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June 21, 2024

Dr. Amanda Vincent, Assistant Secretary  
Office of Environmental Services  
Louisiana Department of Environmental Quality  
P.O. Box 4313  
Baton Rouge, LA 70821  
*Via Electronic Mail to:* [amanda.vincent@la.gov](mailto:amanda.vincent@la.gov)

**Re: AI No. 197379, Permit Nos. 2240-0443-V3 & PSD-LA-808(M3), Activity No. PER20240004**

Dear Assistant Secretary Vincent:

The Deep South Center for Environmental Justice (DSCEJ) and below signed organizations urge the Louisiana Department of Environmental Quality (LDEQ) to withdraw the above referenced and attached permit variance for the Venture Global Plaquemines LNG facility. As set forth in LAC 33:917(B), LDEQ has no authority to issue the permit variance for increased water usage that creates “a nuisance, or a danger to public health or safety.”

The permit variance specifically allows Venture Global Plaquemines LNG to increase its use of public water from Fire Water Pumps FRMP1 (EQT0043) and FRMP2 (EQT0044) from May 13, 2024 through August 15, 2024.<sup>1</sup> This permit variance authorizes 30 hours of additional water use per pump, which are not to be counted toward the BACT limit of 52 hours of annual water use per pump. This permit variance would allow Venture Global Plaquemines LNG to increase annual use of each water pump by more than 57%.

The impacts of increased use of the public water supply, as allowed by the permit variance, would exacerbate dire conditions already suffered in Plaquemines Parish. It is documented in Plaquemines Parish Council Meetings and news reports that the water pressure has been severely lowered by the significant water usage for the construction of the Venture Global Plaquemines LNG facility.<sup>2,3,4,5,6</sup> One of these adverse impacts is lowered water pressure to unsafe levels, which poses a danger to the public now without reliable water pressure to fight a fire. Another adverse impact is the public nuisance of

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<sup>1</sup> The above-referenced permit variance also allows increased emissions of air pollutants.

<sup>2</sup> Plaquemines Parish Council Meeting, March 14, 2024, Public comments on inadequate water pressure video recorded from 5:53 (start time) to 15:45 (end time), available at [https://www.youtube.com/watch?v=y304cYC\\_oA4](https://www.youtube.com/watch?v=y304cYC_oA4).

<sup>3</sup> Delaney Nolan, *A fossil fuel plant is leaving Louisiana families with ‘barely enough water for your toothbrush’*, The Guardian, January 12, 2024, available at <https://www.theguardian.com/us-news/2024/jan/12/louisiana-water-crisis-fossil-fuel-plant-venture-global-lng>.

<sup>4</sup> Wilfret Johnson, Guest Column: *Plaquemines officials sacrificing our water for LNG. Whom are they serving?*, March 28, 2024, NOLA.com, available at [https://www.nola.com/opinions/guest-column-plaquemines-officials-sacrificing-our-water-for-lng-whom-are-they-serving/article\\_fae7e70a-e62c-11ee-bc13-5f9ef903e76e.html](https://www.nola.com/opinions/guest-column-plaquemines-officials-sacrificing-our-water-for-lng-whom-are-they-serving/article_fae7e70a-e62c-11ee-bc13-5f9ef903e76e.html).

<sup>5</sup> Lylla Younes & Jake Bittle, *‘Death stars in sinking land’: How liquified natural gas took over the Gulf Coast*, August 2, 2023, Grist co-published with The Lens, available at <https://grist.org/energy/louisiana-liquified-natural-gas-terminal-lng-gulf-coast/>.

<sup>6</sup> Stephen Proctor, *Company draws millions of gallons of water while state residents barely have enough to live: ‘Look for basic human need first’*, The Cool Down, January 25, 2024, available at <https://www.thecooldown.com/green-business/venture-global-louisiana-freshwater-shortage/>.

inadequate water pressure for cleaning and hygiene. This nuisance extends to inadequate water pressure for hydration and cooling during high temperatures, which have already set records with the late May 2024 heat wave and are expected to set more records this summer.<sup>7</sup> The permit variance for increased water use spans the entire period when high temperatures and increased evaporation rates in Plaquemines Parish are driving water use by residents to remain hydrated, comfortable, and avoid heat-related illness. This permit variance for increased water use by Venture Global LNG is alarming given the growing concern over recent salt water intrusion that limited water supply in Plaquemines Parish.

