

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

**Response to Comments  
Public Notice #14-006-CM-C  
Jones-Hamilton Company Synthetic Minor Construction Permit  
Richburg, Chester County, South Carolina  
Permit No. 0640-0069-CA**

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 held February 7 through March 20, 2014, and the public hearing held on March 13, 2014, regarding the draft synthetic minor construction permit for Jones-Hamilton Company (Jones-Hamilton) at 4544 Lancaster Highway in Richburg, Chester County. The written comments received regarding the draft permit are available for viewing at the SC DHEC Columbia office located at 2600 Bull Street, Columbia, SC 29201, or on the SC DHEC webpage (<http://www.scdhec.gov/environment/baq/PermittingDecisions>), or hardcopies can be requested by contacting our Freedom of Information Office at (803) 898-3882.

**Air Pollution Impact** - Several comments were received regarding air pollution emissions from the proposed operation. The Clean Air Act requires the 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 uses and regularly reviews all available scientific data to set concentration limits to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly. These NAAQS are set to protect human health with an adequate margin of safety. The EPA is also required to designate areas of the country as either meeting the standards ("attainment") or not meeting the standards ("nonattainment"). With the exception of a portion of York County, South Carolina is in attainment with the NAAQS.

The EPA has not established national ambient air standards for air toxics. South Carolina does have a state air toxic standard (S.C. Regulation 61-62.5, Standard No. 8 - Toxic Air Pollutants) that sets maximum allowable concentrations that facilities must meet at the fence line and beyond into the community. Using an EPA-approved air dispersion model, Jones-Hamilton has demonstrated compliance with the applicable federal ambient standards and the state air toxics standard.

**Cancer Rates and Air Pollution Impact** - Several comments stated that Chester County has a high incidence of cancer and expressed concern that emissions from the proposed facility would add to this situation. The air quality regulations are designed to be protective of public health and welfare. As part of the permit review, the Department determines if the facility can demonstrate compliance with the state and federal air quality standards. In accordance with Section 48-1-100(A) of South Carolina Pollution Control Act, the Bureau of Air Quality must issue a permit if an applicant submits an application indicating that all applicable standards can be met while in operation.

Additionally, the main pollutants that will be emitted by the proposed facility will be particulate matter in the form of sodium chloride (i.e., table salt) and food grade sodium bisulfate (an additive used to lower the pH of food without adding a sour taste), hydrochloric acid, and trace amounts of sulfuric acid. Hydrochloric acid is a byproduct of the production of sodium bisulfate, which Jones-Hamilton condenses and sells. These four substances are not classified as carcinogens by the EPA or the International Agency for Research on Cancer. Finally, DHEC's South Carolina Central Cancer Registry (SCCCR) was requested to address the issue of high cancer incidence. SCCCR produced a Cancer Data Summary document for Chester County, which was provided at the public meeting and public hearing. To obtain a copy of the document or if you have any further questions regarding cancer in Chester County, please contact Susan Bolick, Director of SCCCR, at (803) 896-2100 or bolicks@dhec.sc.gov.

**Proximity to Residences** - Comments stated that the facility would be located too close to residences. Where a facility may locate is dictated by zoning. All zoning decisions are made at the local level by a city or county zoning authority, usually before a permit request is submitted to DHEC. If a facility meets all applicable state and federal air quality standards at a certain location, DHEC does not have the regulatory authority to deny a permit action because it is located close to a residential area. Please contact your local city or county Council representatives for more information on how to get involved in local zoning issues.

**Air Monitoring**- Several comments requested that an air monitoring station be installed in the area. Monitoring stations in South Carolina's ambient air monitoring network are specifically located to represent ambient pollution levels in a diverse set of geographical areas.

The EPA has determined a minimum number of monitoring sites that must be established and maintained for each pollutant. DHEC annually reviews the monitoring network to make sure the minimum requirements and the needs of the air program are met. The Annual Ambient Air Network Monitoring Plan is made available for public review and EPA approval to incorporate network changes that may be needed to meet new requirements, address new questions or redirect resources.

In response to air concerns in the Chester area, DHEC's Bureau of Air Quality is implementing a citizen-led air quality work group. The work group will serve as a means to communicate how DHEC monitors the air along the I-77 corridor. If you have any interest in participating in this workgroup, please contact Lawra Boyce at (803) 898-4585.

**General Opposition and Support**- DHEC received general comments supporting the issuance of a permit for this facility. The Department cannot make permitting decisions based on community approval or disapproval of the company/facility. The Department's decision is based on the Department's technical review of an applicant's application and the regulatory requirements in place at the time of the Department's review. The Department appreciates all comments made regarding the Jones-Hamilton Company.