



SC DEPARTMENT *of* **ENVIRONMENTAL SERVICES**

Bureau of Air Quality Response to Comments on Air Quality

Carolina Shavings Inc Clinton, Laurens County, South Carolina Permit Number OP-1520-0107 v2.0

The following is the South Carolina Department of Environmental Services, Bureau of Air Quality's (SCDES or Department) response to the comments made during the formal comment period held March 14, 2024, through April 12, 2024, regarding the draft renewed state air quality operating permit for Carolina Shavings, Inc.

The written Department Decision, permit, statement of basis, this response document, and a letter of notification are located for viewing at the SCDES Columbia office located at 2600 Bull Street, Columbia SC 29201, and on our webpage at <https://des.sc.gov/programs/bureau-air-quality/air-quality-department-decisions>.

Hard copies of all the above-listed documents and written comments received can be requested by contacting our Freedom of Information Office at (803) 898-3882.

During the comment period, eight written comments were received. The Department has reviewed each comment. The Department received an additional comment after April 12, 2024. The individual submitting comments after the comment period has been added to the notification list, along with those making comments during the open comment period and will receive notification of the Department's decision and response document.¹

¹ In responding to comments made during the formal comment period, the Department has also addressed various concerns raised in a comment received after the comment period had expired. The Department's acknowledgment of and response to concerns raised in a comment received after the comment period should not be construed as an interpretation by the Department that a response to this comment is legally required.

1. Fugitive Sawdust/Shavings

Comments were received about excessive smoke and sawdust settling on neighboring properties. The comments referenced situations in the past where cars and homes were regularly covered in thick layers of accumulated sawdust. Commenters also noted concerns about health impacts from facility emissions, including but not limited to risks to those with asthma.

Response: The renewed operating permit includes additional monitoring and more stringent requirements than the previous air permit to ensure compliance with all applicable regulations and standards, which are designed to protect public health and the environment.

A new condition was added to this operating permit renewal to establish and implement a fugitive dust plan for facility-wide operations. This plan must be submitted to the Department for review and approval and modified as necessary to ensure the control of fugitive dust.

This plan must include, but is not limited to, the following requirements:

1. Dust Control Methods for Process Operations:

- a. Weekly maintenance and operation checks of all plant equipment, enclosures, and transfer points. These maintenance and operational procedures shall be based on the manufacturer's recommendations when available.
- b. Visual monitoring of the facility's Wood Waste Burner system, Equipment ID: RDRY 1, during source operation.
- c. Written guidelines on how to handle any potential fugitive emissions from all process operations.

2. Dust Control Methods for Truck Traffic and Roads:

- a. Maintenance requirements for paved roads
- b. Limit speeds on facility-maintained roads to 15 miles per hour.
- c. Written procedures for cleanup of material spills on roadways.

3. Dust Control Methods for Storage and Transfer Points:

- a. Written guidelines on how to handle any potential fugitive emissions from all transfer points and storage locations.

- b. Procedures for cleanup of residual materials and spills from any transfer equipment or storage equipment failures.

The facility has also completed various upgrades to address past emissions issues. Please see the "Past Compliance" section below for further details.

2. Fugitive Shavings from Trucks

One comment referenced shavings blowing up and down the road from the transfer trucks.

Response: The facility's fugitive dust plan will mitigate emissions from the truck traffic on site, by requiring a limited speed, paving of the roads, and procedures for cleaning up any spills on site. Any shavings escaping from the trucks while outside of the Carolina Shavings property is outside of the purview of the Department's regulatory authority.

State law, however, does require operators to prevent materials loaded on vehicles from escaping, to clean up any escaped substance or cargo, and to ensure that loads and covers are firmly attached. Local law enforcement has jurisdiction to enforce this law; any complaints regarding unsecured loads or any loaded materials escaping from a truck shall be made to the Laurens County Sheriff's Office.

3. Smoke and Fire

Comments were received regarding smoke from the facility's past operation negatively impacting the neighborhood's air quality. One comment referred to fires that would be "smoldering for weeks."

Response: The facility has developed and is required to maintain a written fire control plan, and any revision made to this plan must be submitted to the Department.

Any concerns regarding active fires should be reported to the local fire department. If you perceive any abnormal fires or smoke, it could be a sign of equipment malfunction or other issues. In such cases, it's best to report the issue to the Department, which does investigate citizen complaints. Such issues can be reported to the Department online at <https://des.sc.gov/about-scdes/contact-us/report-environmental-concern> or by calling the Department's Upstate Greenwood Regional Office at (864) 642-1637.

