S.C. Department of Health and Environmental Control

Department Decision

Air Quality Synthetic Minor Construction Permit
Permit No. 2320-0049-CA

RDA, LLC
Seaboard Road
Andrews, South Carolina 29510

March 25, 2019

In accordance with the 1976 Code of Laws of South Carolina, as amended, including SC Code Section 44-1-60(D), a Department Decision has been made to issue Air Quality Synthetic Minor Construction Permit No. 2320-0049-CA to the above-named permittee. This permit was previously placed on public notice and open for public comment from June 20, 2018, through August 10, 2018. A joint public hearing was held by SC DHEC's Bureau of Air Quality and Bureau of Land and Waste Management on July 26, 2018, to receive oral and written comments on the proposed project. Adverse public comments were received by SC DHEC during the comment period. Comments received during the formal comment period regarding air quality issues have been addressed in SC DHEC's *Responses to Comments* document attached to this Department Decision. SC DHEC's decision to issue this permit has been made after consideration and a complete review of the following: the air permit application, applicable state and federal air quality regulations, comments and concerns made at the public hearing and all other comments received within the required time frame, the public hearing transcript, and all other pertinent information.

This Department Decision regarding Air Quality Synthetic Minor Construction Permit No. 2320-0049-CA includes the following; a) the issued permit (Attachment A) which meets the requirements of all applicable air quality regulations; b) a summary of the project, permit, and applicable regulations as outlined in the Statement of Basis (Attachment B); and c) a summary of the comments made by concerned citizens regarding air quality issues and responses by the Bureau of Air Quality, as outlined in the *Responses to Comments Permit No. 2320-0049-CA* (Attachment C). This Department Decision (including attachments) will be included in SC DHEC's administrative record for this permit decision.

Alyson Hayes for

Steve McCaslin, P. E., Director
Air Permitting Division
Bureau of Air Quality

Attachment A

Air Quality Synthetic Minor Construction Permit
Permit No. 2320-0049-CA

S.C. Department of Health and Environmental Control

Bureau of Air Quality
Synthetic Minor Construction Permit

RDA, LLC
Seaboard Road
Andrews, South Carolina 29510
Williamsburg County

In accordance with the provisions of the Pollution Control Act, Sections 48-1-50(5), 48-1-100(A), and 48-1-110(a), the 1976 Code of Laws of South Carolina, as amended, and South Carolina Regulation 61-62, Air Pollution Control Regulations and Standards, the Bureau of Air Quality authorizes the construction of this facility and the equipment specified herein in accordance with the plans, specifications, and other information submitted in the construction permit application received on June 27, 2017, as amended. All official correspondence, plans, permit applications, and written statements are an integral part of the permit. Any false information or misrepresentation in the application for a construction permit may be grounds for permit revocation.

The construction and subsequent operation of this facility is subject to and conditioned upon the terms, limitations, standards, and schedules contained herein or as specified by this permit and its accompanying attachments.

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Permit Number: **2320-0049-CA**
Issue Date: **March 25, 2019**

Steve McCaslin, P. E., Director
Air Permitting Division
Bureau of Air Quality

A. PROJECT DESCRIPTION

Permission is hereby granted to construct a new 500 tph crushed limestone processing plant. It will consist of stone crushing, conveying, screening and washing operations.

B.1 - EQUIPMENT FOR EMISSION UNIT 01 – STONE CRUSHING

Equipment ID	Equipment Description	Capacity (tph)	Subject to NSPS Subpart OOO	Control Device ID	Emission Point ID
CR1	Primary Crusher #1	500	Yes	WS	V1
CR2	Secondary Crusher #2	400	Yes	WS	V20
CR3	Tertiary Crusher #3	400	Yes	WS	V31

B.2 - EQUIPMENT FOR EMISSION UNIT 02 – STONE CONVEYING

Equipment ID	Equipment Description	Capacity (tph)	Subject to NSPS Subpart OOO	Control Device ID	Emission Point ID
C1a	42″ Conveyor #1a	500	Yes	WS	V2a
C1b	42″ Conveyor #1b	500	Yes	WS	V2b
C2	42″ Conveyor #2	150	Yes	WS	V5
C3	42″ Conveyor #3	150	Yes	WS	V6
C4	36″ Conveyor #4	400	Yes	WS	V8
C5	48″ Conveyor #5	400	Yes	WS	V10
C6	36″ Conveyor #6	400	Yes	WS	V11
C7	36″ Conveyor #7	50	Yes	WS	V14
C8	36″ Conveyor #8	50	Yes	WS	V15
C9	26″ Conveyor #9	50	Yes	WS	V17
C10	42″ Conveyor #10	50	Yes	WS	V18
C11	36″ Conveyor #11	400	Yes	WS	V21
C12	36″ Conveyor #12	400	Yes	WS	V22
C13	36″ Conveyor #13	75	Yes	WS	V25
C14	36″ Conveyor #14	75	Yes	WS	V26
C15	36″ Conveyor #15	75	Yes	WS	V28
C16	36″ Conveyor #16	75	Yes	WS	V29
C17	36″ Conveyor #17	290	Yes	WS	V32
C18	36″ Conveyor #18	290	Yes	WS	V33
C19	66″ Conveyor #19	90	Yes	WS	V36
C20	36″ Conveyor #20	90	Yes	WS	V37
C21	36″ Conveyor #21	80	Yes	WS	V39

B.2 - EQUIPMENT FOR EMISSION UNIT 02 – STONE CONVEYING

Equipment ID	Equipment Description	Capacity (tph)	Subject to NSPS Subpart OOO	Control Device ID	Emission Point ID
C22	36" Conveyor #22	80	Yes	WS	V40
C23	36" Conveyor #23	75	Yes	WS	V42
C24	48" Conveyor #24	75	Yes	WS	V43

B.3 - EQUIPMENT FOR EMISSION UNIT 03 – STONE SCREENING

Equipment ID	Equipment Description	Capacity (tph)	Subject to NSPS Subpart OOO	Control Device ID	Emission Point ID
S1	96 ft^2 Scalping Screen #1	500	Yes	WS	V4
S2	120 ft^2 Secondary Screen #2	400	Yes	WS	V13
S4	120 ft^2 Quaternary Screen #4 (Fines)	290	Yes	WS	V35

B.4 – CONTROL DEVICES

Control Device ID	Control Device Description	Pollutants Controlled
WS	Wet Suppression	PM, PM_{10}, $PM_{2.5}$

B.5 - EQUIPMENT FOR EMISSION UNIT 04 – STONE WASHING

Equipment ID	Equipment Description	Capacity (tph)	Subject to NSPS Subpart OOO	Control Device ID	Emission Point ID
SS1	Sand Screw	150	No	None	SS1
S3	Tertiary Screen #3	400	No	None	V24

C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS

Condition Number	Conditions
C.1	**Equipment ID:** All **Control Device ID:** All (S.C. Regulation 61-62.1, Section II.J.1.g) A copy of the Department issued construction and/or operating permit must be kept readily available at the facility at all times. The owner or operator shall maintain such operational records; make reports; install, use, and maintain monitoring equipment

