

Marisa Weber

From: PUBCOMMENT-OCC
Sent: Thursday, July 10, 2014 8:16 AM
To: PUBCOMMENT-OCC2
Subject: FW: Public comment on Permit Number 56552
Attachments: PAM3.docx

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PM

From: pspurr@nwcmail.net [mailto:pspurr@nwcmail.net]
Sent: Wednesday, July 09, 2014 3:52 PM
To: donotReply@tceq.texas.gov
Subject: Public comment on Permit Number 56552

REGULATED ENTY NAME MARSHALL PLANT

RN NUMBER: RN102609724

PERMIT NUMBER: 56552

DOCKET NUMBER:

COUNTY: HARRISON

PRINCIPAL NAME: CABOT NORIT AMERICAS INC

CN NUMBER: CN604597021

FROM

NAME: Pam Spurr

E-MAIL: pspurr@nwcmail.net

COMPANY:

ADDRESS: 1203 GORDON ST
MARSHALL TX 75670-6280

PHONE: 9039261727

FAX:

COMMENTS: Please note attached file

MW

Mrs. Pam Spurr
1203 Gordon
Marshall, Texas 75670

Office of the Chief Clerk, MC 105
TCEQ
PO Box 13087
Austin, TX 78711-3087

RE: Cabot-Norit Americas Inc.
Public Comment for Permit 56552

To whom it may concern:

I have reviewed the public documents on the referenced permit application as well as other public documents regarding Cabot and Cabot Norit. I have many concerns, both procedurally and technically regarding this application. Cabot Norit should be required to make a proper public notice before continuing with the application. If issued, the permit should contain new requirements to ensure compliance with the law and protection of the Marshall Environment.

Public Notice

Regarding the public notice, either Cabot Norit has shown utter contempt for the public notice requirement, or complete incompetence. They should be required to repeat the public notice portion of the application process. They should also be required to have a public meeting to address the concerns of the public.

~~There were no process descriptions, process flow diagrams or emissions calculations in the application. Cabot Norit claims that they are all confidential. The absolute nature of the claim is absurd. There is little chance that the gasoline fueling pump or diesel fueling pump are confidential processes, or that the emissions calculations from these sources is confidential.~~

In the application itself, Cabot Norit includes a "Summary of Investigation Findings," that includes the pH requirements and flow rate requirements of scrubbers at Kilns 2, 3, and 4. Cabot Norit and TCEQ seem to agree that this information is not confidential. The process description, including at least this data, should be included in the Process description and process flow diagrams of the application.

Regarding operation of the kilns, TCEQ wrote the following in the publically available Technical Review of the original permit:

Process Description

Kilns 2, 3, and 4 produce activated carbon from lignite. The kilns burn natural gas and combustible gas and particulate matter generated from the lignite during the activation process. Other emission points are associated with handling raw material or the product of the kilns. The product from these three kilns is commingled with product from other kilns, which are permitted already.

Sources, Controls, Source Reduction and 10-Year BACT [§116.779(c)]

Emissions from each of the three kilns goes to a natural gas fired boiler (3 boilers in all) as part of the combustion air for the boiler in order to control VOC from the kiln. Exhaust from the boiler goes to a saturator where it is sprayed with water, thence to a venturi scrubber, thence to an air/water separator. A new system, which will be installed as part of this permit, adds caustic to the venturi scrubber liquor as needed to keep the pH at a set limit; SO₂ control will increase from 89% to 94%. Exhaust from all three of the separators is combined and is emitted through the kiln common stack (EPN: MAINSTACK). Each Kiln has an emergency stack, which will be used also during kiln startup and shutdown (when there is no lignite in the kiln); emissions are calculated based on gases which may remain in the kiln and natural gas burned during the startup and shutdown.

If the process has not changed in the last ten years, then none of this information is confidential. If the process has changed, then this should be permit modification, not renewal, and CabotNorit has likely violated new source review. Therefore, Cabot Norit should put process data at least as detailed as given in the previous application to demonstrate that this is a legitimate renewal.

The EPN "AREAADCVENT" is described as "LFP Conveyors from Kilns 2, 3 and 4." Therefore, the fact that LFP is conveyed from the kilns is not confidential and should be described. The identity of the material being conveyed and emitted should be described. According to the Title V permit Statement of Basis, AREAADCVENT is a dust collector. Cabot Norit should describe why emissions calculations from a dust collector are confidential, if they are.

