

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

**Response to Comments on Air Quality
Scout Motors Inc A Delaware Corporation – Blythewood Plant
Blythewood, Richland County, South Carolina
Permit No. PSD-50000007 v1.0**

The following is the SC Department of Health and Environmental Control's (SC DHEC) Bureau of Air Quality (Department) response to the comments made during the formal comment period held September 8, 2023, through October 18, 2023, regarding the draft prevention of significant deterioration air quality construction permit for Scout Motors Inc A Delaware Corporation – Blythewood Plant (Scout Motors).

The Department Decision, permit, statement of basis, final determination, this response document, and a letter of notification are located for viewing at the SC DHEC Columbia office located at 2600 Bull Street, Columbia SC 29201, and on our webpage at www.scdhec.gov/air-quality-permitting-decisions.

Hardcopies of all the above-listed documents, as well as the written comments received can be requested by contacting our Freedom of Information Office at (803) 898-3882.

Health Impacts

Comments were received regarding the short and long-term health impacts of emissions from the facility. This included impacts to near-by schools, daycares, communities, and sensitive populations.

Response: The facility's operations have undergone a Best Available Control Technology (BACT) review. This review considers, among other things, those controls used at similar facilities so as to ensure the facility is well-controlled and meets the rigorous BACT standard.

The federal and state air quality regulations are established to be protective of public health, using scientific data and human health risk exposure assessments. These regulations include standards for ambient air quality and emission limits, controls and/or operational requirements for industrial facilities. The Clean Air Act requires the U.S. Environmental Protection Agency (EPA) to establish National Ambient Air Quality Standards (NAAQS) for six common 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.

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.” The proposed facility operations were evaluated to determine if the emissions would interfere with attainment of the NAAQS. An air quality analysis was performed using an EPA approved air dispersion computer model to simulate how the facility’s maximum emissions will be dispersed into the atmosphere surrounding the proposed site. This simulation used official National Weather Service Meteorological data from the Columbia National Weather Service Station that was processed, and quality assured by Department staff meteorologists. This meteorological data was determined to be representative of the weather conditions that would be observed at the facility site, including those weather conditions that would produce the worst-case pollutant concentrations in the community surrounding the proposed site. The maximum facility concentrations from the computer model were added to background (monitored) pollutant concentrations. The EPA-approved model demonstrated compliance with the NAAQS. Air dispersion modeling for sulfur dioxide was not conducted because controlled emissions were shown to be below threshold levels requiring an air quality analysis. Where emissions are shown to be below the de minimis threshold level, operations are not expected to interfere with attainment of the relevant NAAQS.

Air emissions of non-criteria pollutants called Hazardous Air Pollutants (HAPs) were also reviewed. HAPs are a list 187 pollutants considered hazardous to human health and regulated under the Clean Air Act. HAPs are regulated by the EPA under the regulations found in 40 CFR Part 61 or 40 CFR Part 63 (MACT). The majority of the proposed facility’s operations are subject to 40 CFR Part 63 Subpart IIII (Surface Coating of Automobiles and Light-Duty Trucks). This regulation has undergone a risk and technology review (RTR) meant to assess residual health risk from all pollutants emitted from applicable surface coating operations. The only HAP not subject to these regulations, Manganese, is addressed by state regulations.

In addition to implementing and enforcing applicable MACT regulations, South Carolina regulates Toxic Air Pollutants (TAPs) under state regulations (S.C. Regulation 61-62.5, Std. 8). The list of TAPs includes the original HAP list plus additional pollutants South Carolina considers toxic. The state regulation sets a maximum allowable average 24-hour average concentration for each TAP designed to be protective of human health. Manganese emissions at Scout are below de minimis levels and therefore are not expected to cause an exceedance of the maximum allowable 24-hour average concentration specified by the regulation.

Compliance

A comment was received asking about how compliance with the air permit is determined.

Response: As part of the permitting process, all applicable requirements have associated monitoring that is required. For all emission limits, the facility will be required to keep records and submit documentation for determining compliance with the limits, on a semiannual basis. For all equipment with good work practices imposed, the facility is required to develop and submit a work practice plan for approval. Once approved, the facility is required to adhere to that work plan. In addition, the facility has reporting requirements under the associated state and federal regulations as outlined in the permit. The facility will also be required to source test their control devices, two regenerative thermal oxidizers, to demonstrate compliance with the requirements outlined in the permit and state and federal regulations.

Once operating, facility compliance with all applicable permit and regulatory provisions would be evaluated by the Department upon review of facility reports and during both comprehensive unannounced inspections and in response to any complaint-driven inspections for a facility.

Growth Analysis

A comment was received about how "growth" is assessed with the additional impacts analysis on air quality (Preliminary Determination - Modeling Review Analysis, Section 2.2.1).

