



SC DEPARTMENT *of* **ENVIRONMENTAL SERVICES**

Bureau of Air Quality Response to Comments on Air Quality

Adams Scrap Recycling LLC Greenville, Greenville County, South Carolina Permit Number CP-50000386 v1.0

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 24, 2026, through April 24, 2026, regarding the draft state air construction permit for Adams Scrap Recycling LLC.

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.

A public hearing was held by the Department on April 23, 2026, to receive comments from the public on the proposed project. The Department received both written and verbal comments during the public comment period. The Department also received a letter from the South Carolina Environmental Law Project (SCELP) shortly before commencement of the comment period and is addressing comments and questions from that letter in this response as well.

Each comment was carefully reviewed and considered as part of the Department's evaluation of the permit application. Based on the comments received and the Department's regulatory authority, several revisions were made to the draft permit and Statement of Basis.

The following changes have been made to the draft permit and statement of basis:

- The volatile organic compound (VOC) emission factor used to calculate potential VOC emissions from scrap metal shredding has increased from 0.21 pounds of VOC per ton of material processed to 0.31 pounds of VOC per ton. The emissions table in the statement of basis has been updated to reflect this change which provides a more conservative estimate of potential emissions.
- Condition B.1 of the draft construction permit has been revised to replace all instances of the word "will" with "shall."
- Condition B.4 of the draft construction permit has been revised to require the facility to submit an annual report to the Department documenting any instance in which a control device operated outside of its approved operating range. The report must include the date and time of the occurrence, the cause, and any corrective actions taken.
- Condition B.7 of the draft construction permit has been revised to require the facility to submit its proposed liquid flow rate operating range to the Department for review and approval. In addition, the liquid flow rate must now be recorded within the first hour of operation each day.
- Condition B.8 and B.9 of the draft construction permit have been revised to restrict the shredding equipment from operating during control device malfunction or mechanical failure.
- Condition B.9 of the draft construction permit has been revised to require the facility to submit its proposed pressure drop operating range to the Department for review and approval. In addition, the pressure drop must now be recorded within the first hour of operation each day.
- Condition B.10 of the draft construction permit has been revised to require the owner or operator to document the model year of all vehicles processed and that all mercury-containing switches have been removed from model year 2002 and older vehicles before those vehicles are shredded. Additionally, the condition requires the log to be kept on site and made available to the Department upon request.
- Condition B.12 of the draft construction permit has been added to limit the hours of operation of the metal shredding equipment to between the hours of 5:00 AM and 8:00 PM. The owner or operator must record the initial operating start time and the final stop time daily and submit reports of these records annually.

1. Operation of Shredders Without a Permit

Comments were received expressing concern that some shredding equipment has been installed and operated without obtaining an air permit. Some commenters asserted that the facility's past shredder operations were in violation of the permit's conditions. Commenters asked why the facility had been allowed to operate shredders on site for years without an air permit or enforcement and during the pendency of draft permit review. Some comments raised concern about operations occurring at night. Some commenters asked why the Department had not identified the shredders prior to the community. Some comments opposed issuing a permit following unauthorized operation of shredders and asserted that this sends the wrong message to the regulated community. Comments asserted that the Department must issue an order directing the facility to cease operation of the shredders and complete enforcement action. Some comments further asserted that any permit issued must contain more protective criteria in light of past unpermitted operations.

Response: Inquiries and complaints from the public play an important role in Department oversight as a general matter. In this case, when questions were raised about the facility's shredding equipment, the Department initiated activities to verify the status of such equipment at the site and employed standard investigative and permitting processes to address previous shredder operations.

Specifically, in March 2025, the Department made inquiries to the facility regarding its shredding activities, both by phone and in writing, and the facility submitted a construction permit application (subsequently revised) for various shredder equipment. The emission calculations submitted with the permit application, prepared by the facility's consultant, documented that the relevant shredder equipment exceeded emission-based thresholds for exemption from air quality permitting. Notably, these emission calculations were based on updated VOC emission factors from December 2023 industry guidance (see Comment/Response below concerning "VOC Emission Factors" for further discussion), whereas previous (1996) industry emission factor guidance had indicated that shredder VOC emissions were negligible and therefore within permit exemption levels. On April 22, 2025, Department representatives conducted an on-site investigation to verify any shredder equipment present and the operational status of such equipment in light of the facility's permit application indicating shredder emissions above permit exemption thresholds. During the Department's investigation, the Department was able to determine that one of the shredders being permitted in this action, a 25 ton per hour mobile shredder, did operate periodically at the site for about a year without a permit. The other shredders being permitted in this action are not known to have operated at the site previously; equipment components have been identified at the site, but they are not fully assembled and need repairs before they could operate. One other unpermitted shredder (another 25 ton per

hour mobile shredder) was determined to have operated at the Site periodically for about a year but is no longer on site and not included in this permitting action.

The Department has not at any point authorized the facility to conduct any operations known to emit above permit exemption thresholds without such permit. Under South Carolina air quality regulations, non-exempt equipment covered by a construction permit application may not be constructed or operated until the Department issues a final permit authorizing those activities. As a result, the shredders included in this permit application were not authorized to operate unless and until a final permit was issued by the Department. Following the Department's April 22, 2025, inspection identifying potential noncompliance, the Department referred this matter to the Bureau of Air Quality's Enforcement Section for review. Following receipt of a letter in March 2026 expressing concern about potential continued shredding operations, the Department conducted a follow up investigation at the site to evaluate the present status of any shredding equipment and operations. During the inspection, the Department documented that no units had been newly assembled or were in operation, and no shredded metal piles or other materials suggesting that metal had been recently shredded onsite were observed. The Department inspector did not find any continued violations during the investigation. The Department inspector also reiterated that no construction or operation of shredding processes was allowed before a permit was obtained. The Enforcement Section completed its enforcement review regarding the noncompliance found during the April 22, 2025, inspection and issued a closure letter on August 25, 2026. For ease of reference, the closure letter is attached to this response to comments.

