

AdvanSix Resins & Chemicals, LLC – Hopewell  
VPDES Permit No. VA0005291  
Summary of and Response to Public Comments  
August 26, 2024

**Purpose**

The purpose of this memo is to fulfill the obligations of the Department of Environmental Quality (“DEQ”) regarding controversial permits in accordance with § 10.1-1184.1.B of the Code of Virginia (“the Code”) and DEQ’s Public Hearing Procedures for Permitting Decisions dated September 23, 2022. A controversial permit is defined in the Code as an air or water permit action for which a public hearing is granted. As mandated by the Code, *“Before rendering a final decision on a controversial permit, DEQ must publish a summary of public comments received during the applicable public comment period and public hearing. After such publication, DEQ must publish responses to the public comment summary and hold a public hearing to provide an opportunity for individuals who previously commented, either at a public hearing or in writing during the applicable public comment period, to respond to the Department’s public comment summary and response. No new information will be accepted at that time.”*

The information below outlines the background, public participation, DEQ’s Summary of Public Comments and response for the draft Virginia Pollution Discharge Elimination System (VPDES) permit for the AdvanSix Resins & Chemicals, LLC (VA005291) facility in Hopewell, Virginia. A notice announcing the public’s opportunity to comment on DEQ’s Summary of Public Comments and Response and advertising a public hearing on DEQ’s Summary of Public Comments and Response was published in the Progress Index and Richmond Times Dispatch on Thursday, August 29, 2024. The notice was also posted on the Virginia Regulatory Town Hall on August 29, 2024, and distributed to individuals who previously commented on the draft permit. In response to public comments, no substantive changes have been made to the draft permit.

**Background**

**Draft Permit Preparation:**

On January 26, 2021, DEQ received an application for reissuance of a VPDES permit to authorize the discharge of industrial wastewater, cooling water, and stormwater from the AdvanSix Resins & Chemicals, LLC (VA0005291) facility in Hopewell, Virginia. The application was deemed technically complete on June 23, 2021. DEQ prepared a draft permit that was sent to the applicant for review on June 13, 2023, and to the US Environmental Protection Agency (EPA) on June 16, 2023. DEQ received the applicant’s concurrence on the draft permit on October 12, 2023, and EPA’s concurrence on October 19, 2023.

To ensure the interested parties were aware of the opportunities to participate in the permitting process, DEQ took several steps to engage with the public. These steps included a public informational meeting, two public comment periods, and a public hearing.

**Public Outreach Community Meeting:**

Prior to the start of a public comment period, DEQ hosted an outreach meeting on September 21, 2023, at the Hopewell Public Library at 6:00 pm. The purpose of the meeting was to provide information regarding DEQ’s VPDES permit program, present the draft permit, and answer questions from the public regarding the VPDES permit program and draft permit, and inform attendees of future public participation opportunities. The outreach meeting was advertised in the

Progress Index, and DEQ posted flyers in high-traffic areas around the City of Hopewell. The meeting was attended by approximately 27 members of the public in addition to AdvanSix staff.

**Public Notice Publication 1 – Fall 2023:**

A notice announcing the public’s opportunity to comment on the draft permit was published in the Progress Index on October 31, 2023, and November 7, 2023, and in the Richmond Times Dispatch (RTD) on November 3, 2023 (due to an error on the RTD’s part, the advertisement didn’t publish on October 31, 2023, as requested) and November 7, 2023. The notice was also distributed to e-mail and postal mail lists which included several environmental organizations and other members of the public who have expressed interest in receiving such notices. The public notice, draft permit, and fact sheet were posted on the DEQ website for the duration of the public comment period.

During the 30-day public comment period, DEQ received and individually reviewed correspondence from 176 separate commenters, including 5 environmental, non-governmental organizations. One of two distinct form letters was submitted by 170 commenters, of which 59 added personalized statements. All 170 form letters included a request for a public hearing.

After review of the public comments, DEQ determined on December 19, 2023, that the statutory requirements to hold a public hearing were met and proceeded to schedule a new comment period and public hearing. A notice was scheduled for publication on January 21, 2024, announcing the commencement of a new comment period and a hearing. However, prior to the publication of the notice, DEQ received a verbal request by the facility to postpone the public comment period and hearing as they intended to request revisions to the draft permit that would result in substantial changes to the conditions of the draft permit. Because the publication announcing the new comment period and hearing had already been scheduled and could not be canceled, DEQ subsequently published a follow up notice, postponing the public comment period and public hearing.

