

To: Mr. Davis Murphy
N.C. Division of Air Quality
450 West Hanes Mill Road, Suite 300
Winston-Salem, NC 27105

From: Concerned Residents of the Anderson Community

Reference: Environmental Justice Snapshot Report, Carolina Sunrock LLC, Proposed Projects, February 26, 2020.

Dear Mr. Murphy,

This letter is in response to the recent EJ Snapshot Report for the Burlington North/Anderson site in Caswell County NC. It states in this report that comments are encouraged and a full EJ report is possible. On behalf of myself and the residents of the Anderson community, we formally request a full detailed EJ report. In this letter we will also offer additional insights about the immediate area around the Burlington North site which should be used in the full EJ analysis and report.

As you will see in the information provided in this letter, the proposed Burlington North facility is perfect example of how minority and low income communities are targeted by polluting industries. This area is currently free from industrial pollution and the people currently enjoy a clean and healthy environment. However, if the Burlington North facility is allowed to operate this will totally change the situation for the residents as it will become an undesirable area with major air pollution, noise, heavy truck traffic on small country roads. The calculated emissions from this facility will most certainly cause an imminent health risk to our 20 plus citizens with COPD, cancer, Lung cancer, breathing issues, high blood pressure, RA, PTSD, and children with severe asthma. People of color and poverty are often subjected to the most polluted environments so this is a call to NC DEQ to not allow to happen. The future of the people of this community is in your hands as you currently have the power to determine if this will be allowed. If allowed, this will become yet another example of how environmental justice and environmental racism is allowed to exist and propagate.

As stated in the summary of the NC DEQ Preliminary EJ report, the people in this area **"generally exhibit higher poverty levels than both the county and state"** and **"display slightly higher percentage of African-American residents compared to the state"**. If NC DEQ approves this permit, these people will be trapped as they cannot afford relocate. As we talk to people in this area they are terribly fearful of the proposed site since they have will exposed to high levels of pollution and will have nowhere to escape.

"I am a retired Vet with (b) (6) Privacy, (b) (7)(C) Enforcement Power As I served my country, I bought and made payments for this small piece of land; in hopes to finally have a home

for me and my family. Although I loved serving my country, military families do not get the luxury of living where they want and are required to moved over and over. Me and my family just finish building our home and just got settled here. And then we were told about the proposed toxins and noises that will be less than a 1,000 feet from our back door. My health would force me to leave. We have children who live here, we would never risk endangering them. And given it is a loud and pollutant industry, we can not even sale and relocate. "

(b) (6) Privacy, (b) (7)(C) Enforcement Privacy

"I already had (b) (6) Privacy, (b) (7)(C) Enforcement Privacy (b) (6) Privacy, (b) (7)(C) Enforcement Privacy I know if they bring these chemicals into my home; I know it will finish me off." (b) (6) Privacy, (b) (7)(C) Enforcement Privacy

"My concern and fear is, with all of the sick people in my home... my daughter has (b) (6) Privacy, (b) (7)(C) Enforcement Privacy, she can not be around loud noises such as sirens, trucks, or any loud noises. She is on 11 medications to keep her well. We can not afford to move. ARC has just built a ramp. My nephew, who I raised, had a (b) (6) Privacy, (b) (7)(C) Enforcement Privacy medications for life. My sister lives with me and she has health problems, and I've had a (b) (6) Privacy, (b) (7)(C) Enforcement Privacy.

My taxes are behind. I am paying back taxes now. My daughter's hospital bills got me behind. Those chemicals will kill us. We can't let this happen. I am trusting God, He can do anything.

My neighbor next door has had (b) (6) Privacy, (b) (7)(C) Enforcement Privacy. There is a lot sickness on this road. Lord, we can't have this thing here". (b) (6) Privacy, (b) (7)(C) Enforcement P

(b) (6) Privacy, (b)

It also states in the NC DEQ Preliminary EJ Report that **"the EJ Snapshot does not include a reconnaissance of the community"**. This is very true and therefore this is an official request for NC DEQ to complete a full reconnaissance of the area. Here are some additional key factors which should be considered as part of the full reconnaissance.

