Summary of Public Comments and DEQ Responses

Virginia Pollutant Discharge Elimination System Permit (VPDES) No. VA0093319
Amazon Data Services, Inc. – Lake Anna Tech Campus

The first of two public comment periods was held from November 13, 2025, through December 15, 2025, on the proposed issuance of VPDES Permit No. VA0093319 for the Lake Anna Tech Campus. During the first comment period, written comments were received from 66 commenters.

On March 19, 2026, DEQ held a public hearing at Louisa County Middle School in Mineral, Virginia. There were approximately 90 citizens in attendance, of which 23 speakers presented oral comments on the VPDES permit draft. During the second public comment period, which began January 29, 2026, through April 3, 2026, 38 written comments were received.

The comments, in italicized text, are summarized by topic below. DEQ's responses to the comments associated with each topic follow the italicized text.

<u>Permit Presentation and Minor Disparities Between the ADS Northeast Creek Tech Campus (VA0093301) and the ADS Lake Anna Tech Campus (VA0093319) Permits</u>

1. *Part I.A presentation of a given chemical parameter should be consistently displayed across both permits.*

   A consistent number of significant digits should be used in establishing a maximum QL for a given parameter across both permits.

   Part I.B.1.a listing of metal chemical parameters should be consistently presented in their Total Recoverable form across both permits and should match their corresponding presentation in Part I.A of the permit.

   Part I.C.2 handling of O&M requirements for stormwater and sludge sample collection procedures needs to be consistent in both permits especially where stormwater and sludge sampling are otherwise not expressly required by the permit.

   An erroneous CFR citation exists in both fact sheets and should be corrected.

   VA0093319 Part I.C.10 needs to be re-worked and re-phrased to enhance its enforceability and flexibility.

   DEQ Response:

   The permit, as drafted, is designed to protect the Virginia Water Quality Standards (9VAC25-260 *et seq.*) as well as the receiving stream, Sedges Creek, from any potential impact from the discharge. Differing presentations of Part I.A. parameters between two or more permits when written by different staff is not uncommon. Stylistic differences in terms of the presentation of permit conditions and requirements do not impact the protectiveness of a permit. The permit was prepared in accordance with state and federal regulations and applicable practices and guidance. As such, the permit is protective of the Virginia Water Quality Standards and protects the Commonwealth's waters from pollution.

   The quantification level (QL) for Total Recoverable Copper was revised from 0.50 µg/L to 0.5 µg/L and Total Recoverable Cadmium was revised from 0.030 µg/L to 0.3 µg/L to be consistent with the QLs stipulated in Guidance Memo No. 00-2011 (Guidance on Preparing VPDES Permit Limits). The QL for

Total Residual Chlorine was revised from 0.10 mg/L to 0.1 mg/L to be consistent with the VPDES Permit Writers' Manual (Version 1.02, revised April 1, 2026). All other QLs presented in Part I.B.1.a are consistent with Guidance Memo No. 00-2011.

The Part I.B.1.a listing of metal chemical parameters matches their corresponding presentation in Part I.A.1 of this permit. Differing presentations of Part I.B.1.a parameters between two or more permits when written by different staff is not uncommon. Stylistic differences in terms of the presentation of permit conditions and requirements do not impact the protectiveness of a permit. The permit was prepared in accordance with state and federal regulations and applicable practices and guidance. As such, the permit is protective of the Virginia Water Quality Standards and protects the Commonwealth's waters from pollution.

Operation and Maintenance Manual (O&M Manual) requirements are often tailored to be specific to the activity being regulated by the permit. Differing presentations of O&M Manual requirements between two or more permits when written by different staff is not uncommon. However, the O&M Manual requirements were updated as appropriate in the VPDES permit No. VA0093301 (ADS Northeast Creek Tech Campus) to align with the VPDES permit for ADS – Lake Anna Tech Campus.

Staff agree that the Code of Federal Regulations (CFR) reference in Section C.5 of the fact sheet is incorrect. The fact sheet has been corrected to correctly reference 40 CFR Part 125.92(p).

To enhance flexibility as well as enforceability of the Pond Decommissioning Plan special condition, language was added to the special condition, Part I.C.10, of the permit. This special condition has been revised to state that the Pond Decommissioning Plan must be submitted and reviewed for approval by DEQ. Additionally, it has been updated to state that any modifications to this plan must be submitted and approved by DEQ.

Public Participation Process

2. *Regarding the public participation process, comments received questioned why the public was not aware of the draft permit, why the draft permit was released for public comment during the holidays, and why information related to the public comment period was posted on the last day of the public comment period.*

   DEQ Response:

   Public participation requirements for the public notice of the draft permit were followed as stipulated in the VPDES Permit Regulation (9VAC25-31-290). In accordance with 9VAC25-31-290 C.2., public notice shall be given by publication once a week for two successive weeks in a newspaper of general circulation in the area affected by the discharge. The public notice was published in *The Central Virginian* on November 13, 2025, and November 20, 2025. 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 was also posted on the DEQ website for the duration of the public comment period.

   Additionally, pursuant to Section 62.1-44.15:01.2 of the State Water Control Law, the public notice is to be mailed to the chief elected official and chief administrative officer and planning district commission of the affected locality. DEQ notified the Louisa County Board of Supervisors, the Louisa County Administrator, the Mayor of the Town of Mineral, the Town Manager of the Town of Mineral, and the Thomas Jefferson Planning District Commission on November 10, 2025.

In accordance with the VPDES Permit Regulation (9VAC25-31-290 B.1.), public notice shall allow at least 30 days for public comment. The public notice established a public comment period from November 13, 2025, through December 15, 2025.

The newspaper publications on November 13, 2025, and November 20, 2025, and notifications to the chief elected official and chief administrative officer and planning district commission on November 10, 2025, satisfy the regulatory requirements for public notice. Distribution of public notice information from sources other than DEQ is not within the control of DEQ.

Water Quality Standards and Protection of State Waters

3. *Comments received stated that the facility should not be allowed to discharge treated or untreated water.*

   DEQ Response:

   The Clean Water Act and Virginia's State Water Control Law expressly authorize the discharge of treated effluent into state waters. These activities are governed through the Virginia Pollutant Discharge Elimination System (VPDES), a program delegated by the U.S. Environmental Protection Agency (EPA) to DEQ. Any facility discharging pollutants in Virginia requires a VPDES permit. These permits are provided to municipal wastewater plants, construction sites, agricultural operations, and industrial facilities. Lake Anna Tech Campus proposes to discharge treated noncontact cooling water to state waters and therefore requires a VPDES permit.

   Upon receipt of an application for a VPDES permit, DEQ is required to evaluate and process that application and make a decision to issue, revoke or deny a permit based upon the applicable VPDES Permit Program requirements, which are based on federal authority that EPA has delegated to DEQ, laws passed by the Virginia General Assembly, and requirements in applicable regulations. The VPDES permit, as drafted, conforms with the applicable laws, regulations, policy and guidance.

