



SAVANNAH RIVERKEEPER®

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COMMENTS TO:

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Air Permit Manager

4244 International Parkway

Suite 120

Atlanta, Georgia 30354

COMMENTS ON:

Aurubis Richmond, Inc

Permit # 28364

Valencia Way (Augusta Corporate Pkwy), Augusta, GA

Copper recycling and Secondary Copper Smelter

5/23/2022

EPD Air Permit Management,

Savannah Riverkeeper is deeply concerned about the Aurubis, Richmond proposed air permit (#28364) and its effect on our community and nearby waterways. The proposed Aurubis facilities permit request includes a shockingly high number, over 30, of highly dangerous pollutants, from arsenic to o-Xylene, to be released in and around the facility, and the process includes multiple areas of fugitive emissions. While we recognize the need for electronics recycling and reuse, other facilities in our basin offering similar services are not requesting $\frac{1}{3}$ the numbers of pollutants and at lower amounts. A facility unable to reduce its waste stream to a more manageable level should not locate in a community where air quality is already a serious concern. Augusta's air quality already ranks 28th worst in the nation (*Particle Pollution in*

Augusta: The “State of the Air ” report found that year-round particle pollution levels in Augusta were higher than in last year’s report. The area was ranked 28th most polluted for year-round particulate pollution (worse than the ranking of 36th last year). The report also tracked short-term spikes in particle pollution, which can be extremely dangerous and even lethal. Augusta’s short-term particle pollution improved in this year’s report, which means there were fewer unhealthy days. The area is ranked 54th worst for short-term particle pollution.

The “State of the Air” report found that nationwide, more than 4 in 10 people (135 million) lived with polluted air, placing their health and lives at risk. In Augusta, pollution placed residents at risk, including those who are more vulnerable to the effects of air pollution, such as older adults, children, and people with lung disease. The report also shows that nationally, people of color were 61% more likely to live in a county with unhealthy air than white people, and three times more likely to live in a county that failed all three air quality grades. The report also finds that climate change made air quality worse and harder to clean up.

<https://www.lung.org/media/press-releases/2021-augusta-ga-state-of-the-air-release>

The proposed location of this facility seems to align with the studies findings and threatens to exacerbate the environmental justice issues plaguing the community.

Under the Federal Clean Air Act Amendments, air quality violations occur when an 8-hour ozone average exceeds 0.085 parts per million. Data recorded by GA EPD at a monitoring station at Bayvale Elementary School indicates that ozone levels in Augusta have exceeded the 8-hour standard for several years running, in varying numbers of days since the monitoring began in 1997. In 2018 the Georgia Department of Public Health found that 6.1% of male GA citizens suffer from asthma and 11.8% of female GA citizens suffer from asthma or other breathing-related illnesses. The prevalence of these asthma DPH numbers, from 2018, was highest among adults whose annual household income was less than \$15,000 which leads us to believe that lower-income citizens and their air quality are impacted the most. In Georgia, child asthma rates are 16.2%, over

double the national average and Augusta has been ranked as one of the top 10 Asthma cities in the country - currently ranked as #69 worst city in a 2021 report from the Asthma and Allergy Foundation of America. The location of the facility is a clear environmental justice implications with the population surrounding the facility over 80% African American, and the [EPA National Air Toxics Assessment](#) cancer rate in the area is 95-99%. This area already suffers from relic heavy metal toxicity, which this plant could exacerbate. Much of the relic contamination still sits in the soil and waterways around the area, waiting on taxpayer funds to remediate messes created from other industrial endeavors. The river and surrounding waterways within a short distance of this facility already exceed state standards for mercury contamination, and fecal matter. The contamination problem is compounded by the significant population of subsistence fishers engaging in this area year round.

We are very concerned with Aurubis's handling of their feedstock and the accompanying fugitive emissions. Fugitive emissions are unregulated emissions of contaminants the state accepts will migrate offsite. Those emissions should be aggressively minimized. The feedstock should be contained in warehouses and dust should be aggressively mitigated. Stormwater controls should require proper filtering of stormwater to ensure pollutants used on site have been removed from the stormwater before leaving the site. We fear that adding more particulate matter and emissions from the pyrolysis and smelting process will jeopardize air quality that is already compromised in Augusta. Our citizens should not have to tolerate air with higher concentrations of more CO, NOx, VOCs, PMs, SO2, Organic and Inorganic HAPs, polycyclic organic compounds, and many other contaminants. Many of the hazardous materials requested to be discharged into the air are known carcinogens. EPA's current air assessment already shows an alarmingly high cancer risk rate for most of Richmond County.