C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS

Condition Number	Conditions
	or methods; sample and analyze emissions or discharges in accordance with prescribed methods at locations, intervals, and procedures as the Department shall prescribe; and provide such other information as the Department reasonably may require. All records required to demonstrate compliance with the limits established under this permit shall be maintained on site for a period of at least 5 years from the date the record was generated and shall be made available to a Department representative upon request.
C.2	**Emission Unit ID:** 01-03 **Equipment/Control Device ID:** All For any source test required under an applicable standard or permit condition, the owner, operator, or representative shall comply with S.C. Regulation 61-62.1, Section IV - Source Tests. Unless approved otherwise by the Department, the owner, operator, or representative shall ensure that source tests are conducted while the source is operating at the maximum expected production rate or other production rate or operating parameter which would result in the highest emissions for the pollutants being tested. Some sources may have to spike fuels or raw materials to avoid being subjected to a more restrictive feed or process rate. Any source test performed at a production rate less than the rated capacity may result in permit limits on emission rates, including limits on production if necessary. The owner or operator shall comply with any limits that result from conducting a source test at less than rated capacity. A copy of the most recent Department issued source test summary letter, whether it imposes a limit or not, shall be maintained with the operating permit, for each source that is required to conduct a source test. Site-specific test plans and amendments, notifications, and source test reports shall be submitted to the Manager of the Source Evaluation Section, Bureau of Air Quality.
C.3	**Emission Unit ID:** 01-04 **Equipment/Control Device ID:** All (S.C. Regulation 61-62.5, Standard No. 4, Section VIII) Particulate matter emissions shall be limited to the rate specified by use of the following equations: For process weight rates less than or equal to 30 tons per hour $E = (F)\ 4.10P^{0.67}$ and For process weight rates greater than 30 tons per hour $E = (F)\ 55.0P^{0.11} - 40$ Where E = the allowable emission rate in pounds per hour P = process weight rate in tons per hour F = effect factor from Table B in S.C. Regulation 61-62.5, Standard No. 4 For the purposes of compliance with this condition, the process boundaries are defined as follows:

C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS

<table>
<tr><th>Condition Number</th><th>Conditions</th></tr>
<tr><td></td><td>
<table>
<tr><th>Process/Equipment IDs</th><th>Max Process Weight Rate (ton/hr)</th></tr>
<tr><td>Crushed Stone Processing (including storage piles)</td><td>500</td></tr>
</table>
</td></tr>
<tr><td>C.4</td><td>Emission Unit ID: 01 - 04
Equipment/Control Device ID: All

(S.C. Regulation 61-62.5, Standard No. 4, Section IX) Where construction or modification began after December 31, 1985, emissions from these sources (including fugitive emissions) shall not exhibit an opacity greater than 20%, each.</td></tr>
<tr><td>C.5</td><td>Emission Unit ID: All
Equipment/Control Device ID: Non-Enclosed Operations and Fugitive Dust

(S.C. Regulation 61-62.5, Standard No. 4, Section X) All non-enclosed operations shall be conducted in such a manner that a minimum of particulate matter becomes airborne. In no case shall established ambient air quality standards be exceeded at or beyond the property line. The owner/operator of all such operations shall maintain dust control of the premises and any roadway owned or controlled by the owner/operator by paving or other suitable measures. Oil treatment is prohibited.

(SC Regulation 61-62.6 Section III.a) Emissions of fugitive particulate matter shall be controlled in such a manner and to the degree that it does not create an undesirable level of air pollution.

(SC Regulation 61-62.6 Section III.b) Restrictions and requirements may be contained in operating permits on a case-by-case basis that are deemed appropriate and necessary to control fugitive particulate matter in accordance with reasonably available control technology.

(SC Regulation 61-62.6 Section III.c) Any method of materials handling which will generate fugitive particulate matter that is not fully described in the permit application shall not be used.

Compliance with non-enclosed operations and fugitive dust requirements shall be demonstrated by developing a facility-wide fugitive dust control plan for controlling fugitive emissions from process operations, truck traffic, storage piles, and any other areas within the permitted facility where fugitive dust emissions can be generated. The plan shall be developed and submitted to the Director of Air Permitting for approval 180 days prior to the start of operation. The owner/operator shall implement the plan within 30 days of approval and create a schedule for its periodic review and update. The plan shall be kept and maintained on-site with a record of revisions. The plan shall address and/or contain at a minimum the following:
1. Water Trucks
a. Weekly operation and maintenance checks of water trucks
b. Operating scenarios for water truck failures or inadequacies</td></tr>
</table>

C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS

Condition Number	Conditions
	c. Dates the water trucks did not operate and the alternative(s) dust control method used 2. Truck Traffic a. Road speed limits b. Vehicle loading, off-loading, transportation or dumping of material procedures c. Spillage and residual materials clean-up procedures d. Weekly operation and maintenance checks of sprinklers e. Signage with respect to SC Code of Laws Sections 56-5-4100 and 56-5-4110 (which requires haul trucks transporting aggregate from all quarries to prevent the escape of materials loaded onto the vehicles) 3. Storage Piles a. Material stock piling procedures 4. Process Equipment a. Weekly operation and maintenance checks of all plant equipment and enclosures b. Spillage and residual materials clean-up procedures c. Written guidelines on how to handle opacity problems The owner/operator shall develop logs or use other approved methods to comply with the requirements of the plan.
C.6	**Emission Unit ID:** 01-03 **Equipment/Control Device ID:** Wet Suppression Systems The owner/operator shall operate its wet suppression system except as necessary to accommodate weather conditions or elevated material moisture content (i.e. rainfall). In case the wet suppression system is not operating properly, then a portable water spray system is acceptable for use until the permanent water spray system is back in proper operation. If a portable water system is not available, then the process shall be shut down until the permanent water spray system is back in proper operation. The owner/operator shall perform weekly inspections of all wet suppression related equipment including a check that water is flowing to discharge spray nozzles in the wet suppression system. The owner/operator must initiate corrective action within 24 hours and complete corrective action as expediently as practical if the owner/operator finds that water is not flowing properly during an inspection of the water spray nozzles. The owner/operator must record each inspection of the water spray nozzles, including the date of each inspection and any corrective actions taken in the logbook. The weekly inspections required in this condition meets the requirements of monthly inspections in 40 CFR 60.674(b).
C.7	**Emission Unit ID:** All **Equipment/Control Device ID:** All (S.C. Regulation 61-62.1, Section II.G and Section II.E) This facility is a potential major source for PM and PM_{10} emissions. The facility has agreed to federally enforceable operating limitations to limit its

C. LIMITATIONS, MONITORING AND REPORTING CONDITIONS

Condition Number	Conditions
	potential to emit to less than 250.0 tons per year for PM and PM_{10} emissions to avoid PSD and less than 100.0 tons per year for PM_{10} emissions to avoid Title V. The owner/operator shall show compliance with these limits by operating its control devices in accordance with the conditions of this permit. The logs required in this permit shall be maintained on site. However, in the event of enforcement actions or complaints, the Department may require that these logs be reported annually.

