



SC DEPARTMENT of **ENVIRONMENTAL SERVICES**

Bureau of Air Quality Response to Comments on Air Quality

Heidelberg Materials Southeast Agg LLC - Manning Quarry Columbia, Richland County, South Carolina Permit Number CP-50000372 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 February 5, 2026, through April 3, 2026, regarding the draft Synthetic Minor Construction Permit for Heidelberg Materials Southeast Agg LLC - Manning Quarry.¹

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.

Air Pollution Impacts - Comments were received expressing concerns about air quality impacts generally and associated health and quality of life impacts, including impacts on the elderly population in the area.

Response: Federal and state air quality regulations are established to protect public health and welfare, including the health of sensitive populations such as asthmatics, children, and the elderly. These regulations are based on scientific data and human health risk exposure assessments, and include ambient air quality standards, emission limits, and operational and control requirements for industrial facilities.

State ambient air quality standards are codified in South Carolina Regulation 61-62.5, Standard No. 2. The primary pollutant of concern associated with this project is particulate matter (PM). State standards include limits for particulate matter with an aerodynamic

¹ Written comments or comments during the public hearing associated with the facility's application for a mine permit from SCDES's Bureau of Land and Waste Management (BLWM) are addressed in BLWM's separate response to comments for the mine permit.

diameter less than or equal to 10 micrometers (PM₁₀) and less than or equal to 2.5 micrometers (PM_{2.5}).

The proposed operations at the Heidelberg Manning facility were evaluated to determine whether emissions from the project would cause or contribute to an exceedance of ambient air quality standards under S.C. Regulation 61-62.5, Standard No. 2. Air dispersion modeling demonstrated that controlled PM₁₀ and PM_{2.5} emissions would comply with the applicable standard. These analyses indicate that emissions from the proposed quarry would not adversely affect compliance with Standard No. 2 at or beyond the property boundary.

The permit also incorporates additional federal and state regulatory requirements that address particulate matter emissions through emission limits, required controls, monitoring, and operational practices. These requirements include limits on PM emissions and opacity, which is a measure of the amount of light obscured by particulate emissions. The crushed stone processing equipment, including crushers, screens, and conveyor systems, is subject to the federal New Source Performance Standards for Nonmetallic Mineral Processing Plants under 40 CFR Part 60, Subpart OOO, as well as applicable state regulations.

While state regulations establish opacity limits for emission sources, the applicable federal standards incorporated into the permit are more stringent and limit opacity to 12 percent for crushers and 7 percent for screens and conveyors. To demonstrate compliance with these requirements, the permit requires the facility to conduct initial Method 9 visual opacity observations on all regulated equipment.

The permit further requires the use of wet suppression systems to control particulate matter and fugitive dust emissions, except when elevated material moisture content resulting from rainfall provides adequate suppression. Wet suppression equipment must be inspected on a weekly basis to ensure proper operation. When recent rainfall is relied upon in lieu of active wet suppression, required logbook entries must document those conditions in accordance with 40 CFR 60.676(b).

Additionally, the facility is required to develop and implement a comprehensive Fugitive Dust Control Plan. At a minimum, the plan must address dust control measures for haul roads and truck traffic, storage piles, and process equipment. When implemented in accordance with the permit, these measures are expected to effectively minimize fugitive dust emissions from the facility.

Free Silica and Silicosis - A comment was received expressing concern about crystalline silica, a type of particulate matter, and links to silicosis and other health impacts.

Response: Crystalline silica is a naturally occurring mineral that is widely present in the earth's crust and is a component of materials such as granite, sand, soil, and other common minerals. As a result, low levels of silica are present in ambient air from natural and routine activities, including windblown dust and travel on unpaved roads.

Crystalline silica is recognized as a human carcinogen, and long-term exposure to elevated concentrations of respirable silica dust has been associated with health conditions such as silicosis primarily in occupational or industrial workplace settings. Federal occupational safety agencies, including the Occupational Safety and Health Administration (OSHA) and the Mine Safety and Health Administration (MSHA), regulate workplace exposure to respirable crystalline silica and have established standards intended to protect workers from prolonged high-level exposure.

The U.S. Environmental Protection Agency (EPA) has previously reviewed evaluated available scientific information related to crystalline silica exposure, including both occupational studies and ambient air exposure data. EPA concluded that healthy individuals exposed to ambient concentrations of silica are adequately protected by the federal PM₁₀ ambient air quality standards, which at that time were set at 50 micrograms per cubic meter (annual standard) and 150 micrograms per cubic meter (24-hour standard). Since that evaluation, the annual PM₁₀ standard has also been strengthened to provide increased protection.

