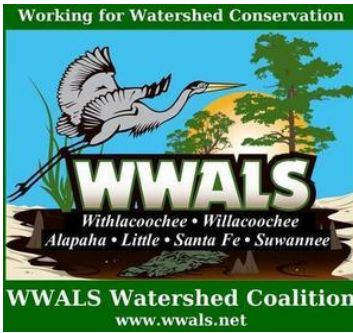


November 19, 2021



By Electronic Mail to:

Eric Cornwell, Program Manager, eric.cornwell@dnr.ga.gov
Stationary Source Permitting Program
Air Protection Branch
4244 International Parkway, Suite 120
Atlanta, GA 30354
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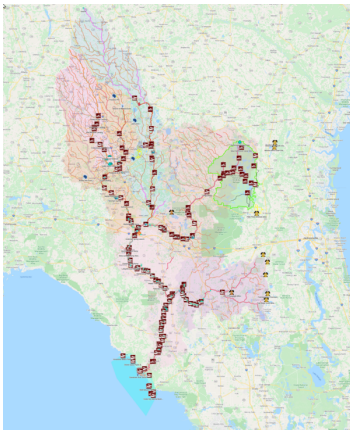


RE: WWALS Public Comments on Air Permit Application No. 28143 for Spectrum Energy Georgia, LLC

Dear Mr. Cornwell,



It appears that EPD approval of the Renewable Biomass Group's (RBG) wood pellet plant in Adel has now drawn another application.



This application from Spectrum Energy Georgia, LLC (Spectrum), has numerous problems, including that several estimates of emissions are just slightly below Prevention of Significant Deterioration ("PSD") applicability thresholds.

Those estimates are especially concerning that meanwhile Enviva Pellets Waycross, LLC, in Application No: 610193, is asking:

To remove existing HAP synthetic minor caps, to update the current permit basis to include emissions which were not previously quantified, to update emission factors for specific equipment based on recent compliance testing and engineering reviews, and to update the overall production rate of the facility to 920,000 ODT per year of pellets using up to 95% softwood feedstock.

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WWALS is an IRS 501(c)(3) nonprofit
charity est. June 2012

WWALS Watershed Coalition advocates for conservation and stewardship of the Withlacoochee, Willacoochee, Alapaha, Little, Santa Fe, and Suwannee River watersheds in south Georgia and north Florida through education, awareness, environmental monitoring, and citizen activities.

Suwannee RIVERKEEPER® is a program and a paid staff position of WWALS.

Will Spectrum come back in a few years and ask to raise its estimates? Where is this question addressed in the Spectrum application?

The Environmental Justice (EJ) implications are a larger problem. Adel is a majority minority community, in which EPD has approved one polluting pellet plant, and now entertains approving another.

Beyond Adel, both RBG and Spectrum probably will draw wood from 75 miles around, from Tallahassee, Florida to the Okefenokee Swamp. This is in addition to the use of wood by the Waycross Enviva pellet plant.

While RBG's CEO Craig Whitlock told the Adel City Council in September 2020 that RBG's plant would not burn whole trees, its EPD air quality application said it could. <https://wwals.net/?p=53580> Historically, woody biomass plants that start out with tops and stems end up burning or pelletizing whole trees. Thus these pellet plants threaten deforestation across a wide swath of south Georgia and north Florida.

Please deny this Spectrum air quality permit application.

John S. Quarterman
Suwannee RIVERKEEPER®
/s/
WWALS Watershed Coalition, Inc.