D. SOURCES SUBJECT TO 40 CFR 60 SUBPART OOO

Condition Number	Conditions
D.1	**Emission Unit ID:** 01-03 **Equipment/Control Device ID:** All This facility is subject to the provisions of 40 CFR Part 60, New Source Performance Standards General Provisions, Subparts A and Standards of Performance for Nonmetallic Mineral Processing Plants, Subpart OOO. Any new affected sources shall comply with the requirements of these Subparts upon initial start-up unless otherwise noted.
D.2	**Emission Unit ID:** 01-03 **Equipment/Control Device ID:** All 40 CFR 60.670(a)(1) Except as provided in paragraphs (a)(2), (b), (c), and (d) of this section, the provisions of this subpart are applicable to the following affected facilities in fixed or portable nonmetallic mineral processing plants: each crusher, grinding mill, screening operation, bucket elevator, belt conveyor, bagging operation, storage bin, enclosed truck or railcar loading station. Also, crushers and grinding mills at hot mix asphalt facilities that reduce the size of nonmetallic minerals embedded in recycled asphalt pavement and subsequent affected facilities up to, but not including, the first storage silo or bin are subject to the provisions of this subpart. 40 CFR 60.670(e) An affected facility under paragraph (a) of this section that commences construction, modification, or reconstruction after August 31, 1983, is subject to the requirements of this part
D.3	**Emission Unit ID:** 01-03 **Equipment/Control Device ID:** All (40 CFR 60.672(b)) Affected facilities must meet the fugitive emission limits and compliance requirements in Table 3 of this subpart within 60 days after achieving the maximum production rate at which the affected facility will be operated, but not later than 180 days after initial startup as required under 40 CFR 60.11. The requirements in Table 3 of this subpart apply for fugitive emissions from affected facilities without capture systems and for fugitive emissions escaping capture systems.

<table>
<tr><th>Condition Number</th><th>Conditions</th></tr>
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<table>
<tr><th>For</th><th>The owner or operator must meet the following fugitive emissions limit for grinding mills, screening operations, bucket elevators, transfer points on belt conveyors, bagging operations, storage bins, enclosed truck or railcar loading stations or from any other affected facility</th><th>The owner or operator must meet the following fugitive emissions limit for crushers at which a capture system is not used</th><th>The owner or operator must demonstrate compliance with these limits by conducting</th></tr>
<tr><td>Affected facilities that commence construction, modification, or reconstruct on or after April 22, 2008</td><td>7 percent opacity</td><td>12 percent opacity</td><td>An initial performance test according to 40 CFR 60.11 and 60.675; and Periodic inspections of water sprays according to 40CFR 60.674(b) and 60.676(b); Affected facilities controlled by water carryover from upstream water sprays that are inspected according to the requirements in 40 CFR 60.674(b) and 60.676(b) are exempt from this 5-year repeat testing requirement.</td></tr>
</table>

(40 CFR 60.672(d)) Truck dumping of nonmetallic minerals into any screening operation, feed hopper, or crusher is exempt from the requirements of this section.
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Condition Number	Conditions
D.4	**Emission Unit ID:** 01-03 **Equipment/Control Device ID:** All (40 CFR 60.675(c)(1)) In determining compliance with the particulate matter standards in 40 CFR 60.672(b), the owner or operator shall use Method 9 of Appendix A-4 of this part and the procedures in 40CFR 60.11, with the following additions: (i) The minimum distance between the observer and the emission source shall be 4.57 meters (15 feet). (ii) The observer shall, when possible, select a position that minimizes interference from other fugitive emission sources (*e.g.,* road dust). The required observer position relative to the sun (Method 9 of Appendix A-4 of this part, Section 2.1) must be followed. (iii) For affected facilities using wet dust suppression for particulate matter control, a visible mist is sometimes generated by the spray. The water mist must not be confused with particulate matter emissions and is not to be considered a visible emission. When a water mist of this nature is present, the observation of emissions is to be made at a point in the plume where the mist is no longer visible. (40 CFR 60.675(c)(3)) When determining compliance with the fugitive emissions standard for any affected facility described under 40 CFR 60.672(b), the duration of the Method 9 (40 CFR part 60, Appendix A-4) observations must be 30 minutes (five 6-minute averages). Compliance with the applicable fugitive emission limits in Table 3 of this subpart must be based on the average of the five 6-minute averages.
D.5	**Emission Unit ID:** 01-03 **Equipment/Control Device ID:** All (40 CFR 60.674(b)) The owner or operator of any affected facility for which construction, modification, or reconstruction commenced on or after April 22, 2008, that uses wet suppression to control emissions from the affected facility must perform monthly periodic inspections to check that water is flowing to discharge spray nozzles in the wet suppression system. The owner or operator must initiate corrective action within 24 hours and complete corrective action as expediently as practical if the owner or operator finds that water is not flowing properly during an inspection of the water spray nozzles. The owner or operator must record each inspection of the water spray nozzles, including the date of each inspection and any corrective actions taken, in the logbook required under 40 CFR 60.676(b). (1) If an affected facility relies on water carryover from upstream water sprays to control fugitive emissions, then that affected facility is exempt from the 5-year repeat testing requirement specified in Table 3 of this subpart provided that the affected facility meets the criteria in paragraphs (b)(1)(i) and (ii) of this section:

Condition Number	Conditions
	(i) The owner or operator of the affected facility conducts periodic inspections of the upstream water spray(s) that are responsible for controlling fugitive emissions from the affected facility. These inspections are conducted according to paragraph (b) of this section and 40 CFR 60.676(b). (ii) The owner or operator of the affected facility designates which upstream water spray(s) will be periodically inspected at the time of the initial performance test required under 40 CFR 60.11 of this part and 40 CFR 60.675 of this subpart. (2) If an affected facility that routinely uses wet suppression water sprays ceases operation of the water sprays or is using a control mechanism to reduce fugitive emissions other than water sprays during the monthly inspection (for example, water from recent rainfall), the logbook entry required under 40 CFR 60.676(b) must specify the control mechanism being used instead of the water sprays. (40 CFR 60.676(b)(1)) Owners or operators of affected facilities for which construction, modification, or reconstruction commenced on or after April 22, 2008, must record each periodic inspection required under 40 CFR 60.674(b), including dates and any corrective actions taken, in a logbook (in written or electronic format). The owner or operator must keep the logbook onsite and make hard or electronic copies (whichever is requested) of the logbook available to the Department upon request.
D.6	**Emission Unit ID:** 01-03 **Equipment/Control Device ID:** All (40 CFR 60.670(d)) (1) When an existing facility is replaced by a piece of equipment of equal or smaller size, as defined in 40 CFR 60.671, having the same function as the existing facility, and there is no increase in the amount of emissions, the new facility is exempt from the provisions of 40 CFR 60.672, 60.674, and 60.675 except as provided for in paragraph (d)(3) of this section. (2) An owner or operator complying with paragraph (d)(1) of this section shall submit the information required in 40 CFR 60.676(a). (3) An owner or operator replacing all existing facilities in a production line with new facilities does not qualify for the exemption described in paragraph (d)(1) of this section and must comply with the provisions of 40 CFR 60.672, 60.674 and 60.675. (40 CFR 60.676(a)) Each owner or operator seeking to comply with 40 CFR 60.670(d) shall submit to the Department the following information about the existing facility being replaced and the replacement piece of equipment. (1) For a crusher, grinding mill, bucket elevator, bagging operation, or enclosed truck or railcar loading station: (i) The rated capacity in megagrams or tons per hour of the existing facility being replaced and (ii) The rated capacity in tons per hour of the replacement equipment. (2) For a screening operation:

