

OCT 13 2011

AIR PROTECTION BRANCH

October 12, 2011

Eric Cornwell
Program Manager
Stationary Source Permitting Program
Georgia EPD - Air Protection Branch
4244 International Parkway, Suite 120
Atlanta, Georgia 30354

**Subject: CARBO Ceramics Inc. – Millen, Georgia Facility
Pending PSD Application #20615
PUBLIC VERSION**

Note: Pursuant to a claim of confidentiality, information in this application/document (including attachments/exhibits) has been redacted by the company/applicant by blacking it out. Information appearing in brackets and which is underlined has been added by CARBO CERAMICS INC.

Dear Mr. Cornwell:

This letter is intended to address the questions you raised to Matthew Page of Smith Aldridge, Inc., in your conversation of October 7th. Our responses are provided below in question-and-answer format. Please note that this response includes confidential business information. A confidentiality substantiation and a copy of the letter prepared for public review is also attached. In the public version, the marked confidentiality information has been redacted, and a detailed list of why each item qualifies for confidentiality per GA EPD's "Procedures for Requesting that Submitted Information be Treated as Confidential" is included. CARBO Ceramics Inc. (CARBO) respectfully requests that after GA EPD's review of the substantiation of the confidentiality claim, GA EPD notify CARBO in writing if GA EPD disagrees with the request for confidential handling of this information.

Q1: Spray Dryer Baghouses - Please clarify the total airflow from each spray dryer; is the ~25,000 dscf/min the airflow from each baghouse (of which there are 4 per spray dryer), or each spray dryer?

A1: Exhaust airflow from each spray dryer is ~26,500 dscfm. That exhaust volume is split across the four baghouses for each spray dryer. This will be clarified in our updated SIP forms.

Q2: Please clarify the numerical value of the air flow in both ACFM and DSCF/MIN, and show the conversion between the two (temp and moisture)

A2: Please see the attached spreadsheet.

Q3: Please verify that all stacks and vents vent vertically without rain caps

A3: Yes, all stacks and vents will exhaust vertically without rain caps to provide for the best possible dispersion characteristics.

Q4: Please address growth emissions from any clay mine that (a) will sell to Carbo and (b) is located in the PM10/2.5 SIA

A4: There are no growth impacts in the PM10 SIA of 3.4 km or the PM2.5 SIA of 4.4 km. Both distances are within Jenkins County. To the best of CARBO's knowledge, there are no kaolin mines within that distance or within Jenkins County. The nearest known deposits are in Jefferson County. See <http://minerals.usgs.gov/minerals/pubs/state/981301mp.pdf>.

Q5: Please provide production rate estimates.

A5: Please note that CARBO Ceramics considers production rates to be confidential business information. The facility's design production capacity is [REDACTED] [CONFIDENTIAL- REFERENCE A] pounds per year per production line.

If you have any questions or need any further information, please contact me at (281) 921-6472 or via email at Jason.Goodwin@carboceramics.com.

Sincerely,



Jason M. Goodwin, PE, CSP
Director – Environmental, Health, and Safety
CARBO Ceramics Inc.

cc: Hamid Yavari – GA EPD
Susan Jenkins – GA EPD
Curt Churchill – GA EPD
Craig Smith – Smith Aldridge, Inc.
Matthew Page – Smith Aldridge, Inc.

Attachments: Confidentiality Substantiation
Process Exhaust Gas Flow Clarification

CONFIDENTIALITY SUBSTANTIATION

Pursuant to the federal Freedom of Information Act (FOIA), 28 U.S.C. § 552 and 40 C.F.R. Part 2, the federal Clean Air Act, 42 U.S.C. § 7414(c), § 7661b(e) Georgia Open Records Act (GORA), CARBO Ceramics (CARBO) hereby claims that the enclosed information, labeled as confidential, contains confidential business information and trade secrets. As such, the identified information is entitled to confidential treatment and excerpted from public disclosure. Disclosure of the identified confidential portions of this submittal would cause substantial injury to CARBO's competitive position. Accordingly, CARBO requests that the proprietary information such as production rate capacities be kept confidential from the public at all times and not be disclosed by Georgia Environmental Protection Division (GAEPD) or USEPA. Furthermore, pursuant to the Federal Trade Secrets Act, 18 U.S.C. § 1905, this information is entitled to protection as a trade secret. CARBO asserts a property right in its trade secrets. Therefore, disclosure of such information without compensation would violate the protections of the Fifth Amendment to the United States Constitution. CARBO has submitted a public copy of the entire submittal from which the confidential information has been redacted, as well as a confidentiality substantiation for each individual section of information, as labeled (see Confidentiality Substantiation attachment to Public Version cover letter).

If any person (including any representative or employee of any governmental agency) should request an opportunity to inspect or copy of this submittal, CARBO should be notified immediately of any such request. CARBO requests that a copy of all written material pertaining to such requests (including but not limited to the request itself and any agency determination with respect to such request) also be provided to CARBO. CARBO respectfully requests that sufficient advance notice of any intended release be provided so that CARBO may avoid inadvertent waiver of its rights and may pursue any remedies available to it, if necessary. See 40 C.F.R. § 2.213.

CARBO's requests set forth in the preceding paragraphs also apply to third-party requests directed to, or the intended release of, any memoranda, notes, transcripts, or other writing of any source whatsoever which would be made by or at the direction of any employee of the USEPA, GAEPD, or any other government agency or entity, and which incorporates, includes, or relates to any of the matters (1) contained in any materials furnished by, or on behalf of, CARBO to USEPA, GAEPD, or to any other governmental agency or entity; or (2) referred to in any conference, meeting, telephone conversation, or interview between (A) representative, agents, and/or counsel for CARBO and (B) employees of USEPA, GAEPD, or any other governmental agency or entity.

CARBO hereby certifies that the company has no knowledge that the information provided in this submittal has ever been published, disseminated, or otherwise become a matter of general public knowledge. The justification for this claim is as follows:

1. CARBO has always maintained an active policy of prohibiting disclosure of such information to third parties on a non-confidential basis. CARBO attorneys review any proposed disclosures to ensure against inadvertent disclosure of such information.