

**South Carolina Department of Health and Environmental Control
Bureau of Air Quality**

**Response to Comments
Public Notice #21-048-GCM-C-M-H
Luck Stone – Enoree Development Site
Permit Number 2060-0648-CA**

The following is the SC Department of Health and Environmental Control's (SC DHEC) Bureau of Air Quality (Department) response to the comments made and issues raised during the formal comment period held August 3, 2021 through September 17, 2021 and the public hearing regarding the draft Luck Stone – Enoree Development Site (Luck Stone Enoree) synthetic minor air quality construction permit. One written comment was received during the comment period for the draft air quality permit.¹ The public hearing transcript and written comment received regarding the draft permit are available for viewing at the SC DHEC Columbia office located at 2600 Bull Street, Columbia, SC 29201, or hardcopies can be requested by contacting our Freedom of Information Office at (803) 898-3817.

Air Pollution Impacts – One commenter expressed concern about air quality, including impacts to nearby grandchildren and harmful effects on asthma and other respiratory problems from air particulates released. Other comments received by BLWM referenced general concern about air pollution, air quality, and health impacts, including concern about respiratory and skin diseases as well as potential impacts to farm animals and wildlife.

Federal and state air quality regulations are established to be protective of public health and welfare, using scientific data and human health risk exposure assessments. These regulations include setting standards for ambient air quality and emission limits, controls and/or operational requirements for industrial facilities.

¹ Written comments associated with Luck Stone Enoree's application for a mine permit from SC DHEC's Bureau of Land and Waste Management (BLWM) are addressed in BLWM's separate response to comments for the mine permit. To the extent those comments reference concern about air quality, those concerns are also addressed by this response to comments. The Bureau of Air Quality's acknowledgment of and general response to concerns raised in the BLWM permitting process should not be construed as any representation or warranty regarding those comments' applicability to this air permit decision or the availability of further review.

The Clean Air Act (CAA) requires the U.S. Environmental Protection Agency (EPA) to establish National Ambient Air Quality Standards (NAAQS) for six pollutants (“criteria” pollutants) considered harmful to public health and the environment. There are two types of NAAQS: primary standards and secondary standards. Primary standards are set to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly. Secondary standards are set to protect public welfare, such as protection against decreased visibility, and damage to animals, crops, vegetation, and buildings. The criteria pollutant of concern from this project is particulate matter (PM). PM consists of any finely divided solid or liquid material, other than uncombined water, and includes particulate matter less than 10 micrometers in diameter (PM₁₀) and particulate matter less than 2.5 micrometers in diameter (PM_{2.5}). National ambient standards have been set for both PM₁₀ and PM_{2.5}.

The EPA is also required to designate areas of the country as nonattainment when monitoring information shows pollutant concentrations exceed (or violate) a set standard. There are no nonattainment areas in South Carolina for PM₁₀ or PM_{2.5}.

In accordance with South Carolina air quality regulations, “no permit to construct or modify a source will be issued if emissions interfere with attainment or maintenance of any state or federal standard.” Luck Stone Enoree emissions were evaluated to determine if they would interfere with attainment of the NAAQS. Air dispersion modeling showed that controlled emissions of PM₁₀ are in compliance with the standards, and PM_{2.5} emissions evaluation showed that emissions would be at levels below the de minimis threshold level requiring an air quality analysis, thus demonstrating that no violation of the national ambient standard should occur.

Furthermore, the Luck Stone Enoree aggregate processing facility will be subject to federal New Source Performance Standards, fugitive dust control requirements, and other air permit requirements designed to limit PM emissions. Specifically, PM or dust emissions from the process equipment, storage piles, and on-site roads are required to be controlled in accordance with air quality regulations. These regulations limit PM emissions and opacity (amount of light blocked by dust particles). The air permit requires implementation of a Fugitive Dust Control Plan and the use of wet suppression to control PM emissions, and underlying regulations require maintenance, inspections and, if necessary, corrective action on the control equipment. When dust suppression is conducted in accordance with this permit, it should be effective in controlling dust emissions.

Impacts to wildlife are also assessed by South Carolina's Department of Natural Resources (SC DNR) and reviewed by SC DHEC's Bureau of Land and Waste Management (BLWM) as part of the mine permit application process.

Comments on Non-Air Quality Issues – In addition to comments received on issues related to the synthetic minor air quality permit (discussed above), comments received during the comment period and public hearing also addressed a range of other concerns such as: blasting impacts, impacts to water and land resources, roads and increased truck traffic, noise, quality of life, and property damage.

Air permit decisions are based on the applicable air quality regulations and standards in place at the time of the Department's technical review of the permit application. Based upon this review, Luck Stone Enoree has met the requirements for issuance of an air permit. Issues such as blasting impacts, impacts to water and land resources, road safety, damage, and access issues, increased truck traffic, wildlife impacts, reclamation issues, noise, quality of life, and property damage are outside the scope of the Department's air quality regulations and therefore are not addressed in the air quality permit. Luck Stone Enoree has also applied for a mining permit from BLWM and for a National Pollutant Discharge Elimination System (NPDES) permit from SC DHEC's Bureau of Water (BOW). Although not addressed by the air quality permit, other issues raised by the commenters have been considered by BLWM and BOW as applicable to the facility's mining and water permit reviews.

Regarding truck traffic specifically, the Department regulates the fugitive dust from roads within the facility; however, the Department does not have the authority to regulate truck traffic on the public roads. Also, as part of the facility's fugitive dust plan, signage with respect to Sections 56-5-4100 and 56-5-4110 of the S.C. Code of Laws shall be posted on site. These laws require that haul trucks transporting aggregate from quarries be constructed to prevent the escape of materials loaded onto vehicles, that escaped substances or cargo be cleaned from highways, and that loads and covers be firmly attached.

General Opposition and Support – Commenters expressed general support or opposition to the facility.

The Department considers and appreciates all comments made regarding the draft air quality permit for Luck Stone Enoree. However, the Department does not have

the authority to make permitting decisions based on general community, business, employee and customer approval or disapproval of the company/facility. The Department's decision is based on the Department's technical review of an application and the regulatory requirements in place at the time of the Department's review.