Condition Number	Conditions
	(i) The total surface area of the top screen of the existing screening operation being replaced and (ii) The total surface area of the top screen of the replacement screening operation. (3) For a conveyor belt: (i) The width of the existing belt being replaced and (ii) The width of the replacement conveyor belt. (4) For a storage bin: (i) The rated capacity in megagrams or tons of the existing storage bin being replaced and (ii) The rated capacity in megagrams or tons of replacement storage bins.
D.7	**Emission Unit ID:** 01-03 **Equipment/Control Device ID:** All (40 CFR 60.676(f) The owner or operator of any affected facility shall submit written reports of the results of all performance tests conducted to demonstrate compliance with the standards set forth in 40 CFR 60.672 of this subpart, including reports of opacity observations made using Method 9 (40 CFR part 60, Appendix A-4) to demonstrate compliance with 40 CFR 60.672(b). (40 CFR 60.676(h)) The subpart A requirement under 40 CFR 60.7(a)(1) for notification of the date construction or reconstruction commenced is waived for affected facilities under this subpart. (40 CFR 60.676((i)) A notification of the actual date of initial startup of each affected facility shall be submitted to the Department. (1) For a combination of affected facilities in a production line that begin actual initial startup on the same day, a single notification of startup may be submitted by the owner or operator to the Department. The notification shall be postmarked within 15 days after such date and shall include a description of each affected facility, equipment manufacturer, and serial number of the equipment, if available. (2) For portable aggregate processing plants, the notification of the actual date of initial startup shall include both the home office and the current address or location of the portable plant.
D.8	**Emission Unit ID:** 04 **Equipment/Control Device ID:** All (40CFR60.676(g)) The owner/operator of any wet material processing operation that processes saturated and subsequently processes unsaturated materials, shall submit a report of this change within 30 days following such change. At the time of such change, this screening operation, bucket elevator, or belt conveyor becomes subject to the applicable opacity limit in 40CFR60.672(b) and the emission test requirements of 40CFR60.11 if it meets the 40CFR60 Subpart OOO applicability requirements.

E. AMBIENT AIR STANDARDS REQUIREMENTS

Condition Number	Condition
E.1	Air dispersion modeling (or other method) has demonstrated that this facility's operation will not interfere with the attainment and maintenance of any state or federal ambient air standard. Any changes in the parameters used in this demonstration may require a review by the facility to determine continuing compliance with these standards. These potential changes include any decrease in stack height, decrease in stack velocity, increase in stack diameter, decrease in stack exit temperature, increase in building height or building additions, increase in emission rates, decrease in distance between stack and property line, changes in vertical stack orientation, and installation of a rain cap that impedes vertical flow. Parameters that are not required in the determination will not invalidate the demonstration if they are modified. The emission rates used in the determination are listed in Attachment - Emission Rates for Ambient Air Standards of this permit. Higher emission rates may be administratively incorporated into Attachment - Emission Rates for Ambient Air Standards of this permit provided a demonstration using these higher emission rates shows the attainment and maintenance of any state or federal ambient air quality standard or with any other applicable requirement. Variations from the input parameters in the demonstration shall not constitute a violation unless the maximum allowable ambient concentrations identified in the standard are exceeded. The owner/operator shall maintain this facility at or below the emission rates as listed in Attachment - Emission Rates for Ambient Air Standards, not to exceed the pollutant limitations of this permit. Should the facility wish to increase the emission rates listed in Attachment - Emission Rates for Ambient Air Standards, not to exceed the pollutant limitations in the body of this permit, it may do so by the administrative process specified above. This is a State Only enforceable requirement.

F. PERIODIC REPORTING SCHEDULE

Compliance Monitoring Report Submittal Frequency	Reporting Period (Begins on the startup date of the source.)	Report Due Date
Annual	January-December April-March July-June October-September	January 30 April 30 July 30 October 30
Note: This reporting schedule does not supersede any federal reporting requirements including but not limited to 40 CFR Part 60, 40 CFR Part 61, and 40 CFR Part 63. All federal reports must meet the reporting time frames specified in the federal standard unless the Department or EPA approves a change.		

G. REPORTING CONDITIONS

Condition Number	Condition
G.1	Reporting required in this permit, shall be submitted in a timely manner as directed in the Periodic Reporting Schedule of this permit.
G.2	All reports and notifications required under this permit shall be submitted to the person indicated in the specific condition at the following address: **2600 Bull Street** **Columbia, SC 29201** The contact information for the local EQC Regional office can be found at: **http://www.scdhec.gov**
G.3	The owner/operator shall submit written notification to the Director of Air Permitting of the date construction is commenced, postmarked within 30 days after such date.
G.4	Unless elsewhere specified within this permit, all reports required under this permit shall be submitted to the Manager of the Technical Management Section, Bureau of Air Quality.
G.5	(S.C. Regulation 61-62.1, Section II.J) For sources not required to have continuous emission monitors, any malfunction of air pollution control equipment or system, process upset, or other equipment failure which results in discharges of air contaminants lasting for one (1) hour or more and which are greater than those discharges described for normal operation in the permit application, shall be reported to the Department within twenty-four (24) hours after the beginning of the occurrence and a written report shall be submitted to the Department within thirty (30) days. The written report shall include, at a minimum, the following: 1. The identity of the stack and/or emission point where the excess emissions occurred; 2. The magnitude of excess emissions expressed in the units of the applicable emission limitation and the operating data and calculations used in determining the excess emissions; 3. The time and duration of excess emissions; 4. The identity of the equipment causing the excess emissions; 5. The nature and cause of such excess emissions; 6. The steps taken to remedy the malfunction and the steps taken or planned to prevent the recurrence of such malfunction; 7. The steps taken to limit the excess emissions; and, 8. Documentation that the air pollution control equipment, process equipment, or processes were at all times maintained and operated, to the maximum extent practicable, in a manner consistent with good practice for minimizing emissions. The initial twenty-four (24) hour notification should be made to the Department's local Environmental Affairs Regional office. The written report should be sent to the Manager of the Technical Management Section, Bureau of Air Quality and the local Environmental Affairs Regional office.

H. PERMIT EXPIRATION AND EXTENSION

Condition Number	Condition
H.1	(S.C. Regulation 61-62.1, Section II.A.4) Approval to construct shall become invalid if construction: a. is not commenced within 18 months after receipt of such approval; b. is discontinued for a period of 18 months or more; or c. is not completed within a reasonable time as deemed by the Department. The Department may extend the construction permit for an additional 18-month period upon a satisfactory showing that an extension is justified. This request must be made prior to the permit expiration.
H.2	This provision does not apply to the time period between construction of the approved phases of a phased construction project; each phase must commence construction within 18 months of the projected and approved commencement date.

I. PERMIT TO OPERATE

Condition Number	Condition
I.1	(S.C. Regulation 61-62.1 Section II.F.2) The owner/operator or professional engineer in charge of the project shall certify that, to the best of his/her knowledge and belief and as a result of periodic observation during construction, the construction under application has been completed in accordance with the specifications agreed upon in the construction permit issued by the Department.
I.2	If construction is certified as provided in S.C. Regulation 61-62.1 Section II.F.2, the owner or operator, may operate the source in compliance with the terms and conditions of the construction permit until the operating permit is issued by the Department.
I.3	If construction is not built as specified in the permit application and associated construction permit(s), the owner/operator must submit to the Department a complete description of modifications that are at variance with the documentation of the construction permitting determination prior to commencing operation. Construction variances that would trigger additional requirements that have not been addressed prior to start of operation shall be considered construction without a permit.
I.4	(S.C. Regulation 61-62.1, Section II.F.3) The owner or operator shall submit a written request to the Director of the Air Permitting for a new or revised operating permit to cover any new or altered source postmarked within 15 days after the actual date of initial startup of each new or altered source. The written request for a new or revised operating permit must include, as a minimum, the following information: i. A list of sources that were placed into operation. ii. The actual date of initial startup of each new or altered source.

