

**South Carolina Department of Health and Environmental Control
(SC DHEC)
Bureau of Air Quality (BAQ)**

**Response to Comments
SC Pet Foods Solutions, LLC
1299 Duncan Road
Ward, South Carolina 29166
Air Quality Permit No. 1940-0022-CA**

The following is the SC DHEC BAQ's (Department) response to comments made during the permitting period beginning March 16, 2017 through July 5, 2017, regarding the minor source construction permit application for SC Pet Foods Solutions, LLC, located at 1299 Duncan Road in Ward, Saluda County, South Carolina.

During the permitting process, the Department has maintained direct contact with community members and provided a web page with updated information related to all the DHEC permits required for the proposed project. Because this permit is being issued to a minor source of air emissions, no formal public comment period was required by regulations. However, the Department has considered the comments from the community and has responded below.

The Department Decision, permit, statement of basis, this response document, and a letter of notification to citizens who submitted comments or asked to be notified of the decision are available for viewing at the SC DHEC Columbia office located at 2600 Bull Street, Columbia, South Carolina 29201, or our webpage at <http://www.scdhec.gov/Environment/AirQuality/PermittingDecisions/>.

Hardcopies of all the above-listed documents, as well as the written comments received can be requested by contacting our Freedom of Information Office at (803) 898-3882. The following is a summary of all comments submitted and the Department's response.

Public Meeting - A question was received asking if there would be a public meeting.

The level of emissions from the proposed facility allowed the facility to apply for a minor source construction permit. The regulations do not require a public hearing for minor source construction permits, and no regulation requires the Department

to hold a public meeting on an air permit. The Department informed the interested person that no public meeting was being planned, and provided information for staying informed about the project and an opportunity to express any further questions or concerns. The Department also developed a web page to provide the public with updates and important information regarding the proposed project, including a copy of the air permit application. The web page can be found at <http://www.scdhec.gov/SCPetFoodSolutions/>.

In addition, during the permit process the Department conducted community outreach to inform the public of the air permit application and to receive and respond to questions and concerns.

Odors – Commenters expressed concern that the facility may produce odors that may impact residents who live nearby.

There are no state or federal air quality odor regulations. However, SC Pet Foods Solutions, LLC, is voluntarily installing volatile organic compound (VOC) emission control devices to minimize odors that may be generated by the facility processes. These voluntary control devices include a regenerative thermal oxidizer, five scrubbers, and one flare.

Permitting decisions are based on the Department's technical review of an applicant's application and the regulatory requirements in place at the time of the review. The presence of odor 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 facility also includes a wastewater lagoon, which is permitted through a treated wastewater permit. The wastewater permit has a condition to address odor from the wastewater treatment and disposal activities.

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 DHEC regional office whenever an unusual odor is detected so that it can be investigated.