The predominant months of operation of an Asphalt plant are the warmer months of the year which for this area is April through September. This is documented in the NC DEQ draft permit. Asphalt plants may operate in some of the cooler months, but the height of operations are during warm weather. For this specific area, the prevailing winds blow out of the west during the warmer months and here is a data source to support this fact.

<https://weatherspark.com/y/19575/Average-Weather-in-Burlington-North-Carolina-United-States-Year-Round>

The wind is most often from the west for 5.1 months, from March 18 to August 21 and for 2.0 months, from November 26 to January 26, with a peak percentage of 41% on July 12.

Why is this important? Using the Caswell County GIS site it is apparent to see which areas will be most highly impacted by the westerly winds. FIGURE 1 below clearly identifies a high density population just east of the proposed facility (see roads labeled (b) (6) Privacy, (b) (7)(C) Enforcement Privacy). The residents in this area are as close as ¼ mile from the proposed facility and it is critical to note that this entire area is predominately a low income African-American minority community. Many people in the area also have existing health issues which will be exacerbated if industrial pollution is allowed to begin. Please note example of people with imminent health issues have already been documented via separate communications but more information can be provided upon request.

The shorter red horizontal line in FIGURE 1 represents a distance of "1 mile" from the Proposed Burlington North facility to the west.

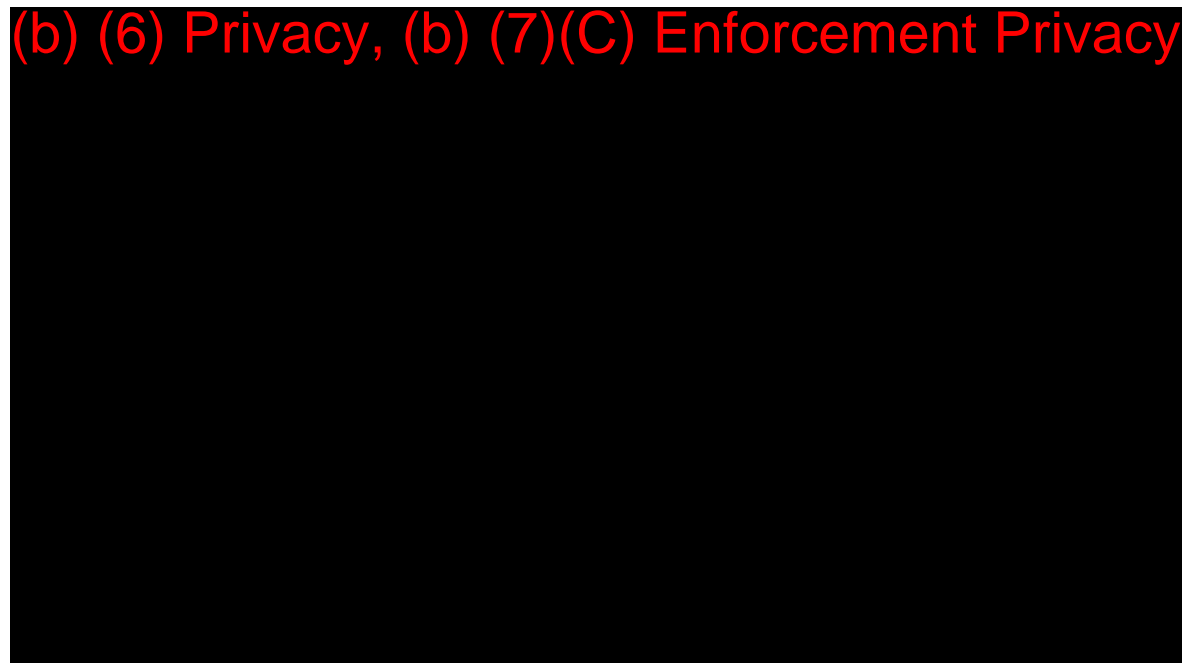


FIGURE 1 (1 Mile East of Burlington North Site)

FIGURE 2 has a red block which represents the residents who will be most highly impacted by air pollution which will blow west to east during the warmer months when the Asphalt/Cement plant would be at its highest output. Again, the residents in this area are as close as ¼ mile from the proposed facility and it is critical to note that this entire area is predominately a low income minority community.