There are no separate ambient air quality standards for crystalline silica, and EPA does not regulate crystalline silica separately as a Hazardous Air Pollutant under the Clean Air Act. Consistent with EPA guidance, the Department's air quality regulations focus on controlling particulate matter emissions (including but not limited to particulate matter that may contain silica).

Exposure to elevated levels of silica dust remains primarily an occupational concern. As noted above, OSHA and MSHA regulate workplace exposure to respirable crystalline silica and have established standards to protect workers. Many of the control measures are used to reduce occupational exposures, such as wet suppression, also reduce particulate emissions and potential off-site impacts. The permit includes multiple requirements intended to minimize dust and particulate emission from the facility. Crushing, screening, and conveying operations are required to utilize wet suppression systems, and additional fugitive dust control measures such as water trucks, roadway control, and other operational practices are required to minimize off-site dust migration.

The permit also requires ongoing inspection and maintenance of dust control equipment and implementation of a Fugitive Dust Control Plan to ensure emissions are minimized during facility operations. When operated in accordance with permit conditions, these control measures are expected to effectively reduce particulate matter emissions, including

dust containing crystalline silica, and minimize potential impacts to surrounding properties and nearby communities.

Dust/Fugitive Particulate Matter Emissions – Comments were received regarding particulate matter (PM emissions), including fugitive PM emissions at the proposed facility. These comments inquired about the effectiveness of water spray systems for primary dust control given the scale of the operation and dry weather conditions and requested suspension of crushing during high levels of wind or other adverse conditions.

Response: The air permit requires the use of wet suppression systems to control particulate matter emissions from the facility. The crushed stone processing operations, including crushers, screens, and conveyor systems are regulated under the federal New Source Performance Standard for Nonmetallic Mineral Processing Plants, 40 CFR Part 60, Subpart OOO, as well as applicable State regulations. These requirements mandate the use of wet suppression controls and require the facility to properly maintain, inspect and repair dust control equipment as necessary to ensure effective operation. When promulgating the federal Subpart OOO regulations, EPA recognized that wet suppression water sprays are a common control measure applied to reduce fugitive emissions from nonmetallic mineral processing plants and confirmed that subject facilities are responsible for continuously complying with the applicable fugitive emission (*i.e.*, opacity) standards during their operations (*i.e.*, under any weather conditions during which the facility operates).

Notably, although the federal regulations require a monthly inspection of water spray systems to ensure proper functioning, the issued permit is more stringent and requires weekly inspections of all wet suppression equipment, including corrective action for any issues identified. Furthermore, under the issued permit, if the permanent wet suppression system is not operating properly and there is no available portable water spray system, the process must be shut down until the permanent water spray system is back in proper operation.

Additional dust control measures, including water trucks or other equivalent suppression methods, are also required to minimize fugitive dust emissions from haul roads, storage piles, and other exposed areas. The facility must also develop and implement a comprehensive Fugitive Dust Control Plan to minimize fugitive dust emissions from all applicable sources (including processing equipment, truck traffic, storage piles, and other potential fugitive dust sources throughout the facility). At a minimum, the plan must identify potential fugitive emission sources, describe the control measures that will be used to minimize emissions, document excessive dust events, and outline corrective actions that will be taken when necessary. The plan must also address operating scenarios in the event of any water truck failure or inadequacies (e.g., conditions such as high winds or excessive dusting during crushing and processing operations). This plan is

required to be submitted to the Department for review and approval prior to start of operations. When implemented and maintained in accordance with permit requirements, the permit's collective measures are expected to effectively control particulate matter emissions.

Records documenting inspections, maintenance activities, and corrective actions must be maintained by the facility. The Department conducts unannounced inspections to verify compliance with permit requirements. During these inspections, Department staff review required records, observe facility operations, evaluate visual emissions, confirm that equipment matches permitted configurations, and assess compliance with applicable regulations and permit conditions. Additional inspections may also be conducted in response to complaints or observed concerns. Any identified violations are documented and may be referred to the Department's Enforcement Section for further action.

Ambient Air Monitoring – A comment was received requesting continuous PM monitoring at the site boundary as well as PM₁₀ and PM_{2.5} air monitoring specific to crystalline silica at the property boundary and at receptor distances of 1-3 miles downwind. The commenter also requested automatic operational shut down from PM exceedances documented by such a monitor.