J. GENERAL CONDITIONS

Condition Number	Condition
J.1	The permittee shall pay permit fees to the Department in accordance with the requirements of S.C. Regulation 61-30, Environmental Protection Fees.
J.2	In the event of an emergency, as defined in S.C. Regulation 61-62.1, Section II.L, the owner or operator may document an emergency situation through properly signed, contemporaneous operating logs, and other relevant evidence that verify: 1. An emergency occurred, and the owner or operator can identify the cause(s) of the emergency; 2. The permitted source was at the time the emergency occurred being properly operated; 3. During the period of the emergency, the owner or operator took all reasonable steps to minimize levels of emissions that exceeded the emission standards, or other requirements in the permit; and 4. The owner or operator gave a verbal notification of the emergency to the Department within 24 hours of the time when emission limitations were exceeded, followed by a written report within 30 days. The written report shall include, at a minimum, the information required by S.C. Regulation 61-62.1, Section II.J.1.c.i through viii. The written report shall contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. This provision is in addition to any emergency or upset provision contained in any applicable requirement.
J.3	(S.C. Regulation 61-62.1, Section II.O) Upon presentation of credentials and other documents as may be required by law, the owner or operator shall allow the Department or an authorized representative to perform the following: 1. Enter the facility where emissions-related activity is conducted, or where records must be kept under the conditions of the permit. 2. Have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit. 3. Inspect any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit. 4. As authorized by the Federal Clean Air Act and/or the S.C. Pollution Control Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements.
J.4	(S.C. Regulation 61-62.1, Section II.J.1.a) No applicable law, regulation, or standard will be contravened.

ATTACHMENT - Emission Rates for Ambient Air Standards

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The emission rates listed herein are not considered enforceable limitations but are used to evaluate ambient air quality impact. Until the Department makes a determination that a facility is causing or contributing to an exceedance of a state or federal ambient air quality standard, increases to these emission rates are not in themselves considered violations of these ambient air quality standards (see Ambient Air Standards Requirements).

AMBIENT AIR QUALITY STANDARDS - STANDARD NO. 2						
Emission Point ID	Emission Rates (lbs/hr)					
	PM_{10}	$PM_{2.5}$	SO_2	NO_x	CO	Lead
V1	0.27	0.05	--	--	--	--
V2A	0.023	0.007	--	--	--	--
V2B	0.023	0.007	--	--	--	--
V3	0.023	0.007	--	--	--	--
V4	0.37	0.025	--	--	--	--
V5	0.007	0.002	--	--	--	--
V6	0.007	0.002	--	--	--	--
V7	0.007	0.002	--	--	--	--
V8	0.018	0.005	--	--	--	--
V9	0.018	0.005	--	--	--	--
V10	0.018	0.005	--	--	--	--
V11	0.018	0.005	--	--	--	--
V12	0.018	0.005	--	--	--	--
V13	0.296	0.02	--	--	--	--
V14	0.002	0.001	--	--	--	--
V15	0.002	0.001	--	--	--	--
V16	0.002	0.001	--	--	--	--
V17	0.002	0.001	--	--	--	--
V18	0.002	0.0007	--	--	--	--
V19	0.002	0.0007	--	--	--	--
V20	0.216	0.04	--	--	--	--
V21	0.018	0.005	--	--	--	--
V22	0.018	0.005	--	--	--	--
V23	0.018	0.005	--	--	--	--
V24	0.296	0.02	--	--	--	--
V25	0.003	0.001	--	--	--	--
V26	0.003	0.001	--	--	--	--
V27	0.003	0.001	--	--	--	--
V28	0.003	0.001	--	--	--	--
V29	0.003	0.001	--	--	--	--

ATTACHMENT - Emission Rates for Ambient Air Standards

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AMBIENT AIR QUALITY STANDARDS - STANDARD NO. 2						
Emission Point ID	Emission Rates (lbs/hr)					
	PM_{10}	$PM_{2.5}$	SO_2	NO_x	CO	Lead
V30	0.003	0.001	--	--	--	--
V31	0.216	0.04	--	--	--	--
V32	0.013	0.0038	--	--	--	--
V33	0.013	0.0038	--	--	--	--
V34	0.013	0.0038	--	--	--	--
V35	0.638	0.097	--	--	--	--
V36	0.004	0.001	--	--	--	--
V37	0.004	0.001	--	--	--	--
V38	0.004	0.0012	--	--	--	--
V39	0.004	0.001	--	--	--	--
V40	0.004	0.001	--	--	--	--
V41	0.004	0.001	--	--	--	--
V42	0.003	0.001	--	--	--	--
V43	0.003	0.001	--	--	--	--
V44	0.003	0.001	--	--	--	--
V45	0.05	0.008	--	--	--	--
V46	0.04	0.006	--	--	--	--
V47	0.008	0.001	--	--	--	--
Customer Roads	0.58	0.06	--	--	--	--
Haul Roads	1.04	0.10	--	--	--	--
Material Storage	0.32	0.05	--	--	--	--

Attachment B

Statement of Basis
Permit No. 2320-0049-CA

Company Name	RDA, LLC	**Permit Writer:**	Mareesa Singleton
Permit Number:	2320-0049-CA	**Date:**	March 25, 2019

DATE APPLICATION RECEIVED: June 27, 2017

FACILITY DESCRIPTION: Limestone Quarry and Processing Plant

PROJECT DESCRIPTION: New crushed stone processing plant capable of processing 500 tons per hour. The facility will consist of crushers (primary, secondary, and tertiary), screens, conveyors, a wash process, storage piles, truck hauling and loading, electric dewatering pumps.

SOURCE TEST REQUIREMENTS All sources from IDs 01 through 03 are subject to an initial source test in accordance with 40 CFR 60.11 and 40 CFR 60.675.

SPECIAL CONDITIONS, MONITORING, LIMITS: The facility is requesting federally enforceable limits of less than 100.0 TPY of PM_{10} for Title V avoidance and less than 250.0 TPY of PM and PM_{10} for PSD avoidance.

EMISSIONS

FACILITY WIDE EMISSIONS		
Pollutant	**Uncontrolled Emissions**	**Controlled/Limited Emissions**
	TPY	**TPY**
Quarry Operations Emissions		
PM	654	29.8
PM_{10}	191	12.0
$PM_{2.5}$	29.0	1.77
Fugitive Emissions (Roads and Stockpiles)		
PM	249	27.4
PM_{10}	72.2	8.47
$PM_{2.5}$	7.28	0.91
Quarry Operations + Fugitive Emissions		
PM	903	57.2
PM_{10}	263	20.5
$PM_{2.5}$	36.2	2.68

OPERATING PERMIT STATUS: The facility will be issued a new general conditional major operating permit for nonmetallic mineral processing plants.

