



SC DEPARTMENT of **ENVIRONMENTAL SERVICES**

Bureau of Air Quality Response to Comments on Air Quality

Vulcan Construction Materials, LLC - Orangeburg Quarry Eutawville, Orangeburg County, South Carolina Permit Number CP-50000132 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 January 3, 2024, through February 23, 2024, regarding the draft minor source air quality construction permit for Vulcan Construction Materials, LLC - Orangeburg Quarry. The Department Decision, construction 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>. These documents, along with other documents regarding Vulcan Construction Materials, LLC - Orangeburg Quarry, may be found on SCDES's Vulcan webpage at <https://des.sc.gov/community/environmental-sites-projects/vulcan-construction-materials-llc-orangeburg-limestone-quarry>.

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 meeting and hearing were held by the Department on February 8, 2024. During the public hearing, the Department received oral and written comments on the proposed projects. During the comment period, a total of five written and oral comments were received. The Department has reviewed each comment and provided this summary response to the comments.

1. Air Pollution Impacts

Comments were received concerning air quality and health issues.

Response: Under the authority of Clean Air Act (CAA), the Environmental Protection Agency (EPA) is required to establish National Ambient Air Quality Standards (NAAQS) for six criteria

air pollutants considered harmful to public health and the environment. The EPA regularly reviews all available scientific data to set NAAQS concentration limits to be protective of public health and welfare, including the health of sensitive populations such as asthmatics, children, and the elderly. The pollutant of concern from this project is particulate matter (PM). The EPA has established NAAQS for both PM less than 10 micrometers in diameter (PM₁₀) and PM 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.” Vulcan Orangeburg’s proposed operations were evaluated to determine if the emissions from the proposed project would interfere with attainment of the NAAQS. In this case, the facility’s emissions were shown to be below threshold levels requiring an air quality analysis. Because emissions were below the de minimis threshold level requiring air quality analysis, operations at the proposed Vulcan Orangeburg quarry are not expected to interfere with NAAQS attainment at or beyond the property boundary.

Additional permit requirements and underlying federal and state regulations further address PM emissions from the project and impose emission limits, controls (wet suppression), and monitoring. These include limits on PM emissions and opacity (amount of light blocked by dust particles). The crushed stone processing plant (crushers, screens, conveyor systems) is regulated under the federal EPA New Source Performance Standard for Nonmetallic Mineral Processing plants, 40 CFR Part 60, Subpart OOO, as well as under state standards. The permit requires wet suppression to control PM and fugitive dust emissions and requires weekly inspections of wet suppression related equipment to ensure they are operating properly. The facility must also develop and implement a comprehensive Fugitive Dust Control Plan to ensure fugitive dust emissions are minimized, and the plan must address, at minimum, fugitive dust control procedures related to water trucks, truck traffic, storage piles, and process equipment. When dust suppression is conducted in accordance with the permit, it should be effective in controlling dust emissions.

2. Chemical Usage, Storage, Disposal

A comment was received regarding chemical use, storage, and disposal, including the availability of the safety data sheets for the products

Response: The proposed facility is a mechanical processing plant, and the facility will not store or use any chemicals above threshold levels that would subject it to regulation under Clean Air Act provisions governing chemical accident prevention. No regulated sources of air emissions have been identified in connection with any chemicals to be used or stored by the facility. However, the facility will have a Stormwater Pollution Prevention Plan (Stormwater Plan) from the Bureau of Water (BOW), and the fuel, oil, and grease will be required to be used, stored, and disposed of in a manner approved in the Stormwater Plan.

Additionally, the Mine Operating Permit will have terms and conditions that require the use of best management practices for the safe storage, use, and disposal of these chemicals.

3. Additional Meeting

A comment was received that the public meeting and hearing conducted on the evening of February 8, 2024, was not equitable or conducive, because many local residents do not drive well after dark, and because the town mayor, judge, and town clerk were not in attendance to provide meeting information to residents. The commenter requested an additional meeting.

Response: The Department held a public meeting and public hearing prior to issuance of the permit, and no additional meeting was held or required. The Department's procedures for public participation are designed to provide opportunities for public awareness and involvement consistent with regulatory requirements, including making draft permitting resources available to the public for review and comment where applicable. Although not generally required for minor source air quality construction permits, consistent with S.C. Regulation 61-62.1, the permit application, draft air permit, draft statement of basis were put on public notice, and notice of a public meeting and public hearing were provided on the SC DES Website. In addition to the opportunity to make comments at the public hearing, the Department provided a period for submitting written comments, and resources related to the permit application and draft permit are made available to the public. Public meetings and hearings are open to everyone, and everyone is provided with the same opportunity to provide questions and/or comments on the proposed facility. The Department reviews and considers all comments received relevant to the proposed project and the applicable regulatory and permit requirements. Additionally, the Bureau of Air Quality (BAQ), the Bureau of Land and Waste Management (BLWM), the BOW, and the Community Engagement staff are available to discuss any concerns.