Response: There is no applicable requirement for the use of portable ambient air monitors for permitted sites. In accordance with federal air quality regulations, the Department operates and maintains its statewide ambient air monitoring network to continuously evaluate air quality throughout South Carolina. Monitoring locations are established in accordance with EPA requirements under 40 CFR Part 58, Appendix D, and are intended to represent areas with the highest expected pollutant concentrations and population exposure. If the ambient network monitors demonstrate that air pollutant concentrations are below the applicable standards, it is reasonable to expect that the air pollutant concentrations in the surrounding areas are also lower than the national standards. The Department reviews the monitoring network annually to ensure compliance with federal requirements and to confirm that monitoring objectives continue to be met.

South Carolina has operated an ambient air monitoring network since 1959 to assess compliance with ambient air quality standards. Current monitoring data throughout the state demonstrate attainment with all existing air quality standards, including standards for PM₁₀ and PM_{2.5}.

Under the Clean Air Act, if monitored pollutant levels exceed federal standards and an area is designated as nonattainment, the State is required to develop a State Implementation Plan (SIP) outlining measures necessary to reduce emissions and return the area to compliance.

For the proposed facility, the background PM₁₀ concentrations were based on the most representative monitoring data from the Jenkins Ave/North Charleston FS monitor in Charleston County. SCDES has two state-maintained PM₁₀ ambient monitor locations with complete datasets for use, Greenville ESC (35 micrograms/m³) and Jenkins Ave. in North Charleston (37 micrograms/m³). Jenkins is the more conservative (higher), so it was used as the representative site for PM₁₀ concentrations. The background PM_{2.5} concentrations were based on data from the Parklane monitor in Richland County. Parklane was used as the representative site for PM_{2.5} concentrations due to its proximity (about 7 miles as the crow flies) and land use around the monitor that is representative of the facility location. These background concentrations were incorporated into the facility's air dispersion modeling analysis to evaluate total predicted pollutant concentrations in the surrounding area. The modeling analysis demonstrated compliance with applicable standards under S.C. Regulation 61-62.5, Standard No. 2, for both PM₁₀ and PM_{2.5}.

In addition, there is historical PM₁₀ monitoring data available for granite quarries. The monitoring was contracted and conducted for a Columbia area quarry between 2003 and 2008. The performance and accuracy of the monitors were periodically reviewed by SC DHEC technical staff. This monitoring data showed that ambient air quality standards were being met. The maximum permitted production rate at the Columbia area quarry is higher than that of the proposed Heidelberg Materials quarry. Furthermore, due to concerns about PM₁₀ concentrations in adjacent communities, the SC DHEC conducted ambient PM₁₀ monitoring near two granite quarries in Columbia from 1991 to 2012 and from 1991 to 2010, respectively. At the time the monitoring was discontinued, the results of that monitoring showed ambient concentrations were less than half of the health-based standards for PM₁₀ in the area around both quarries.

Furthermore, 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 portable ambient air monitors. The Department's permitting review process relies on EPA-approved air dispersion modeling, existing ambient monitoring data, and enforceable permit conditions to evaluate compliance with air quality standards and protect public health. The permit also includes operational requirements and particulate matter control measures intended to minimize emissions from the facility, including wet suppression systems and fugitive dust controls. In addition, the facility must conduct daily visual inspections and maintain various records and logs to demonstrate that the facility is being operated as stated in the permit. During the Department's unannounced air inspections, inspectors review all required records, observe the facility's processes while in operation, make visual emission observations, verify that equipment onsite matches that listed in the permit, and review other pertinent information. Copies of inspection reports from the Department's compliance inspections, including

documentation of inspectors' observations and identification of any deviations or potential violations, may be requested through the Department's Freedom of Information process.

Air Dispersion Modeling – The Department received comments stating that air dispersion modeling is needed using worst-case meteorological conditions for the Midlands region, including prevailing southeasterly winds blown towards residential areas east and southeast of the site.

Response: The Department's air dispersion modeling analysis was conducted using EPA-approved modeling methods and meteorological data representative of the area over a five-year period. Consistent with EPA guidance, the use of five years of weather data is considered sufficient to account for normal variations in local weather patterns, including wind directions, seasonal conditions, and worst-case dispersion scenarios. The modeling performed for the proposed facility incorporated these weather variations, including conditions that would be expected to produce the highest potential off-site pollutant concentrations.