REGULATORY APPLICABILITY REVIEW

Regulation	Comments/Periodic Monitoring Requirements
Section II.E - Synthetic Minor	This is a synthetic minor construction permit. The facility is requesting federally enforceable limits of less than 100.0 TPY for PM_{10} for Title V avoidance and less than 250.0 TPY of PM and PM_{10} for PSD avoidance. Since this facility is not one of the 28 source categories for PSD or Title V, fugitive emissions are not included in determining the potential to emit.
Standard No. 4	- Section VIII: From June 15, 1999 guidance, a process includes all process emission units and/or group of process units used to make a finished identifiable output. It was

Company Name	RDA, LLC	**Permit Writer:**	Mareesa Singleton
Permit Number:	2320-0049-CA	**Date:**	March 25, 2019

Regulation	Comments/Periodic Monitoring Requirements
	determined that this facility is one process defined as aggregate processing consisting of all of the equipment with a finished identifiable output of crushed stone. The allowable PM emission rate is 69 lb/hr. - Section IX: All sources are subject to 20% opacity - Section X: The facility is subject to this section for all non-enclosed operations.
Standard No. 7	The facility is requesting a PSD avoidance limit of less than 250.0 TPY of PM and PM_{10}.
61-62.6	The fugitive PM (Dust) emissions are controlled in a manner that should not produce undesirable levels of PM (Dust) emissions by using wet suppression.
40 CFR 60 and 61-62.60	The facility is subject to Subparts A and OOO. The crushers, conveyors, screens, and bins from IDs 01-03 are subject to an initial source test in accordance with 40 CFR 60 Subpart OOO. They are also subject to emission limits, recordkeeping, and reporting as outlined in the Subpart. The dewatering pumps are electric and therefore, are not subject to Subpart IIII/JJJJ.
40 CFR 63 and 61-62.63	The dewatering pumps are electric and therefore, are not subject to Subpart ZZZZ.

MODELING REVIEW

Regulation	Comments/Periodic Monitoring Requirements
Standard No. 2	This facility has demonstrated compliance through modeling; see modeling summary July 20, 2017.

PUBLIC NOTICE

This construction permit has undergone a 30-day public notice period to establish synthetic minor limits in accordance with SC Regulation 61-62.1, Section II(N). This permit was placed in *The Georgetown Times*, *The Post & Courier*, and *The Kingstree News* on June 20, 2018. The comment period was open from June 20, 2018 until August 10, 2018 and the public notice was on the BAQ website during that comment period.

ADDITIONAL PUBLIC PARTICIPATION

- BLWM and BAQ joint Public Information Drop-in on November 30, 2017

- BLWM and BAQ joint Public Hearing on July 26, 2018. All comments are addressed in the response to comments document.

Statement of Basis Changes:

1. Changed 250 TPY to 250.0 TPY and 100 TPY to 100.0 TPY

- Permit Changes:

1. Revised Reporting Permit Condition G.5 with new standard language
2. Added Permit Condition J.4

3. Changed 250 TPY to 250.0 TPY and 100 TPY to 100.0 TPY in Condition C.7

SUMMARY AND CONCLUSIONS

It has been determined that this source, if operated in accordance with the submitted application, will meet all applicable requirements and emission standards.

Attachment C

Response to Comments
Permit No. 2320-0049-CA

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

Response to Comments
Public Notice #18-023-CM-C-H
RDA, LLC
Andrews, Williamsburg County, South Carolina
Permit No. 2320-0049-CA

The following is the SC DHEC BAQ's (Department) response to comments made during the formal comment period held June 20 to August 10, 2018, and the public hearing held on July 26, 2018, regarding the draft synthetic minor construction permit for RDA, LLC (RDA) located on Seaboard Road in Andrews, Williamsburg County, South Carolina. 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 SCDHEC Columbia office located at 2600 Bull Street, Columbia, SC 29201, and on our webpage at www.scdhec.gov/air-quality-permitting-decisions. Hardcopies of all the above-listed documents, as well as the written comments received, and transcript of the public hearingcan 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.

Air Pollution Impacts - Comments were received about air pollution impacts to air quality, health impacts to the general population and sensitive individuals, impacts to wildlife and other animals and impacts to vegetation from the proposed operation.

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

The Clean Air Act (CAA) requires the U.S. Environmental Protection Agency (EPA) to establish National Ambient Air Quality Standards (NAAQS) for six common pollutants ("criteria" pollutants) considered harmful to public health.There are two types of NAAQS: primary standards and secondary standards. Primary standards are set to protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly. Secondary standards are set to protect public welfare, such as protection against decreased visibility, and damage to animals, crops, vegetation, and buildings. National ambient standards have been set for the

pollutant of concern from this project, particulate matter. Particulate matter (PM) consists of particulate matter less than 10 micrometers in diameter (PM_{10}) and particulate matter less the 2.5 micrometers in diameter ($PM_{2.5}$). The EPA also must designate areas of the country as nonattainment when monitoring information shows pollutant concentrations exceed a set standard. There are no nonattainment areas in South Carolina for PM_{10} or $PM_{2.5}$.

In accordance with South Carolina 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." RDA'sproposed operations were evaluated to determine if the emissions would interfere with attainment of the NAAQS. An air quality analysis was performed using an EPA-approved air dispersion computer model to simulate how the facility's maximum emissions will be dispersed into the atmosphere surrounding the proposed site. This simulation used official National Weather Service Meteorological data from Charleston, SC,which was determined to be representative of the weather conditions that would be observed at the facility'sproposed site, including those weather conditions that would produce the worst-case pollutant concentrations in the community surrounding the proposed site. The modeledPM_{10} and $PM_{2.5}$ concentrationsfrom the proposed facility were added to representative background (monitored) pollutant concentrations. The EPA-approved model demonstrated compliance with the NAAQS at the property boundary and off-site without including trees or other vegetation as a buffer (a worst-case scenario).

Dust/Fugitive Particulate Matter – Comments were received about particulate matter (PM emissions), including fugitive PM emissions at the proposed facility. These comments included health impacts, dust on public and facility-owned roads, and dust on homes, plants, and animals.

Particulate matter (PM) emissions, including PM_{10} and $PM_{2.5}$, from the operating equipment and the on-site roads and storage piles are required to be controlled in accordance with theapplicable air quality regulations. These regulations limit PM emissions, limit opacity (amount of light blocked by dust particles) and require the facility to take initial opacity readings of equipment. Air dispersion modeling demonstrated that PM concentrations did not exceed the NAAQS, which are protective of public health and welfare. For health impact information, please see the *Air Pollution Impacts*section.

The permit requires the use of wet suppression to control PM. The crushed stone processing plant (crushers, screens, conveyor systems) is regulated under the federal EPA New Source Performance Standard (NSPS) for Nonmetallic Mineral Processing Plants, 40 CFR Part 60, Subpart OOO, as well as State standards. When wet suppression systems are in use, the water spray valves will be activated prior to the initiation of operations and the operator will adjust the flow depending on process conditions. However, due to the moisture level expected in the material and based on the operation of other similar limestone quarries in the state, minimal visible emissions are expected from the stone processing. Water trucks (or other dust control measures) are required to control fugitive emissions from the roads and storage piles.

Dust Monitoring and Mitigation Plan - A request was received that RDA should develop and submit a formal dust monitoring and mitigation plan and implement control measures to reduce fugitive dust emissions.

The permit requires that compliance with non-enclosed operations and fugitive dust requirements be demonstrated by developing a facility-wide fugitive dust control plan for controlling fugitive emissions from process operations, truck traffic, storage piles, and any other areas within the permitted facility where fugitive dust emissions can be generated. The plan shall be developed and submitted to the Air Permitting Division for approval 180 days prior to the start of operation. The owner/operator shall implement the plan within 30 days of approval and create a schedule for its periodic review and update. The plan shall be kept and maintained on-site with a record of revisions. The plan shall address and/or contain at a minimum the following:

1. Water Trucks / Dust Control Systems
    a. Operation and maintenance checks of water trucks or an approved dust control system.
    b. Operating scenarios for water truck or dust control system failures or inadequacies.
    c. Dates the water trucks or dust control system did not operate and the alternative(s) dust control method used.

