



You Are Why We Are Here

**FRANKLIN COUNTY
BOARD OF COMMISSIONERS
INFORMATION MEETING MINUTES
January 6, 2020
6:00 P.M.**

BOC: Commission Chairman Thomas Bridges
District 1 Commissioner Robert Franklin
District 2 Commissioner Dr. Jason Macomson
District 3 Commissioner Ryan Swails
District 4 Commissioner Eddie Wester

Media: Lisa Manus, Franklin County Citizen Leader (out at 6:20 p.m.)
Kandice Eberhardt, Franklin County Citizen Leader (in at 6:20 p.m.)
MJ Kneiser, WLHR (in at 6:30 p.m.)

Staff: County Manager Beth Thomas
County Clerk Elaine Evans
County Attorney Bubba Samuels

Item 1: Call meeting to order – Chairman Bridges called the Information Meeting to order at 6:00 p.m. and welcomed everyone.

Item 2: Invocation and Pledge of Allegiance – Commissioner Swails led the invocation and pledge of allegiance to the American flag.

Item 3: Items for discussion

U.S. Census – Jessie Clayton

Jessie Clayton came forward to give information on the 2020 Census and stated April 1 is known as Census Day. Ms. Clayton said Franklin County has done a tremendous job in getting the count for federal funding. In the year 2000, Franklin County reported 63% of residents that responded and in 2010 the number went up to 73%. For every person not counted in the Census, federal funding of \$2,300 per year is lost. Ms. Clayton said the lost federal funding would pay for a lot of roads, meals for seniors and new schools. Each county receives funding based on the number of residents and the determined amount comes from the Census.

Ms. Clayton said the Census forms will be mailed somewhere around March 12. There are three ways the forms can be filled out; by mail, internet or telephone. The cards are sent to addresses not people. Ms. Clayton encouraged everyone who to return the form and make sure they are counted to avoid losing funding. The hardest people to count are children under age five and millennials and Ms. Clayton said to please remember to count these in the Census. All of the Census information is confidential, it is not given out to anyone. The Census count of how many people responded in the United States is given to the President on December 31, 2020. The Census information is held in



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confidence for 72 years.

Census information was provided by Ms. Clayton. She also said the Census is hiring with part-time jobs starting at \$14 per hour. This is a very flexible schedule that you can set yourself. She told the Commissioners she will be contacting them later to determine how everyone can be counted. This is free money for your county and everyone counts. Census data is used for numerous things including locating new businesses.

EPD Air and Water Protection representatives

Anna Truszczynski said on the water side that EPD has been working with both GRP Franklin and GRP Madison responding to citizen complaints and going out for site inspections. Most of this was wrapped up by December 9, 2019. Ms. Truszczynski stated EPD is continuing with the enforcement processes for both facilities through information gathering and enforcement. Both communities have very interested citizens who contact EPD with complaints and questions. Currently there are no substantial changes to the water permits for the GRP plants.

Commissioner Macomson asked Ms. Truszczynski if EPD has ongoing water monitoring for GRP. Ms. Truszczynski stated Georgia EPD is not taking continuous samples but there are monitoring requirements in the permit that GRP has for their waste water and storm water notice of intent. She said that onsite it looks like these two are comingled at the Franklin facility so the waste water would be all that would be looked at. For GRP Madison there are some different monitoring requirements and the report is due to EPD by January 31, 2020 as it is for all industrial storm water permit holders. EPD has monitored a few locations around the Madison plant and results are being reviewed.

Chairman Bridges asked Ms. Truszczynski what the water is being monitored for. Ms. Truszczynski said the monitoring is for the standard suite of metals, total suspended solids looking for oil and grease and a number of volatile organic compounds including phenols that are seen around creosote. Commissioner Macomson questioned if GRP is supposed to be doing the monitoring now. Ms. Truszczynski stated GRP is supposed to be monitoring what is leaving their facility and entering the water bodies and this is to be provided to EPD on a monthly basis. Commissioner Macomson asked how EPD assesses ground water contamination. Ms. Truszczynski stated GRP will not be doing this and EPD does not usually do monitoring of this kind unless it is a certain kind of permit which GRP does not have. There is no ground water monitoring being done around the GRP Franklin facility.

