



# SC DEPARTMENT of ENVIRONMENTAL SERVICES

## Bureau of Air Quality Response to Comments on Air Quality

### Michelin North America Inc Sandy Springs Facility (US2) Sandy Springs, Anderson County, South Carolina Permit Number TV-0200-0018 v2.0

The following is the South Carolina Department of Environmental Services, Bureau of Air Quality's (SCDES or Department) response to the comments made during the formal comment period held March 6, 2025, through May 4, 2025, regarding the draft AIR-Title V Operating Permit for Michelin North America Inc Sandy Springs Facility (US2).

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, written comments received, and information submitted by the facility in response can be requested by contacting our Freedom of Information Office at (803) 898-3882.

**Odors:** The Department received comments regarding concern about odor from the facility over a period of approximately six months (August 2024 through March 2025).

**BAQ Response:** There are no current state or federal air quality regulations that specifically address odor.

The presence of odor alone does not necessarily indicate the presence of dangerous air pollution. Many air pollutants can be detected by smell at much lower concentrations than the maximum allowable concentrations established to protect public health.

The Department investigates citizen complaints, including odor complaints, to determine if an equipment malfunction or process upset has occurred. Citizens should contact the local [SC-DES regional office](#) whenever an unusual odor is detected so that it can be investigated. The Department has previously responded to complaints referencing odors from the facility, including through investigations conducted by Department inspectors in September 2024 and February 2025.

The facility operates several rubber groups vented to boilers to alleviate odor created from natural rubber and additives. Circulating these gases into the boilers is not required under the facility's air permit. The facility noted two occasions, since November 2024, where this process was bypassed to maintain boiler function, and increased odors may have resulted.

**Carbon black:** The Department received comments, photos, and videos stating concern about carbon black from the facility on personal property. The commenter also noted concerns about health impacts. The commenter also referenced concern about settlement provisions regarding contacting Michelin before contacting the U.S. EPA about the facility.

**BAQ Response:** Carbon black is a component of particulate matter (PM) emissions, specifically PM<sub>2.5</sub>. Various permit requirements and underlying federal and state regulations address PM emissions from the facility. These requirements include limits on PM emissions, as well as required parametric monitoring and maintenance.

Although PM<sub>2.5</sub> emissions were estimated as below the threshold at which air quality analysis would be required, due to community concerns about carbon black impacts, the Department requested PM<sub>2.5</sub> air dispersion computer modeling. The modeling performed showed compliance with applicable ambient air quality standards, which are set by the U.S. EPA to be protective of public health, including sensitive and vulnerable populations, and the environment.

In addition, source testing is being required for several PM emission sources. The source testing will be used to verify emission rates used in facility emissions calculations. The PM control devices are required to be monitored for proper operation.

It is the Department's understanding that the facility has engaged with the community and has taken steps to minimize PM, including carbon black, emissions. The facility has informed the Department that they have integrated a cleaning program for carbon black areas including daily housekeeping and an external contractor to perform a deep cleaning on a regular basis. According to facility, three deep cleanings have been performed in the last twelve months and will continue for the foreseeable future. The Department will continue to investigate any complaints associated with the facility and will address any permit noncompliance through applicable compliance and enforcement processes.

The Department is not a party to the settlement agreement(s) referenced in the comments and is therefore unable to speak to its contents. As noted above, the Department will continue to respond to complaints associated with the facility pursuant to its standard procedures.