

Georgia Environmental Protection Division, Air Protection Branch  
c/o Steven Allison  
Manager, Stationary Source Permitting Program  
c/o James Boylan  
Chief, Air Protection Branch  
c/o DeAnna Oser  
Assistant Chief, Air Protection Branch

*RE: Richmond Hill Facility Air permit application, No. 29975*

Mr. Allison and the Air Protection Branch,

On behalf of One Hundred Miles and Ogeechee Riverkeeper, we respectfully request that the Georgia Environmental Protection Division (EPD) Air Protection Branch extend the public comment period for the "Richmond Hill Facility" (application number 29975) for 60-days, to Tuesday, April 7, 2026. Additionally, we request that the Air Protection Branch denies or revokes this application's eligibility under the Expedited Permitting Program. A 60-day extension and removal from the Expedited Permitting Program is warranted and serves the public interest in the following ways:

1. **Severely restricted opportunity for public comment:** Trinity Consultants, on behalf of Westwin Elements, submitted the permit application on December 12, 2025, and EPD provided public notice on January 7, 2026. There was no substantial public awareness of this proposed nickel refinery until the meeting of the Bryan County Commission on January 13, 2026. Since the revelation of Westwin's interest in the Caesarstone facility, Bryan County residents have been intensely engaged with the project. At no point has Westwin revealed the existence of their permit application. During the question-and-answer session of a community meeting hosted by Westwin on Monday, February 2, 2026, the moderator directly asked Westwin Elements CEO, KaLeigh Long, what permits the facility would require. Even when confronted with a direct question, Ms. Long failed to acknowledge the existence of this application.

Even our organizations were unaware of this permit due to Westwin's decision to refer to themselves as "Project Patriot" and the site as the "Richmond Hill Facility." Westwin has not gone by "Project Patriot" at any other point when discussing this project, nor does it appear in any public materials from the City of Lawton, Oklahoma, the site of their current "demonstration plant." Westwin's use of alternate applicant and site names in this permit application has curtailed public awareness despite the Air Protection Branch's timely public notice.

2. **Recent actions of the Bryan County Commission:** During the February 2, 2026, meeting, Ms. Long contended that the Caesarstone facility was contaminated with silica, arsenic, and barrels of unspecified hazardous waste. In response to this assertion, the Bryan County Commission called a special meeting on February 3, 2026. At this meeting, the Commission unanimously directed (with one abstention) the county attorney to coordinate with Bryan County staff, the City of Richmond Hill, and the Development Authority of Bryan County to open an investigation into the potential for declaring the Caesarstone site a public nuisance under O.C.G.A. §41 *et seq.* A 60-day extension aligns with this prudent course of action taken by the Bryan County Commission and will allow residents the opportunity to incorporate the findings of this forthcoming investigation into their comments.
  
3. **Lack of vested interest by the applicant:** At this time, the applicant has not purchased the Caesarstone facility and therefore has no substantial vested interest in the site that would be disrupted by an extension of the public comment period.
  
4. **The “highly unusual” and “very controversial” status of the application:** The project and operations being sought in this application are both “highly unusual” and “very controversial.” The project seeks to refine metals through a process that is currently being used at only one other facility in the United States, the applicant's own “demonstration plant” in Lawton, Oklahoma. Moreover, Westwin [produced their first batch of carbonyl nickel powder](#) in December 2024 and has not produced this product at a commercial scale. The lack of regulatory history and experience, both in Georgia and in the United States, makes this application “highly unusual” and inappropriate for an expedited permitting process. Further, the activities sought through this application, and therefore the application itself, are also “very controversial.” As noted above in Sections 1 and 2, both residents and elected officials in the area have serious concerns about the site and activities sought through this permit application. Under the Standard Operating Procedures for Expedited Permitting Program (updated January 1, 2025), the Georgia EPD Air Protection Branch may determine that an application is not eligible for the Expedited Permitting Program after it has been submitted. EPD may make this determination for applications that “proposed something that is highly unusual” or “turn out to be...very controversial.” Both situations exist here. As such, we ask that the Air Protection Branch deny or otherwise revoke this application's acceptance into the Expedited Permitting Program.

We appreciate the Air Protection Branch's commitment to protecting Georgia's shared air resources and your attention to this matter. A 60-day extension and removal from any expedited process is critical to ensure that Georgians have ample opportunity to provide informed, substantive comments on a technical and complex industrial process. We look forward to your response. Please contact us if you have any questions or would like further supporting information.

Sincerely,

Jeffrey Beauvais  
North Coast Advocate  
One Hundred Miles



Ben Kirsch  
Legal Director  
Ogeechee Riverkeeper

