

Advocacy – July 2020

When we moved to Tellico Village from Houston a few years ago, one of the positive aspects we talked about was the improvement in air quality. Due to the large amount of heavy industry in the Houston area, it consistently ranks as one of the most polluted areas of the country. Our thinking was that moving to a pristine area like east Tennessee would be a huge improvement compared to what we had experienced in Houston.

Recently I was asked to look at air quality in Loudon and Monroe counties, which gave me an opportunity to check on my earlier assumptions about air quality in our area. While this is still a work in process, I thought I'd share some of what I've learned so far.

1. In May 2004 a group of Tellico Village residents formed a group that they named "BCAAT" (Breathe Clean Air Action Team). It's primary purpose was "to encourage the improvement of air quality through: public awareness and education; research and fact finding; advocacy with industry, [and] government...." At its start the group had 80 individual members, plus the HOA and Garden Club.
 - a. Through the years BCAAT worked with TN environmental agencies to improve the transparency of reporting and accountability. Of particular importance was the need to ensure that citizens were fully informed about changes to air permits and that there was opportunity to provide input prior to decisions being made.
 - b. The most significant activity of BCAAT was a lawsuit against Tate & Lyle regarding a plant expansion to produce ethanol. The lawsuit was settled in 2005 and viewed as a "win-win" by all sides.
 - i. Tate & Lyle agreed to invest \$14m in additional pollution controls, resulting in reducing allowable emissions by 50%.
 - ii. The expansion project was allowed to go forward (completed in 2007), resulting in 12% reduced plant costs and nearly doubling the ethanol production.
 - iii. TDEC (TN Department of Environment and Conservation) agreed to continue a study of Loudon county air quality they had started in 2003.
 - c. TDEC stopped their air quality study in 2009. They continue to monitor ozone and particulate emissions. Their monitoring station is close to Loudon Middle School.
 - d. Another goal of BCAAT was to see Loudon county come into compliance with all EPA air quality standards for particulate pollution. In 2017 Loudon, Anderson, Knox, Blount, and part of Roane counties all achieved "attainment" status – the last area of TN to become qualified.
 - e. The BCAAT group closed in 2018 due to a lack of sustainable membership.
2. The EPA collects air, water, and solid waste pollution data from industrial and governmental facilities. This is published annually in their "Toxics Release Inventory" (TRI) report. The most recent TRI report is from 2018.
 - a. Here is a link to the TRI 2018 report for Loudon County:
https://enviro.epa.gov/triexplorer/tri_factsheet.factsheet?pzip=&pstate=TN&pcity=&pcounty=Loudon&pyear=2018&pParent=TRI&pDataSet=TRIQ1

- b. Here is a link to the TRI 2018 report for Monroe County:
https://enviro.epa.gov/triexplorer/tri_factsheet.factsheet?pzip=&pstate=TN&pcity=&pcounty=Monroe&pyear=2018&pParent=TRI&pDataSet=TRIQ1
 - c. The three primary pollutants are Carbon Disulfide, Hydrogen Sulfide, and Styrene – all of which are toxic and/or carcinogenic.
 - d. Comparison of Loudon and Monroe county to the rest of the US gives some interesting information. **Of the 3,262 counties and county equivalents in the US and its territories, Loudon county ranks #28 (from the bottom).** It has higher emissions than 9 out of 10 of the largest urban areas (except Houston). **Monroe county is #263 (from the bottom).** It has higher emissions than 6 out of 10 of the largest urban areas.
3. HOA has now been added to the distribution list at TDEC for any permit changes that come from Loudon and Monroe counties. This will at least give us an idea of the changes that are occurring.
 - a. It is interesting to note that TDEC does not normally consider the total amount of a toxin already in the air before allowing more. It only looks at the amount put out by each facility separately, without consideration of the total amount already in the ambient air we breathe.
 - b. The notice period for a permit change is 30 days. A challenge to a permit change request must be specific regarding the issues of concern. This is a significant concern because you have to do your research and make your complaint all within the 30-day review period.

At the moment I seem to have more questions than answers, so I continue to dig. Currently my focus is on TDEC, who I hope can help me with some basic questions.

1. What is the dispersion pattern once this stuff is released? Does it float off into the upper atmosphere or come back to ground in the local area?
2. What happens to this stuff once it's released? Does it convert to other more benign chemicals or does it remain in its as-released toxic state?
3. Are any of these chemicals part of the makeup of acid rain in our area? How does this impact the forests and waterways of East TN?
4. Where can we see the results of the 2003-2009 air quality study in Loudon county?

I'll try to provide updates as I learn more about this topic.

While our ability to see each other at HOA Social gatherings is currently limited, please feel free to send me a note if you have any issues or concerns that I might be able to help with.

Thank you. I look forward to hearing from you.

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