It is difficult to believe that "Ashpit Fugitives," "General Plant Fugitives" and "Refractory Pit Fugitives," are confidential processes. Cabot Norit should be required to publicly identify these processes and the methods used to calculate the emissions.

Lime Tank Emissions, Main 50 percent NaOH and Main HCL Storage Tanks are not likely confidential processes. Emissions calculations from the tanks are not confidential. Norit should identify the emissions of NaOH, Lime and HCl, not just as PM.

Permittees are not allowed to keep confidential the compounds being emitted. The general term PM₁₀ is inadequate. Based on the descriptions, it seems Cabot Norit may be emitting chemicals called HDR, LFP, Ashpit Fugitives, and Refractory Fugitives. Cabot Norit should identify these chemicals. Oddly, there is no reference to emissions of lignite or activated carbon. Cabot Norit should explain why they do not emit activated carbon or lignite from a lignite activated carbon plant.

Cabot Norit failed to locate the emissions points in the permit application available at the library. This is probably incompetence on their part. The title of the document that purports to provide the locations references another permit and the old name of the facility. The bottom line is that it identifies a large

number of pollution sources, but not the ones in this application. Incompetence or not, Cabot Norit is required to provide the correct information to the public.

There may be more inconsistencies, but those provided are adequate to make the point. Cabot Norit has intentionally withheld public information from the public application. It goes far beyond any reasonable argument about confidentiality. They should be required to go through the public notice process again with all the required public information.

Emissions

The emissions from the Main HCl Storage Tanks Scrubber vent are hydrochloric acid. Cabot Norit must have authorization for these HCl emissions.

Permit 78421 authorizes HCl emissions from the furnaces that manufacture activated carbon at Cabot Norit. This proves HCl is manufactured in activated carbon furnaces. This is consistent with burning of lignite in power plants. Cabot Norit should authorize HCl emissions from Kilns 2, 3 and 4. Cabot Norit should be required to demonstrate removal efficiency of HCl in their kilns.

Cabot Norit claims a 94% SO₂ removal efficiency for the kilns. Cabot Norit should have to perform stack testing to prove this case.

Cabot Norit also authorized sulfuric acid and hydrofluoric acid emissions from the furnaces in permit 78421. They should do the same for the kilns.

Assuming the sulfur compounds being emitted are from the lignite source, TCEQ should impose a sulfur limit on the lignite. Cabot Norit should have the sulfur analysis of every pound of lignite they feed before they feed it to the kilns. This is the only way to ensure that they do not exceed the permitted limits on sulfur dioxide, hydrogen sulfide and sulfuric acid.

Likewise, TCEQ should impose chlorine and fluorine limits on the coal.

Cabot Norit reports emissions of mercury, lead and manganese from the plant, but has no permit authorization to do so. I work serving mentally retarded citizens of Marshall and know that these pollutants contribute to mental retardation. I am very concerned that TCEQ properly evaluate these emissions and require proper controls so future generations will not suffer from the debilitating effects of prenatal exposure to these toxins. TCEQ should impose mercury, lead and manganese limits on the coal, including sampling requirements.

Fugitive PM emissions from the facilities seem to be dramatically underestimated. (This is why they should be required to show the public the methods of calculation.) Given the physical appearance of the plant, it is difficult to believe that general plant fugitive emissions are only 8 pounds per year.

The current permit appears to have no method for ensuring compliance with the VOC and CO limits of the permit. As stated above, gas fired boilers are used to combust these compounds. Cabot Norit should be required to measure and report combustion in the boilers.

Upsets

Cabot-Norit has reported a large number of emissions events, which include toxic gasses such as hydrogen sulfide and carbon monoxide. These are combustible compounds that should be controlled by a flare or other method.

Cabot Norit has suffered a number of explosions on plant in the past few years. On July 21, 2013, an explosion destroyed the kiln 5 air pollution control system (an employee described it as looking "like a plane crash."). Kilns 2, 3 and 4 are of similar design. Cabot Norit should be required to report what caused the July explosion and what steps are being taken to prevent another explosion on these kilns.

The plant has had a large number of explosions, indicating a lack of concern or incompetence with regards to safety and the environment. In the past few years, Cabot Norit has suffered explosions at the Generator, Mill 5 and the Mill 6 Bins. All of these led to major property loss and fire. While these explosions are not directly related to this permit action, the processes are associated. Cabot Norit should be required to report on the causes of these explosions and what actions are being taken to prevent recurrence.

