

WRITTEN COMMENTS - PUBLIC HEARING -- JANUARY 19, 2012

PyraMax Ceramics, LLC

Draft Air Permit No. 0160-0023-CA

S.C. Department of Health and Environmental Control

RECEIVED

JAN 19 2012

PLEASE

PRINT

CLEARLY

BUREAU OF AIR QUALITY

NAME

Mark Tinsley

MAILING ADDRESS (include P.O. Box or street, city, zip code):

2937 Concord Church Rd  
Allendale, SC 29810

PHONE:

803-300-4925

COMMENTS MUST BE RECEIVED

BY: THURSDAY, JANUARY 26, 2012

COMMENTS:

I object to the issuance of the permit. Despite the applicable standards it is clear this facility will ~~emit~~ hazardous pollutants into our community. This company chose not to locate near or in the vicinity of existing ~~emission~~ sources because it knew it could not comply with the standards. Therefore, it is ~~disrespectful~~ to contend that simply moving the facility five miles down the road and that somehow makes the facility safe for this community. Over 500,000 lbs of pollutants per year is not safe for my child who is growing up very near this site.

Further, your analysis of air quality does not appear to take into account the anticipated emissions from the BioMass facility which was recently permitted.

Signature:

Mark Tinsley

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S.C. Department of Health and Environmental Control

JAN 25 2012

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BUREAU OF AIR QUALITY

NAME James P. Overett

MAILING ADDRESS (include P.O. Box or street, city, zip code):

PHONE: 803 584 2526

PO Box 254  
Allendale SC 29810

**COMMENTS MUST BE RECEIVED**

**BY: THURSDAY, JANUARY 26, 2012**

COMMENTS:

*Allendale County needs jobs for its  
Citizen. Please, Please do NOT allow The  
Wealth of a few citizens ruin the jobless'  
hope for survival.*

*Thank You DHEC -*

*James P. Overett*

Signature.

*James P. Overett*

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BUREAU OF AIR QUALITY

NAME Bob Fields

MAILING ADDRESS (include P.O. Box or street, city, zip code):

PHONE: (903) 584-5044

126 Crawford Rd.

Allendale, S.C. 29810

**COMMENTS MUST BE RECEIVED**

**BY: THURSDAY, JANUARY 26, 2012**

COMMENTS: Don't have full understanding  
Concerning health to the community

Not for plant coming in community.

Try using Inches' Park on Hwy 278

Signature: Bob Fields

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Draft Air Permit No. 0160-0023-CA

S.C. Department of Health and Environmental Control

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PLEASE PRINT CLEARLY

BUREAU OF AIR QUALITY

NAME Christine H. Fields

MAILING ADDRESS (include P.O. Box or street, city, zip code):

PHONE: (803) 584-5044

126 Crawford Rd.

**COMMENTS MUST BE RECEIVED**

Allendale, S.C. 29810

**BY: THURSDAY, JANUARY 26, 2012**

COMMENTS:

Was at the meeting on 1-~~20~~<sup>19</sup>-2012 with DHEC, plot was not answered to give me a clear understanding of what the community is dealing with as far as health. Therefore I am ~~to~~ not for the plant coming to appleton.

Signature:

Christine H. Fields

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PyraMax Ceramics, LLC  
Draft Air Permit No. 0160-0023-CA

S.C. Department of Health and Environmental Control

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JAN 26 2012

PLEASE PRINT CLEARLY

BUREAU OF AIR QUALITY

NAME Glen Kinard

MAILING ADDRESS (include P.O. Box or street, city, zip code):

PHONE: 803-686-1125

P.O. Box 999

COMMENTS MUST BE RECEIVED

302 HAMMOND DR.

BY: THURSDAY, JANUARY 26, 2012

Allendale, S.C. 29811

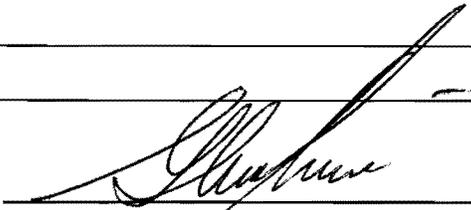
COMMENTS: I think it was a very interesting meeting. Only a couple people were against this plant. I grew up in Appleton and a lot of people are for this plant. Most all of the silent majority is in favor of the plant.

Allendale county is 16<sup>th</sup> poorest county in U.S.

Highest unemployment in the state

We need these jobs.