4. *Comments state that the data center discharge will not be safe and will impact the designated use of downstream waterbodies, specifically Lake Anna. An additional comment expressed concerns with Amazon Data Services, Inc. plans and actions to discharge cooling water into the York River watershed.*

   DEQ Response:

   The permit has been drafted to protect water quality through permit requirements, special conditions, discharge limitations and monitoring requirements of the receiving stream, Sedges Creek. The effluent limits are site-specific and established assuming worst-case, critical conditions in the receiving water and the facility discharging at full design flow. For this facility, due to the small drainage area of Sedges Creek at the proposed point of discharge, the critical low flow volumes of the receiving stream were determined to be zero, as at times there is no natural flow in the stream and accordingly, the stream at times will be comprised only of the discharge. Using flows of zero gallons per day within the stream forces "self-sustaining" or "end of pipe" limits to be calculated and the therefore, the discharge is required to meet all applicable criteria at the point of discharge. This is considered a conservative approach to developing water quality-based effluent limitations because of no further dilution accounted for from stream flows.

   A reasonable potential analysis (RPA) is conducted to compare the calculated wasteload allocation (WLA) values with available discharge data to determine the need for discharge limits. For purposes of this analysis for this facility, because discharge data is currently not available, it was staff's professional judgement to utilize the raw source water data rather than the anticipated concentrations determined by

engineering design and best professional estimates to be conservative in projecting discharge quality. Additionally, proposed treatment additives for the system were considered in this analysis. The permit contains discharge limits based on state and federal regulations and applicable practices and guidance for the following parameters: pH, chlorine, dissolved oxygen (minimum), maximum temperature, hardness, zinc, cadmium, and copper. The permit also contains monitoring for chlorides, aluminum, and dissolved organic carbon with no limitations; however, these parameters will be reassessed along with all other parameters that are sampled during the permit term at the next time of reissuance to determine if a limitation is necessary.

Additionally, special condition Part I.C.5 requires the facility to complete Water Quality Criteria Monitoring twice during the permit term, which contains a list of an additional 123 pollutants. If any of these pollutants are found to be present in the discharge, then they will also be assessed at the time of reissuance to determine if a limitation is necessary. Finally, when the facility submits an application for reissuance, EPA Form 2D is required to be submitted. This form requires sampling for a list of pollutants which are classified as conventional, non-conventional, toxic metals, organic toxic pollutants and certain hazardous substances. If any of these pollutants were to be present in the effluent, a RPA would be conducted to determine if more monitoring or limits were needed in the permit.

VPDES permits are prepared to protect the Virginia Water Quality Standards found in 9VAC25-260 *et seq.* The standards define the beneficial uses of specific waterbodies. Included with the standards are criteria that are used to define the physio-chemical parameters needed to meet the defined beneficial uses, including protection of aquatic life and human health in surface waters.

Staff has determined there is reasonable assurance that the proposed discharge, as proposed to be authorized by the draft permit, will protect beneficial uses, will not violate applicable water quality standards, and will not cause or contribute to significant impairment of state waters, recreation or fish and wildlife resources, proved the applicant complies with all permit conditions. Based upon staff's review and modeling the conditions of the draft permit are protective of existing beneficial uses.

5. *Comments expressed concern with how the limits will be regularly verified, ensuring compliance with effluent limits, how often the parameters are sampled for, possible compliance outcomes for effluent limit violations and the effectiveness of those noncompliance penalties. Additional concerns were expressed with the conflicted interest of the facility self-collecting effluent samples as well as self-reporting on discharge monitoring reports, if an independent laboratory would be testing the samples, and the public transparency of those reports. A comment asked if the public is able to take samples of the discharge.*

   DEQ Response:

   The Clean Water Act was adopted in 1972 and the NPDES (National Pollutant Discharge Elimination System) program was developed to permit point source discharges from municipal and industrial sources. Self-monitoring and reporting is the cornerstone of this program. Utility staff are professionals, required to have the appropriate training and licensure, who are tasked with managing and properly operating wastewater treatment facilities. DEQ, Virginia Department of Health (VDH) as well as the Virginia Department of Professional and Occupational Regulation (DPOR) all have oversight for these facilities and their staff in Virginia. These state agencies each have their own set of regulations and programs, with a series of checks and balances, to ensure proper operation.

   Cases of noncompliance are handled by the DEQ's Water Compliance Program, and depending upon severity, may be referred to DEQ's Enforcement Program. The DEQ Northern Regional Office Compliance staff review the discharge monitoring reports (DMR) required to be submitted by the permittee to verify that the discharge is in conformance with the permit. Additionally, the facility will be subject to periodic inspections by DEQ Water Compliance staff. DEQ utilizes a risk-based protocol comprised of elements

designed to identify facilities that pose the greatest potential for environmental impact. Should noncompliance occur, the appropriate processes will take place to address that.

The proposed permit requires sampling of all listed parameters in Part I.A. The most infrequent sampling of parameters occurs on a monthly basis with some parameters being sampled on a once-per-day basis. Samples are sent to an independent and state approved lab for testing. The facility is required to submit a monthly electronic DMR to DEQ. On the DMR, the facility reports all monitored parameter values that are contained in Part I.A of the permit. Additionally, any other reports or sampling that are not contained in Part I.A of the permit are submitted for DEQ review. The DEQ Northern Regional Office Compliance team reviews the DMRs and other required reports to verify that the discharge is in conformance with the permit. DMR results can be found online through the EPA Enforcement and Compliance History Online (ECHO) database. This system and process is typical for facilities with VPDES permits.

Individuals and organizations can conduct their own monitoring projects of state waters. However, monitoring of waterbodies or discharges that are located on private property may occur only with the permission of the property owner.

6. *A comment stated that there were only two outfall monitoring sessions for the permitted term and that there were no pollutant specific limits and the reporting requirements were only annual and the reporting should be at least monthly. The comment also expressed concern that the O&M manual can be edited and questioned whether DEQ will review the edits. Additionally, there were concerns about the facility being allowed to bypass. Finally, the commentor said they would like to see a bond posted so that the treatment facility is finished.*

   DEQ Response:

   The effluent limits and monitoring requirements are found in Part I.A of the proposed permit. This part of the permit outlines the requirements for continuous testing for flow rate, daily sampling for pH, total residual chlorine, dissolved oxygen and temperature, as well as monthly testing for chlorides, hardness, total recoverable zinc, total recoverable cadmium, total recoverable copper, total recoverable aluminum and dissolved organic carbon are also required. Of these parameters, limits are imposed for pH, total residual chlorine, dissolved oxygen, temperature, hardness, total recoverable zinc, total recoverable cadmium and total recoverable copper.

   The two water quality monitoring events required by Part I.C.5 of the proposed permit are in addition to the monitoring required by Part I.A. This condition requires the facility to complete Water Quality Criteria Monitoring twice during the permit term, which contains a list of an additional 123 pollutants. If any of these pollutants are found to be present in the discharge, then they will also be assessed at the time of reissuance to determine if a limitation is necessary.

   The Operations and Maintenance (O&M) Manual is required to detail the practices and procedures which will be followed to ensure compliance with the requirements of the permit. Part I.C.2 of the permit requires that the facility develop and maintain a current O&M Manual for the facility. Any changes in the practices and procedures followed by the permittee are required to be documented in the O&M Manual within 90 days of the effective date of the changes. The O&M Manual is required to be available to DEQ personnel for review during facility inspections as well as within 30 days of a request by DEQ.

