From:	Russo, Todd
To:	Groendyke, Todd; Dressler, Jason
Subject:	FW: Important Safety Information to Consider - Proposed RV Park
Date:	Wednesday, August 04, 2021 10:54:57 AM
Attachments:	888_Woodstock_St_CHEMICALEXP_032721_phone_1 - Copy.wav F6DDC5BFFE4F4162B0EC3E89C1A882AA.png

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Jason – is this related to 3V that you mentioned Monday?
Regards,

Todd Russo
Chief, Air Enforcement Branch
Enforcement and Compliance Assurance Division
U.S. EPA Region 4
Tel: (404) 562-9194

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From: Kemker, Carol <Kemker.Carol@epa.gov>
Sent: Tuesday, August 3, 2021 10:58 AM
To: Russo, Todd <Russo.Todd@epa.gov>; Lamberth, Larry <Lamberth.Larry@epa.gov>; Jenkins, Brandi <Jenkins.Brandi@epa.gov>
Subject: FW: Important Safety Information to Consider - Proposed RV Park
FYI

From: 5 U.S.C. § 552 (b)(6) Personal Privacy
Sent: Tuesday, August 3, 2021 10:08 AM
To: louisrmorant@gtcounty.org; lilliejohnson@gtcounty.org; everettcarolina@gtcounty.org; raymondnewton@gtcounty.org; Bob Anderson <bobanderson@sc.rr.com>; John Thomas <johnthomas@gtcounty.org> <johnthomas@gtcounty.org>; stevegoggans@gtcounty.org
Cc: deggiman@gtcounty.org; ahucks@gtcounty.org; Charles Swenson <cswenson@coastalobserver.com>; Demi Lawrence <DLawrence@postandcourier.com>; Theresa Floyd <tfloyd@gtcounty.org>; Angela Christian <achristian@gtcounty.org>; Holly Richardson <hrichardson@gtcounty.org>
Subject: RE: Important Safety Information to Consider - Proposed RV Park
Dear Council Members,
On July 15, the Planning Commission voted 4-2 in favor of rezoning property on the Sampit River across from 3V Chemical for a family campground. The Planning Commission Chair and Vice-Chair spoke in favor and Commissioners Bundy and Hamby spoke against the proposed rezoning for public safety reasons. The second reading and public hearing before County Council will occur at your August 24 meeting.
Many in the community feel the Planning Commissions decision was irresponsible and ignored best practices for planning and zoning. The U.S. has a sad but long history of serious accidents affecting people near facilities that handle flammable and hazardous materials. You might argue that the odds are low but it only takes one incident, like the one that occurred just 4 month ago at 3V, to endanger the entire population of the proposed campground.
I am attaching the 911 recording and I hope you take 10 minutes to listen to the entire call. I think it will help you realize how serious the March 27 incident was, not only for employees, but for anyone located

immediately downwind. The company reported over 23,000 pounds of methylene chloride was released to the atmosphere. There was one fatality but, as you will hear, it came very close to involving 5 more. As you listen, keep in mind that under prevailing summer weather conditions, the toxic chemicals released during the March 27 incident would take only 6 minutes to reach the campground. This is long before employees could assess the situation and notify EMS. Look at the photos below taken at Huntington Beach State Park yesterday and try to imagine how campers, such as these, could be protected in the event of smoke and/or hazardous chemicals reached the proposed campground.

I'm copying our Fire/EMS Chiefs and hope you will consult with them on issues such as likely notification times to EMS, response time and the possible alternatives for protecting campers such as sheltering in place, evacuation along a single exit route, etc.

A resort RV Campground would be a wonderful addition for Georgetown County if located at an appropriate location. We should do everything possible, along with economic development, to help interested developers identify that location.

Please contact me if you have any questions. My interest in this is solely based on public health and prudent planning considerations. Accident prevention is much preferred to accident response.

5 U.S.C. § 552 (b)(6) Personal Privacy
[redacted]
Environmental Health & Safety Manager (retired)

PS: Theresa, Would you please make this a part of the hearing record for the August 24, 2021 meeting and send me a confirmation? Thanks, 5 U.S.C. § [redacted]

Sent from Mail for Windows 10

From: 5 U.S.C. § 552 (b)(6) Personal Privacy [redacted]

Sent: Wednesday, July 14, 2021 12:18 PM
To: 5 U.S.C. § 552 (b)(6) Personal Privacy [redacted] louisrmorant@gtcounty.org; lilliejohnson@gtcounty.org; everettcarolina@gtcounty.org; raymondnewton@gtcounty.org; Bob Anderson; stevegoggans@gtcounty.org; John Thomas <johnthomas@gtcounty.org>; Angela Christian; Holly Richardson
Subject: Important Safety Information to Consider - Proposed RV Park

On tomorrow's Planning Commission agenda is an application for a 700-site resort RV park. On the surface, this appears to be an excellent economic development project and asset for Georgetown County.

I am contacting you to explain why, in my opinion, this project should never have progressed past the "initial consultation" phase with the Planning Department. As you read my comments, I hope you will consider this a learning moment about the importance of updating our Comprehensive Plan and using it effectively so situations like this can be avoided in the future.