Chairman Bridges said one of the citizen questions concerns the runoff that killed the fish in Indian Creek, how long will the poison last and when the cleanup be done for the sand. Ms. Truszczynski stated she does not have an answer and will have to check with DNR for the information. Commissioner Macomson asked how in the future will EPD require monitoring from GRP. Ms. Truszczynski said as part of their waste water permit they have end of pipe limits and is renewable every five years. At the time of renewal EPD asks site questions and reviews the data and look for updates and then assess the permit limits and monitoring as required. Commissioner Macomson



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questioned if the data is reported during the five-year period or only at renewal. Ms. Truszczynski stated reporting is required monthly. The permit for GRP will expire in September of 2020.

Another citizen question as read by Chairman Bridges will wells be tested around GRP as the citizens are extremely concerned that a baseline needs to be established. GRP does not have a good reputation and can they be trusted to properly monitor the water table. Ms. Truszczynski said the runoff water according to information from GRP and site inspections by EPD goes into two ponds onsite. These ponds then discharge into the creek. EPD does not do any monitoring of private drinking wells as the state and federal regulations only concern public drinking water systems. Ms. Truszczynski stated the University of Georgia is a great resource that could be used for testing and other third-party labs and she is willing to help find someone.

Commissioner Wester said a lot of Franklin County is agricultural and a lot of people have property that these creeks flow through and animals drink from them. He questioned if there is any kind of monitoring for this activity from EPD. Ms. Truszczynski said water quality standards for surface water in monitored but not in conjunction with specific agricultural use. On December 12, 2019 in response to complaints from farmers and land owners near GRP Madison, EPD did take water samples. Ms. Truszczynski stated in response to the email request from Commissioner Macomson for surface water monitoring it will be discussed.

Commissioner Macomson questioned if an opportunity for public participation will be given during the permit renewal for GRP and asked how the process works. Ms. Truszczynski said an opportunity for public comment will be given and public notices will be posted. The application must be received 180 days prior to being issued for the review process of the permit renewal. The information for GRP Franklin, EPD will post a copy of the public notice of the proposed permit on their website. Ms. Truszczynski said the 2015 requirement was that a copy of the public notice be posted at the Franklin County Courthouse but EPD is undergoing rule changes so the process may for public notice may change. Citizens can sign up with the EPD listserv for notifications. Commissioner Macomson stated the public comment time should start soon. Ms. Truszczynski said provided the application is complete and timely.

Chairman Bridges read the question from the Franklin County Citizen's Lisa Manus who asked who oversees GRP in their water monitoring and the reports are true. Ms. Truszczynski said EPD has a requirement that monthly monitoring reports be submitted to NETDMR website. The submitted data is reviewed and site inspections are randomly made to verify the accuracy. Commissioner Macomson questioned if GRP does their own testing or if a certified company is used. Ms. Truszczynski said she is not sure how GRP does the testing but can look into it.

Another question posed by the citizens and read by Chairman Bridges is does an applicant have to have permission from landowners to discharge water onto their private property and if so, why. Ms. Truszczynski said the only permission EPD gives for water discharge is a specific end of pipe outfalls directly into waters of the state which is



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allowed by the permit. EPD does not have regulation over sheet flow runoff between two properties. Commissioner Swails asked for clarification on if runoff from his property went onto a neighbor there was no regulation. Ms. Truszczynski said EPD regulates point source dischargers, the runoff as questioned by Commissioner Swails should be handled by local nuisance ordinances.

Chairman Bridges next citizen question was GRP is taking measures to migrate emissions and some of the dust is coming from them but lots is coming from what National Salvage is bringing in, including creosote railroad ties and is causing mixed water runoff. Ms. Truszczynski stated this is unique to the GRP Madison because the water from National Salvage goes GRP Madison's pond and they only have an industrial stormwater permit. To discharge water GRP Madison has to make sure they meet the state requirements in this permit. EPD is only interested in what is going into the waters of the state and GRP and National Salvage will have to work discharge and comingling between themselves.