Response: "Growth" in the context of the Preliminary Determination's additional impact analysis refers to a projection of the area's associated industrial, commercial, and residential source growth due to the new source and an estimate of the air emissions generated by this growth. Significant increases in human population and associated activities (e.g., road traffic, support facilities, additional labor workforce, other industrial growth, etc.) may contribute to air pollution and must be addressed as part of the analysis. An in-depth growth analysis is typically only required if the project significantly shifts population and associated activity in the area (i.e., a population increase on the order of thousands of people).

The applicant has addressed growth in population and ancillary support activities to the extent possible. The Blythewood area and surrounding communities already have an available workforce that will allow the facility to hire people from within the area. As stated in the Scout Motors application, most new jobs are expected to be filled by workers from the existing population. Thus, in terms of residential growth, no new housing developments will be needed to support an increase in population due to the proposed project according to the facility. In addition, the product that the proposed facility manufactures will be

distributed worldwide and is not being produced to support any anticipated growth in the immediate vicinity.

Industrial growth is the anticipated growth in those industries providing goods and services, maintenance facilities, and other large industries necessary for the operation of the source or modification. The surrounding Blythewood community already contains many commercial services needed to support the proposed facility. Any additional industrial or commercial facilities that are built to support the new Scout facility are expected to have minimal impact on overall emissions in the region.

Additionally, any new proposed facility that would emit air pollutants would go through air permitting review and have to demonstrate that the operation would not cause or contribute to a violation of any ambient air quality standard.

For these reasons, any additional air quality impacts resulting from industrial, commercial, and residential growth in the local area due to the proposed project are not quantifiable and are expected to be negligible at this time, and further modeling analyses accounting for growth are not necessary.

Ambient Air Quality Monitoring

A comment was received asking if the Department planned to put air quality monitors near the plant and requesting the monitoring of air quality at the Scout site.

Response: Consistent with federal regulations, the Department relies on its stationary network of ambient air monitors to continuously monitor air quality throughout the state and determine compliance with the NAAQS and state ambient air quality standards. Monitoring stations in South Carolina’s ambient air monitoring network are specifically located to represent ambient pollution levels in a diverse set of geographical areas. The Department annually reviews the monitoring network to make sure the federal requirements and the needs of the air program are met. The monitoring network currently includes seventy monitors and samplers at twenty-three sites across the state. All monitors in South Carolina show attainment with all current air quality standards.

In accordance with 40 CFR Part 58, Appendix D, ambient air monitors are required to be placed in areas with the highest population, or where the highest pollutant concentrations are expected to occur. If an ambient monitor located in an area of higher emissions or concentrations demonstrates the air pollutant concentrations are lower than the primary standards, which are set by the EPA to provide public health protection, then it is reasonable to expect that the air pollutant concentrations in the surrounding areas are also lower than the national standards.

This facility underwent a Prevention of Significant Deterioration review, which requires an extensive air dispersion modeling demonstration that facility operations are not expected to cause or contribute to a violation of State or Federal ambient air quality requirements. Therefore, no additional monitoring stations will be added in the area as a result of this project.

Chemicals Used at the Facility

A comment was received that asked what chemicals would be used at or emitted from the facility and if they would use “forever chemicals.”

Response: The Department’s technical analysis looked at all regulated air pollutants from the proposed operation. With the exception of pollutants emitted in de minimis or trace amounts, the list of pollutants and the analysis are contained in the project’s statement of basis. All pollutants, including de minimis and trace amounts, were included in the application.

Scout Motors will not store or use chemicals regulated by 40 CFR Part 68 - Risk Management Plan, above threshold quantities.

At this time there are no state or federal air quality regulations regarding per- and polyfluoroalkyl substances (PFAS; also called forever chemicals). Therefore, these substances were not evaluated for this project. If, and when, regulations for PFAS are created, the facility would have to comply with any applicable regulation.

Scout Motors provided this additional statement in response:

Scout Motors expects to use paints, adhesives and other chemicals common in automotive assembly in its process. Scout Motors does not intend to use any “forever chemicals” in its manufacturing process. A chemical review and approval process assists in ensuring regulatory requirements are met.

Impacts on Other Non-Air Quality Resources

Comments were received regarding impacts to wetlands, groundwater, flooding, soil, drinking water, recreational activities on water bodies, wildlife, and animal habitats. Comments were also received regarding the release of chemicals or other pollutants into the environment and waterways.

Response: The proposed and noticed action was the issuance of an Air Quality PSD Construction Permit. The Department’s decision must be based on the technical review of

the proposed project, the state and federal air quality regulations, and the project's ability to meet those regulations. The non-air quality impacts referenced by commenters are outside the scope of the Department's air quality regulations and therefore cannot be considered in the decision to issue the air quality permit. However, impacts on non-air quality resources are addressed by other areas of federal and state environmental oversight. Facility releases of regulated air pollutants into the ambient air will be addressed by the air quality permit's terms, including the applicable regulatory requirements referenced therein.