**Revisions to Draft Permit:**

The permittee requested revisions to the draft permit on February 26, 2024, to incorporate modifications to process operations at the facility that will result in accelerated reductions in the ammonia concentrations discharged and achievement of compliance with the new ammonia limitations sooner than was proposed in the initial draft permit. DEQ revised the draft permit to include the requested changes. The revised draft permit was sent to EPA for review on March 15, 2024, and EPA provided their concurrence on the revised draft permit on April 1, 2024.

**Public Notice Publication 2 and Public Hearing – Spring 2024:**

Based on public interest in the draft permit expressed during the public comment in Fall 2023, DEQ concurrently announced another public comment period and public hearing on the revised draft permit. A public notice announcing the opportunity to comment on the revised draft permit and notice of a public hearing was published in *The Progress Index* and *Richmond Times Dispatch* on April 19, 2024, and April 26, 2024. The notice was also posted on the Virginia Regulatory Town Hall on April 17, 2024. The public notice was also distributed to e-mail and postal mail lists, which included several environmental organizations and other members of the public who have

expressed interest in receiving such notices. The public notice, revised draft permit, and fact sheet were posted on the DEQ website for the duration of the public comment period.

During the 45-day public comment period, DEQ received and individually reviewed written correspondence from 39 separate commenters, including 5 environmental, non-governmental organizations. A form letter was submitted by 34 of the commenters.

A public hearing was held on May 21, 2024, at the Cater G. Woodson Middle School in Hopewell, Virginia. Twenty-one individuals, including representatives of the facility, attended the hearing. Five individuals presented oral comments during the hearing.

### **Summary of Public Comments and DEQ Response**

Below is a Summary of Public Comments received during the 1<sup>st</sup> and 2<sup>nd</sup> comment periods and the public hearing described above. DEQ's response follows in *italics*.

#### **1. Mixing Zone Study**

Comments were received requesting DEQ to require a new Mixing Zone Study for Gravelly Run to replace the 1994 study used in the AdvanSix and Hopewell Water Renewal draft permits.

*DEQ Response: The draft permit requires multiple changes to the facility's discharge, therefore, requiring a new mixing study prior to completion of these changes would result in a study that would not be representative of mixing conditions in the near future. The agency will re-evaluate the need for an updated mixing zone study at the next permit reissuance after the significant facility modifications are completed.*

#### **2. Thermal Effects Study**

Comments were received requesting DEQ to require a new thermal effects study for the thermal discharge at AdvanSix.

*DEQ Response: The existing thermal effects study conducted in 1990 determined a heat discharge limit for this facility, which is applied as heat limits at Outfall 998 (combined Outfalls 001 + 002) and Outfall 003. The facility has not exceeded those limits, and DEQ is not aware of any significant changes from the study conditions. Additionally, recent changes in facility operations including the addition of closed loop cooling towers and removal of Area 13 from the production area has reduced thermal loading. The James River, in the area of the facility's discharges, has not shown a statistically significant increase in temperature since 1989. Therefore, a new thermal effects study is not deemed necessary with this permit reissuance.*

#### **3. Per- and polyfluoroalkyl substances (PFAS)**

Several comments were received asserting that the facility's discharge contains PFAS and requested DEQ to require the facility to monitor and treat for PFAS. Commenters also stated that testing by the Virginia Department of Health indicated the presence of PFAS in Gravelly Run.

*DEQ Response:* As specified in 40 CFR 125.3, technology-based treatment requirements under CWA Section 301(b) represent the minimum level of control that must be imposed in NPDES permits, or VPDES permits for the Commonwealth of Virginia. National Pollution Discharge Elimination System (NPDES)/VPDES permits must include water quality-based effluent limits (WQBELs) derived from water quality standards. There are currently no water quality standards for PFAS and no EPA-approved test methods in 40 CFR 136 for PFAS. Upon publication of an approved method in 40 CFR 136, permittees may be required to report the results of operational or process control samples for PFAS. In addition, Chapters 316 and 343 of the 2024 Virginia Acts of Assembly (HB1085 and SB243) requires DEQ to develop a priority plan for PFAS assessments to identify sources of PFAS in public water systems' raw water sources where PFAS in finished drinking water has been detected above any PFAS Maximum Containment Level (MCL). If this facility is evaluated and included in a PFAS assessment, then additional evaluation will be performed to determine any additional self-reporting or monitoring that may be needed to fulfill the requirements of Chapters 316 and 343 of the 2024 Virginia Acts of Assembly.