4. Excessive Noise

Comments were received regarding noise disturbance from the facility's operation and increased noise at night, resulting in sleep disturbance.

Response: Federal and state air quality regulations do not contain any noise standards, and noise issues are outside the scope of Department air quality permitting. However, Laurens County does have a Noise Ordinance, and all noise complaints shall be made to the Laurens County Sheriff's Office.

5. Night Operations

Six comments were received regarding the facility's operation at night. One commenter mentioned a concern that the facility would "ramp up" production at night due to "no concern of inspections going on at night." In addition, the commenter referenced the permit conditions that require compliance testing to be completed using EPA-approved Method 22 observations. There was concern that this method of testing would not or could not be done effectively at nighttime, and the commenter inquired if, based on such an issue, there could be operation times implemented on the facility.

Response: The Department has the authority to conduct inspections and investigations any time a facility is operating, including nights, weekends, and holidays. In order to determine fugitive emissions, the USEPA Method 22 is utilized. Since Method 22 is a determination of the presence and general characterization of emissions and does not require the determination of opacity levels (i.e., Method 9), Method 22 can be used at night.

6. Past Compliance

Comments were made regarding the facility's operation and compliance history. One commenter asked about the operation of the facility under its previous owner and whether the operation was inspected and met air quality standards. Commenters had concerns about how the facility's operations were handled and referred to past air quality permitting standards violations.

Response: The operating permit has been updated to include additional monitoring and other measures for complying with all applicable regulations. Included with this renewed operating permit is a requirement for a new Fugitive Dust Plan, as discussed above.

The Department will continue to conduct routine unannounced inspections and respond to all complaints as the facility begins operation under this renewed operating permit.

The Department conducted inspections at the facility during its prior operations/ownership and has taken enforcement action in response to past noncompliance, consistent with the Department's standard procedures for reviewing compliance at regulated facilities. Primary issues addressed by past enforcement have included opacity limits as well as fugitive emissions and dust control. To ensure compliance with the operating permit requirements, the Department did not issue the renewed operation permit until a set of upgrades to address the causes of past issues were completed, to the Department's satisfaction. The Department visited the site on February 5, 2025, and verified that all required upgrades were completed. These upgrades include:

1. Cyclone repairs:
 - a. Install video monitoring equipment at the shaker screen,
 - b. Remove the canvas sides and replace them with solid sides,
 - c. Seal all holes and repair all process cyclones.
2. All conveyor systems following the cyclone must be enclosed,
3. Pave all surfaces at the facility entrance with a hard top surface,
4. Complete the replacement of the Pneumatic Transfer to Fuel Bins with a fully enclosed auger system,
5. Install a video monitoring system for the burner of the facility's Dryer.

7. Contaminated Soil and Water Concerns

Two comments were received regarding contamination on and from the Carolina Shavings site. The surrounding area relies on well water for its drinking water, and commenters raised concerns about significant soil and rain-water runoff contamination that negatively impacts the neighbors' quality of life and health.

Response: Concerns about soil and water are outside the scope of the Department's Bureau of Air Quality regulations and permitting requirements. The Bureau forwarded the comments to the Bureau of Land and Waste Management and Bureau of Water's regional office for follow-up.

Visits to the facility by appropriate Department personnel following review of the comments have not identified oil or sheens leaving the property in stormwater. If there is any contamination observed on the property or migrating off the property, please contact the

Department's Upstate Greenwood Regional Office at (864) 642-1637. If there are concerns about your well, such as detection of petroleum or petroleum odors, contact the Department. The Department also offers well water test kits to the public. For more information, please visit our website at <https://des.sc.gov/programs/bureau-water/residential-wells/well-water-quality-testing-services>.

8. Odor

Two comments were made regarding odor from this facility.

Response: Odor alone does not necessarily mean that there is a dangerous level of air pollution. Some air pollutants can be detected by their smell even if their concentrations are lower than the maximum allowable concentrations established to protect public health. No state or federal air quality regulations specifically address odors. However, local and county governments may have requirements related to odor, so it's recommended to contact the relevant authority if you have any questions about local odor ordinances.