   The VPDES Permit Program has no requirement nor the authority to require bonds to ensure aspects of a project are complete. Therefore, the proposed permit does not require a bond to be kept in place to ensure that the treatment facility is finished.

7. *Comments stated that the permit should require flow limitations and continuous monitoring of Total Dissolved Solids (TDS), chloride, salts, chlorine and "other pollutants." A separate comment stated that Amazon should be required to install and provide real-time monitoring and logging meters and sensors for flow, temperature, dissolved solids and other applicable chemical compounds in the discharge. Another similar comment asked if the flow would be constant or if it could be turned on and off. Additionally, other comments wanted corrective action requirements.*

   DEQ Response:

   Operation of the evaporative cooling system will be determined by the ambient temperature and humidity. Evaporative cooling is generally used when the ambient air temperature is above the threshold for air cooling. The applicant anticipates that the direct evaporative cooling system for the Lake Anna Tech Campus will likely operate during the warmest months of the year (April – October). A continuous discharge of noncontact cooling water is not anticipated during this period. When the cooling system is needed, they anticipate that it will run for approximately eight hours during the day and will likely not be needed every day. The maximum cooling system operation is expected to be three continuous days. Any unseasonably warm periods could warrant an increase in operation.

   DEQ establishes discharge limits and monitoring frequencies based on consideration of agency guidance, the VPDES permit writer's manual and professional judgment for a specific discharge. All the sampling frequencies for parameters contained within the proposed permit were selected based on the VPDES Permit Writer's Manual recommendations (*Version 1.02, revised July 30, 2025*). The proposed permit requires continuous monitoring of the discharge through the use of Totalizing, Indicating, and Recording Equipment (TIRE). It is staff's professional judgement that continuous measurements of pollutant concentrations or listing of corrective action requirements are not warranted for this discharge.

8. *A comment asked what safeguards will be in place to ensure the cooling water meets all the DEQ requirements as far as the quantity and quality of the water being released. An additional comment asked, what contingency plan exists if measurable harm to water quality, fish populations, or aquatic vegetation occurs? Finally, another comment suggested that any monetary fines assessed for noncompliance issues of the facility appropriately reflect the "deep pockets" of ADS.*

   DEQ Response:

   The proposed permit has been drafted in accordance with the applicable laws, regulations, policy and guidance and compliance with the permit will protect water quality and the existing beneficial uses of the receiving stream. The DEQ Northern Regional Office Compliance staff reviews the DMRs and reports required to be submitted by the permittee to verify that the discharge is in conformance with the permit. The facility is also subject to periodic inspections by DEQ Water Compliance staff. DEQ utilizes a risk-based protocol comprised of elements designed to identify facilities that pose the greatest potential for environmental impact. Should noncompliance occur, the appropriate processes will take place to address that.

   Cases of noncompliance are handled by the DEQ's Water Compliance Program, and depending upon severity, may be referred to DEQ's Enforcement Program. Should the enforcement measure include civil charge, penalty or fine, those are based upon specific criteria for calculating the appropriate penalty for each violation based on the following factors: the severity of the violations; the extent of any potential or actual environmental harm; the compliance history of the facility or person; any economic benefit realized from the noncompliance; and the ability of the person to pay the penalty.

9. *Comments expressed concern with the temperature of the effluent raising the temperature of Lake Anna and asked what the expected temperature of the discharge. Specifically, comments were received regarding the*

temperature of Lake Anna and its effect on the operations of the Dominion Nuclear Power Plant located on Lake Anna. Additional comments included: "What is the maximum potential discharge volume under peak summer operating conditions?", "What is the maximum possible discharge temperature and chemical concentration under worst-case scenarios?", and "Please provide the engineering models or reports supporting these projections."

DEQ Response:

The permit has been drafted is to protect water quality of the receiving stream, Sedges Creek, through permit requirements, special conditions, discharge limitations and monitoring requirements. Additionally, due to the small drainage area of Sedges Creek at the proposed point of discharge, the critical low flow volumes of the receiving stream were determined to be zero, as at times there is no natural flow in the stream, and accordingly, the stream at times will be comprised only of the discharge. Using flows of zero gallons per day within the stream forces "self-sustaining" or "end of pipe" limits to be calculated and the therefore, the discharge is required to meet all applicable criteria at the point of discharge. This is considered a conservative approach to developing water quality-based effluent limitations because of no further dilution accounted for from stream flows.

Based upon information provided by the applicant, the facility utilizes an adiabatic cooling process. Adiabatic cooling involves direct contact between the air stream and water in a soaked evaporative medium. Outside air is drawn through the media causing the water to evaporate. The evaporation process absorbs the heat, and the cooled air is then directed through the building. As a result, the discharge, which flows to Sedges Creek, is not expected to have a thermal component. The permit application indicates that the temperature of final discharge is expected to be equivalent to the ambient temperature of the water entering the treatment system and therefore not expected to raise the temperature of the receiving stream.

However, because heat is a pollutant that has a reasonable potential to be present in the discharge, the proposed permit contains a daily maximum temperature limit of 32° C (89.6° F) in accordance with the water quality criteria, 9VAC25-260-50. The engineering models were not submitted with the application materials received by DEQ as these were not required for processing this application.

10. *Comments requested detailed advanced notice of water releases which include why the discharge was occurring, how the discharge was occurring, details of volume of the discharge, what time the discharge was occurring as well as duration of the discharge, the intended purpose of the discharge, effluent monitoring data, ecological impact and lake level projections. Additional comments raised concerns over navigational safety and lawful operation of regulated commercial vessels in Lake Anna if lake levels were to elevate.*

    DEQ Response:

    Part I.C.8 of the permit requires notification prior to the commencement of the initial discharge from Outfall 001 to surface waters. Further public notification of the proposed discharge, after a permit is issued, is not a requirement under VPDES Permit Program as notification of the proposed project and its details are provided during the permit application process.

    Once a discharge to surface waters commences, Discharge Monitoring Reports (DMRs) will provide information on when and how much was discharged on a daily basis for the previous month in which a discharge to surface waters did occur. Details of monthly discharges including flow averages, flow maximums and pollutant concentrations can be found online through the EPA ECHO database.

The VPDES Program has purview to regulate discharges to surface waters and therefore, the regulatory oversight of the program is limited to evaluating potential water quality impacts to surface waters associated with the discharge. Navigational safety is not withing the purview of this program.

11. *A comment stated concern with protection of Sedges Creek and Lake Anna during extreme weather events. An additional comment asked if there are safeguards in place that preclude release of this water other than where it is intended to go (e.g., flooding roads, etc.).*

    DEQ Response:

    The discharge limits established in the permit are site-specific and based upon worst-case, critical conditions and the facility discharging at full design flow to ensure water quality is not adversely impacted during these times. Additionally, due to the small drainage area of Sedges Creek at the proposed point of discharge, the critical low flow volumes of the receiving stream were determined to be zero as at times there is no natural flow in the stream and accordingly, the stream at times will be comprised only of the discharge. Using flows of zero gallons per day within the stream forces “self-sustaining” or "end of pipe" limits to be calculated and the therefore, the discharge is required to meet all applicable criteria at the point of discharge. This is considered a conservative approach to developing water quality-based effluent limitations because of no further dilution accounted for from stream flows.

