

Public Comment

Re: PyraMax Ceramics LLC, King's Mill Road, Wrens, Ga.; PSD Permit No. 3295-163-0035-P-01-0

From: David B. Lauderdale Sr.; nearby property owner; 6 Stillwater Lane, Hilton Head Island, SC 29926; 843-384-2935.

As a fourth-generation owner of property near the proposed PyraMax Ceramics LLC proppant manufacturing facility, my concerns include:

- **Liability.** Your permitting should document the baseline of air quality that exists prior to construction so that liability for any future damage can be established.
- **Bonding.** Your permitting should force the applicant to post bond and document tort liability insurance coverage so financial reparations could be made for any damages to personal, animal, wildlife or plant health; quality of life; and property values of those subjected to pollutants from this plant.
- **True emissions.** You propose that emissions into the air will total 168,989 tons of pollutants per year. You must also document actual emissions if and when the plant becomes operational. You must show the true emissions, not emissions based on forecasts or computer modeling.
- **Limits.** Have you posted the limits on each type of pollutant the plant will emit? Does your permit limit each pollutant to a maximum annual tonnage?
- **Enforcement.** You must check to see that the applicant abides by the terms, expectations and promises in the permit. You must check to see that the applicant puts into place the air pollution control technology that you expect or mandate in your permits.
- **Ongoing enforcement.** You must make constant checks long beyond the checks at start-up. Monitors should be put in place with emissions data posted monthly online. Tell the public what the permit allows for each of the pollutants this plant will put into the air; show the public that the permit is being monitored on a regular, ongoing basis during the full lifetime of the plant; and show the public what those actual emissions are in an ongoing manner.
- **Ongoing inspections.** The air pollution control technology you cite, including catalytic baghouses, must be inspected on a regular basis throughout the lifetime of the proposed plant to see that it is maintained to do what it is supposed to do, and that it is indeed controlling the pollution to the degree you expected. Results of these inspections should be

made public.

- **Cumulative effect.** What is the effect of this rate of pollution, year after year? What is the effect of 168,989 tons of pollutants on those who breathe it for 5 years, 10 years, 20 years? What is the cumulative effect of this amount of pollution permitted today when added to future permits for more pollutants from other sources?

- **Show your teeth.** What recourse will the state of Georgia take should this plant fail to be in compliance with its permits? What are the penalties for violation of the terms and limitations of the permits? What is the trigger to shut down the plant should its air emissions be a danger to the public, or if the emissions exceed your expectations?

The public counts on the professionals at the Georgia Environmental Protection Division to serve as an unbiased, science-based, third-party collector of emissions data to prove that what you have permitted is what we get. We count on you to be advocates for the people, plant life and animal life. The burden falls to you to prove that what you think is safe today is what the proposed plant actually produces for as long as it should exist.

David Funderdale

Jan. 23, 2012

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