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To: <epdcomments@dnr.state.ga.us>
Date: 5/16/2012 3:42 PM
Subject: Plant Washington air permit comments
Attachments: KHC comments.doc

Please see the attached comments regarding the MATS requirements for Plant Washington.

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Read my blog at <http://ruralandprogressive.org/>

KATHERINE HELMS CUMMINGS

May 15, 2012

To: Georgia Environmental Protection Division

RE: Amendment 4911-303-0051-P-01-2

When Plant Washington was announced over four years ago the plant was expected to pump 122 lbs of mercury per year into the local airshed. The EPD approved that amount of toxins in a permit which local residents and organizations across the state challenged. The result was a second permit reducing the mercury emissions to 55.6 lbs per year.

The developer of Plant Washington, Dean Alford, acquiesced on meeting the MATS rules at start up. The much needed and long awaited MATS regulations reduce the allowable mercury emissions to 1.69 lbs per year.

Please allow me to pat myself and other plant opponents on the back for standing firm on lower emissions in a community which already teeters on non-attainment, and whose citizens suffer the health ramifications of poor air quality. If your agency is truly committed to protecting the health of Georgia's citizens and our natural resources permits with such high emission levels should never have been issued.

Now that Mr. Alford has agreed to meet the MATS emissions sooner rather than later, he seems to have had a change of heart. In interviews with *Politico Pro* and *The Sandersville Progress*, Alford said he can meet the emissions standards at start up. That is what the amended permit requires. Period.

I hope you can appreciate my concern about Alford's ability to meet these standards when he joined a filing with the U.S. Court of Appeals for the District of Columbia Circuit stating that the emission regulations are unattainable.

The EPD permit amendment makes no mention of any technical or engineering requirements, or fuel mix, to assure that the emission standards will be met.

Is your agency in the business of issuing permits to companies who announce, before they have secured a final permit, that they can't meet the requirements of the permit?

Rightly so, the confidence of local citizens in Alford's ability to meet the standards has been deflated.

The taxpayers and citizens of Georgia expect, deserve, and demand that all companies issued a permit for emissions of any type, are able to meet those standards and maintain them in demonstrable and measurable ways.

Alford's assurances that Plant Washington can meet the MATS rule are now hollow. I urge and request that the EPD do its duty to protect the health of my community as it is described in your mission and vision statements, and require Alford and Power4Georgians to demonstrate their ability to meet the MATS standards before a final permit is issued.

Sincerely,



Katherine Helms Cummings