Additionally, after conferring with the Virginia Department of Health, DEQ is not aware of any monitoring data that indicates the presence of PFAS in Gravelly Run.

#### 4. **316(b) - Fragile Species**

Comments were received that assert that the draft permit does not sufficiently protect fragile species from impacts associated with the facility's cooling water intake structures.

*DEQ Response:* The Existing Facility rule under 316(b) of the Clean Water Act provides that the permitting authority may require additional technologies on cooling water intake structures for protection of fragile species, however, it does not mandate such action. (40 CFR 125.98(d)). Such additional requirements are appropriate where specific impacts are identified, Best Technology Available (BTA) would not be sufficiently protective, and additional technologies that protect fragile species are available. For this permit, the BTA specified in the permit will be sufficiently protective of all organisms potentially impacted including fragile species. DEQ cited concern with the impact to fragile species during the §316(b) determination of BTA, found in Attachment S to the Fact Sheet. AdvanSix voluntarily provided 23 months of entrainment monitoring data and 6 months of impingement monitoring data in the permit reissuance application, and these data were used in the BTA determination. The permit requires the installation of fine mesh screen in Part I.E.7 of the draft permit. The effectiveness of a screen is site-specific and depends on variables such as the species present at the location, the cleanliness of the river, and river/tidal velocity; therefore, the design of the new screens will be informed by two years of on-site pilot testing, supported by and done in consultation with Virginia Department of Wildlife Resources. The pilot testing is required to ensure the functionality of the low velocity fine screens at this location. The pilot testing will determine the amount of entrainment that is prevented by the new screens. Impingement is assumed to be near zero with the new screens, due to the low design velocity. Pilot testing will also determine if blinding, fouling, or sedimentation might cause disruption of cooling water flows or screen functioning during periods of high river sediment or algae loading. After the

*completion of pilot testing, the compliance schedule requires design, permitting, and construction to be accomplished in a systematic manner, so that the screens will be installed as soon as possible. EPA has concurred on these aspects of the draft permit.*

**5. 316(b) - Schedule for Compliance**

Comments were received that the facility should comply with BTA requirements within this next permit cycle.

*DEQ Response: AdvanSix is a large complex facility. DEQ identified concerns with the compliance alternatives in the permit application and as a result the agency must consider additional data addressing the numerous factors that are relevant to BTA. This permit specifies BTA and includes a schedule for implementation that is consistent with VPDES program requirements and 40 CFR 125.94(b). EPA has reviewed the schedule for compliance and has concurred on the proposed schedule.*

**6. 316(b) - Offset**

Comments were received that the facility should offset negative impacts to aquatic organisms from their cooling water intake structures for as long as they are out of compliance.

*DEQ Response: Regulations under Clean Water Act (CWA) Section 316(b) focus on applying BTA requirements to cooling water intake structures at VPDES-permitted facilities. DEQ notes that restoration was rejected in a federal court decision addressing the Phase I 316(b) regulation, and EPA removed restoration as a compliance option under the Phase II/ Existing Facility rule.*

**7. 316(b) Interim BTA and Inconsistent Screen Requirements**

Comments were received that maintain that referencing 40 CFR 125.98(b)(5) and (6), which in part require the establishment of interim BTA requirements for early permits, is inappropriate since this permit is being issued in 2024 or later. In addition, comments asserted that the interim BTA screen requirements are not consistent with the final BTA screen requirements.

*DEQ Response: The interim BTA requirements in this permit were established in the 2016 permit, under which DEQ allowed for an alternate schedule for application submittal. As a result, the BTA requirements for that permit were identified as interim. Since these provisions have not yet changed under the current draft permit (which includes as required final BTA requirements), they remain identified as interim. DEQ notes that 40 CFR 125.94(h) provides that a facility may be subject to interim BTA requirements. Regarding the screen requirements, DEQ has included different specifications for the interim and final screen requirements and the fact sheet and compliance schedule provide that the interim requirements apply until the final approved design is installed and operational, at which point that becomes the BTA required under this permit.*

**8. 316(b) Technical Assistance Process**

Comments were received that questioned whether the technical assistance process that provides for sharing information with the US Fish and Wildlife Service (USFWS) and National Marine Fisheries Service (NMFS) and considers their feedback and recommendations regarding potential impacts to endangered species and critical habitat was properly implemented.

