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[www.ogeecheeriverkeeper.org](http://www.ogeecheeriverkeeper.org)  
*Working Together to Protect the Ogeechee, Canoochee and Coastal Rivers*

July 18, 2025

**Via E-Mail**

Georgia Environmental Protection Division  
Watershed Protection Branch  
2 MLK Jr. Dr., 1470A East Tower,  
Atlanta, Georgia 30334  
[EPDcomments@dnr.ga.gov](mailto:EPDcomments@dnr.ga.gov)

**Re: Pretreatment Permit No.: GAP050365 for Hyundai Motor Group Metaplant America LLC**

To whom it may concern:

Ogeechee Riverkeeper 501(c)(3) (ORK) works to protect, preserve, and improve the water quality of the Ogeechee River basin, which includes the Canoochee River, tributary streams, and all of the streams flowing out to Ossabaw Sound and St. Catherine's Sound. The Ogeechee River system drains more than 5,500 square miles across 20 counties in Georgia. ORK works with local communities to retain the ecological and cultural integrity of rivers, streams, wetlands, and related habitats throughout the Basin. One of ORK's primary roles is as watchdog on permits throughout the watershed that could pose a significant threat to its water quality and aquatic environments.

ORK's comments on the pretreatment permit issuance for the Hyundai Motor Group Metaplant America (HMGMA) facility address three concerns. First, the initial monitoring period should be extended and tied to facility operations rather than an arbitrary time deadline. Second, some clarification is needed to explain the selection of different pollution parameter limitations between this Hyundai Motor Group Metaplant America facility permit and the HL-GA facility permit and (No.: GAP050374). Third, PFAS monitoring is desperately needed at this industrial facility, as well as every other industrial facility in the state. These minor adjustments and additions will improve this pretreatment permit, ensure that pollutants are more successfully controlled, and ensure that our shared waters are protected for current and future generations of Georgians.

Please note that while these comments are *similar* to ORK's comments on Permit No. GAP050374 for the HL-GA facility, they are *not identical*. Key differences in the facilities' history of operations and compliance as well as the applicable discharge limitations have raised separate and unique concerns that we raise below. The comments included in this letter should be considered wholly separate from those other comments.

As the initial pretreatment permit for discharge to the North Bryan Water Reclamation Facility (NBWRF) is the first in a likely long series of permits at this significant and important industrial site, it is crucial that EPD takes all steps necessary to fully ensure that the Ogeechee River, the eventual receiving water for this industrial wastewater, will not be degraded. The permit terms should be guided by significant caution, gather all relevant information to fully describe the operations of this facility, and only consider relaxed monitoring frequency and discharge limitations requirements after consistent compliance is demonstrated. ORK strongly urges EPD to approach this facility and this initial pretreatment permit carefully.

1. Increased monitoring requirements tied to facility operations

In this initial pretreatment permit to the NBWRF, it is vital that EPD is cautious in its approach. Given the facility's track record of noncompliance<sup>1</sup> under nearly identical pretreatment requirements, additional attention and caution is warranted and necessary. The facility's trucking of its wastewater to alternative disposal sites further highlights its continued issues with meeting this same pretreatment requirement that must inform the terms and issuance of this draft permit. As such, ORK strongly urges EPD to replace the arbitrary one-month conclusions on the initial monitoring period with an operations and compliance-related transition date.

The one-month period of increased monitoring proposed in Part I Section A.1.a and Section A.2.a is not sufficiently long to demonstrate compliance with required effluent limitations given the much longer record of apparent noncompliance. Worse, the one-month period starts at the effective date of the permit. With the NBWRF yet to be completed and operational, it is possible, if not likely, that HMGMA will not be able to discharge under this permit during its first month of effectiveness. As such, the one-month initial monitoring period could easily become entirely pointless and fail to achieve its goals of demonstrating initial compliance.

ORK suggests that the initial monitoring periods described in Part I Section A.1.a and Section A.2.a be directly tied to the facility's actual operations. To gather the most relevant information and demonstrate full compliance, the initial period of increased monitoring should apply until the facility can demonstrate at least one consecutive month of continued compliance with effluent limitations. Additionally, this increased monitoring frequency should also apply once 'full operational' conditions and discharge to the NBWRF begin and, again, continue until the facility can demonstrate at least one consecutive month of continued compliance with effluent limitations. A truly reflective effluent characterization profile can only be gathered once the facility is fully operating.

