

**South Carolina Department of Health and Environmental Control
Bureau of Air Quality**

**Response to Comments
Public Notice #16-019-CM-RE
CPJ Technologies
Conditional Major Renewal Operating Permit
Taylors, Greenville County, South Carolina
Permit No. 1200-0068**

The following is the South Carolina Department of Health and Environmental Control (DHEC) Bureau of Air Quality's (Department) response to comments made and issues raised during the formal comment period from April 26 to May 27, 2016, and the public meeting held on May 09, 2016, regarding the Conditional Major renewal operating permit for CPJ Technologies (CPJ or facility) at 200 Tanner Drive in Taylors, Greenville County. The Department Decision, permit, statement of basis, this response document, and a letter of notification to citizens who submitted comments are available for viewing at the SC DHEC Columbia office located at 2600 Bull Street, Columbia, SC 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 also be requested by contacting our Freedom of Information Office at (803) 898-3882.

Health Impacts: Comments were received concerning air pollutant emissions from the facility's process and the potential health impacts.

Federal and state air quality regulations are established to be protective of public health, using scientific data and human health risk exposure. These regulations include setting standards for ambient air and setting emission limits, controls and/or operational requirements for industrial plants.

The Clean Air Act requires the United States Environmental Protection Agency (EPA) to establish National Ambient Air Quality Standards (NAAQS) for six common pollutants ("criteria" pollutants) considered harmful to public health. The EPA regularly reviews scientific data to set concentration limits to protect public health with an adequate margin of safety, including the health of sensitive populations such as asthmatics, children, and the elderly. Ambient monitoring data throughout the country is evaluated to determine if an area is not meeting those national standards

(non-attainment). South Carolina has no areas in the state designated as non-attainment. There are no national ambient standards for hazardous air pollutants (HAPs). However, South Carolina does have air toxic concentration standards through SC Regulation 61-62.5, Standard 8 - Toxic Air Pollutants. These air toxics standards include concentration limits for all 187 federal HAPs and an additional 61 other air pollutants that South Carolina has deemed to be toxic air pollutants.

The Department's permitting regulations require facilities demonstrate compliance with the NAAQS and state air toxics standard at the facility boundary and beyond into the community. Compliance is demonstrated by either emitting pollution at levels below a specified threshold or through air dispersion modeling. Using the EPA-approved computer model, the facility demonstrated that the maximum ambient air concentrations were well below these standards. Further, to address community concerns about pollution levels, a worst-case emissions scenario was developed by using uncontrolled emissions in the model; typically, facilities model emissions based on controlled emission levels. Compliance with these state and federal standards was shown using these uncontrolled concentrations. Additionally, the permit requires air toxic emissions from the process to be vented through a 95% efficient scrubber control technology.

Odor Impacts: Comments were received about odors from the facility's process and the impacts of those odors. One commenter stated the odors made them physically ill and that they had to once evacuate their store, losing revenue. One commenter asked if they were safe when exposed to odors. There was a request to require a tree buffer. There was a request that the Department provide the facility with addresses where odors have been experienced and logged. There was a request that the operating permit not be renewed until the odor issues are resolved.

There are no federal or state air quality odor regulations. 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 Department specifically reviewed the modeling for the three of the most odor-causing pollutants at CPJ: acrylic acid, ethyl acrylate and trimethylamine. Modeling demonstrated that even at uncontrolled levels, the emissions were well below the air toxics standards. The permit requires the scrubber control device be used when the processes are running and requires frequent monitoring to show the control device is operating efficiently.

While there are no federal or state odor regulations, the Department has provided opportunities for the community's odor concerns to be addressed. Odor logs were

distributed to members of the community to document specific information to be shared with the Department and the facility. With consistent use and complete information, these logs can be a useful tool in identifying trends that could lead toward a solution. In addition, the Department encouraged the facility to develop an Odor Control Plan. CPJ Technologies' Odor Control Plan is a non-regulatory procedure that details the monitoring and recording of the facility's processes, promotes the use of odor logs, and outlines the procedures of the facility's odor hotline number that provides direct access to the plant manager. The Department has also remained engaged with community members to ensure concerns and questions are heard, and to discuss opportunities to promote dialogue and engagement. The Department encourages the community and facility to continue to communicate with each other, as well as other stakeholders who may have an interest.

- **Sharing of Personal Information:** We heard the concern regarding the sharing of odor logs filled out by citizens and provided to DHEC. There are privacy laws that we must follow to protect personal information of citizens that includes name(s) and address(es). Per S.C. Code Ann. §§ 30-4-10 et seq., "Freedom of Information Act," state agencies may not disclose information that may reveal the identity of any individual who has made a complaint that may allege a violation or potential violation of law or regulation to a state regulatory agency. The Department did provide CPJ with the dates, times, and general location when the odors were observed by residents. We are working on developing a resolution that will allow us to share this information with nearby industries.
- **Buffer request:** While the Department agrees that trees can provide air quality benefits, it cannot require a facility to plant a buffer of trees.
- **Permit Issuance:** Permitting decisions are based on a technical review of a facility's application and the regulatory requirements in place at the time of the review. The Department, by statute, must issue a permit if it can be shown that the facility can meet the federal and state air quality requirements. This renewed operating permit requires more frequent monitoring on the control device. Additionally, emissions were modeled at uncontrolled levels rather than a controlled scenario; the modeling showed that national criteria pollutant standards and state air toxic standards were being met. The Department is committed to continue working with the community, CPJ and other stakeholders to address odor concerns.