(b) (6) Privacy, (b) (7)(C) Enforcement Privacy

FIGURE 2 (b) (6) Privacy, (b) (7)(C) Enforcement Privacy)

A complete reconnaissance (door to door survey) was conducted in the (b) (6) Privacy, (b) (7)(C) Enforcement Privacy " which is identified in Figure 2 in order to generate a race and ethnicity assessment. **The study area shows a significantly higher percent of African-American residents (75%)** as compared to the State (21.5%). Note, the numbers for the State are copied from the Environmental Justice Snapshot Report, Carolina Sunrock LLC, Proposed Projects, February 26, 2020.

Table 2 (b) (6) Privacy, (b) (7)(C) Enforcement Privacy – Race and Ethnicity

Race and Ethnicity	North Carolina		(b) (6) Privacy, (b) (7)(C) Enforcement Privacy	
	Number	Percent	Number	Percent
Total Population	9,535,483	100%	160	100.0%
White	6,528,950	68.5%	27	16.9%
Black or African American	2,048,628	21.5%	120	75.0%
Hispanic	800,120	8.4%	15	9.4%
Other			0	0.0%

A complete reconnaissance of a 1 mile radius of the Burlington North site has NOT been completed. However, Figure 3 (1 Mile Radius of Burlington North Site) from Caswell County GIS indicates approximately 18 addresses would be added. If all 18 addresses had two people, all of which were white, **we can provide a race and ethnicity "estimate" which would indicate the area still shows a significantly higher percent of African-American residents (61.2%)** as compared to the State (21.5%).

Table 3 (b) (6) Privacy, (b) (7)(C) Enforcement Privacy **Tract with 1 Mile Radius Estimate – Race and Eth-**

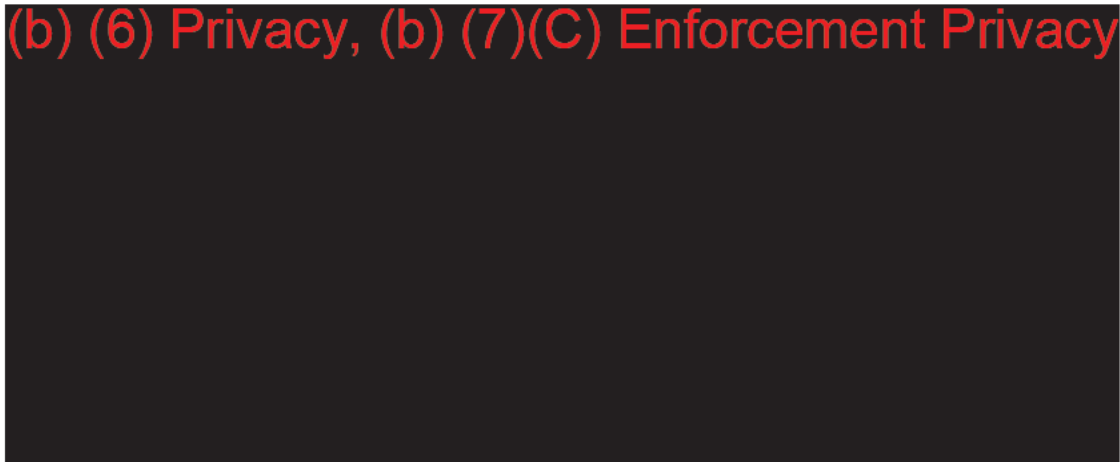
Race and Ethnicity	North Carolina		(b) (6) Privacy, (b) (7)(C) Enforcement Privacy Track		1 Mile Radius (Estimate)	
	Number	Percent	Number	Percent	Number	Percent
Total Population	9,535,483	100%	160	100.0%	196	100.0%
White	6,528,950	68.5%	27	16.9%	63	32.1%
Black or African American	2,048,628	21.5%	120	75.0%	120	61.2%
Hispanic	800,120	8.4%	15	9.4%	15	7.7%
Other			0	0.0%	0	0.0%

nicity

FIGURE 3 (1 Mile Radius of Burlington North Site)

As further evidence, the following picture (FIGURE 4) was taken on the evening of March 14, 2020. The picture was taken from (b) (6) Privacy, (b) (7)(C) Enforcement Privacy, Burlington, NC 27217 which is approximately 1.5 miles due north of the proposed Burlington North facility. The smoke shown in the picture is from a brush fire very near (just east) of the location of the proposed plant that occurred on the evening of March 14. The cell phone tower in the picture is a landmark ref-

(b) (6) Privacy, (b) (7)(C) Enforcement Privacy er-



erence point which can be validated. **The picture clearly provides evidence of how the pollution from the proposed plant will blow from the west to the east and directly over the residents who are located as close as 1/4 mile from plant.** The people in this community will be devastated.