Signature:



Post Office Box 747  
Allendale, South Carolina 29810

January 26, 2012

Karen Lee  
S.C. Department of Health and Environmental Control  
Bureau of Air Quality  
2600 Bull Street  
Columbia, South Carolina 29201

RE: Air Quality Permit No. 0160-0023CA  
PyraMax Ceramics LLC  
Allendale, SC 29810

Dear Ms. Lee:

On behalf of Neighbors for Clean Air and Healthcare, we ask the South Carolina Department of Health and Environmental Control to deny Air Quality Permit No. 0160-0023CA requested by PyraMax Ceramics LLC, Allendale, South Carolina, because, as a major source of air pollutants, the facility will harm the health of the people of Allendale County. The project will require Prevention of Significant Deterioration permitting for projected emissions of carbon monoxide, nitrogen oxides, volatile organic compounds, sulfur dioxide, particulate matter, and greenhouse gases. The facility would be a major source of HAP emissions.

This facility will have a very heavy carbon footprint, which will contribute to global climate change, which will damage human health in South Carolina. Carbon-based fuel will fire the kilns. Trucks powered by carbon-based fuel will haul clay to the plant. Trains and trucks will carry the ceramic pellets long distances, using substantial amounts of carbon-based fuel. Then the pellets will be used in the controversial practice of fracking to obtain fresh supplies of carbon-based fuel.

Table 23 Class II Full Impact Analysis – NAAQS SIA and 20D Sources on page 82 of the Draft Permit Application is out of date. SRE Allendale was recently granted a permit as a Synthetic Minor source of air pollution on the verge of being a major source, yet the projected emissions from SRE were not included in Table 3. As Allendale County is on the Georgia border, any facilities in the Central Savannah River Area of Georgia should be included in Table 23. The PyraMax plant itself is dangerous, and combined with the SRE biomass incinerator recently permitted in Allendale and the proposed ceramic facility across the river in Millen, Georgia, the cumulative effects will be horrible. Issuing a permit to PyraMax will cause the region to be in or near nonattainment of the National Ambient Air Quality Standard, in violation of DHEC regulations.

DHEC's Draft Permit states that PyraMax "has purchased" property in Allendale County, but an Allendale County rezoning ordinance states the property still belongs to a local

landowner. Both statements cannot be true. Taking that into consideration, we feel that the DHEC Bureau of Air Quality should take its time to further review to remove any assumptions of reliability on observation from any of the categories listed on determination on notice of MACT approval for PyraMax Ceramics.

DHEC documents say, “there are a limited amount of facilities conducting the same type of operations and producing the same products as planned by the PyraMax facilities. The most comparable facilities would be the CARBO Ceramics, Inc., Toombsboro, and McIntyre facilities located in Georgia.” (p. 53)

“Because there are only a few facilities similar to the proposed ceramic proppant facility that have been proposed or are in operation and because little experience with kiln FGD controls in such facilities is available, DHEC considers the low end of the control efficiency...”

“Due to the limited availability of pelletizer efficiency summaries, PyraMax was not able to locate information that could distinguish between separate technologies.” (p. 69)

The DHEC engineers at the public hearing for PyraMax, as at the public hearing for SRE, informed the audience that DHEC could consider only air quality. In other words, if it fits, we must permit. In reading the Preliminary Determination and Notice of MACT Approval (December 15, 2011) the engineers of the DHEC Bureau of Air Quality appear to err on the side of PyraMax when controls are not economically feasible or “in one exception where PyraMax contributions are above the SIL for an exceeding receptor, the receptor is on the property of an existing facility and there is no exceedance predicted without the contribution from the existing facility.” (p. 82) Exceedance is exceedance regardless of who is contributing.

We feel that DHEC has made too many assumptions and should remove them and include all polluting sources, including truck traffic between the mine site and the proposed facility location. (p. 85)

The members of Neighbors for Clean Air and Health Care are concerned about the citizens of Allendale County, their health, their environment, and their economic condition. Although the DHEC Bureau of Air Quality is concerned only with out-of-date legal standards, we are concerned about our health and the cost effectiveness of reducing our risks of exposure to pollutants.

DHEC’s permitting procedure is flawed and should be reformed. The BAQ public hearings and public comment process do not consider anything except air quality. But those are the only public hearings and public comment opportunities that are available. Because DHEC is charged with protecting human health, DHEC should hold a comprehensive public comment process that takes into account all threats to human health. Several speakers, including Representative Lonnie Hosey, made that point at the public hearing on January 19. The January 26 edition of *The Allendale Sun* quotes Representative Hosey as saying that he was disappointed in the DHEC presentation. He

said, according to the newspaper, “You got more than air quality. Some of this information is over our heads. You need to slow down until you get approval of citizens who live in this area. It’s important – air quality, water quality. You need to put it all together to get a full understanding of what we are looking at.”

Thank you for your consideration.

Sincerely,

Daniel M. Johnson and members of Neighbors for Clean Air and Healthcare

S. Rosalie Laffitte  
Post Office Box 747  
Allendale, SC 29810

Camille S. Nairn  
301 Bryan Street  
Allendale, South Carolina 29810

Rebecca Laffitte  
4305 Sequoia Road  
Columbia, South Carolina 29206