The modeling analysis evaluated particulate matter emissions from the proposed operations under conservative, worst-case operating assumptions. These assumptions are designed to ensure the analysis represents maximum potential impact of the facility. Actual emissions during normal operations are expected to be lower than the modeled concentrations. The results of the modeling demonstrated compliance with applicable state and federal ambient air quality standards for both PM₁₀ and PM_{2.5}.

Based on the results of the modeling analysis, the permit includes operational limitations intended to ensure continued compliance with applicable standards. These conditions include limiting facility operations to a maximum of 15 hours per day, with allowable operating hours between 5:00 a.m. to 8:00 p.m. daily. The Department determined, based on the modeling and permit controls, that the proposed facility is expected to operate in compliance with Standard No. 2 ambient air quality standards. See the table below for more information regarding compliance with particulate matter concentrations.

STANDARD NO. 2 - AMBIENT AIR QUALITY STANDARDS ANALYSIS							
Pollutant	Averaging Time	Basis	Maximum Concentration (mg/m ³) ⁽¹⁾	Background Concentration (mg/m ³)	Total (mg/m ³)	Standard (mg/m ³)	% of Standard
PM ₁₀	24-Hour	AERMOD	111.7 ⁽²⁾⁽⁵⁾	37	149	150	99
PM _{2.5}	24-Hour	AERMOD	20.0 ⁽³⁾⁽⁵⁾	11.4	31	35	78

STANDARD NO. 2 - AMBIENT AIR QUALITY STANDARDS ANALYSIS							
Pollutant	Averaging Time	Basis	Maximum Concentration (mg/m ³) ⁽¹⁾	Background Concentration (mg/m ³)	Total (mg/m ³)	Standard (mg/m ³)	% of Standard
	Annual	AERMOD	4.7 ⁽⁴⁾⁽⁵⁾	6.8	12	12	100

Public Outreach - A comment was received for a request that SCDES schedule a public hearing because the level of community concern warrants formal oral testimony and a recorded record. It was also requested that the Department should require the applicant to conduct targeted community outreach in 29203, including direct mail and a community meeting at an accessible location in the zip code, before a permitting decision. The comment also asserted that the public notification of the public hearing was inadequate for failing to directly notice residents of 29203.

Response: The Department conducted a public meeting and public hearing on March 19, 2026, prior to issuance of the permit. These proceedings provided an opportunity for community members to present oral comments, ask questions, and submit information for consideration as part of the permitting process. In addition, the Department provided a public comment period during which written comments could be submitted and reviewed as part of the official administrative record.

The Department's public participation procedures are intended to provide meaningful opportunities for public awareness and involvement consistent with applicable regulatory requirements. S.C. Regulation 61-62.1, Section II(N), provides that public notice, when required, is provided through publication in a newspaper of general circulation in the area where the source is located, or by posting to a public website identified by the Department, or by publication in the S.C. State Register, and to persons on a mailing list developed by the Department including those who have requested in writing to be on the list. In accordance with S.C. Regulation 61-62.1, the permit application, draft air permit, draft statement of basis were made publicly available, and notice of a public meeting, public hearing, and comment period was published through the Department's website (both on the Department's general public notices webpage as well as through a separate webpage dedicated to information about the proposed project). On February 11, 2026, notification was sent via mail by the BLWM to adjacent property owners within a 0.5-mile radius of the proposed mine to inform them of the public meeting and hearing. Public meetings and hearings are open to all interested parties, and all participants are provided with the opportunity to submit comments or concerns regarding the proposed project.

The Department reviews and considers all comments received relevant to the proposed facility and the applicable regulatory requirements before making a permit decision. Staff from the Bureau of Air Quality (BAQ), Bureau of Land and Waste Management (BLWM), Bureau of Water (BOW), and the Community Engagement program are also available to respond to questions and discuss concerns related to the permitting process. While the Department administers the formal public participation process required under state and federal regulations, outreach efforts conducted directly by the applicant are outside the Department's purview. Prior to the public hearing, Heidelberg Materials Southeast Agg LLC independently conducted outreach activities, including informational displays and engagement with members of the public regarding the proposed project.

Cumulative Impacts and Concerns About Disproportionate Burden – Comments expressed concerns about economic vulnerability within the relevant community (zip code 29203) and concern about other existing environmental burdens in the area and requested a full environmental justice review be considered prior to issuing the permit, including census, cumulative environmental burden data, and cumulative air quality impacts for the community. Comments asserted that permit review should account for cumulative air quality impacts and requested that a cumulative impact analysis be performed and made public prior to permit issuance, and that cumulative burdens be considered as a substantive factor in the permit decision.