The pollutant loads already in the air of Augusta Richmond County exist because of the current permittees already calling Augusta's river region home. It is also an unfortunate fact that the citizens in Augusta already show higher rates of lung related health

impacts. It is a reasonable assumption that increasing significant air pollutant discharges will not be beneficial to those already suffering from breathing related issues, or other health related issues caused by pollutant sources already existing in our community. The projected emission from the facility related to particulate matter is just below the allowable limit for yearly exposure. Allowing Arubis to discharge these high volumes of particulate matter when Augusta's air has continually experienced climbing unsafe particulate matter loads, is irresponsible and un-protective of the citizens our state Environmental Agency works to protect. In the unfortunate event that hazardous materials are leaked, spilled, or escaped from this facility, what are the steps and financial coverage set up to ensure that the state and federal governments are not left with the remediation and cleanup bill? This is a facility requesting the ability to handle a large number of hazardous chemicals many of which if incorrectly handled could create legacy groundwater, soil and surface water contamination our community will have to deal with long after the company is gone. We request information on the bonds, insurance, and funds Aurubis will be required to maintain to ensure the protection of our citizens both from pollution and the economic burden of being left with contaminated land once the company has run its course. This is not a foreign story for our community, however it is a story we would not like to perpetuate. It is critical that the companies asking to operate in our communities be able to provide clear evidence of their ability to cleanup if something does go wrong.

Aurubis, unfortunately, has had serious issues handling hazardous waste and managing its stormwater/ wastewater in the past. The issues, seemingly of a chronic nature, give us great pause on trusting this company. The recent string of violations tells a story of repeated visits, failures to comply with requirements, and what comes across as a leadership within the company not quick to ensure they are maintaining and operating in a safe manner, nor quickly solving a problem once discovered. This is not only a possible environmental problem, but a possible OSHA issue as well. A quick google search showed numerous articles focused on issues in Buffalo NY:

<https://www.wkbw.com/news/i-team/the-price-of-water/i-team-aurubis-buffalo-factory-fined-240-000-for-violating-federal-pollution-law>

To our knowledge, this facility has not applied for wastewater, RCRA pre-treatment or treatment permits. Air pollution often becomes stormwater pollution, and scrubbers used in air treatment often lead to a direct increase in wastewater pollutant loads. It is impossible to comment meaningfully about a project with so many different permitting actions without understanding the interconnectivity of the permits and their allowable pollutant loads. Groundwater contamination in the areas around the facility are already a known issue, regular extensive monitoring of air and water around the site should be required. We have very serious concerns about the waste stream from the facility going into the City of Augusta's wastewater system. The City of Augusta uses a tertiary wetland filtering system and applies its solids on nearby farms. This facility could put both of those systems at risk. To the best of our knowledge, they have also not applied for their stormwater permits. Their fugitive emissions and air discharges of over 30 chemicals will likely end up in their stormwater which will drain into the Spirit Creek basin and make its way to the Savannah River. Given the limited flows of the streams on the industrial site, it seems reasonable to assume wastewater will only be pre-treated onsite but guessing isn't a great way to be informed, feedback would be greatly appreciated. Valencia Way sits just off Route 56 atop the ridge between Spirit Creek and McBean Creek and as one continues into the industrial park, Valencia Way descends into the McBean basin. Stormwater may flow into the Spirit Creek basin, an already heavily impaired waterway.

Due to the complexity and overall length of the Aurubis, Richmond SIP & Air Quality Permit application (#28364), the Savannah Riverkeeper (SRK) humbly requests EPD deny the permit as written and we request a 90-day extension for the review process to properly review and understand the implications, and future environmental impacts that this industry will be bringing to the city of Augusta and the Savannah River Basin. We would request the time to provide meaningful feedback on possible improvements to the