4. Truck Traffic/Roads

A comment was received about the dirt, dust, and noise from trucks. A comment was also received regarding concerns about increased truck traffic and its safety implications. A comment was also received about residue from rock plants affecting driving visibility.

Response: The Department does not have the authority to regulate truck traffic on public roads, as this is under the jurisdiction of the SC Department of Transportation. Additionally, tailpipe exhaust emissions from mobile sources are regulated by the EPA under the authority of the CAA. However, the Department does regulate the fugitive dust from roads within the facility. The permit requires the facility to maintain dust control of its roadways, and the facility must have a Facility Wide Fugitive Dust Control Plan. As part of the facility's

fugitive dust plan, signage shall be posted on site with respect to Sections 56-5-4100 and 56-5-4110 of the S.C. Code of Laws requiring that haul trucks transporting aggregate from quarries prevent the escape of materials loaded onto vehicles, clear spilled material or cargo from highways, and ensure that loads and covers are firmly attached. Other permit and regulatory requirements, discussed under “Air Pollution Impacts,” further address PM and opacity emissions from the facility. These include a requirement that non-enclosed operations to be conducted in a manner such that a minimum of PM becomes airborne.

5. Community/Economics/Quality of Life Concerns and Quarry Location

Comments were received questioning the need for another quarry and asserting employment impacts, structural damages, and potential impacts on lifestyle, property values, the desirability of their community quality of life, and physical and monetary costs.

Response: A community’s quality of life and economy can be impacted by a variety of factors. The Department does not have the authority to base permit decisions on these factors. Furthermore, the Department does not have the authority to dictate where a facility may locate or to make zoning decisions. Zoning and land use decisions are outside of the Department’s purview and are typically made by city or county zoning authorities, usually before a permit request is submitted to the Department. The Department’s decision of whether or not to grant an air quality construction permit is based on the technical review of the proposed project, state and federal air quality regulations, and the project’s ability to comply with those regulatory requirements. The Department has determined that Vulcan Orangeburg has demonstrated it can meet the standards and requirements by operating in accordance with the submitted application and in compliance with permit requirements. As discussed below, the mining permit and National Pollutant Discharge Elimination System (NPDES) permit address other concerns outside the scope of the air quality permit.

6. Blasting

Comments were received with respect to blasting and potential impacts to homes and safety, including the accuracy of the device used to measure force of the blast.

Response: Blasting activities are directly regulated pursuant to the South Carolina Mining Act and mining permits issued under such authority. Accordingly, the comments related to blasting will be considered by the BWLM as part of the mining permit application review.

7. Impacts on Other Non-Air Quality Resources

Comments were received expressing concerns about impacts to non-air quality resources, such as impacts to wildlife/animals (including endangered species), vegetation, land

impacts and present and future land uses, buffer protocols, structures, water quality and quantity, and water usage.

Response: Air permit decisions are based on the applicable air quality regulations and standards in place at the time of the Department’s technical review of the permit application. Based upon this review, the proposed facility has met the requirements for issuance of a permit. The above-referenced non-air quality impacts addressed by commenters are outside the scope of the Department’s air quality regulations and therefore are not addressed in the air quality permit. The facility has also applied for a mining permit from BLWM and for a NPDES permit from BOW. Although not addressed by the air quality permit, other issues raised by the commenters have been considered by BLWM and BOW as applicable to the facility’s mining and water permit reviews. In addition, the secondary NAAQS for PM are set to protect public welfare, including protecting against air pollutant damage to buildings, animals, crops, and vegetation. Impacts to wildlife are also assessed by South Carolina’s Department of Natural Resources (SC DNR) and reviewed by BLWM as part of the mine permit application process.

8. General Opposition

Comments were received regarding the general opposition to the facility.

Response: The Department does not have the authority to make permitting decisions based on general support or opposition to a proposed project. The approval, denial, or modification of a draft permit is instead based on the technical review of the proposed project, the state and federal air quality regulations, and the proposed facility’s ability to meet those regulations.