

application. That public advisory expired on July 12, 2024. All comments received during the public advisory period are being reviewed and considered when drafting the proposed SIP-E permit amendment. When the draft ~~SIP-E~~ permit amendment is issued, the Division will provide a 30-day public comment period on the draft permit amendment.

GA EPD does not select sites for facilities. When companies choose their proposed locations, they frequently also must obtain local permits or permissions to build and operate their facilities. GA EPD does not have oversight of these local government decisions. Current state and federal air quality requirements do not prohibit the construction of a pellet mill based on the demographic makeup of the surrounding area. However, as discussed above GA EPD strives to provide opportunities for public feedback and as discussed below GA EPD conducted a thorough evaluation of the potential emissions impact on the air quality and the surrounding community.

GA EPD completes an independent analysis of the air emission impacts from proposed revised emission units as well as the rest of the facility specified in the previous application on the ambient air. These impact assessments model projected emissions using the protocols in the Georgia “Guideline for Ambient Impact Assessment of Toxic Air Pollutant Emissions.” Those protocols specifically factor in potential health impacts of those emissions on people living in the surrounding area. When GA EPD performed this analysis for the facility, it indicated that the HAP emissions from the facility, after the modification, would not pose a significant risk to the community.

Currently, Georgia does not have any specific Environmental Justice rules. EPA has not yet promulgated any specific rules associated with Environmental Justice, either.

The Division has been applying the same standard when reviewing this application compared to other applications. Conducting a Toxic Impact Assessment before issuing the permit ensures that the emissions from the facility will not cause an adverse impact on the local community. The decision to recommend issuance of an air permit is based on GA EPD’s review of the application and all technical and other information submitted. That review indicates that the modified greenfield facility, as proposed, will comply with all applicable state and federal air regulations and will not pose a significant risk to the community. The Division will continue to follow our regulations and policies to protect the citizens around the facility.

A Public Advisory comment from the EPA, submitted on July 12, 2024, requested clarification on the source of the facility’s choice of Acceptable Ambient Concentrations (AAC) used in its Toxic Impact Assessment.

EPD Response:

All AACs (other than acrolein, which is an alternative AAC referenced from EPA’s *Residual Risk Assessment for Plywood and Composite Wood Products* document) are referenced from Appendix A of the Summary of Ambient Impact Assessment of Toxic Air Pollutant Emissions (2018), which is included in the Georgia Air Toxics Guideline.

An additional comment from the EPA requested clarification of the sources of several emission factors used by the facility in their calculations.

EPD Response:

The facility’s updated application (dated December 30, 2024) provides the emission factors and their sources in more detail.