p> <p>This is an existing plant which already imports liquefied natural gas and gasifies it for distribution. The new operation for which the permit is requested is for the liquefaction of natural gas for exportation.</p>
<p>The Clean Water Act requires states to meet water quality and anti-degradation standards. The Act lists mercury as one of 65 Toxic Pollutants to be monitored and controlled. Priority Pollutants are regulated chemicals for which US EPA has developed analytical test methods. The list also includes mercury. Yet no mercury monitoring, recordkeeping or controls are included in the draft permit.</p>	<p>The EPA NPDES Form 2D application signed on March 20, 2017 required Elba Liquefaction Company L.L.C. to provide effluent characteristics for pollutants that are believed to be present. Elba Liquefaction Company L.L.C. indicated in the application that mercury is not believed to be present in the effluent; therefore EPD does not believe mercury is a pollutant of concern for this discharge.</p>

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<p>Thermal discharges are regulated under the CWA. Potential thermal discharges of heated water may result from the Elba Liquefaction plant regasification and cryogenic operations. Yet no thermal discharge monitoring, recordkeeping or controls are included in the draft permit.</p>	<p>The EPA NPDES Form 2D application submitted does not indicate there will be any discharges of heated water. EPD expects the discharge to be cooler than ambient water temperature.</p>
<p>The overall goal of the Clean Water Act is the improvement of water quality, not just maintenance of the status quo. Yet the draft permit requires nothing beyond best management practices, which fall far short of BAT (best available technology).</p>	<p>There are currently no federal Effluent Limitation Guidelines for natural gas liquefaction, therefore there are no applicable federal technology based effluent limits.</p>