2. Truck Traffic
    a. Road speed limits
    b. Vehicle loading, off-loading, transportation or dumping of material procedures.

c. Spillage and residual materials clean-up procedures.
d. Operation and maintenance checks of sprinklers.
e. Signage with respect to SC Code of Laws Sections 56-5-4100 and 56-5-4110 (which requires haul trucks transporting aggregate from all quarries to prevent the escape of materials loaded onto the vehicles).

3. Storage Piles
    a. Material stock piling procedures.

4. Process Equipment
    a. Operation and maintenance checks of all plant equipment and enclosures.
    b. Spillage and residual materials clean-up procedures.
    c. Daily visual emission checks on each crusher, screen, conveyor, and storage bin when it is in operation.
    d. Written guidelines on how to handle opacity problems.

The owner/operator shall develop logs or use other approved methods to comply with the requirements of the plan.

A comment was also received that RDA should use best practices to minimize dust emissions including covering or dampening materials prior to haulage, and concurrent reclamation ofstockpiles and overburden areas to minimize erosion and dust.

A requirement of the Department-approved dust plan is to post signage with respect to SC Code of Laws Sections 56-5-4100 and 56-5-4110 (which require haul trucks transporting aggregate from all quarries to prevent the escape of materials loaded onto the vehicles). The approved dust plan is also required to have material stock piling procedure(s). The Department has found that it has been more advantageous to establish the storage pile procedures once the facility is constructed. Allowing the plan to be developed post construction allows for more specifics and details on the planned procedure, thus better addressing the fugitive dust emissions. Additionally, reclamation plans for the overburden areas are addressed in RDA's mining permit.

Dust Emissions from Conveyor over Murray Swamp -A comment was also received that the proposed conveyor over Murray Swamp should include operational controls such as secondary containment to prevent fugitive and particulate dust emissions through vibrational losses or operational upset conditions.

Residual moisture in the rock material as well as the wet suppression system on the conveyor, will minimize windblown material from the belt during its transit time across the Murray Swamp wetlands.

Impacts to Wildlife and Vegetation – Comments were received regarding the potential impacts to area wildlife and vegetation.

As mentioned previously in the *Air Pollution Impacts* section, some regulated air pollutants have primary and secondary standards.Secondary standards are set to protect public welfare, which includes protecting against damage to animals, crops, and vegetation. The Department's evaluation of RDA's application determined that the facility could operate in compliance with both primary and secondary national ambient air quality standards. Impacts to wildlife are assessed by South Carolina's Department of Natural Resources (SC DNR) and reviewed by SC DHEC as part of the mine permit application process.

Ambient PM Monitoring – Comments were received requesting the installation of portable air monitors with real-time monitoring (specifically the Met One E-BAM particulate monitor).

Monitoring requirements under federal and state regulations generally do not include the use of portable ambient air monitors. Portable monitors are typically used on temporary, short-term basis and are not used to determine compliance with the NAAQS. Specifically, the Met One E-BAM can be used as an indicator of the amount of particulate matter, however, it is not a reference or equivalent method. Therefore, its data cannot be used to demonstrate compliance with permit limits or the NAAQS.

Consistent with federal regulations, the Department relies on its stationary network of ambient air monitors to monitor air quality throughout the state. 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. In accordance with 40 Code of Federal Regulations (CFR) Part 58, Appendix D, ambient air monitors are required to be placed in areas with the highest population, or where the highest pollutant concentrations are expected to occur. If an ambient monitor located in an area of higher emissions or concentrations demonstrates the air pollutant concentrations are lower than the levels set by the national health-protective standards, then it is reasonable to expect that the air pollutant

concentrations in other areas with lower emissions or concentrations will also be lower than the national standards.

The Department has operated an air quality monitoring network in South Carolina since 1959. The monitoring network currently includes 43 PM_{10} and $PM_{2.5}$ monitors and samplers at 16 sites across the state.[1] These monitors and samplers are used to assess South Carolina's air quality and determine compliance with the NAAQS and state ambient air quality standards. All monitors in the state show attainment of all current air quality standards. The Department annually reviews the monitoring network, and seeks input from the public, to make sure the minimum requirements and the needs of the air program are met.

The nearest ambient air monitoring PM_{10} station to the proposed site is the Howard monitoring station, located less than 21miles southeastof Andrews in the city of Georgetown, SC, and theCharleston Public Works $PM_{2.5}$ monitoring station is located less than60 miles southwest of Andrews. These monitoring stations represent the highest expected concentrations and population exposure in the area that includes all of Charleston, Berkeley, Dorchester, Georgetown, and Williamsburg counties. Data from these monitoring sitesshow that Williamsburg County, including the Andrews area, remains in attainment for both PM_{10} and $PM_{2.5}$ ambient air quality standards. The Department's air monitoring data is on EPA's website atwww.epa.gov/airdata. Other publicly-available web-based applications, such as AirNow (www.airnow.gov), also provide near real-time air quality information.

There is also historical PM_{10} monitoring data available for granite quarries (RDA would be a limestone quarry, which is expected to generate smaller amounts of PM_{10} during processing due to its inherent moisture content). PM_{10} was monitored because quarry operations (transferring, hauling, and crushing material) would be expected to produce more PM_{10} sized particulate matter than smaller particulate fraction ($PM_{2.5}$), which is primarily produced by combustion. The fine particulate is also included in the PM_{10} measurement. Ambient PM_{10} monitoring was conducted by a contractor for Vulcan Construction Materials, LLC at its Columbia Quarry (Columbia Quarry) between 2003 and 2008. SC DHEC technical staff periodically checked performance and accuracy of the monitors. This monitoring data showed that ambient air quality standards were met.The maximum permitted production rate at the proposed RDA quarry is less than at the Columbia quarry.

[1] www.scdhec.gov/environment/your-air/ambient-air-monitoring-network

SC DHEC also conducted additional ambient PM_{10} monitoring near the Columbia quarry and the Martin Marietta Cayce quarry (Cayce quarry) due to concerns about PM_{10} concentrations in the adjacent communities. Monitoring was conducted near the Cayce quarry from 1991 to 2012 and near the Columbia Quarry from 1991 to 2010. The results of that monitoring showed ambient concentrations less than half of the health-based standards for PM_{10} in the area around both quarries at the time the monitoring was discontinued.

Based on air dispersion modeling showing compliance with the PM standards, permit requirements to control PM emissions, and historical information indicating compliance with the PM ambient standards at other mining sites expected to generate greater amounts of PM than the proposed RDA quarry, the Department expects the facility to meet State and Federal ambient air quality standards.

Compliance Inspections – Comments were received regarding the inspection process.

RDA is a conditional major facility based on its potential air emissions. All conditional major facilities undergo a comprehensive air inspection by the Department at a minimum of every other year. The Department has the authority to inspect facilities more frequently if repeat non-compliance is observed or in response to complaints. During air quality inspections, all emission sources on the permit are inspected for compliance with the permit conditions. The inspectors also verify that the equipment was constructed per the construction permit and is operating in accordance with its conditions. The inspector also reviews all required records, logs, etc. to determine that the facility is adhering to the permit. Any alleged violations are detailed in the inspection report and referred to the Department's Enforcement Section.

The Department also conducts site visits for permitting and compliance assistance. If any deviations or potential violations are observed on these visits, they may bereferred to the Enforcement Section for resolution.

An air inspection report serves as documentation of the inspectors' observations and includes a listing of the equipment and logs inspected and identifies any deviations or potential violations. These reports are typically completed within 30 days after an inspection.