FIGURE 4 (Smoke Path During Key Operating Months)

The NC DEQ preliminary EJ report also has a section for "Local Sensitive Receptors". There were two churches identified. The following Local Sensitive Receptor are submitted for inclusion in the full EJ report:

- (b) (6) Privacy, (b) (7)(C) Enforcement Privacy [Redacted]

We also challenge "Table 1", listed below, from page 3 in the Preliminary EJ report (shown below). This Emissions overview table is presenting "Expected Actual Emissions (tons/year) and "Potential Emissions (with controls and permit limits, tons/year)". With the facts listed above from FIGURES 1 and 2, showing the majority of the emissions will be a direct path over the people in these minority communities we request hazardous air pollutants emissions modeling be performed which would show the exposure to the people who are ¼, ½, ¾ and 1 mile due east of the facility.

In addition, the following points have been identified:

- The Expected Actual Emissions (tons/year) in table 1 are inconsistent with the data provided in DAQ's draft permit review. The SO₂, NO_x, and HAP totals are different
- The two sites are less than ten miles apart, not 19 miles
- Recycled No. 2 fuel oil and recycled No. 4 fuel oil may also be used for the asphalt plant burners
- The report fails to mention the natural gas/No. 2 fuel oil-fired asphalt heaters at the sites

Expected actual and potential emissions of criteria and hazardous air pollutants (after emissions controls and permit limits are taken into account) are shown in Table 1

Table 1. Facility Emissions Overview (Burlington North)

Pollutant	Expected Actual Emissions (tons/year)	Potential Emissions (with controls and permit limits, tons/year)
PM ₁	33.92	34.08
PM _{2.5}	17.96	18.01
SO ₂	6.88	31.15
NO _x	8.43	16.53
CO	33.61	33.85
VOC	12.05	12.06
HAP _{Total}	1.40	2.59
HAP _{Specific} (Formaldehyde)	0.80	0.80

Summary

We request a full reconnaissance be done and specifically for the area highlighted in FIGURES 1, 2, and 3 as has been modeled in Table 3. This is a community with a very high African-American minority population (much higher than the State average) as presented in this report and incomes below the State average. We also request hazardous air pollutant emissions modeling be performed which would show the exposure to the people who are ¼, ½, ¾ and 1 mile due east of the facility.

We therefore conclude the EJ Snapshot report generated by NC DEQ falls far short and is incomplete in terms of representing the affected community for the following reasons:

- A reconnaissance of the community was not accomplished
- The study area has significantly higher percentages of African-American population than is represented in the report.
- Additional sensitive receptors were missed because of lack of field reconnaissance visits and public input.
- Census data is from 2010 is outdated
- U.S. EPA's EJSCREEN does not provide all of the data categories that were used in this analysis so the census tract and county data cannot be compared to the radius evaluating the facility boundary
- Census tracts can be large areas that do not identify exact locations of each population
- Some of the census tracts slightly overlap with the two-mile radius and NC DEQ cannot determine which populations are located within that small area of overlap

Additional reasons for a more thorough assessment be conducted:

- The proposed Carolina Sunrock LLC is in an area designated with moderate health factors and outcomes in comparison to other areas of the State, ranking last place in both.
- Burlington North has over 35 people and counting within a mile radius, with serious health issues that the calculated emissions listed on the proposed permit (toxins and chemicals) would most certainly create and imminent health risk to these citizens. (b) (6) Privacy, (b) (7)(C) Enforcement Privacy

[REDACTED]

iseases that create a predisposition to further their illnesses if exposed to this many toxins and chemicals. How is an endangered species more important than a human life.

- The language data needs to be checked for accuracy
- Additional outreach options need to be explored that best fit our community's needs
- Caswell County ranks 71th in health factors and 64th in health outcomes