Directly related to this permit action, it is reported that Kiln 3 had multiple minor explosions that damaged the associated boiler. The damage was extensive enough that the boiler had to be rebuilt last year. Also, a number of years ago, there was an explosion in the Kiln 3 product conveyors and in the kiln 3 product bins. The explosions damaged local equipment and started fires.

We should know what caused these explosions and what steps Cabot Norit is taking to prevent more of the same.

Cabot Norit employees discussed the 2013 explosion and fire in the social media. I've attached a copy of that discussion. Employees were clearly disturbed by the events and management's lack of attention. I hope that TCEQ will take steps to ensure that west Marshall isn't the next West, Texas.

Compliance

A fire at Cabot Norit on June 21, 2013 was only reported because of a community complaint about an explosion the following day. TCEQ fined the Cabot Norit for failing to make that report. Sadly, the Cabot facility in Pampa, Texas, was recently fined by TCEQ due, in part, to failure to report. EPA recently fined Cabot \$975,000 for making major modifications without proper air permits. It seems there is a culture of dishonesty and cover up has been developed at Cabot Corporation. The Marshall plant is no exception.

There have been a large number of complaints from the public about upsets that the plant does not report. Most recently, the complaint says the events are periodic. Probably so. But they still stand as evidence that Cabot Norit is covering up their non-compliance. Perhaps TCEQ could evaluate process conditions at the various processes at the time of the alleged complaints, not just take the word of the environmental staff, given their history of dishonesty with you.

Regulations:

There are a number of EPA regulations that should be applied to the boilers at Cabot Norit. These include 60 CFR Subparts Db or Dc, and 63 CFR subparts DDDDDD or JJJJJJ.

In Summary

Cabot Norit has demonstrated a repeated non-compliance and dishonesty. They knowingly are emitting hazardous air pollutants without a permit and without applying for a permit. Multiple fires and explosions at the plant will someday lead to disaster if the state does not intervene. TCEQ should require the following for Cabot Norit:

1. Repeat the Public Notice with the proper information made available to the public;
2. Hold public meetings in Marshall so that Cabot Norit can explain their behavior;
3. Evaluate hazardous air pollutant emissions from all the furnaces at Cabot Norit, including HCl, mercury, manganese, HF, lead and other metals.;
4. Place sulfur, chloride fluoride, mercury, manganese and lead limits on coal feed to the furnace;
5. Require proper controls, such as flares, on emission events;
6. Evaluate the history of explosions at the plant and how Cabot Norit plans to prevent future explosions;
7. Evaluate this history of the boilers to determine if they have been damaged and if they have been replaced;
8. Require combustion monitoring and limits in the boilers;
9. Review process conditions related to the various public complaints against Cabot Norit.

Please include me on any correspondence regarding Cabot Norit. Please don't issue this permit until you make sure that all air emissions are evaluated. Please let the people of Marshall Review it before you issue any permit.

My name is Pam Spurr. I live at 1203 Gordon Street in Marshall. My house is a mile and a half from the plant. I work with mentally retarded citizens in Marshall, and know the emissions from Cabot Norit can lead to mental retardation, as well as other health effects. Please hold public meetings so that we know what Cabot Norit is doing.

Respectfully,

Pam Spurr

Attachment: Facebook posts from June 2013

Search for people, places and things



Trey Parker

Last night was not a bad night at work but Friday night sure was horrible, At least everyone was Safe!!

Like · Comment · Share · 6 hours ago via mobile ·

Douglas Reason and 6 others like this.

Jeff Mauldin ??????????????
6 hours ago · Like · 1

Sandy Smelley Wright What happened?
5 hours ago via mobile · Like

Mitchell Fleet What happened? Friday day was not good either
5 hours ago via mobile · Like

Brian Newton Tell me, I heard we had another fire. Where was it?
4 hours ago via mobile · Like

Beth McDonald Godsey Mike just heard about it and is upset. He's been on call this weekend and never got a call out.
2 hours ago · Like

Trey Parker MI3 Needs a lot of work!
2 hours ago via mobile · Like

Trey Parker Bath CO would not help.
2 hours ago via mobile · Like

Beth McDonald Godsey Yeah I know. He can see it tomorrow. There's an article in Marshall paper.
2 hours ago · Like

Trey Parker Paper is not the truth though
2 hours ago via mobile · Like

Jamie Gentry Lol it looked like a plane crash
2 hours ago via mobile · Like

Jamie Gentry it will have a life changing effect on some one!!!
2 hours ago via mobile · Like

Facebook posts from June 2013 regarding fires at Cabot Norit.