*DEQ Response: DEQ provided the permit application to the Services for the specified 60-day review. As discussed in the fact sheet, no comments were received from the USFWS, and NMFS acknowledged critical habitat for sturgeon, provided no corrections, and made no recommendations regarding additional control measures. Thus, the required process was completed, and the permit has been developed with consideration of the relevant information that was received.*

**9. Additional Limits and Monitoring at Outfall 101**

Comments were received requesting that DEQ include limits in the permit at Outfall 101 for zinc, chromium, and copper based on the presence of these pollutants in wastewater from the facility as reported in the 2022 Toxics Release Inventory (TRI) data. Comments were received requesting increased monitoring of existing limited parameters.

*DEQ Response: DEQ has reviewed the Organic Chemicals, Plastics, and Synthetic Fibers (OCPSF) Effluent Limitation Guidelines (ELGs) in 40CFR414.101(b) applicable to Outfall 101 and the Appendix A to Part 414 that includes a list of Metal-Bearing Waste Streams and Cyanide Bearing Waste Streams. The discharge from Outfall 101 does not include any of the waste streams listed in Appendix A. The 2022 TRI lists the presence of zinc, chromium, and copper in the waste stream that is sent to the Hopewell Water Renewal for treatment.*

*Regarding the monitoring frequency of those parameters limited at Outfall 101, annual monitoring for (40 CFR 414) limitations in Part I.A.4 is carried forward for this reissuance. The EPA Questions and Answers Memo (Q and A) for the OCPSF ELGs states that the monitoring frequency should be determined on a case-by-case basis, and the minimum monitoring frequency shall not be less than once per year. DEQ considered the nature and effect of the discharge in determining the monitoring frequency. The discharge of Outfall 101 constitutes approximately one-third of the total flow from Outfall 001 combining with non-contact cooling water before discharging. Limitations for toxic parameters in Outfall 001 are based on a mixing zone study, as described in Attachment G, where the instream waste concentration for Outfall 001 is 50.2% for acute, and 2.59% for chronic. This means that the effect of a limitation exceedance from Outfall 101 would not correlate to an exceedance on the James River. Additionally, Outfall 101 has not reported any exceedance of limitations. For these reasons, annual monitoring is appropriate for Outfall 101.*

**10. Limitations and Monitoring of Stormwater Discharges Outfalls 901-913**

Comments were received requesting DEQ place numeric limits in the permit on stormwater Outfalls 901 through 913 due to concerns with elevated concentrations of ammonia in

stormwater discharges from the facility as discussed in the 2014 EPA guidance on stormwater discharges as well as increasing the monitoring frequency for the stormwater outfalls. Additionally, a comment was received requesting that DEQ require the permittee to monitor all discharges for ammonia.

*DEQ Response: EPA's November 26, 2014, memorandum states that numeric WQBELs could be appropriate for stormwater but also acknowledges that applicable WLAs can be translated into Best Management Practices (BMPs) to reflect reasonable further progress towards meeting applicable water quality standards. The draft permit contains a compliance schedule in Part I.D.2 to address the runoff from the facility, including elimination of five (5) stormwater outfalls at the facility and the stormwater discharge from the Building 12 area. The draft permit also requires enhanced inspection and housekeeping in the ammonia sulfate handling areas and a stormwater contaminant elimination plan for areas of ammonium sulfate handling where the discharges are not captured. All discharges from this facility are monitored at either stormwater Outfalls 901-913 or at Outfalls 001, 002, or 003. The permit requires additional monitoring at the existing stormwater outfalls and establishes new stormwater monitoring requirements from the interior portions of the plant prior to discharging at Outfalls 001, 002, and 003. The stormwater requirements and monitoring frequencies set forth in the draft permit are established in accordance with the CWA, VPDES regulations, and EPA and DEQ guidance.*

#### **11. Additional limits for Outfall 913**

A comment was received requesting DEQ to place technology-based limits in the permit for runoff from the coal debris at Outfall 913.