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 part of this process, the Department provided public notice and a public comment period, as well as a public hearing on March 19, 2026, to allow community members and stakeholders the opportunity to submit comments and participate in the review process.

Air permitting decisions must be based on applicable state and federal regulations and a thorough review of the technical information submitted by the applicant. Existing regulations do not require a separate environmental justice analysis or a cumulative impact assessment as part of the air permitting process. For this permit, the facility accepted enforceable synthetic minor limits to restrict its potential emissions. These limits, in conjunction with other operational, monitoring, recordkeeping, and reporting requirements, are consistent with applicable state and federal air quality regulations.

Blasting – Comments were received requesting suspension of blasting activities during windy operations. During the public hearing, a comment was received concerning one-half mile notifications for blasting.

Response: The air permit does not directly address blasting activities, as such activities are regulated by the South Carolina Mining Act, and there are no federal or state air quality provisions specific to blasting operations. Blasting activities at granite quarry operations are reviewed through the mining permit process administered by the Bureau of Land and Waste Management (BLWM).

Although the air quality permit does not directly address blasting, it is worth noting that blasting is typically done while primary crushing and hauling are not in operation. The blast area must be cleared before the blast and cannot resume until the blasting contractors have inspected the blast area and determined the area safe to re-enter. This operational shutdown typically lasts approximately 30 minutes while the actual blast occurs in less than one minute. The emissions created from blasting are offset by the cessation of emissions from primary crushing and hauling during that blasting period.

Comments and concerns related to blasting operations, including operational practices, notification procedures, and potential off-site impacts, will be evaluated by BLWM as part of its review of the mining permit application and applicable mining regulations.

Noise Levels – Comments were received during the public hearing concerning noise levels of the facility and related operations.

Response: The Department does not have any noise standards in its air quality regulations and lacks authority to base a permit decision on noise levels. Noise is usually handled at the local level through county or city ordinances.

While noise is not regulated under the air quality permitting program or applicable air quality regulations, Department's air dispersion modeling analysis resulted in operational limitations for the facility, including restricting operations to 15 hours per day between the hours of from 5:00 a.m. to 8:00 p.m.

The Department encourages members of the public to report excessive or unusual noise conditions to the appropriate regional office, as abnormal noise levels may indicate that equipment is not operating properly or that maintenance may be necessary.

In addition to the air permit requirements, the facility is also subject to conditions and operational requirements under its mining permit administered by the Bureau of Land and Waste Management (BLWM). Those requirements include the implementation of best management practices intended to minimize operational impacts, including noise associated

with quarry activities. Additional information regarding those requirements is available through the mining permit review process.

Impacts on Other Non-Air Quality Resources – Comments were received during the public hearing and public comment period expressing concern about potential impacts on non-air quality resources including impacts to wildlife/animals (including endangered species), water, sedimentation of the Broad River and the creek, historical sites (such as the Nipper Creek Heritage), property, and safety risks.

Response: Department air permit decisions are based on the state and federal air quality regulations and standards in effect at the time of the Department's technical review of the permit application. The Department's permitting decision for the air quality permit is based on whether the applicant has demonstrated compliance with those air quality requirements. Based on the Department's review, the applicant demonstrated compliance with the applicable requirements for the issuance of an air permit.

Concerns related to wildlife, water resources, sedimentation, historical or cultural resources, property impacts, and public safety are outside the scope of the Department's air quality regulations and permitting authority and, therefore, are not directly addressed through the air permitting process. However, the proposed facility is also subject to review under additional permitting programs administered by other Department divisions. These include a mining permit review conducted by the Bureau of Land and Waste Management (BLWM) and a National Pollutant Discharge Elimination System (NPDES) permit review conducted by the Bureau of Water (BOW). Issues relevant to those regulatory programs are evaluated as part of their respective permitting processes.

In addition, secondary National Ambient Air Quality Standards for particulate matter are intended to protect public welfare, including potential impacts to vegetation, crops, animals, and property. The air dispersion modeling analysis conducted for the proposed facility demonstrated compliance with the applicable secondary standards for PM10 and PM2.5. Potential impacts to wildlife and natural resources are also reviewed by the South Carolina Department of Natural Resources (SC DNR) and considered as part of the mining permit review process administered by the BLWM.