    The facility is authorized to discharge only at the specific discharge point identified by the permit. The permitted discharge is a point source conveyed through fixed infrastructure and relocating the discharge point without prior authorization from DEQ would constitute a permit violation.

12. *Comments requested reasons as to why the facility cannot treat the noncontact cooling water to a level that would be able to be reused and result in the facility not requiring an effluent discharge.*

    DEQ Response:

    DEQ coordinated with the applicant regarding this comment, and the resulting response is as follows: Non-contact cooling water (NCCW) can be treated after use in the direct evaporative cooling (DEC) system and re-used; however, viable water supply treatment methods (e.g., reverse osmosis and crystallization) are energy-intensive and will generate solid waste for off-site disposal. Because air cooling will be sufficient for approximately 96% of the year at the Lake Anna Tech Campus, the applicant balanced water usage with energy demands.

13. *Comments expressed concerns with the ability to remove amounts of metals from surface water if the facility discharges these to a detrimental amount over time.*

    DEQ Response:

    A reasonable potential analysis is conducted to compare the calculated wasteload allocation (WLA) values with available discharge data to determine the need for discharge limitations for each metal to ensure the continued protection of the receiving stream. For purposes of this analysis for this facility, because discharge data is currently not available, it was staff’s professional judgement to utilize the raw source water data rather than the anticipated concentrations determined by engineering design and best professional estimates to be conservative in projecting discharge quality. Additionally, proposed treatment additives for the system were considered in this analysis. The reasonable potential analysis, and therefore any resulting limitations, will be updated with each permit reissuance using discharge data to ensure that existing limits or new limits for concentrations of metals and other pollutants are protective of water quality criteria at the point of discharge.

14. *Comments expressed concerns with the impact to the residential water supply and questioned who would be held responsible if local citizens were to become ill as a result of contamination in the water supply, who will be legally responsible for environmental remediation and if there will be an environmental bond or insurance policy in place to cover potential remediation costs?*

    DEQ Response:

    The proposed discharge location is not to a stream designated as a public water supply. DEQ coordinated with the Virginia Department of Health (VDH) – Office of Drinking Water on the application and VDH provided the following comments. The nearest downstream raw water intake is located approximately 30 miles from the discharge point. There are also no identified public water supply groundwater wells located within a 1-mile radius from the discharge.

    The VPDES Permit Program has no requirement nor the authority to require bonds for environmental remediation. Therefore, the proposed permit does not require a bond to be kept in place to cover potential remediation costs.

    No adverse environmental impacts are anticipated provided the facility remains in full compliance with its permit, as the discharge limits and permit conditions are developed to protect the water quality and beneficial uses of the receiving stream. Should noncompliance with the VPDES permit occur, it will be addressed by DEQ's Water Compliance Program, and depending upon severity, may be referred to DEQ's Enforcement Program.

15. *Comments expressed concerns with PFAS being discharged from the facility.*

    DEQ Response:

    The facility is not an expected source of PFAS. However, the draft permit contains a special condition, simply called Reopeners (Part I.C.3), which outlines various situations in which DEQ has the authority to reopen and modify a permit once it has been issued. This condition specifically addresses PFAS, noting that the permit may be reopened "To incorporate changes to any applicable standard or requirement, including those related to per- and polyfluoroalkyl substances, for discharges of pollutants promulgated under Section 402 of the Clean Water Act, the State Water Control Law, or 9VAC25-31-10, et seq., of the Virginia Pollutant Discharge Elimination System Permit Regulation."

16. *Comments stated concern with the facility causing pollution for the parameters of E. coli, legionella bacteria, Hydrilla growth, PCBs, and other conditions that may cause algal blooms.*

    DEQ Response:

    A reasonable potential analysis (RPA) is conducted to compare the calculated wasteload allocation (WLA) values with available discharge data to determine the need for discharge limits. For purposes of this analysis for this facility, because discharge data is currently not available, it was staff's professional judgement to utilize the raw source water data rather than the anticipated concentrations determined by engineering design and best professional estimates to be conservative in projecting the quality of the discharge. Additionally, proposed treatment additives for the system were considered for RPA. Based upon this information, the noncontact cooling water discharge is not expected to be a contributor of nutrients, bacteria or PCBs. PCBs are not known to be present in the source water. For nutrients and bacteria, those that are present in the discharge are anticipated due to those being present in the source water.

    The facility will utilize chlorine treatment to disinfect the discharge and therefore removing pathogens such as *E. coli* and legionella bacteria. The treatment process also includes dechlorination to remove the chlorine

before discharge. The RPA conducted found a limit for Total Residual Chlorine to be necessary at a Daily Maximum concentration of 0.016 mg/L and a Monthly Average concentration of 0.008 mg/L. Both of these limits are included in the permit.

17. *Comments asked where the residual solids generated during the process will be dewatered and disposed of and what dewatering means.*

    DEQ Response:

    In general, dewatering is the removal of water from the solids after they are separated from the treatment process. Residual solids generated during the industrial process will be dewatered and disposed of off-site in accordance with state and federal regulations. The facility plans to dewater by taking backwash waste from the multimedia filters and then thicken using plate settlers. The solids will then be held in solids holding tanks for additional gravity thickening and dewatered using a filter belt press. Dewatered solids will be managed by a qualified and licensed vendor with wastes disposed of at a permitted facility in accordance with state waste regulations.

18. *Comments stated that DEQ should require more stringent thermal discharge limitations.*

    DEQ Response:

    The discharge limit for temperature is the water quality criteria for temperature as outlined in the water quality criteria, 9VAC25-260-50. A daily maximum temperature limit of 32° C with a monitoring frequency of once per day (1/Day) is included in the permit.

19. *A comment asked what the current summer temperature of creek water flowing into Lake Anna is and what is the current volume of water flowing from Sedges Creek to Lake Anna? Additionally, what is the calculated mixed water temperature downstream of Amazon discharge at the proposed flow and temperature discharge?*

    DEQ Response:

    A reasonable potential analysis (RPA) is conducted to compare the calculated wasteload allocation (WLA) values with available discharge data to determine the need for discharge limits. For purposes of this analysis for this facility, because discharge data is currently not available, it was staff's professional judgement to utilize the raw source water data rather than the anticipated concentrations determined by engineering design and best professional estimates to be conservative in projecting the quality of the discharge. As the analysis is based upon the receiving stream, Sedges Creek, at the discharge location, further data downstream is not needed to complete the analysis.

    Additionally, due to the small drainage area of Sedges Creek at the proposed point of discharge, the critical low flow volumes of the receiving stream were determined to be zero, as at times there is no natural flow in the stream, and accordingly, the stream at times will be comprised only of the discharge. Using flows of zero gallons per day within the stream forces "self-sustaining" or "end of pipe" limits to be calculated and the therefore, the discharge is required to meet all applicable criteria at the point of discharge. This is considered a conservative approach to developing water quality-based effluent limitations because of no further dilution accounted for from stream flows.

