

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

**Response to Comments
Public Notice #12-031-C-H
Pinewood Site Custodial Trust - Construction Permit
Pinewood, Sumter County, South Carolina
Permit No. 2140-0017-CJ**

The following is the S.C. Department of Health and Environmental Control's (DHEC) Bureau of Air Quality's response to the comments made during the formal comment period held April 10 through May 11, 2012, and public hearing held on April 19, 2012, regarding the draft construction permit for Pinewood Site Custodial Trust (Pinewood Site) at 8430 Camp Mac Boykin Road in Pinewood, Sumter County. The written comments received regarding the draft permit are available for viewing at the S.C. DHEC Columbia office located at 2600 Bull Street, Columbia, SC 29201 or on the S.C. DHEC Web page www.scdhec.gov/Pinewood. Hardcopies can be requested by contacting our Freedom of Information Office at (803) 898-3817.

A. Comment from Hearing

Onsite Inspectors – The commenter stated there was a need to have a DHEC on-site inspector when the Leachate Treatment System was in operation.

South Carolina law (Hazardous Waste Management Act) allows for on-site inspectors at commercial facilities accepting waste. Based on the volume of waste entering the Pinewood Site when it was open, DHEC determined on-site inspectors were necessary. The inspectors' primary duty was to check the waste receipts against the waste being brought onto the facility. Because the site has been closed and is no longer operating as a commercial facility, waste receipt inspections are no longer needed.

The proposed leachate treatment system will be operated and manned by the Pinewood Site Custodial Trustee and its contractor. The leachate treatment system can not be operated without personnel being present. The Pinewood Site Custodial Trust has stated that the treatment system building design will include a spill prevention and collection system in the event of an accidental spill. Even though the Pinewood Site no longer accepts waste, DHEC closely monitors all operations at the facility. The entire site operations are now, and the proposed treatment system will be, tied into an electronic monitoring system that allows staff from DHEC's Bureau of Land and Waste Management to see live data from all operations at the Pinewood Site and respond to situations that deviate from normal operations. Additionally, the air permit requires leachate testing, monitoring and reporting to ensure the emission

limits are met and continue to be met. The permit requires notification within 24 hours to DHEC when process upsets, exceedances or malfunctions occur.

DHEC will have staff present during the startup of the treatment system and we will be conducting periodic inspections at the facility through the Bureau of Land and Waste Management, the Bureau of Air Quality and the regional field office in Sumter. The Environmental Protection Agency (EPA) has also committed to assisting with inspections. The Bureau of Air Quality is also responsible for reviewing emission reports, testing protocols and testing results.

B. Comment from Facility

Name Change – The Trustee (Kestrel Horizons) has requested that the name on the permit be changed to coincide with the name on other Department permits.

This name change has been completed in all applicable places on the permit and Statement of Basis.

Below is a summary of changes made to the Statement of Basis and Permit

CHANGES TO THE STATEMENT OF BASIS

1. Name has been changed in all applicable areas.

CHANGES TO THE DRAFT PERMIT

1. Name has been changed in all applicable areas.