Community/Quality of Life Concerns – Comments were received expressing concern about reductions in quality of life and property values and potential expansion of commercial or other development in the area.

Response: The Department recognizes that community quality of life and local economic conditions are important concerns for residents and may be influenced by a variety of factors. However, the Department's authority in the air permitting process is limited to evaluating compliance with applicable state and federal air quality regulations and

standards. The Department does not have regulatory authority to approve or deny permits based on property values, broader economic impacts, or general land use concerns.

Decisions regarding zoning, land use, facility siting, and future development are typically addressed at the local government level by city or county planning and zoning authorities and are outside the scope of the Department's air quality permitting authority.

The Department's review and permitting decision for the proposed facility are based on the technical evaluation of the project, applicable regulatory requirements, and the applicant's demonstrated ability to comply with those air quality standards and permit conditions.

Truck emissions and traffic – Comments were received during the public hearing concerning pollution from trucks and traffic concerns.

Response: The Department does not have regulatory authority over truck traffic on public roadways, as roadway design, traffic management, and transportation infrastructure are under the jurisdiction of the South Carolina Department of Transportation. In addition, emissions from vehicle tailpipes are regulated by the U.S. Environmental Protection Agency under the Clean Air Act and are not regulated through this air permitting action.

While the Department does not regulate public roadway traffic, the Bureau of Air Quality does regulate fugitive dust emissions associated with on-site roadways within the facility boundaries. The air permit requires the facility to implement dust control measures for on-site roads and to develop and maintain a Facility-Wide Fugitive Dust Control Plan. This plan must address measures intended to minimize particulate matter emissions associated with truck traffic, material handling, and roadway use within the facility boundaries.

As part of these requirements, the facility must maintain appropriate dust suppression practices and comply with all applicable South Carolina laws related to the transport of aggregate materials. The permit requires signage referencing Sections 56-5-4100 and 56-5-4110 of the South Carolina Code of Laws, which require transported materials to be properly secured to prevent spillage, require escaped materials to be promptly removed from roadways, and require truck loads and coverings to be adequately fastened.

Additional permit conditions addressing particulate matter and opacity emissions also require facility operations to be conducted in a manner that minimizes the release of airborne dust from non-enclosed operations.

The mining permit administered by the Bureau of Land and Waste Management (BLWM) also includes requirements intended to minimize sediment material track-out onto public roadways. These requirements include implementation of Best Management Practices (BMPs), daily removal of accumulated sediment or soil from public roads if necessary, and

construction of a paved or gravel access connection between haul roads and public roadways to reduce track-out from exiting vehicles.

Address location – A comment was received during the public hearing asserting that the listed address does not match the location of the quarry. The commentor is concerned that the quarry could move to the other side of the street.

Response: The proposed quarry is identified within the mining permit application by the site coordinates (Latitude: 34.085° N, Longitude: 81.0833° W). Mining activities are limited to the approved permitted area established through the Bureau of Land and Waste Management (BLWM) mining permit process. The permitted mining area cannot be relocated or expanded to another area, including the opposite side of the roadway, without additional Department review, approval and applicable public notice requirements.

Although the mailing or reference address in the air permit application is identified as 7900 Monticello Road, the exact locations of the permitted equipment, operational areas, and property boundaries were included and evaluated as part of the air quality modeling analysis submitted with the application. The permit is based on those specific source and property locations.

The permitted equipment associated with the facility includes truck unloading areas, screens, crushers, feeders, bins, and conveyor systems. Locations for these emission sources and property boundaries are identified in the air quality modeling analysis using Universal Transverse Mercator (UTM) Zone 17 (NAD83) coordinates. The locations of permitted emission sources cannot be changed without additional review and updated modeling analysis.

Additional details regarding the location of permitted equipment and operational areas are provided in the air quality modeling analysis and related permitting materials.

General Opposition – Commenters during the public hearing expressed general opposition to the facility.

Response: The Department acknowledges and appreciates all comments submitted during the public participation process regarding the proposed air quality permit. Public comments and community input are reviewed and considered as part of the Department's evaluation of the permit application and applicable regulatory requirements.

The Department's authority to approve, deny, or modify an air permit is governed by applicable state and federal air quality laws and regulations. Permitting decisions cannot be based on general support or opposition to a proposed project. Instead, the Department's

decision is based on the technical review of the application and regulatory requirements in place at the time of the Department's review.