If you perceive any abnormal odors, it could be a sign of equipment malfunction or other issues. In such cases, it's best to report the issue to the Department, which does investigate citizen complaints, including odor complaints. Such issues can be reported to the Department online at <https://des.sc.gov/about-scdes/contact-us/report-environmental-concern> or by calling the Department's Upstate Greenwood Regional Office at (864) 642-1637.

9. Increased Truck Traffic/Dangerous Driving Conditions

Several comments were made regarding the increase in truck traffic as a result of this facility's operation and its impact on the safety of drivers on the narrow roads. One commenter referenced a situation in which a truck leaving the Carolina Shavings facility had no working lights.

Response: Traffic and road safety issues are outside the scope of the Department's air quality regulations and air permitting.

Shady Grove Church Road is under the jurisdiction of the S.C. Department of Transportation. All design or maintenance concerns should be made to the S.C. Department of Transportation District 2 office at (864) 227-6971.

Traffic safety issues, including unsafe operation of a motor vehicle, should be reported to the Laurens County Sheriff's Office.

10. Existing Equipment Integrity and Continued Operation and Maintenance

Comments were made asserting the state of the existing equipment would lead to compliance issues. One comment referenced the equipment as being “worn out” and in constant need of repairs.

Response: The Department did not issue the renewed operating permit until upgrades to address the causes of past issues were completed, to the Department’s satisfaction.

Additionally, operational and maintenance checks must be completed on the facility’s process cyclone weekly. These checks are intended to ensure that the cyclone and all associated ductworks are not damaged or worn. During these weekly checks, the facility must also ensure that all collection hoppers and conveyance systems are in proper condition. The facility must maintain a log of these checks on site and include any corrective action taken due to any maintenance or operational issues determined through the weekly checks.

11. Location

Comments were received stating concerns about permitting this facility in the area as the community has grown and new development is planned. Additionally, a comment was made regarding this facility belonging in an industrial location rather than a rural community.

Response: The Department does not have the authority to dictate where a facility may or may not be located or make zoning decisions, and the interpretation, application, and enforcement of county zoning ordinances are outside of the Department’s purview. Zoning and land use decisions are made by city or county zoning authorities. The Carolina Shavings plant is located in Laurens County, which currently does not have any zoning ordinances.

The Department’s decision is based on the technical review of the permit application, state and federal air quality regulations, and the facility’s ability to comply with those regulatory requirements. These requirements aim to protect air quality and to safeguard public health and the environment. Based upon the Department’s review, Carolina Shavings has met the requirements for issuance of the permit renewal. If you want to get involved in local planning issues, you can contact your local county council representatives for more information.

12. Impacts on Property Values, Trash Piles and Rodents

A comment was received regarding piles of debris and trash blowing onto neighboring properties and visible rodents around those piles. Additionally, comments referenced the

state of the equipment and building as well as an associated motorhome and its impact on property values and quality of life in the area.

Response: Concerns about non-air quality issues such as refuse/debris, rodents, and building state are outside the scope of Department air quality permitting. The Department's permitting decisions are based on its technical review of an application and the regulatory requirements in place at the time of the review. The Department cannot dictate where a facility desires to locate or control impacts on property values and does not have the regulatory authority to consider current or future property values when making permitting decisions.

Any concerns regarding the safety and integrity of the equipment and buildings on site should be directed to the Laurens County Building Officials office at (864) 681-5670.

The most recent site visits conducted by the Department did not identify any illegal dumping occurring on site. If solid waste or process materials are migrating off the property, please contact the Department's Upstate Greenwood Regional Office at (864) 642-1637.

13. General Opposition Due to Previous Incidents

Comments were received stating that DHEC is expected to protect the community and should hold the facility responsible for previous incidents at the location by denying renewal of the permit.

Response: By statute, the Department's decision to issue an air permit must be based on the applicable air quality regulations and standards in place at the time of the Department's technical review of the permit application. State and Federal regulations are established to protect the health and welfare of the public and the environment. Permit applicants must demonstrate that they can meet the protective standards in place under the regulations before an air permit is issued. If a facility can meet all permitting requirements and comply with all applicable regulations, the S.C. Pollution Control Act requires the Department to issue a permit. The Department is aware of the facility's previous incidents and the community's concerns. As such, the renewed air permit includes additional monitoring and more stringent requirements than the previous air permit.

The Department will continue to conduct both routine inspections and investigations in response to any complaints, and the Department will respond to any noncompliance and take additional enforcement action as needed.