**Proposed language changes for:**

**Part I Section A.1.a:** Upon the effective date of the permit and continuing until confirmation of one month of consecutive compliance with discharge limitations, and again upon notice from the permittee of the facility reaching full operation until confirmation of one month of consecutive compliance with discharge limitations, the permittee is authorized to discharge...

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<sup>1</sup> City of Savannah. Notice of Violation Re: Violations in September 2024 for HMGMA Permit No. 20427-11. October 1, 2024.

**Part I Section A.1.b:** Effective following confirmation of one month of consecutive compliance with discharge limitations following both the initial period and full operational conditions at the facility and continuing until the expiration date of the permit, the permittee is authorized to discharge...

**Part I Section A.2.a:** Upon the effective date of the permit and continuing until confirmation of one month of consecutive compliance with discharge limitations, and again upon notice from the permittee of the facility reaching full operational conditions until confirmation of one month of consecutive compliance with discharge limitations, the permittee is authorized to discharge...

**Part I Section A.2.b:** Effective following confirmation of one month of consecutive compliance with discharge limitations following both the initial period and following full operational conditions at the facility and continuing until the expiration date of the permit, the permittee is authorized to discharge...

Requiring heightened monitoring frequency requirements for both initial and full operations and requiring demonstration of consistent 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.

## 2. Clarification on EPD's selection of pollution parameter limitations

Ogeechee Riverkeeper requests EPD's clarification about its choice and designation of discharge limitation included in this draft permit. First, ORK requests an explanation as to why mass-based concentrations are included in Part I Section A.1.a. or A.1.b. Unlike the HL-GA draft permit (No.: GAP050374), EPD includes these concentration parameters for HMGMA. Second, ORK requests an explanation as to why HL-GA appears to be required to monitor for more pollutants that HMGMA is required to monitor (compare the list of pollutants in each permits' Part I Section A.1.a as well as HMGMA Part I Section A.2.a). Third and finally, ORK requests an explanation as to why pH is not required to be monitored at all in this permit.

In addition, ORK requests clarification about pollution parameters present in the permittee's Characterization of Effluent Discharge but not included in the effluent limitations. As included in Section 1.13, the permittee reports the presence of chloroform in its effluent. However, no discharge limitation in Part I Section A of the permit is included for this parameter. ORK requests clarification as to whether EPD plans to limit this pollutant parameter. Likewise, ORK asks whether EPD will amend this permit to monitor and limit any additional pollutant parameters that are revealed following the permittee's subsequent Characterization of Effluent Discharge.

### 3. Need for PFAS monitoring and reporting

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 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:**

- **Part 1 Section A.1.a** - (Permit Page 2 of 26)
  - 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
- **Part 1 Section A.1.b** - (Permit Page 4 of 26)
  - 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
- **Part 1 Section A.2.a** - (Permit Page 6 of 26)
  - 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
- **Part 1 Section A.2.b** - (Permit Page 9 of 26)
  - 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

### 4. Potential out-of-state industrial wastewater

Ogeechee Riverkeeper is also requesting clarification about the origin of some of the wastewater to be pretreated and ultimately discharged to the NBWRF. During the public meeting held on July 17, 2025, the presentation included the names of HMGMA affiliates and other entities whose wastewater would be comingled with HMGMA's wastewater for pretreatment. One of the listed affiliates was "Mobis Alabama," which appears to be headquartered in

Alabama.<sup>2</sup> Other potential affiliates might also be out-of-state suppliers of wastewater, but these affiliates are not explicitly included in the permit.

ORK requests an explanation about whether out-of-state wastewater from these affiliates will be comingled, pretreated, treated, and ultimately discharged in Georgia under expected operating conditions. Additionally, ORK requests confirmation that EPD has complied with state laws regarding the transport and receiving of out-of-state industrial wastewater as part of this permitting process.

Thank you in advance for your time and consideration; please let me know if you have any questions:  
[ben@ogeecheeriverkeeper.org](mailto:ben@ogeecheeriverkeeper.org).

Ben Kirsch, Legal Director  
Ogeechee Riverkeeper

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<sup>2</sup>Mobis US Alabama - <https://www.mua.us.com/>