The next question read by Chairman Bridges was when the permit for GRP expires in September 2020 can the renewal be denied. Ms. Truszczynski said the process by EPD is to review all the information from the applicant, listen to the community and take public comment and then make a recommendation to either reissue the permit or deny.

Commissioner Macomson asked Ms. Truszczynski to clarify how the University of Georgia could help with private well testing. Mrs. Thomas asked Raymond Fitzpatrick of the Franklin County Extension to speak. Mr. Fitzpatrick said a multitude of private well testing is offered through UGA and he does not know the specific cost because it is based on what is requested to be tested. He told Ms. Truszczynski he would like a list of what they are looking for so he would be able to help the citizens when they come in requesting water testing. Ms. Truszczynski said she would send the list they have tested for to him.

Dika Kuoh, Assistant Chief of Air Protection Branch for EPD. Chairman Bridges asked Mr. Kuoh if he was the one over monitoring the air quality around GRP. Mr. Kuoh said the air permits were issued through them for Madison and Franklin. Chairman Bridges asked if GRP is operating under a temporary permit and how long it will last. Mr. Kuoh said the temporary permit gives them until June of this year to apply for the permanent permit. During the permit question, Mr. Kuoh introduced Pierre Sanon, the lead inspector for the GRP facilities. Chairman Bridges asked how long is a facility left on a temporary air quality permit. Mr. Sanon said the current permit for GRP is to construct and operate. There is a twelve-month time limit to apply for the federal permit after the start of operations. Mr. Sanon stated GRP Franklin notified EPD that June 2, 2019 was the initial firing date for the boiler. The clock started on June 2, 2019 with the twelve-month to apply for the federal permit. Mr. Sanon said the federal permit is an all-encompassing permit that will include state regulations. At the issuance of this permit notice will be placed in the local legal organ.

Commissioner Macomson clarified the notice will be in a public place. Mr. Sanon affirmed yes and Mr. Kuoh said he would be put the draft out for review with a 30-day comment period. Commissioner Macomson questioned if the comments had to be done



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online. Mr. Kuoh said the notice will have an email address, mailing address and probably a phone number to accept all comments for the review process. Chairman Bridges asked if EPD has received a lot of comments so far for the Franklin and Madison GRP plants primarily due to the soot and smoke. Mr. Kuoh said a lot of complaints have been received about odors and he said most of these are due to the start-up and shut-down of the plant. There has been an unusually high number of start-ups and shut-downs because of getting the equipment up and running and this has caused the pollution problem. Mr. Sanon said the problems first started at GRP Madison as it is about two weeks ahead of GRP Franklin. EPD started getting a lot of complaints from the Madison facility and investigations were started. Because of technical issues and challenges in building the plants it has caused an unusual number of start-ups and shut-downs and certain equipment can not be used during this time.

Mr. Sanon said during this problem with the start-ups and shut-downs some equipment has to go off online and that is when emissions will come out of the stack. Normal operations are for three to four start-ups per year but because of the challenges during the commission period the start-ups have been high. Mr. Kuoh said part of the problem is getting the plant to full operation and once this is completed there should be a lot less start-ups and shut-downs as GRP has been troubleshooting the equipment. Commissioner Macomson asked how close are they to the end. Mr. Sanon said on December 14, 2019, GRP received a letter from Georgia Power for commencement of operation (Georgia Power is the buyer for the product from GRP). Mr. Kuoh said the importance of the December 14, 2019 letter is GRP has to stay running to be able to sell electricity to the grid so they are expecting the operations to run smooth. The troubleshooting for GRP Franklin has been ongoing since May so Mr. Kuoh stated he believes it is complete. Mr. Sanon said the anticipation date for the end of the start-ups and shut-downs is the end of January. GRP has been doing the final stages of boiler tune ups that will finetune the equipment for quicker start-ups. Mr. Sanon said GRP has learned that excess air causes the start-up process to be longer so the control devices should be able to be used.