20. *A comment asked the following questions; "What specific chemicals are used in the cooling water treatment program", "What are the maximum discharge concentrations of each chemical?", "How frequently are these chemicals removed through cooling tower blowdown cycles?", "Will the discharge contain chlorine, bromine, or isothiazolin-based biocides?", "What is the expected Total Dissolved Solids*

(TDS) concentration in the discharge compared with the natural baseline levels of Lake Anna?", "Please provide the complete chemical list and Safety Data Sheets (SDS) for the cooling tower treatment program." and "Will biological treatment occur prior to discharge into the lake?" Another comment asked what limits of the physical and chemical properties, thermal, and metals pollutants will be permitted.

DEQ Response:

Based upon information provided by the applicant, the following chemicals will be utilized as part of the facility's treatment processes: 25% sodium hydroxide, 93% sulfuric acid, 40% sodium bisulfite, polyaluminum chloride, polymer, sulfide-functional polymer, and 32% calcium chloride. These chemicals are removed during the treatment process; however, Total Residual Chlorine (TRC), chlorides and pH are monitored to ensure they have been removed and that the treatment process is operating properly. The Safety Data Sheets were provided with the permit application and can be provided to individuals by request or found online through internet search.

For purposes of this analysis for this facility, because discharge data is currently not available, it was staff's professional judgement to utilize the raw source water data rather than the anticipated concentrations determined by engineering design and best professional estimates to be conservative in projecting the quality of the discharge. Additionally, proposed treatment additives for the system were considered for this analysis. As the analysis is based upon the receiving stream, Sedges Creek, at the discharge location, further data downstream is not needed to complete the analysis. Additionally, due to the small drainage area of Sedges Creek at the proposed point of discharge, the critical low flow volumes of the receiving stream were determined to be zero, as at times there is no natural flow in the stream, and accordingly, the stream at times will be comprised only of the discharge.

The raw source water has a concentration for TDS of approximately 54 mg/L. Due to the proposed six cycles of concentration, the spent noncontact cooling water blowdown is expected to contain a TDS concentration of approximately 324 mg/L.

Chlorine will be utilized as the biological treatment method for the facility and dechlorination will be utilized before discharge occurs.

The permit contains discharge limits based on state and federal regulations and applicable practices and guidance for the following parameters: pH, chlorine, dissolved oxygen (minimum), maximum temperature, hardness (minimum), zinc, cadmium, and copper. The discharge concentration limits, where applicable, are noted in the permit's Part I.A tables and can be provided to individuals upon request.

21. *A comment asked the following questions: "Will this discharge be regulated under a National Pollutant Discharge Elimination System (NPDES) permit?", "Which regulatory agency will be responsible for enforcement and compliance monitoring?" and "Will the full permit conditions be available for public review prior to approval?"*

DEQ Response:

The proposed permit is a National Pollutant Discharge Elimination System (NPDES) permit, but more specifically a Virginia Pollutant Discharge Elimination System (VPDES) permit. The EPA has delegated authority to the Virginia DEQ to implement the NPDES program under the name VPDES. DEQ also oversees compliance and enforcement of these permits.

Yes, the draft permit was under the public review period during the draft permit public comment period from November 13, 2025, through December 15, 2025, and during the public hearing comment period from

January 29, 2026, through April 3, 2026. The draft permit is also available for review at the DEQ Northern Regional Office by appointment or electronically by request.

22. *Comments asked how many gallons per day will be discharged into Lake Anna, whether 280,000 gallons per day was being discharged every day or only on days when evaporative cooling is being used at the facility, what air temperature does ADS anticipate switching to evaporative cooling, what percentage of the lake's total volume or daily inflow does this represent, will the discharge be continuous or periodic blowdown events, and how will volumes change during summer peak cooling demand (June–September). An additional comment asked "What is the 20-year projection for discharge volumes from this facility?" and "Could future AI data center expansion or increased computing density increase discharge volumes?"*

    DEQ Response:

    The proposed discharge location for this facility is to Sedges Creek, which flows into the Waste Heat Treatment Facility (WHTF) for the North Anna Power Station. The percentage of total volume of WHTF compared to the proposed discharge volume was not calculated when developing the proposed permit.

    While operations will be climatically dependent, the proposed permit is structured to account for the critically low flow times of the receiving stream and full operation of the treatment system. Due to the small drainage area of Sedges Creek at the proposed point of discharge, the critical low flow volumes of the receiving stream were determined to be zero, as at times there is no natural flow in the stream, and accordingly, the stream at times will be comprised only of the discharge. Using flows of zero gallons per day within the stream forces "self-sustaining" or "end of pipe" limits to be calculated and the therefore, the discharge is required to meet all applicable criteria at the point of discharge. This is considered a conservative approach to developing water quality-based effluent limitations because of no further dilution accounted for from stream flows.

    Relying on 30 years of weather data for the area, the applicant conservatively calculated the number of hours the noncontact cooling system may need to run, which is about 350 hours or approximately 4 percent of the year. The applicant said it is more accurate to measure the noncontact cooling system run time in hours than days because the system can turn on and off throughout the day, as determined by weather conditions, and will not likely run continuously all day. Based on the design of the noncontact cooling system and equalization tanks, the maximum flow rate is estimated at 194 gallons per minute. For days when the noncontact cooling system is needed, the facility estimates between 1 to 12 hours of continuous noncontact cooling system operation. The facility anticipates a maximum daily discharge of 140,000 gallons during any typical year.

    VPDES permits are developed to protect water quality based upon conducting a reasonable potential analysis of wasteload allocations using the proposed facility operating at full capacity. Therefore, a limit on the volume of water discharged is not necessary as any increase in treatment capacity is subject to further review. The permit lists 280,000 gallons per day as this is the noncontact cooling water treatment system capacity.

    There are many variables that can influence the discharge volume; thus, the facility relied on high-level estimates. Assuming 350 hours of water cooling is needed per year and a discharge flow rate of 4,000 gallons per hour, an estimated 28 million gallons of treated noncontact cooling water would be discharged over 20 years. If a need for flow volume expansion were to present itself, the applicant would be required to apply for a permit modification or address the expansion during a future reissuance of the permit.

    The applicant anticipates the discharge will be periodic, mainly in April through October of each year, depending on the cooling needs of the system as determined by the ambient temperature in the area. Water is anticipated to only be needed during days when ambient temperatures are warmer, around 88° F (31° C).

However, it is not anticipated that the cooling system will run continuously during these months. Equalization tanks are included in the design to stabilize the discharge flow.

23. *A comment questioned that if water cooling was only needed by the facility on the hottest days, then why is the permit written for discharge to be occurring on a daily basis?*

    DEQ Response:

    The proposed permit outlines requirements which allow for operational flexibility at the facility while also being protective of the receiving stream during times of critically low flow periods. Additionally, the facility utilizes equalization tanks to control the volume and timing of discharge and restricting the facility discharge to certain days would limit the use of these tanks.

24. *A comment asked how long the evaporation pond would be in use and what engineering procedures are in place to ensure the pond does not overflow during severe storms.*

    DEQ Response:

    DEQ coordinated with the applicant regarding this comment, and the resulting response is as follows: The evaporation pond is proposed to be used during construction of the water line from the Northeast Creek Reservoir to the facility. The pond is designed with sufficient freeboard to withstand a 100-year storm and can store more than 3.2 million gallons of water.