There is no indication that the LDEQ when it issued the permit variance assessed the well-documented excessive water usage by Venture Global Plaquemines LNG and the adverse impacts it is having on Plaquemines Parish. Nonetheless, the LDEQ has a responsibility to withdraw the permit variance to avoid the nuisance and danger to public health and safety.

The LDEQ unlawfully exceeded its authority when it issued the permit variance for the Venture Global Plaquemines LNG facility. Louisiana regulations limit a variance to extraordinary circumstances where compliance with, in this case, the BACT annual limit of 52 hours of water use per fire pump, “would be unreasonable, impractical or not feasible under the circumstances.” LAC 33:917(A). However, there is no such justification in the permit variance to increase water usage issued for the Venture Global Plaquemines facility, nor could there be given the alternative options available. Furthermore, a permit variance cannot be used to “authorize the maintenance of a nuisance or a danger to public health or safety.” LAC 33:917(B). As discussed above, the annual permitted water use for the construction of Venture Global Plaquemines LNG facility is a nuisance and danger to public health and safety. Increasing this water use by more than 57 percent will significantly increase and exacerbate the nuisance and danger to public health and safety.

For the reasons stated above, the DSCEJ and below signed organizations urge the LDEQ to withdraw the permit variance for increased water use issued for the Venture Global Plaquemines LNG facility.

Prepared and respectfully submitted by:

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<sup>7</sup> Poet Wolfe, *When Will Louisiana's Heat Wave End?*, NOLA.com, May 28, 2024, available at [https://www.nola.com/news/weather/when-will-louisianas-first-heat-wave-of-2024-end/article\\_8a3a5c1a-1cfd-11ef-998a-77b4b93183f9.html](https://www.nola.com/news/weather/when-will-louisianas-first-heat-wave-of-2024-end/article_8a3a5c1a-1cfd-11ef-998a-77b4b93183f9.html).

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**STATE OF LOUISIANA**  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
OFFICE OF ENVIRONMENTAL SERVICES

**TEMPORARY VARIANCE**

Activity No.: PER20240004  
Agency Interest No.: 197379

**AGENCY INTEREST NAME:** Plaquemines LNG Terminal  
**PERMIT NOS.:** 2240-00443-V3 and PSD-LA-808(M3)  
**COMPANY NAME:** Venture Global Plaquemines LNG, LLC and  
Venture Global Gator Express, LLC  
**PHYSICAL LOCATION:** 19000 Highway 23  
Point Celeste, Louisiana 70083  
**CONTACT:** Mr. Fory Musser  
Venture Global Plaquemines LNG, LLC  
1001 19th Street North, Suite 1500  
Arlington, Virginia 22209

**DESCRIPTION:** Variance to commission/operate Fire Water Pumps FRMP1 (EQT0043) and FRMP2 (EQT0044) for 30 hours per pump. This operating time shall not be counted toward the BACT limit of 52 hours per year.

ID NO.:	DESCRIPTION	MAX OPER. RATE or TANK CAPACITY	OPERATING TIME
EQT0043	Fire Water Pump FRPMP1	753 hp	30 hours
EQT0044	Fire Water Pump FRPMP2	753 hp	30 hours

**EMISSION INCREASES - PER VARIANCE PERIOD (tons)**

PM <sub>10</sub>	PM <sub>2.5</sub>	SO <sub>2</sub>	NO <sub>x</sub>	CO	VOC	GHG (CO <sub>2e</sub> )
+ 0.02	+ 0.02	+ 0.05	+ 0.21	+ 0.12	+ 0.04	+ 27

Venture Global Plaquemines LNG, LLC and Venture Global Gator Express, LLC's variance request for the above referenced project, dated April 26, 2024, is hereby approved under LAC 33:III.917, subject to the following condition:

This variance expires August 15, 2024.

A variance does not authorize the maintenance of a nuisance or a danger to public health and safety.

*Amanda Vincent*

Amanda Vincent, PhD, PMP  
Assistant Secretary

AV:DCN

5/13/2024  
Date