In response to comments expressing concern about operations occurring at night, the Department has discussed limiting the operating hours of the shredding equipment with the facility, and the facility has agreed to a limit in the construction permit restricting shredder operations to between the hours of 5:00 AM and 8:00 PM. The permit will require the facility to maintain records of actual hours of operation and to submit annual reporting documenting these hours. These measures are intended to provide additional assurance regarding the timing of permitted operations and to address night-time operation concerns raised by the community.

As discussed elsewhere in this response to comments and as documented in the permit, special permit terms have been included in this permit to establish additional monitoring, recordkeeping, and reporting measures beyond those that are generally required to help strengthen oversight of the operations permitted in this action.

2. VOC Emission Factor

A comment was received asserting that the volatile organic compound (VOC) emission factor used to calculate potential VOC emissions in the construction permit application is incorrect, and that a higher VOC emission factor should be used. The comment claims that the requested higher emission factor may result in potential VOC emissions greater than the Title V threshold.

Response: VOC emissions from metal shredding are estimated using an emission factor measured in pounds of VOC per ton of material processed. This factor comes from the Recycled Materials Association (formerly Institute of Scrap Recycling Industries, Inc.) "VOC Emissions Guidance for Metal Shredders" (December 2023, Table 32). The guidance explains how operators should calculate VOC emissions and is based on EPA test reports and data from several shredding facilities. Table 3-2 provides average VOC emission rates for different types of feed materials. In its permit application, Adams Scrap used a VOC emission factor of 0.21 lb per ton, which is the average emission rate for shredding a mix of end-of-life vehicles (ELV) and light iron blend. A commenter argued that the emission factor for ELV alone should be used instead, which is 0.31 lb per ton.

The emission factor document explains that VOC emissions come from organic liquids in the feed materials that evaporate during shredding. It notes that removing these liquids before shredding, known as source control, is an effective way to reduce VOC emissions. While many facilities use source control, the guidance could not quantify how much it reduces emissions because detailed facility specific information was not available. However, the document states that "[a] facility's consistent use of source control may serve as a means to justify the use of lower VOC emissions factors than those presented in Table 3-2."

Under the permit, Adams Scrap must document that vehicles have been drained of fluids, batteries have been removed, and all mercury switches have been removed from 2002 and older model year vehicles before any vehicle enters the staging area for shredding. Because these source control practices are required at all times, the Department initially used the lower emission factor of 0.21 pounds per ton.

After reviewing the comment and the available guidance, the Department has updated the permit documents to reflect use of the higher emission factor of 0.31 pounds per ton, which provides a more conservative estimate of potential VOC emissions. As a result, the statement of basis has been revised to use the higher emission factor when calculating potential VOC emissions from the shredding operations. However, the facility is still required to implement the source controls specified by the permit and restrict its hours of operation as specified in the permit, which should further reduce potential emissions from the facility below the levels identified in the Statement of Basis.

Even with the revised 0.31 pound per ton VOC emission factor, the Department's evaluation concluded that the facility remains below the applicable major source permitting thresholds.

3. Health Effects from VOC, HAP, and Air Toxics

Comments were received regarding the potential health effects of VOC, hazardous air pollutants (HAP), lead, and air toxic emissions from shredders, specifically respiratory illness, cardiovascular disease, and long-term health consequences for residents who already face disproportionate health burdens, many of whom lack the resources to move locations. One comment raised concerns in particular about multiple shredders operating concurrently and whether emissions can be adequately controlled. Commenters urged permit denial based on concerns about environmental and health impacts from emissions.

Response: Protecting public health is a key purpose of state and federal air quality regulations, and permitted facilities are expected to comply with all applicable regulatory requirements.

As part of the permit review, the Department evaluated the facility's potential emissions of VOCs, hazardous air pollutants, and other regulated air contaminants. Based on the information submitted and the Department's review, the facility qualifies as a minor source of emissions under state and federal air permitting regulations. This means the facility's potential emissions of specific pollutants are below the thresholds that would trigger additional major source permitting requirements. The Department has reviewed the applicant's emission calculations, which have been updated following the comment period using a more conservative emissions factor, as discussed above, and verified that the facility has demonstrated that it qualifies as a minor source under Title V and Prevention of Significant Deterioration provisions. This determination is based on conservative assumptions to ensure emissions are not underestimated.

Adams Scrap is a minor source of HAP emissions. The EPA has not set national ambient standards for HAPs. South Carolina, however, has set air toxic air concentration standards through SC Regulation 61-62.5, Standard 8 - Toxic Air Pollutants. These air toxics standards include concentration limits for over 250 air pollutants that South Carolina has deemed to be toxic air pollutants, including 188 federal HAPs. The Department's air toxics standard requires facilities that emit one or more of the toxic air pollutants to demonstrate compliance with the state air toxics standards.

A facility can demonstrate the air toxic emissions are below the established de minimis rate or use air dispersion modeling to demonstrate that the proposed emissions are at or below the maximum allowable concentration at the facility boundary and beyond. The compliance

demonstration submitted by Adams Scrap was reviewed by the Department. The predicted air toxic emission rates were either de minimis or less than one (1) percent of the air toxics concentrations (with the analysis applying the most conservative scenario of all equipment operating concurrently); therefore, the results demonstrate compliance with the air toxics standard. The analysis was also conservatively based on operations 24 hours per day, whereas permitted operations will only be 5:00 AM to 8:00 PM. The SC Standard No. 8 compliance demonstration can be found in the Adams Scrap modeling summary. The de minimis and trace emission exemptions can be found in South Carolina's Modeling Guidelines for Air Quality Permits ([SCModelingGuidelines_2025.pdf](#)).

In addition, the permit requires the facility to use controls designed to minimize particulate emissions from the shredding and material handling operations. These measures also reduce HAP and air toxic emissions from the operations. The projected controlled (actual) emission rates from the permitted operations, which account for the required control measures, are significantly lower than the emission rates used for purposes of the facility's Standard No. 8 emission rate analysis and calculation of uncontrolled potential to emit. The Department will continue to respond to complaints and investigate potential violations if concerns arise after the facility begins operation.

The Department's permitting decision is based on whether the facility can meet applicable state and federal air quality regulations and standards. Based on the information submitted and the Department's technical review, the facility has demonstrated it can comply with those requirements.