*DEQ Response: Coal has been removed from this area because the steam generation facility no longer exists. Therefore, technology-based limits are not appropriate to be included in the permit.*

#### **12. Compliance Schedules**

Several comments were received expressing concerns for the length of time allowed under the compliance schedules in the draft permit for compliance with ammonia reductions, elimination of stormwater discharges, and addressing screens associated with cooling water intakes.

*DEQ Response: The VPDES regulation (9VAC25-31-250) allows for schedules of compliance, when appropriate, which will lead to compliance with the Clean Water Act, the State Water Control Law, and attendant regulations. As detailed in Attachment W of the Fact Sheet Attachments, DEQ considered the overall amount of work needed at this site when determining 'as soon as possible' with regard to timelines. A general summary of the work required at this site across all permit requirements, during this 5-year permit term, includes the following:*

- *Capture the discharge flow from five stormwater outfalls (904, 905, 906, 907, 911) in the Marine Operations Area.*
- *Convey the captured stormwater to Hopewell Water Renewal or install a treatment system and discharge from new Outfall 005.*
- *Eliminate the stormwater discharges around Building 12.*

- *Perform enhanced inspection and cleaning in the ammonia sulfate handling areas.*
- *Install groundwater testing wells in the Marine Operations Area and begin testing.*
- *Create a Seep Response Plan to characterize and mitigate liquids flowing from the ground, monitor for seeps, and respond appropriately.*
- *Perform a Stormwater Conveyance System Study to identify potential or actual cross connections, bypasses, and inflow or outflow that could result in unauthorized discharges.*
- *Perform process improvements that will result in decreased ammonia concentrations in discharges from the facility.*
- *Develop a stormwater contaminant elimination plan for areas of ammonium sulfate handling where the discharges are not captured.*
- *Conduct pilot testing of new fine screens for the cooling water intake screen replacement.*
- *Design, permit, and construct new fine screens after the pilot study is completed.*

*The resources needed for the planning, engineering, reporting, designing, and constructing of the permit requirements is substantial. In addition, manpower is needed from geologists, engineers, fabricators, biologists, designers, and construction trades from outside the company. Part I.C.25 (Marine Operations Area Improvements), Part I.D.1 (Schedule of Compliance for Ammonia), Part I.D.2 (Schedule of Compliance for Chesapeake Bay Total Maximum Daily Load (TMDL) Action Plan), and Part I.E.7 (Compliance with §316(b) BTA for Impingement and Entrainment) include specific milestones and associated due dates that the facility must meet to demonstrate progress during the term of the permit toward meeting the schedule of compliance. Additionally, between development of the initial draft permit and a second public comment period and hearing, the draft permit was revised to expedite the completion of the improvements at the facility associated with eliminating stormwater discharges from the Marine Operations Area and reducing ammonia discharges from the facility's wastewater and stormwater.*

*The compliance schedules established in the permit are consistent with the federal and state requirements for schedules of compliance in VPDES permits.*

### **13. Compliance issues at AdvanSix**

DEQ received comments regarding the compliance history at the facility and concerns for granting additional discharge permits.

*DEQ Response: This permit action consists of the reissuance of the VPDES permit re-authorizing existing discharges and establishes reductions in the discharge of pollutants from the facility. While concerns regarding the facility's compliance history are understood, this permit establishes requirements to protect water quality. Complementing the permitting process, DEQ implements a progressive compliance and enforcement program to address alleged non-compliance, and those concerns are addressed outside of the permitting process.*

### **14. Impacts to James River drinking water supplies**

Comments were received regarding concerns associated with impacts from the facility's discharges to drinking water.



*DEQ Response: There are no drinking water intakes below the discharge locations for AdvanSix. In addition, the James River at the facility's discharge points is not designated as a Public Water Supply waterbody in the Virginia Water Quality Standards found in 9VAC25-260. The Virginia Department of Health – Office of Drinking Water (VDH-ODW) was provided a copy of the discharge application and responded in a memo dated March 24, 2021 that they had reviewed the application and noted that the nearest upstream raw water intake is under tidal influence and is located on the Appomattox River approximately 5.0 miles upstream from Outfall 001, 5.2 miles upstream of Outfall 002, and 3.3 miles upstream from Outfall 003, which are the three primary industrial water outfalls for the facility. No further comments were received from VDH-ODW.*

#### **15. Protect the James River**

Comments were received expressing desired protections for the James River and improving water quality.

