

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

**Response to Comments
Public Notice #14-032-TV-C
Piedmont Wood Pellets - Johnston Synthetic Minor Construction Permit
Johnston, Edgefield County, South Carolina
Permit No. 0980-0047-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 April 2, 2014, through May 1, 2014, and the public Meeting held on April 15, 2014, regarding the draft synthetic minor construction permit for Piedmont Wood Pellets – Johnston LLC at Across from 490 on Highway 121 in Edgefield 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.

1. **Truck Traffic** – A comment was received regarding the impact from additional truck traffic.

Response: The number of trucks traveling to and from the facility is estimated to be 130 trucks per day. Emissions from mobile sources are regulated by the US. Environmental Protection Agency (EPA) under the authority of the Clean Air Act. The Department does not have the authority to regulate truck traffic on public roads.

2. **Noise** – A comment was received regarding noise that maybe created by the facility.

Response: The Department does not have any noise regulations and therefore no authority to regulate or base a permit decision on noise levels. Edgefield County has a noise ordinance and excessive noise should be reported to the county. However, excessive noise levels that are not usual for a site should be reported to the DHEC regional office. This could be an indication that equipment is not operating properly. The facility has indicated that the chippers will be enclosed in a building, the site will be set back from the property lines, and a buffer of trees are to be planted to minimize any noise impacts off site.

3. **Odor** – A comment was received regarding odor.

Response: There are no state or federal odor regulations. However, the Department's Regional offices investigate citizen complaints, including odor complaints. The presence of odor does not necessarily signal the presence of dangerous air pollution. Many air pollutants have odor thresholds far below the level that would cause harm.

4. **Proximity to Schools and Churches** – A comment was made that there are three schools and a church within two miles of the proposed facility.

Response: Where a facility may locate is dictated by zoning. All zoning decisions are made at the local level by 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 too close to a school or church. State and federal air regulations are protective of human health and welfare.

5. **Environmental Justice** – A comment was made that environmental justice should be considered prior to issuing the permit.

Response: Environmental justice is defined by Executive Order 12898, which was signed by President Clinton in 1994, as “the fair treatment and meaningful involvement of all people regardless of race, color, sex, national origin, or income with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies.” While this policy advocates for environmental justice, it is not a law or regulation. Therefore, it does not give DHEC any legal authority to address quality of life issues that may be associated with a proposed facility. However, as part of our public participation process, the Bureau does inform the company seeking a permit of the concerns that we receive from community members, such as noise, odors, truck traffic, and property values, and encourages the company to address these concerns directly with community members.