4. Particulate Air Pollution of the Neighborhood and Surrounding Area

Several comments were received raising concerns about health, environmental, and property impacts from particulate air pollution or dust originating from the shredder operations under the permit.

Response: Federal and state air quality regulations are established to be protective of public health, using scientific data and human health risk assessments. These regulations include standards for ambient air quality, emission limits, control requirements, and operational requirements for industrial facilities.

State ambient air quality standards have been adopted into regulation within S.C. Regulation 61-62.5, Standard No. 2. Ambient standards (Standard No. 2) have been set for the following pollutants emitted from this project: particulate matter less than 10 micrometers in diameter (PM₁₀) and particulate matter less than 2.5 micrometers in diameter (PM_{2.5}). In accordance with S.C. Regulation 61-62.1, "no permit to construct or modify a source will be issued if emissions interfere with attainment or maintenance of any state or federal standard."

Adams Scrap's proposed operations were evaluated to determine if the emissions from the proposed project would interfere with ambient air quality compliance. In this case, the facility's uncontrolled emissions were shown to be below threshold levels requiring an air quality analysis (and were conservatively based on operations 24 hours per day, whereas permitted operations will only be 5:00 AM to 8:00 PM). Because uncontrolled emissions were below the threshold level requiring air quality analysis, operations at Adams Scrap are not expected to interfere with ambient air quality compliance at or beyond the property boundary. The exemption emissions rate thresholds for the Standard No. 2 pollutants emitted from this project are less than 1.14 lb/hr for PM₁₀, less than 1.14 lb/hr for PM_{2.5}, and less than 0.114 lb/hr for lead.

Of note, the Department conducts ambient air monitoring at 133 Perry Avenue for PM₁₀ and PM_{2.5}. This monitoring station is located approximately 2.5 miles from the facility and shows daily average ambient PM levels that are compliant with Standard No. 2.

In addition, the permit requires the facility to operate dust control measures designed to minimize particulate emissions from the shredding and material handling operations. The projected controlled emission rates from the permitted operations, which account for the required dust control measures, are significantly lower than the emission rates used for purposes of the facility's Standard No. 2 emission rate analysis and calculation of uncontrolled potential to emit. The Department will continue to respond to complaints and investigate potential violations if concerns arise after the facility begins operation.

5. PM Control Devices and Associated Monitoring, Recordkeeping, and Reporting

Several comments were received concerning the control of PM emissions and associated frequency and methods for monitoring, recordkeeping and reporting contained in the draft permit. Specific comments were made concerning draft permit conditions B.3, B.4, B.7, B.8, B.9, B.10, B.11, and F.4, as well as a request for the addition of a new condition H.4. Comments included a request to require advanced emission control technologies and strict operational limitations. Comments also included a request that records be required to be kept electronically and uploaded to the Department's ePermitting portal in light of concerns raised by the commenters about the facility's past recordkeeping compliance. Comments also urged that permit conditions require that operations cease if the control device malfunctions. Comments also requested a requirement for continuous monitoring systems and public reporting for water sprays and bag filters. Comments also requested building additional enforcement teeth into the permit, including automatic triggers/stipulations for penalties.

Response: Based on the facility's projected uncontrolled emissions, Adams Scrap is classified as a minor source of particulate matter under state and federal air permitting regulations. The Department's review found that the facility's uncontrolled emissions are below the thresholds that would trigger additional major source permitting requirements and are below applicable regulatory emission limits.

Although the facility's projected uncontrolled emissions are below these thresholds, the permit requires the operation of control equipment, including water spray systems on the shredders and a baghouse control system on the vertical mill granulator. These controls are intended to reduce particulate emissions and minimize dust generation.

The permit also requires the facility to monitor key operating parameters associated with these control systems. Following review of the public comments, the Department revised the permit to require that certain operating parameters be recorded within the first hour of operation each day. This change is intended to help identify potential issues earlier and allow corrective actions to be taken more quickly if needed.

The Department determined that based on the scale of the permitted operations, projected emissions, and applicable regulatory requirements, daily monitoring and recordkeeping, including daily operation and maintenance checks and parameter readings, are appropriate, and continuous monitoring systems for the water sprays and bag house are not required. While electronic recordkeeping is encouraged, the Department also accepts paper records provided they are maintained and made available for inspection.

The Department reviews compliance information submitted by permitted facilities and conducts inspections to verify compliance with permit requirements. The Department conducts comprehensive inspections consistent with standard procedures as well as investigations in response to complaints received from the public. If violations are identified, the facility may be subject to enforcement action, including requiring corrective actions and assessing penalties when appropriate. Penalties for enforcement action are determined during the enforcement process, based on Department penalty policies, guidance, and review of all relevant information and therefore are not addressed in underlying permits.

Several commenters requested that the facility be required to shut down if a control device malfunctions. The facility's potential to emit remains below applicable regulatory limits even without the operation of the control devices. However, the Department has removed the allowance to operate the equipment during control device malfunction or mechanical failure; therefore, all control devices must be operational and in place at all times when equipment or processes controlled by them are operating. Additionally, the facility is required to properly operate and maintain its control equipment and take reasonable steps to minimize emissions.

The permit also requires the facility to establish acceptable operating ranges for its control systems and document any instances where operations occur outside those ranges. Based on public comments, the permit was revised to require annual reporting of these occurrences to the Department through the ePermitting system. Consistent with the scale of the permitted operations, the projected emissions, and applicable regulatory requirements, some records that must be kept by the facility are not included in regular reporting requirements, though the records must be maintained for at least five years from the date generated, will be reviewed during inspections, and must otherwise be made available to the Department upon request.

6. Fence Line Monitors

Comments were received requesting that the facility conduct fence-line air monitoring. One comment characterized permit language concerning the facility's modeling demonstration as not enforceable absent ambient monitoring and reporting of results.

Response: The Department is not requiring fence-line monitoring as a condition of this permit. South Carolina has operated an air quality monitoring network since 1959 to assess air quality throughout the state and determine compliance with state and federal air quality standards. These monitoring locations are established in accordance with federal requirements and are generally located in areas where pollutant concentrations are expected to be highest or where larger populations may be affected. Data collected from this network shows that South Carolina currently meets all state and federal ambient air quality standards.