Monitoring/Self-Monitoring - Comments were made regarding the frequency of monitoring and how the facility is monitored for compliance.

The air construction permit requires the facility to perform an initial opacity test for all equipment. This test plan is reviewed and approved by the Department's Source Evaluation Section. While these testsare typically performed by a contractor hired by the facility, the Department's Source Evaluation Section may observe the test while it is being performed. The Source Evaluation Section reviews all source test results to ensure compliance with the applicable air standard and regulation.

The air construction permit also requires the facility to conduct daily visual inspections on the equipment and maintain various records and logs of data to demonstrate that the facility is being operated as stated in the permit. The facility is required to record all the data from these daily inspections. During the Department's unannounced air inspections, the inspectors review all required records, observe the facility's processes while in operation, make visual emission observations, verify that the equipment onsite matches those listed in the current permit, and review any other pertinent information. For more information on the inspection process see the *Compliance Inspections* section.

Land and Property Value/Economic Impact – Comments were received regarding the impact to property values and the possible economic impact.

The Department does not have the authority to dictate where a facility locates or factor property value impacts into permitting decisions. All zoning decisions are made at the local level by a city or county zoning authority, usually before a permit request is received by the Department. Contact your local city or county council representatives for more information on how to get involved in local zoning and planning issues.

Other Sources of Air Emissions – Comments were made that air permit emissions and air quality analysis for particulate matter should address other sources and a specific request that it should include drilling, loading, hauling, crushing, conveying, and blasting.

The draft air permit addresses emissions from drilling, loading, hauling, crushing, conveying, screening, and storing material. However, blasting is typically done while primary crushing and hauling are not in operation. The blast area must be cleared before the blast and cannot resume until the blasting contractors have inspected the blast area and determined the area safe to re-enter. This operational shutdown

typically lasts approximately 30 minutes while the actual blast occurs in less than one minute. Refer to *Blasting*section below.

Water Impacts – Comments were received regarding the potential impacts this facility may have on surrounding water sources, wells, and the development of sinkholes.

The Bureau of Air Quality has authority to review the air quality impacts of air pollutants as specified in state and federal air quality regulations. SC DHEC's Bureau of Water (BOW) reviewed the National Pollutant Discharge Elimination System (NPDES) permit application. The facility is also required to have a Mining Permit that addresses the potential for groundwater-related impacts from dewatering activities. The comments related to water impacts were considered by BOW and the Bureau of Land and Waste Management (BLWM) as part of their reviews of the respective permit applications.

Land Impacts – Comments related to land impacts were received.

Impacts to land are not within the scope ofDepartment air quality regulations and are therefore not covered in the air permit. The comments related to these activities will be considered by BLWM as part of the review of the mining permit application.

Light Pollution – The Department received comments regarding the effects of lighting from the quarry, and one specifically seeking a mitigation plan for light pollution.

The Department must base its air permit decision on the applicable air quality regulations and standards in place at the time of the Department's technical review of the permit application. There are currently no air quality regulations regarding lighting; therefore, the Department has no authority to regulate or require a permit condition for lighting. Although lighting is not addressed in the air permit, the facility's extensive buffer should help to minimize extraneous light offsite.

Noise – Comments were received regarding the potential impacts of noise pollution to the area. A request was made for RDA to develop a mitigation plan to address noise.

The Department does not have any noise standards in itsair quality regulations. However, the mining permit requires the facility to use best management practices

to minimize noise. Additionally, excessive noise levels not typical for a site should be reported to the appropriate SC DHEC regional office:Pee Dee Region-Myrtle Beach Office, 927 Shine Avenue, Myrtle Beach, SC 29577 at (843) 953-0150.

Blasting – Comments were received with respect to blasting activities.

The air permit does not address blasting activities, as such activities at a limestone quarry are regulated by the South Carolina Mining Act. The comments related to blasting were considered by BLWM as part of the review of the mining permit application. Also, see the *Other Sources of Air Emissions* section below for more details.

Community/Quality of Life- Comments were received regarding the potential impacts to the community's way of life.

The Department must base the air permit decision on the applicable air quality regulations and standards in place at the time of the Department's technical review of the permit application. As mentioned previously in the *Air Pollution Impacts*section, these air quality regulations are set to protect public health and the environment. Furthermore, as noted above, the Department does not have the authority to dictate where a facility locates or make zoning decisions.

Operating Hours - Comments were received requesting limits on the hours of operations.

Air emissions were estimated as if the facility would be operating 24 hours per day, 365 days per year, although this is not the planned operation of the facility. Based on this operating scenario, the facility demonstrated compliance with all applicable federal and state regulations without requiring a limit on operating hours.

Truck Traffic – Comments were received regarding the impacts from increased truck traffic.

The Department regulates fugitive PM emissions (dust) from the equipment, from any non-enclosed operations (such as storage piles), and from roadways owned and/or controlled by the facility. However, the Department does not have the authority to regulate truck traffic on public roads. Exhaust emissions from vehicles are regulated by the EPA under the authority of the Clean Air Act (CAA). The permit requires the facility's roadways to be paved and/or treated (such as the use of water sprays) to minimize dust. The facility must also develop and implement a

comprehensive fugitive dust control plan to ensure fugitive dust emissions are minimized.

Permit Decision – Comments were received stating that the information and plans provided were insufficient, inadequate and additional data is needed. A comment was also received that since the Department had drafted the air permit, the decision to issue the permit had been made prior to receiving public comments.

Upon receiving a permit application, the Department will review the application together with state and federal air quality regulations governing issuance of the permit. If this review supports that the application meets all applicable requirements, the Department will prepare a draft permit. Pursuant to SC Regulation 61-62.1, Section II.N.2.e, the publicnotice process includes the opportunity for public review of the draft permit prepared by the Department. The public comment period is intended to provide the public an opportunity to review and comment on both the application and draft permit (including whether a final permit should be issued) at the same time. The Department does not make a final decision on the application or permit until after receiving and considering comments received during the comment process.

The facility submitted all information required to make an air permit decision. The air pollutant emission estimates are based on the EPA-developed emission factor document AP-42. These emission factors are based on testing conducted at similar quarries and this estimation methodology is commonly used by all the South Carolina limestone mines (and others across the United States) for estimating emissions. The facility's application included: an air dispersion modeling analysis to show the project would not interfere with attainment of ambient air quality standards, a regulatory review of the applicable state and federal standards, and a demonstration that the facility would be able to meet these requirements. The permit details how the facility will demonstrate compliance with those requirements. The facility has submitted all the information required to assess whether air quality requirements would be met.

After consideration and a complete review of the air permit application and supplemental information, applicable state and federal air quality regulations, comments and concerns made at the public hearing, all other comments received within the required time frame, the public hearing transcript, and all other pertinent information, the Department has determined it has sufficient information to make a permitting decision.

SC DHEC's Responsibility – Comments were made that SC DHEC's mission is to improve the quality of life for all South Carolinians by protecting and promoting the health of the public and the environment.

State and Federal regulations are drafted and promulgated specifically to protect the health and welfare of the public and the environment. The Department ensures that these protective standards can be met before issuing any air permit.

General Opposition and Support – SC DHEC received comments requesting denial of the permit. Comments in support of the facility were also received.

The Department appreciates all comments made regarding RDA. The Department must base the air permit decision on the applicable air quality regulations and standards in place at the time of the Department's technical review of the permit application.