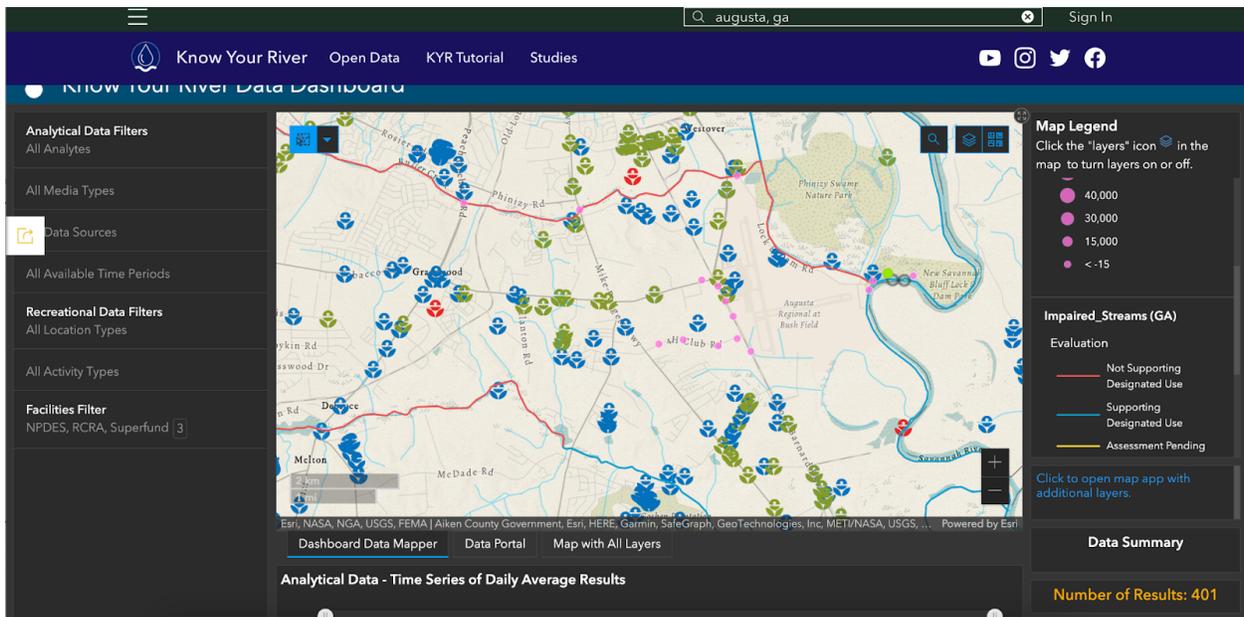
process if improvements leading to less emissions is identified. Air quality experts on our end are reviewing this application and providing feedback and scientific understanding to ensure we are providing the most meaningful feedback possible. We also request an update on all other permits EPD will be requiring on site. If an extension is granted we will submit our final comments within the allotted time frame.