As part of the permitting process, the Department evaluates whether emissions from a proposed project could cause or contribute to a violation of air quality standards that are designed to protect public health and the environment. Depending on the size and expected emissions of a project, this evaluation may include air dispersion modeling or other technical analyses.

For this project, the estimated emissions from the proposed shredders and vertical mill granulator are below the levels that would require air dispersion modeling or additional ambient air monitoring under the Department's permitting guidelines. Based on the Department's review, the facility's emissions are not expected to cause or contribute to a violation of applicable air quality standards.

Portable air monitors give a general look at whether certain pollutants are present or not but cannot determine the exact origin of the pollutant. Requirements under federal and state regulations do not include the installation of ambient air monitors at a permitted site,

and such data from portable ambient air monitors cannot be used to demonstrate compliance with permit limits or ambient air quality standards. The Department will continue to evaluate monitoring needs statewide and investigate complaints or concerns reported by the public. As discussed above, other operational, monitoring, and recordkeeping requirements are included in the permit to exercise oversight, and Department representatives will review information upon records submittals and during inspections to evaluate compliance.

7. Operational Ranges

Comments were received suggesting the Department require the ranges for each required monitoring parameter, liquid flow rate and pressure drop, and associated documentation on how the operational ranges were developed to be submitted to the Department via the ePermitting portal in lieu of being maintained on site for Department review as stated in conditions B.7 and B.9.

Response: The Department reviewed these comments and is requiring the operational ranges and supporting documentation to be submitted directly to the Department.

Operational ranges are used to help verify that emission control equipment is operating as intended. The permit requires the facility to establish acceptable operating ranges for parameters such as liquid flow rate and pressure drop and to maintain documentation describing how those ranges were developed.

In response to the comments received, the permit has been revised to require the facility to submit both the operational ranges and the supporting documentation to the Department through the ePermitting system for review and approval.

8. Performance Testing

Comments were received requesting the Department require the facility to conduct performance tests to verify emissions limitations.

Response: Performance testing is not required for this facility under current state or federal air quality regulations. The projected emissions calculated in the Department's permit evaluation are based on established emission factors and data from similar equipment and facilities. Using these emission estimates, the Department determined that the proposed shredders and vertical mill granulator are expected to comply with applicable air quality requirements and emission limits.

Because the facility's projected emissions are below applicable regulatory thresholds and no state or federal testing requirements apply to this equipment, the permit does not require performance testing.

9. Shredder Building Enclosure

Comments were received stating that the Department should consider requiring Adams Scrap to house the shredders inside a building enclosure with negative air pressure and route all emissions to the controls. Comments referenced a U.S. Environmental Protection Agency Enforcement Alert from July 2021 titled "Violations at Metal Recycling Facilities Cause Excess Emissions in Nearby Communities".

Response: As part of the permit review process, the Department evaluated the facility's projected emissions and determined that the proposed operations are below state and federal major source permitting thresholds. The facility is not subject to any state or federal air quality requirements that would require the installation of a building enclosure, negative pressure system, or additional capture and control equipment.

The EPA document referenced by the commenter discusses air pollution control practices that may be appropriate for certain metal recycling facilities. However, the document does not require all metal recycling facilities to operate within enclosed buildings or install additional capture and control systems.

The referenced EPA Enforcement Alert "is intended to inform metal recycling facility owners and operators about the Clean Air Act requirements that might apply at their facilities and the air pollution control systems that are in use for shredders at similar facilities." The document states that if estimated emissions are over the NSR/PSD thresholds, EPA recommends owners or operators of metal scrap shredders "contact EPA or the state environmental agency to discuss a path forward. In some cases, the installation of capture and add-on pollution controls may be required."

Based on the Department's review, potential emissions from the facility demonstrated compliance with applicable air quality regulations without the need for additional structural controls. Additionally, the EPA Enforcement Alert states "Best industry practices include removal and recovery or proper disposal of scrap metal shredding operation that uses a fluids and certain materials prior to shredding (depolluting)." As discussed above, this permit requires documentation that it has implemented source control measures for each vehicle including draining of automotive fluids to the extent practicable, removal of batteries, and removal of mercury switches from all 2002 and older vehicles. This includes documentation of the model year of all vehicles processed as well as documentation that the required source control measures for each vehicle were implemented. Therefore, the VOC emission factor

used in this permit is believed to be a conservative emissions estimate. Therefore, the Department is not requiring the facility to operate the shredders inside a building enclosure as a condition of this permit.

10. Stationary/Non-Road Engine

Comments were received disputing classification of shredder engines as non-road engines and stating concern about whether and how emissions from those engines will be addressed by the permit. A comment stated concern that the requirement that ambient air quality standards not be exceeded was not enforceable because nonroad engine emissions were not calculated or regulated under the draft permit.

Response: The commenter asserts that the diesel engines powering the mobile shredders should not be classified as nonroad engines because the shredders will be moved throughout a single site and will not leave the Adams Scrap facility. The commenter contends that movement within a single facility does not constitute movement between locations.

As defined in 40 CFR 1068.30, an internal combustion engine is not considered a nonroad engine if it “remains or will remain at a location for more than 12 consecutive months.” The regulation further defines “location” as “any single site at a building, structure, facility, or installation.” On December 5, 2008, EPA Region 5 issued an applicability determination, Control Number M090038, addressing diesel engines used and moved throughout a single facility. In that determination, EPA concluded that if an engine is regularly moved throughout a facility and does not remain stationary at one location within the facility for more than 12 consecutive months, the engine may be classified as a nonroad engine. An August 8, 2012, SCDHEC guidance memorandum titled “Permitting of Portable/Transportable Process Equipment for non-Prevention of Significant Deterioration (non-PSD) Sources” referenced in the comments expressly discusses this EPA applicability determination. Example #4 in the SCDHEC guidance (requiring permitting of emissions for an engine on a crusher “on-site” for more than 12 months) did not state and was not intended to suggest any divergence from the federal regulatory language and EPA guidance. The relevant regulations and guidance indicate that movement within a single facility can constitute movement of the engine’s location for purposes of the nonroad engine definition. Adams Scrap has indicated that the mobile shredders will be moved regularly throughout the site and will not remain in a single location for more than 12 consecutive months. Therefore, under 40 CFR 1068.30, and based on the submitted application, the diesel engines powering the mobile shredders are classified as nonroad engines and do not require a construction permit.