Commissioner Wester asked how would request a public hearing be held for the permitting process. Mr. Kuoh said anyone who contacts EPD could request it but he said because of the public interest in this he thought they would just go ahead and set one up. Commissioner Wester questioned where the public hearing would be held. Mr. Kuoh said a site hasn't been set up yet but typically EPD has a public relations person work with the local people. Commissioner Wester confirmed it would be held locally and not in Atlanta. Commissioner Macomson stated that it would need to be held locally as there are a lot of people who would want to attend. Mr. Kuoh said absolutely they would hold it locally.

Chairman Bridges said the start-ups and shut-downs is making for a lot of fly-ash and dust in the air. He questioned Mr. Kuoh and Mr. Sanon if they regulate this. Mr. Kuoh said unfortunately there is very little that can be done for start-up or shut-down and equated it to the start-up of a vehicle in winter. He said the dust that Chairman Bridges is referring to is controlled by an electrostatic precipitator and works optimally when the boiler is running all the time. There are limited federal and state requirements for this type of problem. GRP does have monitors in place that track pollutants and EPD



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does look at those records. Mr. Sanon stated once the plant is fully operational the start-ups should not be more than three to four times per year. Mr. Kuoh said this plant is designed to run all the time and the start-ups and shut-downs are due to the troubleshooting. Once the plant becomes fully operational the shut-downs will only be for maintenance purposes.

Commissioner Macomson thanked Mr. Kuoh and Mr. Sanon for coming as the citizens need information because of the concern for potential air pollution. He said he understood EPD's position if what is coming out of the plant is okay then the surrounding should be also. Mrs. Hayes at EPD emailed Commissioner Macomson after he questioned her, that there are no plans to monitor the air quality around the GRP plant. Commissioner Macomson asked Mr. Kuoh and Mr. Sanon if the air quality monitoring was done by Franklin County and a problem was found would EPD do follow up and testing. Mr. Kuoh said absolutely. Commissioner Macomson stated he thought this would reassure the citizens. Mr. Sanon said testing is done annually on both facilities for the equipment. Also, quarterly the equipment will be checked for accuracy. Mr. Sanon said the state has tighter regulations for air pollutants than the federal does and both GRP Madison and Franklin passed with flying colors this year. This testing is looked at during a 15-minute time period, 24-hour time period and data is looked at for the year. When this facility is fully operational if the levels do not pass the state standards then the permit will not be issued.

Mr. Sanon said there is a performance test that also has to be passed for permitting. The performance test for GRP Franklin was concluded in November 2019 and the company has 60-days to submit the results to the state because samples have to be sent to certified labs for measurement and evaluation. After the results are sent to the state the samples are reverified and accepted or not. Commissioner Franklin asked who is this sent to at the state. Mr. Sanon said it is sent to the Source Monitoring, a third-party group of engineers hired by the company that verifies the samples.

Chairman Bridges read a citizen question when did the clock start on the Madison GRP plant. Mr. Sanon said it was around May 24, the two plants are only about two weeks apart in time. He said these are identical plants. Commissioner Swails questioned if EPD gives advance notification before doing inspections. Mr. Kuoh said the tests are scheduled in advance because they are done by a third-party company. EPD goes in at the time the third-party testing is done. The test plan has to be sent and reviewed by EPD 30-days prior to the actual testing. Commissioner Macomson questioned how often the toxic impact assessment is done. Mr. Kuoh said this is a one-time test to see if they pass the screening. After this it is tied to the permit for compliance through quarterly testing, annual testing and unannounced air quality inspections. During an unannounced inspection, all records are subject to review. Mr. Sanon stated GRP is required to submit quarterly and semi-annual reports.