Sincerely,

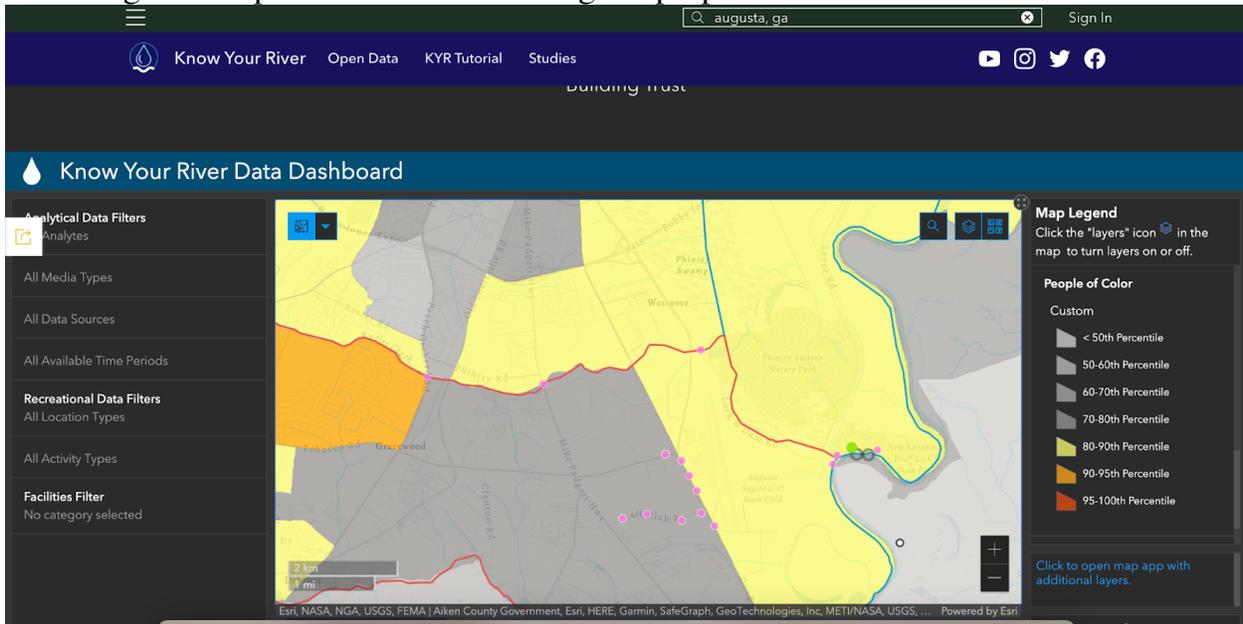


Tonya Bonitatibus
Riverkeeper/ Executive Director
Savannah Riverkeeper

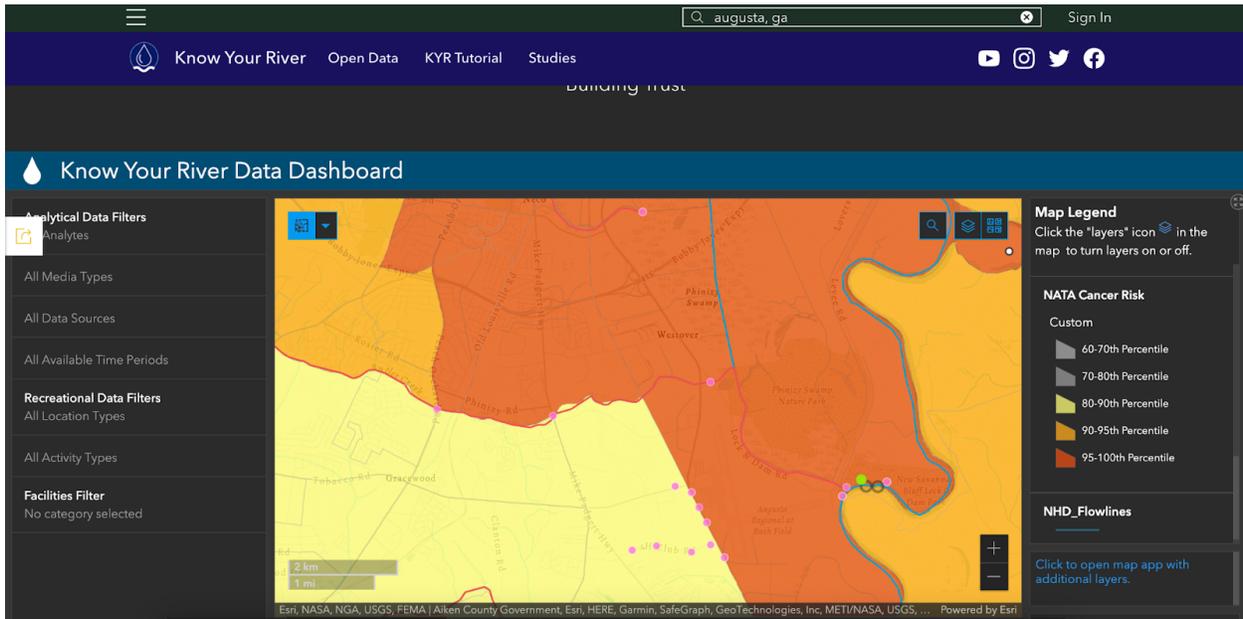
The Number of NPDES, RCRA, and Superfund facilities in the community surrounding Aurubis.