Although the diesel engines are classified as nonroad engines, the mobile shredding operations supported by those engines are considered stationary source operations for air

permitting purposes. This determination is consistent with the above-referenced memorandum dated August 8, 2012.

Clean Air Act Section 302(z) defines a stationary source as “any source of an air pollutant except those emissions resulting directly from an internal combustion engine for transportation purposes or from a nonroad engine or nonroad vehicle.” Therefore, emissions resulting directly from nonroad engines are excluded from the definition of stationary source emissions under the Clean Air Act.

Because the diesel engines powering the mobile shredders are classified as nonroad engines, they are not subject to the requirements of NSPS Subpart IIII or NESHAP Subpart ZZZZ, which apply to stationary engines. However, if any shredder engine remains in the same location for more than 12 consecutive months, that engine would no longer qualify as a nonroad engine. In that circumstance, the engine would be considered a stationary source, would require an air quality permit as applicable, and may become subject to NSPS Subpart IIII and NESHAP Subpart ZZZZ. This conclusion is also supported by EPA Region 5’s December 5, 2008 applicability determination, Control Number M090038. Condition B.11 of the permit requires the facility to keep records of all locations of the relevant shredders and dates on which those locations change to verify their status as nonroad engines.

Regarding the concern about nonroad engine emissions and ambient air quality standard compliance, as discussed above, nonroad engine emissions are not regulated under this permit because they are excluded from the definition of a stationary source. The facility was required to demonstrate compliance with applicable ambient air quality standards. In this case, consistent with applicable Department Modeling Guidelines, emissions from those sources subject to permitting requirements fell below exempt and de minimis rates requiring air quality analysis, which supports that no violation of ambient air quality standards would be expected to occur. The facility still, however, must ensure ongoing compliance with condition B.2 and the other terms of the permit, including requirements to document the locations of shredders and dates when shredder locations change.

11. Burning/Incinerating/Dioxins and Historical Emissions from Previous Facility Operations

Comments were received expressing concerns regarding emissions generated from burning/melting or incinerating recycled vehicles, including asserted health and pollution impacts on the community from previous furnace operations. Comments asserted that the Department’s past actions in relation to Adams Scrap had resulted in community suffering that the agency does not appear to care about and that the Department should not conceal community health problems from the public during its permitting process.

Response: Adams Scrap previously owned and operated a furnace for secondary aluminum processing at the site. That equipment has been removed from the site, and the associated air permit has been cancelled.

The facility is not permitted to burn or incinerate recycled vehicles, vehicle components, or any other materials. Because burning and incineration activities are not authorized operations at the facility under this permit, emissions associated with those activities, including potential dioxin emissions, were not evaluated as part of this permitting action.

As discussed elsewhere in these comment responses, the Department's review of this permit application was based on whether the project was consistent with applicable air quality requirements and whether the applicant has demonstrated the ability to construct and operate the proposed equipment in accordance with those requirements. The Department takes seriously the concerns and interests of all stakeholders in its air quality permitting, and information under review in connection with this permitting action is available to the public. In this case, in light of community concerns, various permit terms have been strengthened to enhance oversight. The Department does not generate medical opinions or analysis regarding specific health conditions or health outcomes, as this is outside of the Department's scope, but the Department is responsible for evaluating whether a facility's emissions are expected to meet applicable air quality standards and comply with regulations that are intended to protect public health and the environment.

12. Permit Condition Language

Condition B.1: A comment was made concerning the use of the word "will" in permit condition B.1 and requesting the language be modified.

Response: Permit condition B.1 includes requirements to minimize fugitive emissions consistent with South Carolina Regulation 61-62.6, *Control of Fugitive Particulate Matter*. The Department reviewed Section III of the regulation, which states that "emissions of fugitive particulate matter shall be controlled in such a manner and to the degree that it does not create an undesirable level of air pollution." To more closely align the permit condition with the regulatory language, permit condition B.1 has been revised to replace the word "will" with "shall."

Condition B.2: A comment was received requesting that the exact control device(s) the Department expects Adams Scrap to use be specified in B.2.

Response: The permit identifies the control devices the facility is expected to use, along with the related monitoring, recordkeeping, and reporting requirements. Permit condition B.2 is a facility-wide condition, which means it covers the specific control devices that have been

deemed acceptable to the Department and are described elsewhere in the permit. Therefore, it is not necessary to repeat the specific control devices in condition B.2.

Condition B.5: A comment was received asserting that draft permit condition B.5 does not state a requirement upon the facility and does not specify how compliance with South Carolina Regulation 61-62.5, Standard No. 4, Section VIII will be demonstrated.

Response: Permit condition B.5 states an enforceable requirement on the facility, requiring the facility to limit its particulate matter emissions to the rate specified by the referenced equations. As discussed previously, the uncontrolled particulate matter emissions from the shredders and granulator are below the applicable regulatory limit under Standard No. 4, Section VIII when operating at the maximum process weight rate. The applicable limit was evaluated using the maximum shredder throughput provided by the manufacturer. Because the equipment's uncontrolled emissions are below the allowable limit, operation of the shredders and granulator is expected to comply with Standard No. 4, Section VIII without additional particulate matter controls for purposes of this standard. Therefore, no control device monitoring or recordkeeping is required to demonstrate compliance with the Standard No. 4 PM emission limit. Other permit conditions nonetheless continue to specify required controls and monitoring to minimize emissions from the equipment.

Condition B.10: A comment was received requesting that draft permit condition B.10 be updated to require removal of all air bag switches, which may contain mercury. Another commenter raised concern about the absence of parameters defining "to the extent practicable" for removal of automotive fluids, and the absence of an express requirement that fluids be disposed of in accordance with applicable state and federal regulations. Another commenter raised concern about the facility operating without continuous agency supervision when draining fluids from cars and preparing them for shredding.

Response: As noted above, the permit has been updated in response to the comments to require that all mercury switches be removed from 2002 and older model year vehicles. Environmental agencies and the End-of-Life Vehicle Solutions (ELVS) program published detailed, model-specific lists of vehicles containing mercury hood/trunk convenience switches. These lists show all vehicles for the 2003 model year and newer do not contain mercury convenience switches.

