



Plant Washington  
Georgia Air Branch  
Attn: Eric Cornwell  
4244 International Parkway  
Suite 120  
Atlanta, GA 3035

August 18, 2011

Dear Mr. Cornwell,

The Fall-line Alliance for a Clean Environment (FACE) urges the denial of an air permit for Plant Washington. The current air quality issues in our area, and the direct impact that air quality has on our local rivers, stream, and ground water are already so negative that allowing any additional air pollution in our airshed is not acceptable to FACE, as well as our friends and neighbors downwind and downstream.

The EPD's mission is:  
protects and restores Georgia's environment. **We take the lead in ensuring clean air, water and land.** With our partners, we pursue a sustainable environment that provides a foundation for a vibrant economy and healthy communities.

Your vision statement includes:

**Georgia's environment is healthy and sustainable.** Natural resources are protected and managed to meet the needs of current and future generations.

Your principles include:

***EPD serves the public by implementing state laws, rules, and policies to protect human health and the environment.***

EPD applies and enforces environmental laws and standards in a consistent, fair, and timely manner.

**EPD is proactive and results-oriented,** and helps develop new approaches to meet Georgia's environmental challenges.

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**Georgians have a right to and a responsibility for a healthy environment** and the conservation of our natural resources.

Georgia's environment consists of diverse ecosystems of interrelated and interdependent components, including people, plants, animals and their habitats, as well as air, water, and land.

**Environmental stewardship, protection of human health,** and economic vitality are compatible and mutually beneficial goals.

*If the department abides by the mission and principles you have set, the draft permit for Plant Washington does not adhere to these standards.*

As your mission and principles state clearly, Georgians have a right to and a responsibility for a healthy environment. One of those responsibilities is to be aware of the impact that future development will have on our community and our health, which is why we continue to speak out in opposition to any permits for this plant. And yet, even if no one spoke up, **your responsibility is no less than to safeguard our health by taking every action possible to ensure a clean environment for us** to live and play in, raise our families, and honor those who came before us.

Additionally, the EPD's principles state that the department will be proactive. The current draft permit is not proactive in consideration of the EPA's proposed emission rules to be finalized in November of this year. These limits are required to be included in the permitted Plant Washington emissions.

The Clean Air Act requires the maximum control of hazardous pollutants. Those pollutants include carcinogens and additional toxic pollutants. The draft permit issued by the EPD fails to require the maximum control of mercury and hydrogen chloride (HCl).

Tests from other plants in the country demonstrate that plants operating now already achieve better levels of control of these pollutants. Based on these reports the EPA's proposed rule would set lower limits than those in the permit. This raises the question of the EPD's principle of being proactive and results oriented. Clearly the draft permit is not proactive in its emissions limits, nor is it progressive in the results.

Based on current plants, **Plant Washington's mercury limit would allow it to emit 210 times more than the cleanest source.** In other words, **there are operating plants with mercury emissions which are far lower than the limits set in the draft.** A similar source in operation currently emits 0.98 lb/yr, or 99.5 percent lower than the draft permit allows.

At the current level of 55.6 lbs per year of mercury emissions, **Plant Washington's limit would allow it to emit 36 times more than the EPA rule would allow.** The proposed EPA limit would restrict the plant to 1.63 lbs per year, an improvement of 97 percent over the draft permit limits.

*FACE does not consider the mercury permit limits to be proactive, results oriented, protective of citizen health, conducive to a healthy environment, or a best practice of earth stewardship.*

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Another hazardous pollutant inadequately addressed in the permit is hydrogen chloride (HCl). This forms corrosive hydrochloric acid on contact with water found in body tissue. Inhaling these fumes can cause coughing, choking, inflammation of the nose, throat, and upper respiratory tract, and in severe cases, pulmonary edema, circulatory system failure, and death. Skin contact can cause redness, pain, and severe skin burns. Hydrogen chloride may cause severe burns to the eye and permanent eye damage.

The draft permit we are commenting on allows for HCl emissions of 98,883 lbs/yr. A similar facility currently emits 938 lbs/yr, besting Plant Washington by 99 percent. The proposed EPA rule would set the maximum allowable emission of HCl at Plant Washington to 2,444 lbs/yr, 97.5 percent lower than the draft permit levels.

***FACE does not consider the HCl permit limits to be proactive, results oriented, protective of citizen health, conducive to a healthy environment, or a best practice of earth stewardship.***

Much to our disappointment FACE finds that there are still other emission levels where Plant Washington fails to be a shining example of best practices for environmental stewardship, use of the best available technology, and protection of citizen health.

1. 117 existing units around the country emit less mercury than the Plant Washington permit allows
2. Between **99 and 168** units emit less HCl than the Plant Washington permit allows
3. **44** units emit less of both mercury and HCl
4. **Plant Washington would not even begin operations as the cleanest coal plant in Georgia.** Plant Hammond has achieved lower emission levels of these two health endangering pollutants. Plant Hammond has accomplished this despite the fact that three of the facility's four units were built in the 1950s; the fourth was built in 1970.

The current health status of Georgians puts us in the bottom tier of the country across too many health indicators (diabetes, cancer, heart disease and stroke, obesity). According to independent research by the Clean Air Task Force published last year (Death and Disease from Power Plants, September 2010), 536 Georgians died prematurely due to exposure to coal plant emissions. Our state ranks 9<sup>th</sup> in deaths resulting from this pollution.

Plant Branch, located approximately 30 miles to the west of Washington County, is already negatively impacting the health of local citizens and visitors to our community. The data reflect:

## Plant Branch Impact on Citizen Health

Deaths: 140	medical costs: \$1,100,000
Heart attacks: 200	medical costs: \$22,000
Asthma attacks: 2,500	medical costs: \$130
Hospital admissions: 100	medical costs: \$2,400
Chronic bronchitis: 90	medical costs: \$40,000
Asthma ER visits: 150	medical costs: \$55
<b>Total cost per year</b>	<b>\$9,673,250</b>

The report concludes that in Washington County one person in our county dies due to exposure to Plant Branch emissions, two people have heart attacks, and 22 people have asthma attacks, in addition to hospital admissions, ER visits, and chronic bronchitis.

**We take the data seriously as these are more than numbers to us; they are people in our families, our neighbors, the people we see at the grocery store and rec department games.** They are the people who are speaking up tonight, and those who are afraid to speak out but trust the EPD to protect our health, the air we breathe, the water we drink, and soil we plant our gardens in each year. We urge you to do what is detailed in your vision, mission and principles, and expected by the citizens and taxpayers of our state.

**Protect our health, our air, and our water. Deny the air permit for Plant Washington.**

Sincerely,



Katherine Helms Cummings  
Executive Director  
Fall-line Alliance for a Clean Environment