Based upon the technical review, and after review and consideration of the pertinent comments received, the proposed facility has met the requirements for issuance of an air quality permit. The Department encourages the commenters to visit our Scout Motor's webpage (<https://scdhec.gov/ScoutMotors>) for information about other permits that may be required and their considerations.

Scout Motors provided these additional statements in response:

Scout Motors is working together with Federal, State and local authorities including the Army Corps of Engineers, EPA and SC DHEC to ensure the environmental impact is mitigated, including any impacts to local wetlands. The Wetlands Permit application includes additional information on these efforts.

Scout Motors' operations will occur within the limits of its property and fence lines. Wildlife that may make their way onto facility grounds will be treated with respect and in accordance with wildlife protection requirements.

Open Burning

Comments were received regarding the burning of land clearing debris on the site and the impacts; and what tools were available to address the current construction activities.

Response: The Department regulates activities such as the burning of yard, land clearing, and construction debris, through enforcement of S.C. Regulation 61-62.2 - Prohibition of Open Burning. That regulation states the burning of such debris is prohibited except under the circumstances and per the requirements listed therein. The Department does not issue permits for such activities but does investigate complaints and initiates enforcement cases for non-compliance.

The Department has visited the site in response to complaints regarding the land clearing debris burning. The Department did not find any violations of the regulation.

Richland County was requested by Scout Motors, to investigate alternative disposal methods. Future land clearing debris will not be disposed of by open burning.

Relationship with Forestry Commission

A comment was received inquiring about the relationship between the Department and the Forestry Commission regarding open burning and air quality.

Response: The Department enforces S.C. Regulation 61-62.2 - Prohibition of Open Burning. Under that regulation, the burning of such debris is prohibited except under the circumstances and per the requirements listed therein. That regulation does allow controlled burns that comply with the Forestry Commission's Smoke Management Guidelines.

The Forestry Commission regulates activities like forest land control burns through the previously mentioned Smoke Management Guidelines. They also handle the notifications, or any permits required each day an individual or company plans to burn. The Forestry Commission also issues and enforces the Red Flag Alerts you may see periodically during the year.

There are times when the Department and the Forestry Commission work together at a particular site when both agencies' regulations may apply.

Studies

A comment was received asking what environmental impact, emergency services, or other studies have been done.

Response: State and federal air quality laws and regulations do not require such studies. The Department conducts a technical review of the proposed project, the state and federal air quality regulations, and the project's ability to meet those regulations. Scout Motors provided this additional statement in response:

As part of the Wetlands Permit application the following due diligence studies were completed:

- Phase 1 Environmental Site Assessment
- Cultural Resource Intensive Studies/Archaeological Testing
- Protected Species Assessment
- Wetlands Jurisdictional Determination

Details related to each study can be found in the Wetlands Permit application.

Truck Traffic

A comment was received concerning dust from heavy trucks and diesel fumes; and what tools were available to address the current construction activities.

Response: For the purpose of responding to this comment, the truck traffic the Department will separately address truck traffic during construction and truck traffic during operation.

Dust created by truck traffic during construction is temporary. The Department does not regulate the dust from this activity as it is not produced from what air regulations define as a “stationary source,” subject to permitting. The site does employ five water trucks to reduce this dust. And the facility has stated that once operation begins, they will diligently focus on preventing fugitive dust.

Particulate matter (dust) from truck traffic during operation has been quantified, evaluated, and undergone a Best Available Control Technology review. It was determined the facility must pave all roads within the site, maintain the roads, and reduce allowable driving speeds to minimize these emissions.

For both types of truck traffic, the Department does not have the authority to regulate engine exhaust (“tailpipe”) emissions. EPA regulates mobile sources under the authority of the Clean Air Act.

Location

A comment was received asking the Department to require Scout Motors to build the facility in a different, or more industrial, area.

Response: The Department does not have the authority to dictate where a facility may or may not be located or make zoning decisions. Zoning decisions are made at the local level by city or county zoning authorities, usually before a permit request is submitted to the Department. The Department’s decision must be based on the technical review of the proposed project, the state and federal air quality regulations, and the project’s ability to meet those regulations. As discussed in this response, those regulations are set to protect public health and the environment.

Denial

A comment was received asking the Department to deny the permit.

Response: The Department's decision to approve, disapprove, or to modify a draft permit is based on the technical review of the proposed project, the state and federal air quality regulations, and the project's ability to meet those regulations. Scout Motors has demonstrated that the source, if operated in accordance with the submitted application and its permit conditions, can meet all applicable air regulations and as such the Department has made a decision to issue the permit as required under the Pollution Control Act.

Earthquakes

A comment asked what infrastructure and building precautions are being taken "in light of many earthquakes in the area."

Response: Earthquakes are not considered in the technical review of whether a facility can comply with the state and federal air quality regulations. Scout Motors provided this additional statement in response:

Structures will be designed and built to applicable building code, including seismic requirements.