Language requiring that automotive fluids be drained "to the extent practicable" requires the permittee to ensure drainage of automotive fluids for each vehicle, recognizing that residual amounts of fluid may remain after drainage. Requirements regarding disposal of drained automotive fluids are outside the scope of applicable air quality regulations and air quality permitting. However, the facility must ensure that all drained fluids or other waste are

disposed of in compliance with any applicable disposal requirements (for example, applicable requirements for collecting and disposing or recycling residual fluids per the facility's coverage under the Department's industrial stormwater general permit).

The permit language requires the facility to document compliance with the relevant requirements for each vehicle, and the Department will review compliance during inspections at the facility. Any specific concerns about facility compliance with required source control measures should be communicated to the Department to facilitate Department investigation and response.

Condition D.3: A comment was received requesting that draft permit condition D.3 concerning documentation of an "emergency" be modified to change the word "may" to "must" to make the emergency report a requirement.

Response: The language used in the referenced permit condition mirrors the relevant regulatory language from Regulation 61-62.1, Section II(L). The language denotes that while claiming an occurrence under the provision is not required, any facility seeking to do so must document the claimed emergency in accordance with the relevant language.

Condition I.1: A comment was received asserting that the permit needed to clearly state the emission limits of the permit to clarify permit condition I.1's reference to "pollutant limitations in the body of this permit."

Response: Relevant permit conditions identify the emission limits applicable to this facility. These include opacity and PM limits under Standard No. 4. These limits are also identified in the supporting Statement of Basis.

13. Past Violations/Penalize for Non-Compliance/Fires/Accountable

Comments were received expressing concerns about past violations and enforcement at the facility, fires on site, and failure of the facility to obtain proper permits and urge that the facility be held accountable for such events. Some comments inquired about pending, unresolved enforcement actions and requested investigation and enforcement of any existing violations before permit issuance. Comments were received asking a variety of questions about civil penalties imposed in previous enforcement actions and an absence of criminal fines or imprisonment, asserting the Department was not upholding its duties and powers, and inquiring about results and fines for outstanding enforcement actions. Comments requested the Department to consider the facility's compliance history in either denying the permit or in strengthening the permit's terms and protectiveness. Comments were received expressing concern about risk of future violations and requesting that the Department specify how it will guarantee compliance with applicable regulations and

protection of the community. Comments were received requesting enhanced inspection and enforcement protocols.

Response: As referenced in the comments, this facility has a compliance history associated with previous secondary aluminum furnace operations at this site. Previous noncompliance related to the facility's furnace operations was addressed in prior enforcement actions (including two Consent Orders). Specific questions regarding how previous penalties were determined or inquiring about criminal enforcement are outside the scope of this permitting action. The Department notes that past enforcement was based on applicable laws and standard civil administrative Department enforcement policies, procedures, and guidance, and there has been no criminal conviction to trigger criminal fines under the statutory provision referenced in comments. The Department disagrees with the assertion that it is not upholding its powers and duties in carrying out its statutory authorities.

At the time the draft permit for this project was placed on public notice, one enforcement action related to the previous furnace operations remained pending, as well the enforcement action related to shredders observed on-site prior to permit issuance (discussed above in response to other comments). The sweat furnace has since been removed from the site, and the associated air permit has been cancelled. The Department completed its review and consideration of both enforcement actions that were still pending on August 25, 2026. Please refer to the Department's August 25, 2026, closure letter for further information regarding the resolution of these matters based on the Department's consideration of the relevant facts. There are no other pending compliance or enforcement matters for Adams Scrap at this time.

Past enforcement history does not render a party ineligible from future air permitting review and issuance pursuant to governing regulations and statutes. In reviewing the current air permit application for the shredders and granulator, the Department is required to base its permitting decision on the current application, the proposed equipment and operations, and the air quality regulations applicable at the time of review. Based on the information submitted, the facility has demonstrated that the proposed project can comply with applicable air quality regulations.

While the Department is unable to guarantee any permittee's future compliance, the Department expects every permitted facility to comply with all applicable air quality regulations and permit conditions, and the permit terms are designed to facilitate Department oversight. Compliance is evaluated through review of facility reports and through unannounced inspections, as well as additional inspections conducted in response to complaints or other information received by the Department. If a violation is identified during an inspection or investigation, it is documented and referred to the Bureau of Air Quality's enforcement section for appropriate action. Inspections and enforcement at

permitted facilities are conducted consistent with established Department policies and procedures.

Some of the comments referenced concerns about fires that had previously occurred at the site. The Department's oversight of Adams Scrap under the air permit is specific to the air quality regulations administered by the Bureau of Air Quality, and the Bureau does not have permitting authority or exercise specific oversight in regard to fires that have occurred in the scrap yard.

The Department encourages members of the public to report concerns about potential compliance issues at the facility as soon as they occur so that the Department can investigate and address any matters subject to Department oversight and take appropriate action when necessary.

As noted above and documented in the permit, special permit terms have been included in this permit to establish additional monitoring, recordkeeping, and reporting measures beyond those that are generally required to help strengthen oversight of the operations permitted in this action.

14. Concerns About Disproportionate and/or Cumulative Environmental and Public Health Impacts

Comments were received referencing household income levels and childhood poverty rates and characterizing the surrounding area as an overburdened community with high rates of public health impacts and close proximity to sites of legacy pollution. Commenters asserted that the community was not equipped to handle additional environmental and health stressors. A number of commenters requested additional study(ies), such as a comprehensive review of cumulative environmental and public health impacts before any future permits are considered, as well as review of environmental justice concerns. Comments were also received asserting concern about cancer occurrence in the community and how cancer clusters are reviewed and determined.

Response: The Department is committed to protecting the health and environment of all communities in South Carolina and to working closely with communities and permit applicants to address concerns raised during the permitting process. We actively engage with residents and stakeholders across South Carolina to ensure that all communities have meaningful opportunities to participate in our decision-making. As discussed above, the Department provided public notice and a public comment period, as well as a public hearing, to allow community members and stakeholders the opportunity to submit comments and participate in our review process for this permit.