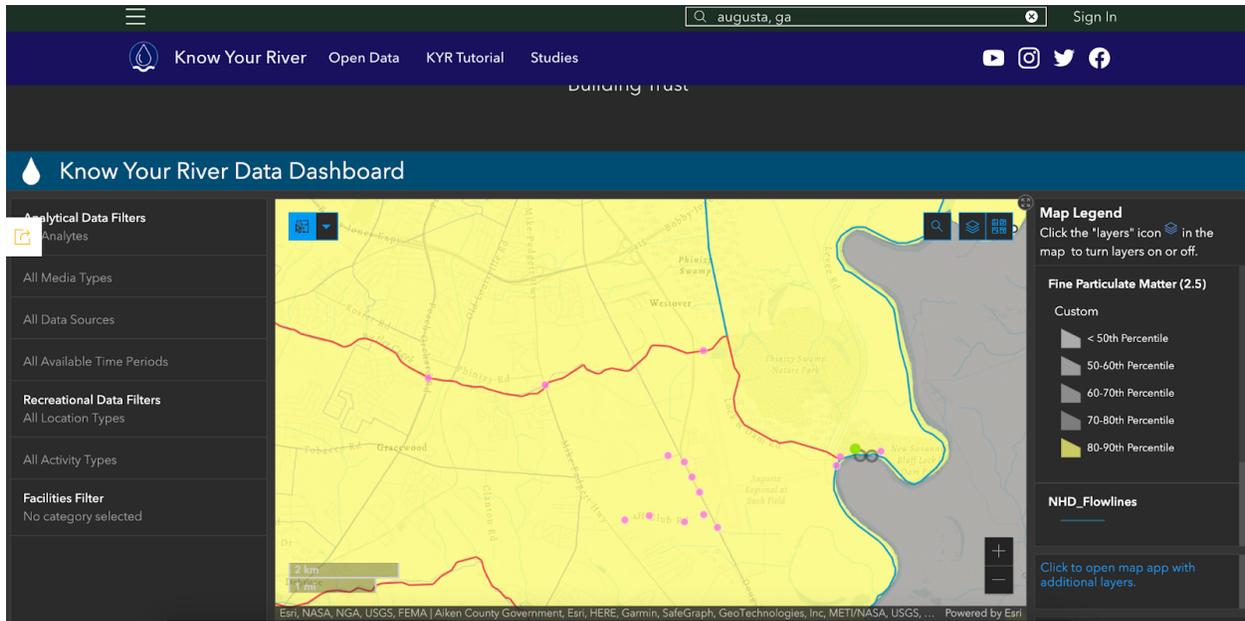
Percentage of People of Color surrounding the proposed Aurubis site.

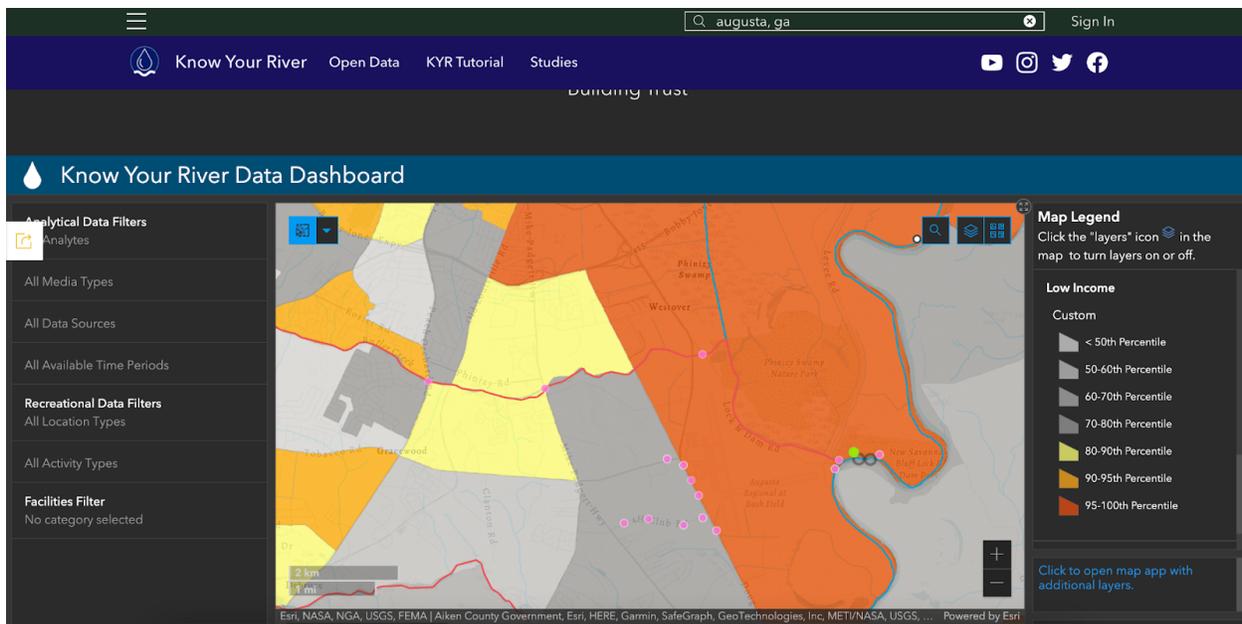


EPA National Air Toxics Assessment Cancer Risk for community surrounding Aurubis site.



Current Fine Particulate matter pollutant loads in the community surrounding the Aurubis facility.





Rates of low income families in the community surrounding the proposed Aurubis site.