25. *A comment asked how the sewage water from the facility was to be handled.*

    DEQ Response:

    In the short term, domestic sewage is stored in container and periodically hauled offsite for disposal. Two Virginia Department of Health (VDH)-permitted Alternative Onsite Sewage Systems (ASOS) are under construction at the campus and will be utilized after completion to treat domestic sewage. The ASOS are underground septic systems and do not discharge to surface waters.

26. *Comments asked to see environmental impact studies, future ecological impact studies, studies that had been completed projecting the impact of the discharge, studies that showed the potential of cumulative water demand impacts, studies that show the thermal plume in Lake Anna, studies of aquatic toxicity, modeling that has been completed in regards to fish populations, amphibians and aquatic vegetation, models that have been run under 100-year drought conditions, and independent environmental analysis confirming that the discharge will not harm aquatic life. It was asked that DEQ require a comprehensive water availability and cumulative impact analysis.*

    DEQ Response:

    Under the VPDES Program, environmental or ecological studies, water demand impacts, cumulative impact assessment of a watershed, or the other requested studies is not a requirement of DEQ or the permittee/applicant. Rather VPDES Permits are prepared to protect the Virginia Water Quality Standards found in 9VAC25-260 of the receiving stream at the point of discharge, which is Sedges Creek. The standards define the beneficial uses of specific waterbodies. Included with the standards are criteria used to define the physio-chemical parameters needed to meet the defined beneficial uses, including protection of aquatic life and human health in surface waters. The draft permit was prepared to protect these standards.

27. *A comment asked where on the creek the discharge would be occurring.*

DEQ Response:

The facility proposes to discharge to Sedges Creek. The coordinate for proposed discharge outfall is 38° 02' 45.77" N, 77° 48' 45.19" W.

28. *Comments expressed a request for adaptive management provisions to address unforeseen impacts, clear boundaries preventing unchecked future expansion and serious consideration of alternative cooling technologies that minimize or avoid lake impacts.*

DEQ Response:

While DEQ acknowledges the value of long-term planning and environmental stewardship, the VPDES permit does not require adaptive management provisions, expansion controls, or alternative technology evaluations, and therefore these elements were not part of the permit development process. However, permits are re-evaluated every five years during the reissuance process. Any proposed facility expansions must be formally requested and will be reviewed, with permit limits updated as necessary to reflect any revisions to the Water Quality Standards.

29. *Comments expressed that Dominion Energy assured local residents that water would not be discharged into Lake Anna and that the document titled "Dominion Energy's Management Plan Lake Anna Waste Heat Treatment Facility (Cooling Lagoons) Located in Louisa County Virginia" prohibits discharge to Lake Anna. An additional comment stated that ADS discharging to water that flows to Lake Anna are not contemplated in the original Lake Anna cooling pond use documents and allowing an industrial discharge associated with a private data center represents a fundamental change in that use that goes beyond the lake's original purpose and permitted intent and regulatory compliance does not address the broader implications of introducing a new industrial use into a system designed for a different function.*

DEQ Response:

The proposed discharge is to Sedges Creek which flows into the Waste Heat Treatment Facility (WHTF) for the North Anna Power Station.

The "Dominion Energy's Management Plan Lake Anna Waste Heat Treatment Facility (Cooling Lagoons) Located in Louisa County, Virginia" document applies only to Dominion Energy's WHTF and establishes guidelines related to recreational access, use of company property, and landowner activities. During the public comment period Dominion Energy was provided with the draft permit materials and did not submit comments during the public comment period.

The VPDES permit, as drafted, conforms with the applicable laws, regulations, policy and guidance.

<u>Water Source and Water Withdrawal</u>

30. *A comment asked to identify what treated noncontact cooling water is defined as and the source of this water.*

DEQ Response:

The Lake Anna Tech Campus will house computing equipment that will store, process, and distribute digital data. Data processing produces heat which results in components needing to be cooled. The Lake Anna Tech Campus will utilize direct evaporative cooling, also known as adiabatic cooling, for this

purpose. Adiabatic cooling involves direct contact between the air stream and water in a soaked evaporative medium. Outside air is drawn through the media causing the water to evaporate. The evaporation process absorbs the heat, and the cooled air is then directed through the building. Water that is not evaporated is recycled through the system. After the six cycles of concentration, the water no longer meets the specifications of the cooling system and is considered "spent". The spent water is treated and discharged as noncontact cooling water blowdown, as it has not come into direct contact with any raw materials, products, or byproducts as defined at 40 CFR Part 125.92.

The source water for the adiabatic noncontact cooling system will initially be served by on-site groundwater wells during construction of a new 12-mile long pipeline from the nearby Northeast Creek Reservoir. Upon completion of the pipeline, the source water for the cooling system will solely be obtained from the reservoir.

31. *Comments expressed concerns that data centers should not be allowed to take water from streams. Additional comments expressed concerns over water being withdrawn in times of drought and affecting the water levels of Lake Anna, Northeast Creek Reservoir, and local resident drinking wells. Additionally, other comments asked how long the groundwater wells were planned to be used, and if after the pipeline is completed will the groundwater wells continue to be in operation and how many groundwater wells are onsite.*

    DEQ Response:

    Once the pipeline is in operation allowing water from the Northeast Creek Reservoir to be sourced, the groundwater wells will cease to be used as the source water for the noncontact cooling water.

    Concerns pertaining to the withdrawal of surface water for use by data centers is not within the purview of the VPDES Permit Program; therefore, the comment is outside the scope of this permitting action. Withdrawal of surface waters is under the purview of DEQ's Office of Water Withdrawal Permitting and the Virginia Water Protection (VWP) Permit Program Regulations (9VAC25-210-310). Water supply planning is a focus of DEQ's Office of Water Supply, which oversees the periodic development of local, regional, and state water supply plans. In accordance with the Local and Regional Water Supply Planning Regulation (9VAC25-780), water supply plans include information on environmental resources, existing and anticipated water sources, existing and projected water use and demand, the potential for water supply deficits, and proposals for new sources of water to address deficits if necessary. This concern has been shared with those programs.

32. *Comments expressed concerns that discharging to Sedges Creek will create excessive erosion in the creek. Some additional comments expressed concerns with additional water being added to the watershed and water table.*

    DEQ Response:

    This permitting action governs the discharge of industrial process water. DEQ has other programs in place to protect water resources from land disturbance and post construction stormwater. The Virginia Erosion and Stormwater Management Program (VESMP) Regulation establishes erosion and sediment control requirements for land-disturbing activities as well as stormwater management requirements addressing post-construction water quality and quantity. This permitting action does not address requirements in the VESMP Regulation; therefore, this comment is outside of the scope of this permit. However, staff has relayed these concerns to the appropriate DEQ program.

33. *A comment suggested that ADS construct a discharge pipe to discharge directly into Lake Anna as to not wash sediment into the lake.*

DEQ Response:

Under the VPDES program, DEQ's authority is limited to regulating pollutant levels of a discharge at the proposed discharge location. DEQ does not have regulatory authority to specify the physical routing or location of the discharge point.

