

Thus this pellet plant would increase harmful emissions in Adel, and would have adverse effects far around on economically disadvantaged and minority populations, possibly ranging from flooding to topsoil loss to *E. coli* in rivers and wells due to sewage spills and cattle manure runoff.

Back in Adel, increased truck traffic around the plant would produce diesel fuel combustion emissions and increased traffic risk, also EJ concerns.

That is all in addition to the adverse climate change effects of the greenhouse gases emitted by the eventual burning of the wood pellets, even if that burning is in Europe. Already the Georgia peach crop fails many years because winters are not cold enough. The Florida citrus industry is in dire straits because of heat-induced diseases. Pine beetles abound in droughts in both states. Poor rural south Georgia and north Florida do not need more greenhouse gas sources driving faster temperature increases. This pellet plant is thus a major Environmental Justice issue.

The Narrative from Director Dunn to Spectrum says:

There are also comments from Environmental Integrity Project (EIP) and WWALS Watershed Coalition, Inc. that questioned the use of the emission factors in the application for various reasons, such as high control efficiency without detailed information for the control devices, use of after-control tested data as uncontrol emission factors, and so on. In reality, there is limited credible information available for pellet mill emission factors. Available data shows widely varying emission factors; therefore, the Division has determined that the permit will require that the facility conduct performance testing to validate all the emission factors provided in the application. These testing requirements are included in Section 6 of the permit.

Yet Enviva has similar plants in six U.S. states, including the one it bought in Waycross. There should be massive amounts of emission data available from those plants.

After it bought that Waycross plant, Enviva sent EPD Application No. 610193, which resulted in significant increases in many Enviva emission estimates. We recommend EPD require to revisit its Prevention of Significant Deterioration (“PSD”) applicability thresholds. We recommend EPD require Spectrum to use the emission estimation methods employed by Enviva in its re-evaluation of the Enviva pellet plant.

If EPD does not consider Enviva’s updated numbers for its Waycross pellet plant credible, why did EPD accept them?

For that matter, why did EPD *not* require such emission updates from the Waycross plant even before it was bought by Enviva? Was the Performance Testing of Section 6 of the current draft permit not required in the original Waycross pellet plant permit? If such testing was so required and there is still “*limited credible information available for pellet mill emission factors,*” why should EPD, or the EJ communities, or the general public, expect that Section 6 testing will be adequate for this proposed new pellet plant?

If there are no credible ways to estimate (as for Spectrum) or to measure (as for Enviva Waycross) emissions, EPD should not be issuing permits for such plants.

Please deny this Spectrum air quality permit application.

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