Another citizen question read by Chairman Bridges, how does EPD monitor the burning of railroad ties and what percentage can be burned and is it mixed with other materials. Mr. Kuoh said the application for GRP was reopened for cause and added a cap to the percentage of rail ties that can be burned at 20%. This 20% matches the



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application submitted by GRP. Mr. Sanon said the wood chips are weighed. Then 20% by weight of rail ties is mixed with the wood chips for burning. Chairman Bridges said he understood that the federal limit is 40% and was that correct. Mr. Sanon said yes, but the application from GRP states they will use no more than 20% of rail ties so the state is holding them to this by letter and reopening the permit. Chairman Bridges asked how this was monitored to be sure GRP is not throwing in more than 20%. Mr. Kuoh said the weight is tracked by records. Mr. Sanon said GRP is required to keep records of the fuel burn. The way the federal law is written the 20% could all be burned in one day or for the entire year. Normally a plant like GRP will mix the fuel, 80% of wood chips and 20% of rail ties. Commissioner Swails clarified 20% for the year. Mr. Sanon said yes. Commissioner Swails said they could burn 10% of the rail ties in one week and the other 10% for the rest of year. Mr. Kuoh said EPD has continuous emissions monitoring at the stack so multiple pollutants are being tracked. When Mr. Sanon visits, he inspects all of these records for compliance. Mr. Kuoh said only burning rail ties would mess up the combustion process in the plant.

Chairman Bridges questioned if rail ties were being burned in with the wood chips when the EPD testing was done. Mr. Sanon said a performance test was done and it has to represent what will be burned when fully operational, 20% railroad ties and 80% wood chips. Mr. Kuoh said GRP will be help to be operating by what is in their permit. Commissioner Wester said all of the wood is already coming in chipped up and how is the railroad ties being monitored. Mr. Sanon said Madison is chipping the railroad ties but it is all done by weight. Commissioner Wester asked if the railroad ties are shipped separate from the regular wood. Mr. Sanon said Madison started burning the railroad chips before Franklin but it was always the intention for both plants to burn them. Commissioner Macomson clarified that the wood and rail ties are chipped separately and then put together by the 80/20 mix. Mr. Kuoh said that is correct, it would not be efficient to mix them together before chipping.

Another citizen question read by Chairman Bridges, is the toxin release monitored at start-up and shut-down. Mr. Kuoh said the regulations on the start-up and shut-down are very limited. To some extent this is uncharted territory as the number of start-ups and shut-ups is extremely unusual for this type of plant. For start-up, capacity is the only thing looked at and capacity is the reading of the smoke for 20%. Commissioner Macomson clarified this is the smoke coming out of the smoke. Mr. Kuoh said yes and the inspectors are trained to read smoke percentages with training every six months. Unannounced inspections are done by calibrations of reading of the smoke for air quality. Mr. Sanon said they also have monitoring. Commissioner Macomson questioned Mr. Sanon if he compares his reading to what GRP is reporting. Different types of surprise inspections are done.

Another citizen question read by Chairman Bridges is how did GRP get a permit to burn creosote without notifying the public. Commissioner Swails said the presentation to Franklin County by GRP was it would be clean, scrap wood so when did the change take place. Mr. Kuoh said there are a couple of fuel categories that are considered exempt from hazard waste under the land rules and creosote is one of them. Mr. Sanon said in 2018 the EPA made the change of rail ties as being an acceptable fuel under certain



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conditions. One of the conditions cited by the EPA is burning creosote rail ties in a boiler such as GRP has with the correct equipment and burning temperatures. Mr. Kuoh stated the general idea is creosote being burned at the high temperature and the correct equipment and is oxidized. The numerous start-ups and shut-downs are where the problems have happened. Mr. Sanon said the EPA determined under normal conditions burning creosote rail ties was similar or no different than burning regular wood. Mr. Kuoh said to keep it in mind that the creosote is burned at 2,000 degrees. Mr. Sanon said when the state did their assessment after the EPA change there was no prevailing data to show otherwise. Mr. Kuoh said the permit will be up for draft this year and the permit will be updated based on the feedback.

Signed on the _____ day of _____, 2020

Chairman J. Thomas Bridges

Robert L. Franklin, District 1 Commissioner

Dr. Jason Macomson, District 2 Commissioner

Ryan Swails, District 3 Commissioner

Eddie Wester, District 4 Commissioner

Gina L. Kesler, Interim County Clerk