*DEQ Response: The draft permit is in conformance with the applicable Federal and State laws and regulations, and agency guidance which are designed to protect the public as well as surface waters. Permit limits are designed to be protective of the Virginia Water Quality Standards (WQS) which establish the beneficial uses of all waters in the Commonwealth and the narrative and numeric criteria necessary to ensure water quality is maintained and protected. Those beneficial uses include recreation, e.g., swimming and boating; the propagation and growth of a balanced, indigenous population of aquatic life; wildlife; and the production of edible and marketable natural resources (e.g., fish and shellfish). These WQS are adopted as regulation (9VAC25-260 et. seq.) and represent the best available science to ensure protection of water quality. Additionally, the Virginia Department of Health Office of Drinking Water (VDH-ODW) was consulted on this permit modification to ensure that public health was protected.*

#### **16. Deny permit or oppose permit**

Comments were received objecting to the release of industrial wastewater in general and requesting denial of the permit on the basis of protecting the health of people who use the James River for recreation.

*DEQ Response: Upon receipt of any application for issuance or reissuance of a VPDES permit, DEQ evaluates all available data, including conducting a series of conservative and worse-case statistical analyses to ensure compliance with the Virginia Water Quality Standards. The Virginia Water Quality Standards are established to protect human health and state waters for designated uses that include aquatic life, fish consumption, public water supply (when applicable), recreation, shell fishing, and wildlife. Permits issued under the VPDES permit program include limitations, monitoring, and other requirements established to ensure that point source discharges to surface waters do not cause or contribute to the violation of water quality standards.*

#### **17. Public Participation Process**

The following comments were received related to the public participation process:

- a. Requests to extend the initial comment period by 60 days (initial comment period).
- b. Requests for a hearing.
- c. Reminder that DEQ must provide a briefing to the State Water Control Board (SWCB) regarding controversial permits as required by the §10.1-1184.1 of the Code of Virginia.
- d. Concerns regarding the difficulty hearing speakers during the public hearing.

DEQ Response:

- a. *Extension of the public comment period was not feasible once the comment period was established by the published public notice. However, additional public comment periods were made available that were associated with the Public Hearing, which was held due to public interest in the permit action.*
- b. *Following the close of the first public comment period, DEQ staff's recommendation to hold a public hearing due to the community's interest, which was demonstrated by the attendance at the September 21, 2023, public outreach meeting was approved. The public hearing was held on May 21, 2024, as described above.*
- c. *In accordance with § 10.1-1184.1.B of the Code of Virginia, DEQ provided an overview and update of this draft permit to the SWCB at their quarterly meeting on June 25, 2024. DEQ will continue to provide to the SWCB status updates throughout the permit decision process.*
- d. *At the beginning of the public hearing, DEQ identified that the microphone that was made available by the facility was not operational. At the time, DEQ attempted to compensate for the lack of an amplification system but understands the frustration with attendees having a difficult time hearing the commenters and will take measures in the future to address this technology concern.*

**18. General Comments**

General comments regarding the draft permit and facility included:

- a. Acknowledgement of the enhancements proposed in the draft permit to address ammonia and toxicity of stormwater.
- b. Acknowledgement of proposed decarbonization for nitrogen-based chemicals at the facility.
- c. Acknowledgement of the significant impact the facility contributes to the City of Hopewell and Virginia.
- d. Despite improvements in the permit and at the facility, additional work is needed to protect water quality.
- e. Because of the Kepone incident in the 1970s, the citizens have little trust in their industries in Hopewell to do the right thing.
- f. Citizens rely on the regulatory agencies to help protect them.

DEQ Response: *DEQ acknowledges these comments, and they have been noted in the permit record.*

**19. Comments received that are outside of the scope of this permit action**

The following comments were received that are outside of the scope of the permit action:

- a. Concerns relative to the deposition of airborne nitrogen to surface waters from the facility.
- b. Dissatisfaction with DEQ's decision to not hold a public hearing for the Title V – Air Permit.
- c. Concerns about the volume of water this facility and others are allowed to withdraw from the Appomattox and James Rivers.
- d. Objection to the compliance schedule in the Hopewell Renewal (VA0066630) draft permit.
- e. Mussel plantings by the facility should occur in areas more suitable than Gravelly Run.

*DEQ Response: While DEQ understands the above concerns that have been raised by the public, these issues are outside of the purview of the VPDES permit program or are not relevant to the AdvanSix – Hopewell facility.*