The total potential emissions from the proposed shredders and vertical mill granulator do not exceed the thresholds that would classify the facility as a major source under the Prevention of Significant Deterioration program. Therefore, the proposed equipment does not trigger a cumulative air dispersion modeling analysis under the applicable permitting requirements.

Additionally, applicable state or federal air quality regulations do not include provisions for a cumulative environmental or public health impact study as part of the air permitting process.

Analyses of any clustering for cancer incidence or cancer deaths in an area may be performed by the South Carolina Cancer Registry. The South Carolina Cancer Registry is distinct from SCDES and may be contacted directly for any questions regarding such analyses.

15. Noise Pollution and Odor

Comments were received concerning noise pollution and odors coming from the Adams Scrap facility. One commenter also inquired about the proposed hours of operation.

Response: Federal and state air quality regulations do not regulate noise. Noise-related concerns fall under local jurisdiction, and Greenville County has adopted a Noise Ordinance to address such matters.

Any noise-related complaints should be directed to the Greenville County Sheriff's Office non-emergency dispatch at 864-271-5210. A copy of the Greenville County Noise Ordinance is available on the Greenville County website under the Answer Book, "Noise Complaint," at: www.greenvillecounty.org/AnswerBook/Noise.aspx.

The presence of odor alone does not necessarily indicate the presence of dangerous air pollution, and many pollutants can be detected by smell at much lower concentrations than the maximum allowable concentrations established to protect public health. The Department investigates complaints, including odor complaints, to determine if an equipment malfunction or process upset has occurred. Citizens should contact their local SCDES regional office whenever an unusual odor is detected so that it can be investigated.

As discussed above, a condition has been added to the permit restricting the facility's hours of operation to between the hours of 5:00 AM and 8:00 PM.

16. Location/Property Values and Quality of Life Impacts

Comments were received concerning the location of the site near the Saluda River and the purchasing of additional land near the river. Additional comments were received regarding the long-term effects of the facility on neighboring property values. Some comments stated concerns about the effect of the facility and its operations on quality of life for residents and businesses. Some comments asked that the location of the facility be reconsidered.

Response: The Department's air permitting decisions must be based on a technical review of the permit application and the air quality regulations applicable at the time of review. The Department does not have the authority to determine where a facility may choose to locate.

Concerns regarding land use, zoning, property acquisition, or proximity to nearby properties or natural resources may fall under the authority of other local, state, or federal programs, depending on the specific issue. With respect to facility's proximity to the Saluda River, the facility is covered by and subject to the requirements of the Department's industrial stormwater general permit. However, those matters are outside the scope of this air permitting action. General concerns about quality of life are also outside the scope of air quality permitting.

The Department also does not have legal authority to regulate or control potential effects a facility may have on neighboring property values, and such concerns are therefore outside the scope of this permitting action.

17. Storm Water Permit Violations

Comments were received regarding the facility's compliance history related to stormwater and suggested a requirement to include in the air permit a condition on how water from the water spray systems must comply with the facility's stormwater permit and applicable law.

Response: Adams Scrap is required to comply with all Department-issued permits, including the applicable stormwater permit coverage for the facility. However, the Department's air permitting decision must be based specifically on the applicable air quality regulations and standards in effect at the time of the Department's technical review of the air permit application.

In this case, the facility has met the requirements for issuance of the air permit. The facility's stormwater compliance history does not provide a basis for denial of this air permit under the applicable air quality regulations.

The proposed water spray systems are addressed in the air permit as air pollution control measures for minimizing particulate matter emissions. Compliance with stormwater requirements, including the management of any water generated or used on site, is outside

the scope of this air permit, but the facility remains required to comply with all applicable stormwater permit requirements or other relevant water quality requirements.

As discussed previously, the Department will respond to any identified noncompliance and take enforcement action as appropriate.

18. Code Violations and Criminal Charges

Comments were received claiming the facility has multiple code violations with Greenville County and a pending court case for non-compliance. One commenter specifically raised a potential zoning issue and safety concern related to the addition of a second gate without Greenville code authorization. Comments were also received referencing criminal charges against the facility owner. Comments raised concern about and opposed issuance of a permit in light of such issues.

Response: Greenville County requirements, alleged county code violations, and any related pending court matters fall outside the scope of the Department's air quality regulations and permitting authority. Likewise, the criminal charges referenced are outside the scope of the Department's air quality regulations and permit review. The Department's decision on this air permit must be based on the current permit application and the applicable state and federal air quality regulations.

Because the alleged Greenville County code violations and other referenced legal matters are not within the Department's air quality jurisdiction, they cannot serve as a basis for approving or denying this air quality permit.

Any concerns about any Greenville County code compliance may be directed to an appropriate county officer for investigation and enforcement.

19. Process Comments

One commenter asserted concern that not all information in the permit application was able to be viewed by anyone who was not an authorized user, specifically including modeling calculations and documentation. One comment expressed concerns about the written comment deadline occurring the day following the public hearing. The Department received comments asserting that the Department should prioritize transparent engagement.

Response: The Department previously committed to notifying residents that wished to be informed of any requests for changes to Adams Scrap's air permit that may increase or alter the facility's emissions. Therefore, in August 2025, the Department sent notification to individuals who had previously attended a public meeting related to Adams Scrap, provided comments on Adams Scrap permits, or had requested to be notified of permitting activity

relating to Adams Scrap, that the facility's previous permit had been cancelled, and that the facility had submitted a permit application for shredders. Although regulations did not require public notice for this air permit, because of known community interest and concern and the Department's prior commitment to the community, the Department provided public notice of the draft permit prepared for the facility, including a 31-day period for public comment, as well as a public hearing. During the notice period, the permit application materials were also available for viewing online. Should any person continue to seek access to any of these materials, they remain available upon request through Freedom of Information Act procedures. The timeframe for receipt of comments and concerns is in keeping with regulatory requirements and standard procedures. Oral comments given at the public hearing were transcribed and have been considered in the permitting process.

Any residents that wish to receive future notifications can contact our Public Participation Coordinator, Monica Taylor, at 803-898-7678 or Monica.Taylor@des.sc.gov, to ask to receive those notifications.