My professional experience involves 40+ years as an Environmental, Health and Safety manager, including risk management and emergency response planning for Fortune 100 companies that handle toxic/hazardous/flammable chemicals. This includes a major industrial facility located here in Georgetown County.

Facts you should know as you consider the proposed RV park.

1. The proposed facility is less than 1 mile from a chemical manufacturing facility that stores, handles and emits hazardous chemicals.

2. The chemical company operates 4 facilities, three of which are in Italy, and has a history of chemical releases, fires and serious accidents.
    1. March 27, 2021 - a runaway chemical reaction at the Georgetown plant released 23,000 pounds of methylene chloride resulting in a fatality and creating a chemical plume noticeable at the North Santee River (10 miles downwind).
    2. August 20, 2020 –a corroded cable broke causing an employee and a platform carrying barrels of concentrated hydrochloric acid to fall three stories resulting in serious injuries to the employee and a hazardous chemical spill.
    3. May 15, 2020 – a fire and explosion at the 3V plant near Venice, IT seriously burned two employees and endangered the surrounding communities with smoke and toxic gases.

    4. November 4, 2006 – a worker died and another was injured inside an oxygen-deficient confined space at the Georgetown plant.
    5. November 11, 1997 – Employee cleaning a 158-gallon chemical spill was overexposed to aniline, his skin turned blue and was transported to Georgetown Memorial Hospital for treatment for aniline overexposure.
    6. November 17, 1997 – In response to employee accident, OSHA inspected 3V Chemical and identified 14 violations, 13 considered serious and assessed fines totaling $20,625.

3. According to the U.S. Environmental Protection Agency, the 3V facility in Georgetown releases between 250,000 and 500,000 pounds of methylene chloride to the air annually along with other hazardous air pollutants. https://echo.epa.gov/air-pollutant-report?fid=110000353448
4. According to the CDC https://www.cdc.gov/niosh/npg/npgd0414.html the symptoms of exposure to methylene chloride include:
    1. irritation to eyes and skin
    2. weakness, exhaustion, drowsiness, dizziness
    3. numbness, tingling limbs
    4. nausea
    5. potential occupational carcinogen
5. The EPA has recently banned methylene chloride for commercial uses.
6. There are a number of other hazardous chemicals stored and processed at this facility including vinyl acetate and acetaldehyde which represent a risk if accidentally spilled,

released or ignited.

7. The 3V facility is adjacent to the property Georgetown County recently acquired and zoned for future heavy industrial use.

The questions the Planning Commission may wish to ask as you consider this zoning request are:

1. If Georgetown County adopted its zoning ordinance "for the purpose of providing for the orderly development" and to "protect the public health, safety, and general welfare," why are we considering a family recreational facility in such close proximity to a facility that stores, processes and releases hazardous chemicals to the environment?
2. Why did the applicant (First Citizens Bank) and their local agent not mention anywhere in the application that a hazardous chemical storage and processing facility is located within 1 mile of the proposed family campground and marina? (Please be aware that Holly and her staff do mention this in the Green Sheets.)
3. If there were to be a future incident, either a fire or significant toxic chemical release, and the wind carried the smoke and/or toxic chemical vapors toward the campground, what emergency action could the Fire Department/Emergency Response officials take:
    1. Order the campers to shelter in place, knowing many would not be protected?
    2. Order the campers to evacuate along the only access road which is 1.75 miles long and possibly in the smoke/chemical plume? (The prevailing wind direction during the summer is from the south quadrant and directly toward the proposed campground).
    3. Is there any possibility that county emergency response (911) would be notified of a future incident before the smoke and vapors reached the campground? (It would take 9 minutes for a smoke/vapor cloud to reach the campground if the wind was 5 miles per hour from the south.)
    4. Would the RV park management be able to control panic among the campers should an unknown chemical odor and/or smoke move through the RV resort?

I realize the responsibilities of the Planning Commission, the County Council and the County Administrator's administrative staff are complex and often have very serious long-term consequences. I also realize that very few of you are well-versed in chemical safety and emergency preparedness. I bring this information to you so that you can make the best possible decision. State and Federal regulations address most aspects of hazardous chemical management ***EXCEPT*** locating facilities nearby. This is left to local government and local planning officials.

The National Institute of Health recently conducted a study of schools located near hazardous chemical facilities and made the following recommendations which you might find useful:

"In light of the current lack of federal authority for oversight of land use near educational institutions, state and local governments should take a proactive role in promulgating state regulations that prohibit the siting of public receptors, such as buildings occupied by children, near facilities that store hazardous chemicals."

Please do not rely solely on my input as you make your decision. I have spoken with two local fire chiefs who were unaware that the proposed RV park was in close proximity to the hazardous materials. Speak with them before you make your decision. I also suggest you contact the management at the chemical facility and ask for their input on whether they feel it is wise to locate a recreational facility near their operations. I have not contacted them to ask this question but in my experience, the answer would be straightforward and clear.

Thanks for your service to our community and for welcoming public input, as you always do, on important matters such as this. As you contemplate this matter, please consider how much easier your decision might be if Georgetown County had a Comprehensive Plan that clearly explained where the county welcomes heavy industry and where other uses such as residential growth, workforce housing, recreational facilities and other uses are best located.

5 U.S.C. § 552 (b)(6) Personal Privacy
[redacted]
Environmental, Health and Safety Manager (retired)

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