Comments Concerning Data Center Operations

34. *Comments asked if the facility utilizes a closed-loop chilled water system or an open-loop evaporative cooling tower system, why a discharge-based cooling system was selected and or approved rather than a zero-liquid-discharge cooling design, whether a discharge-based cooling system was simply a preference over a non-discharging system, and what would have been the water consumption difference and cost differential between the proposed system and a zero-liquid-discharge system. Additionally, another commentor suggested that ADS curtail operations at the facility when water would be needed in order to eliminate the need for water.*

    DEQ Response:

    Permittees are responsible for selecting the water treatment systems used at their facilities and DEQ does not have the regulatory authority to establish operational requirements for individual facilities. DEQ coordinated with the applicant regarding this comment and was informed that they considered a number of cooling systems, including a zero-liquid or zero-water discharge design and chose to balance the potential effects of water use with increased electrical demand. Zero-water systems require managing large volumes of refrigerants to cool the data halls. The additional heat rejection equipment increases the size of the campus and the needed freeze protection introduces additional chemicals on site (e.g., a glycol solution with corrosion inhibitors), which must be periodically replaced and disposed of as a waste.

    The applicant anticipates that the direct evaporative cooling system for the Lake Anna Tech Campus will likely operate during the warmest months of the year (April – October). Curtailing operations at the facility during these months would require the data center to shut down, disrupting online services.

35. *A comment asked how much water is evaporating from the mediums per day when in use and whether there is anything else aside from water that is evaporating off the cooling medium into the atmosphere.*

    DEQ Response:

    When the cooling system is in use, each data center building is estimated to evaporate an average of 19,000 gallons per day. Only water evaporates from the cooling media.

Comments Not Within the Purview of the VPDES Permit Program

36. *Comments expressed concerns that an agreement was made between ADS and Louisa County that wastewater was to be recycled and not discharged, which was a condition that was required before construction was to be allowed. Some commenters questioned whether ADS had always intended to discharge from the facility, when telling Louisa County that there would be no discharge to have the pending construction approved. Additionally, some commenters requested that the facility be required to use alternative methods and water recycling to avoid effluent discharge. An additional comment expressed*

that ADS should be held to their original commitment with Louisa County and return the discharge water to its source at Northeast Creek reservoir or the North Anna River.

DEQ Response:

DEQ appreciates the concern expressed; however, it falls outside the agency's purview. The comment has been shared with the applicant for their awareness.

37. *Comments expressed concerns that the construction of the facility has resulted in rainwater runoff and sediment deposits entering Lake Anna and Sedges Creek. Additional comments expressed concern that the tree line buffer of the construction was more narrow than required.*

DEQ Response:

DEQ staff appreciates the concerns raised regarding stormwater runoff, sedimentation, and buffer alterations during the construction phase and has shared these concerns with DEQ's Virginia Erosion and Stormwater Management Program (VESMP) for further investigation. Construction stormwater is not within the purview of the VPDES permit program and that this permit action only addresses the proposed point source discharge from the cooling water treatment system.

38. *Comments expressed concerns about the lack of transparency and oversight with the facility in terms of construction and long-term planning.*

DEQ Response:

DEQ appreciates the submitted comment and has forwarded it to the applicant for their consideration. In response, the applicant has provided a website (https://lakeannatechcampus.info/) where questions regarding the facility can be submitted through the "Feedback" button.

39. *Comments expressed concerns with the Louisa County Board of Supervisors deriving personal gain from allowing ADS to build the data center. Another commentor stated that a member of the Louisa County Land Planning Commission sold the property for the facility to ADS and noted that it was a conflict of interest.*

DEQ Response:

DEQ appreciates the submitted comment and has forwarded it to Louisa County for their consideration. The VPDES Program has purview to regulate discharges to surface waters and therefore, the regulatory oversight of the program is limited to evaluating potential water quality impacts to surface waters associated with the discharge. Local property transfers or hypothetical conflicts of interest are not factors in the regulatory review or permit decision.

40. *A comment expressed that they would like to be notified of changes to the Aspen Hill subdivision.*

DEQ Response:

The VPDES Program has purview to regulate discharges to surface waters and therefore, the regulatory oversight of the program is limited to evaluating potential water quality impacts to surface waters associated with the discharge. Land use and development planning is under the authority granted to the localities, not DEQ.

41. *Comments expressed concerns about the facility lowering local property values.*

    DEQ Response:

    The VPDES Program has purview to regulate discharges to surface waters and therefore, the regulatory oversight of the program is limited to evaluating potential water quality impacts to surface waters associated with the discharge. Land use and development planning is under the authority granted to the localities, not DEQ.

42. *Comments expressed concern over the facility creating noise, pollution, congestion, water usage and electrical bill increases.*

    DEQ Response:

    The VPDES Program has purview to regulate discharges to surface waters and therefore, the regulatory oversight of the program is limited to evaluating potential water quality impacts to surface waters associated with the discharge. Issues such as noise levels, site traffic, local air emissions, utility usage, or potential effects on customer utility rates fall under the authority of local land-use processes, other state regulatory programs, or the utility provider.

43. *A commentor asked if ADS planned to make physical modifications to Sedges Creek to handle the large volumes of flow.*

    DEQ Response:

    The applicant has indicated that there are no plans nor is there an anticipated need for modification of either the stream bank or bed of Sedges Creek to accommodate the anticipated discharge volume from the outfall. However, should modification to the stream bed or bank be needed to provide channel protection, the oversight of this activity is under the purview of the Virginia Water Protection Permit Program (VWPP) and not VPDES. Additionally, the site is currently permitted under the VWPP Program and any additional stream impacts would be overseen and evaluated by that program.

44. *A comment was submitted saying that the Army Corps of Engineers on Jun 13, 2024, regarding the joint federal and state permits for this project, reported that the proposed action will result in an adverse effect on site 44LS0298 and this was not mitigated by mid-July and would like to know what was done with that.*

    DEQ Response:

    The VPDES Permit Program was not contacted by the U.S. Army Corps of Engineers regarding any adverse effect determination for site 44LS0298 as it pertains to the VPDES permit. The DEQ VWP program has a joint permit (VWP Individual Permit #232060) with the U.S. Army Corps of Engineers on this project. Based on the information available, the proposed discharge as limited in the draft VPDES permit will not cause adverse effects to water quality. The comment has been forwarded to the DEQ VWPP Program for their consideration.

45. *A commentor asked what will ADS do if the permit is denied.*

    DEQ Response:

    If a VPDES permit is denied, the applicant is not authorized to discharge treated wastewater to state waters. In this situation, the facility would need to either revise and resubmit its permit application, pursue alternative wastewater management options that do not require discharge to state waters, or utilize other

regulatory pathways. A permit denial does not prohibit the applicant from reapplying, but the revised application must demonstrate that the proposed discharge can meet the regulatory requirements set forth under the Clean Water Act and Virginia's State Water Control Law. Additionally, the applicant has the right to use the standard administrative appeal process available for DEQ permitting decisions if they wish to contest the denial.