20. General Opposition and Support

The Department received general comments in support or opposition to the issuance of the draft permit for Adams Scrap LLC. Supporting comments referenced the facility's community involvement, employment, use of technology, operational practices, and environmental factors. Various opposing comments raised concern about the facility's compliance history and urged permit denial on such basis. Opposing comments also asserted that profits were being prioritized over health and lives and asserted a Department bias in favor of the company and its owner.

Response: The Department appreciates the comments, concerns, and perspectives shared by community members, businesses, employees, customers, and other interested parties during the public comment period and public hearing for the draft construction permit for Adams Scrap LLC.

The Department's permitting decisions must be based on the applicable state and federal air quality regulations and the technical review of the permit application. The Department has no relationship to the permittee or its owner apart from its role as a state regulator and permitting authority, has no interest in the profits or economic performance of its permittees, and does not have the authority to approve or deny an air permit based solely on whether members of the public support or oppose a facility, its operations, its ownership, or the company itself.

Previous noncompliance and enforcement at a regulated facility do not preclude issuance of a new permit where the facility has met requirements for issuance of a permit and shown

the ability to comply. Applicants will be issued a permit when requisite requirements for permit issuance are met, as discussed above. The Department expects and requires all regulated facilities to comply with the terms and conditions of any permit it issues.

The Department's review is limited to determining whether the proposed project is consistent with applicable air quality requirements and whether the applicant has demonstrated the ability to construct and operate the proposed equipment in accordance with those requirements. Accordingly, the Department has evaluated the permit application, the technical information submitted by the applicant, and all relevant comments received during the public participation process pertaining to the draft construction permit and the facility's ability or inability to meet applicable air regulatory requirements. The Department's responses to those comments are provided above and have been considered as part of the final permitting decision.



August 25, 2026

U.S. MAIL

Adams Scrap Recycling LLC
PO Box 14338
Greenville, SC 29610
Attn: Kamal Desor

Re: Notices of Alleged Violation and Notice of Enforcement Conference - AI-0006425, March 22, 2023 (amended April 25, 2023), and AI-0013342, October 13, 2025

Dear Mr. Desor:

This letter is in regard to the two above-referenced Notices of Alleged Violation and Notice of Enforcement Conference ("Notices") issued to Adams Scrap Recycling LLC ("Adams Scrap") for potential violations of S.C. Code Ann. Regs. 61-62.1 Section II, *Permit Requirements*.

On April 18, 2023, the Department held an enforcement conference with Adams Scrap regarding the Department's first Notice, which concerned alleged violations of afterburner temperature requirements for the facility's sweat furnace, as contained in the facility's air permit. The amended Notice referenced 128 recorded temperatures (documented across 9 days between June and October 2022). It was recognized during the enforcement conference that the required minimum temperature of 1800°F for the afterburner in the Permit was not a regulatory standard or requirement but was included in the facility's air permit as an operating parameter for the afterburner to support compliance with S.C. Code Ann. Regs. 61-62.5, Standard No. 4, for visible emissions (*i.e.*, 20% opacity standard). Visual emission observation records indicate that the sweat furnace and afterburner were able to achieve 0-5% opacity (below the Standard No. 4 opacity limit of 20%) at lower temperatures of approximately 1725-1740°F. Additionally, facility documentation showed compliance with Subpart RRR, National Emission Standards for Hazardous Air Pollutants for Secondary Aluminum Production, which includes a 1600°F minimum afterburner temperature parameter (based on a three-hour block average) for charges to sweat furnaces with emissions controlled by an afterburner. Adams Scrap ceased operation of the furnace in question in August 2023, and the facility's air permit coverage for the furnace was cancelled on August 8, 2025.

On November 12, 2025, the Department held an enforcement conference with Adams Scrap regarding its second Notice, which concerned two (2) portable shredders identified during an April 22, 2025, inspection that were alleged to have periodically operated at the site without an air quality permit or permit exemption documentation. Representatives of Adams Scrap informed the Department that until the facility undertook its review in response to the Department's March 4, 2025, request for additional information concerning the shredders, they had reasonably believed the shredders to be exempt from permitting because the shredders were portable and did not remain

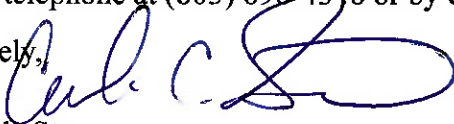
onsite for more than 12 months at a time, and based on previous, longstanding industry emission factor guidance indicating such equipment qualified for exemption under the Department's regulations.

On March 19, 2025, in response to the Department's request for information, the facility, through its consultant, submitted a permit application for shredding equipment, in which the consultant identified and utilized updated VOC emission factors appearing in new guidance issued by the Recycled Materials Association (formerly Institute of Scrap Recycling Industries) in December 2023. Facility representatives reiterated that a permit application was pursued as soon as Adams Scrap became aware of the requirement to obtain a permit and represented that operation of the two units prior to the submittal was minimal. The Department conducted a follow-up inspection at Adams Scrap on March 19, 2026, during which the Department documented that: no shredding equipment had been newly assembled since the previous inspection; no shredded metal piles or other materials that would indicate any recent shredding onsite were observed; and one of the two shredders previously identified as having operated at the site was no longer present. A draft permit for shredding equipment was placed on public notice on March 24, 2026, and a final permit decision remains pending at this time.

Upon consideration of the above information, the Department has elected not to pursue any additional enforcement action in these matters.

Please be advised that future violations of applicable regulations and any permit issued may result in the Department taking additional enforcement action, including the assessment of civil penalties. The facility must continue to refrain from any construction or operation of shredding equipment for which an air permit is pending, or any other equipment requiring an air permit, unless and until a Department-issued permit authorizing such construction and operation is issued. Thank you for your assistance in resolving this matter. If you have any questions, please contact me by telephone at (803) 898-4348 or by email at Amanda.Steuer@des.sc.gov.

Sincerely,



Amanda Steuer
Enforcement Project Specialist
Bureau of Air Quality

(AI-0006425NFA and AI-0013342NFA)

cc: Compliance File 1200-0510
ec: J. Hall, Upstate Region (GSP – BRLS)
U. Patel, A. Lever, BAQ