Attachment 1: Commenter Listing

Table 1: Comments Received During the Draft Permit Public Comment Period

Public Comment Periods: November 13, 2025 through December 15, 2025 January 29, 2026 through April 3, 2026			
Name or Organization	**Method**	**Date Received**	**Request for Hearing**
Curt Linderman	Email	11/29/2025	No
Gary Breedan	Email	12/2/2025 & 2/24/2026	No
Patricia Rainey	Email	12/15/2025	No
Bill Fleser	Email	12/15/2025	No
R.W. Lacey	Email	12/15/2025	No
Deborah (Nicki) Atwood	Email	12/15/2025	Yes
Earl Chidester	Email	12/15/2025	No
Mark Strauss	Email	12/15/2025	No
Anna Olsen	Email	12/15/2025	No
Stephen Britts	Email	12/15/2025	No
Tim Lammonds	Email	12/15/2025	Yes
Nancy Syntax	Email	12/15/2025	No
Jennifer (Chris) Balut	Email	12/15/2025	No
Maureen Daniels	Email	12/15/2025	No
Skip Price	Email	12/15/2025	No
Catherine Bragan	Email	12/15/2025	No
David Reichert	Email	12/15/2025	No
Ron Cowan	Email	12/15/2025	No
Richard Hoyle	Email	12/15/2025	Yes
Merlin Parde	Email	12/15/2025	Yes
Carrie Hall	Email	12/15/2025	Yes
Anne P.	Email	12/15/2025	Yes
Rick Oyler	Email	12/15/2025	Yes
MaryAnne Fiorillo	Email	12/15/2025	Yes
Merl Ater	Email	12/15/2025	Yes
Kimberly Ho Schoelen	Email	12/15/2025	No
Bernadette Wyckoff	Email	12/15/2025	Yes
Dan Budi	Email	12/15/2025	No
Dennis Wallingsford	Email	12/15/2025	Yes
Ellen Campbell	Email	12/15/2025	No
Patrick Quinn	Email	12/15/2025	No
Richard (Georgeanne) Clamp	Email	12/15/2025	Yes
Scott (Mary Ann, Jay) Copperman	Email	12/15/2025	Yes
Julie Shiben	Email	12/15/2025	No

Public Comment Periods: November 13, 2025 through December 15, 2025 January 29, 2026 through April 3, 2026			
Name or Organization	**Method**	**Date Received**	**Request for Hearing**
Joyce Meyers	Email	12/15/2025	No
Tom Shiben	Email	12/15/2025	No
Randolph Palmore	Email	12/15/2025	Yes
Walter Kepley	Email	12/15/2025	Yes
Linda Lacey	Email	12/15/2025	No
Sharon Wallingsford	Email	12/15/2025	No
David Kirk	Email	12/15/2025	No
Laura Lawlor	Email	12/15/2025	No
Christopher Beck	Email	12/15/2025	Yes
Paula Potts	Email	12/15/2025	Yes
Amy Daney	Email	12/15/2025	No
Sandra (Thomas) Brockel	Email	12/15/2025	No
Joseph Kairys	Email	12/15/2025	Yes
Inga Montalvo	Email	12/15/2025	Yes
David Potts	Email	12/15/2025	No
Ron (Susan) Wright	Email	12/15/2025	Yes
Brenda Petitt	Email	12/15/2025	Yes
Jay Taylor	Email	12/15/2025	Yes
Susan Metzler	Email	12/15/2025	Yes
Sylvie Thompson	Email	12/15/2025	Yes
Patti Harper	Email	12/15/2025	Yes
Corey Fisher	Email	12/15/2025	No
Pierre Thuot	Email	12/15/2025	No
J. Tyler	Email	12/15/2025	Yes
Margaret Cooper	Email	12/15/2025	Yes
Jim Turner	Email	12/16/2025	N/A
William Slocum	Email	2/13/2026	N/A
Jim Zimmerman	Email	2/22/2026	N/A
Peter Hamer	Email	2/25/2026	N/A
Rick Oyler	Email	2/27/2026	N/A
Lawrence Clark	Email	3/3/2026	N/A
Micheal Price	Email	3/16/2026	N/A
David (Donna) Smith	Email	3/16/2026	N/A
Laura Foussekis	Email	3/19/2026	N/A
Denice (Gary) Conner	Email	3/19/2026	N/A
Jeff Bridges	Email	3/20/2026	N/A
Lee Stahl	Email	3/23/2026	N/A

Public Comment Periods: November 13, 2025 through December 15, 2025 January 29, 2026 through April 3, 2026			
Name or Organization	**Method**	**Date Received**	**Request for Hearing**
Michael Pimpinelli	Email	3/25/2026	N/A
Agnes Simon	Email	3/26/2026	N/A
Diane Peters	Email	3/26/2026	N/A
Ron (Kathy) Witmer	Email	3/27/2026	N/A
Patti Harper	Email	3/28/2026	N/A
Tom Shiben	Email	3/29/2026	N/A
William Fleser	Email	3/30/2026	N/A
Helen (Ramiro) Andalla	Email	3/31/2026	N/A
Doug (Debbie) Sharp	Email	4/1/2026	N/A
Paula Durbin-Westby	Email	4/1/2026	N/A
Rebecca Chidester	Email	4/1/2026	N/A
Judy (Micheal) Conner	Email	4/1/2026	N/A
Ron Wright	Email	4/1/2026	N/A
Kathlee Bernard	Email	4/2/2026	N/A
Jane (Jim) Bono	Email	4/2/2026	N/A
William Clark	Email	4/2/2026	N/A
Leslie Hammond	Email	4/2/2026	N/A
David Schwartz	Email	4/2/2026	N/A
Paul (Shelia) Moore	Email	4/2/2026	N/A
Donald Brideau	Email	4/2/2026	N/A
Bill (Sandra) Sawin	Email	4/3/2026	N/A
Jim Tyo	Email	4/3/2026	N/A
Chris (Lisa) McCormack	Email	4/3/2026	N/A
Paul Murray	Email	4/3/2026	N/A
Lauren Voluck	Oral Comment	3/19/2026	N/A
Ray Jurgel	Oral Comment	3/19/2026	N/A
Earl Chidester	Oral Comment	3/19/2026	N/A
Nicki Atwood	Oral Comment	3/19/2026	N/A
Skip Price	Oral Comment	3/19/2026	N/A
Jim Tyo	Oral Comment	3/19/2026	N/A
William Fleser	Oral Comment	3/19/2026	N/A
Howard Seay	Oral Comment	3/19/2026	N/A
Christopher Beck	Oral Comment	3/19/2026	N/A
Harry Looney	Oral Comment	3/19/2026	N/A
Mandy Free	Oral Comment	3/19/2026	N/A
Joseph Kairys	Oral Comment	3/19/2026	N/A
Gary Breeden	Oral Comment	3/19/2026	N/A

Public Comment Periods: November 13, 2025 through December 15, 2025 January 29, 2026 through April 3, 2026			
Name or Organization	**Method**	**Date Received**	**Request for Hearing**
Patrick Quinn	Oral Comment	3/19/2026	N/A
Michael Waple	Oral Comment	3/19/2026	N/A
Rick Hoyle	Oral Comment	3/19/2026	N/A
Doug Steinberg	Oral Comment	3/19/2026	N/A
Michael McCartney	Oral Comment	3/19/2026	N/A
John Conway	Oral Comment	3/19/2026	N/A
Emily Tyson	Oral Comment	3/19/2026	N/A
Karen Hughes	Oral Comment	3/19/2026	N/A
Christopher McCotter	Oral Comment	3/19/2026	N/A