



HEI-26220

October 10, 2017

Ms. Diana Wood
Surface Transportation Board
Docket No. FD 36095
c/o ICF
9300 Lee Highway
Fairfax, VA 22031

Re: Berkeley County New Rail Line Construction

Dear Ms. Wood:

On September 13, 2017, we received your letter, dated September 8, 2017, about the proposed new Palmetto Railways rail line in Berkeley County, SC. *Based on the information provided, I am responding on behalf of the South Carolina Department of Health and Environmental Control, Bureau of Air Quality (Bureau).* Please send all future inquiries to my attention.

The Bureau is tasked with implementing the Federal Clean Air Act (1990, as amended) in the State of South Carolina. The Bureau is required to ensure compliance with the National Ambient Air Quality Standards (NAAQS) for criteria pollutants. Currently two criteria pollutants are of particular concern in South Carolina:

- **Ozone** – The 2015 8-hour primary and secondary standards of 70 parts per billion (ppb) were finalized on October 26, 2015. The area represented in this proposal is currently meeting the 2015 ozone standards. Designations for these standards are anticipated in October 2018.
- **Particulate Matter 2.5** (Particulates 2.5 microns in size and smaller) – The 2012 standard for maximum daily concentration is set at 35 micrograms per cubic meter. The 2012 standard for the maximum annual concentration is set at 12 micrograms per cubic meter. The area represented in this proposal is meeting the 2012 particulate matter 2.5 standards.

South Carolina is currently attaining all of the NAAQS, but may face nonattainment when designations for the new ozone standards are made. If a project is located in a nonattainment area, it may be subject to prescriptive requirements such as Transportation Conformity or air quality modeling.

An asbestos survey and project license may be required prior to any demolition activities such as deconstruction of a building or removal of structures in the right-of-way of a road project. If

you have any questions regarding asbestos regulatory applicability you may contact Marc McKenna (with the Bureau's Asbestos Section) at (803) 898-4270 or mckennmt@dhec.sc.gov.

All necessary environmental permits for the subject project must be obtained in accordance with applicable state and federal regulations. If you have not already done so, please contact the Bureau of Water at (803) 898-4300 and the Bureau of Land and Waste Management at (803) 898-2000 for input regarding those program areas' assessments of this proposed project.

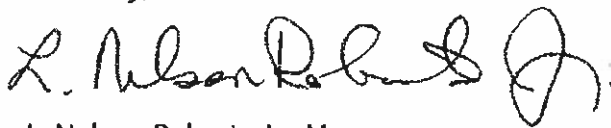
Emissions from diesel equipment are regulated by federal standards. The Bureau would like to offer the following suggestions on how this project can help us stay in compliance with the NAAQS. More importantly, these strategies are beneficial to the health of citizens of South Carolina.

- Utilize alternatively fueled equipment.
- Utilize emission controls applicable to your equipment.
- Reduce idling time on equipment.
- Fugitive dust emissions should be minimized through good operating practices.

The Bureau can provide model clean construction contract language. A vendor may need to retrofit, repower or replace older and more polluting diesel construction equipment in order to satisfy clean construction requirements. These types of projects can be financed with Congestion Mitigation and Air Quality (CMAQ) funds, and are in fact a high priority for CMAQ funding. Please contact our office if assistance is needed.

Thank you for the opportunity to comment on this project. Should you have any further questions or comments concerning this matter, please do not hesitate to contact me at (803) 898-4122 or at robertln@dhec.sc.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "L. Nelson Roberts, Jr.", with a stylized flourish at the end.

L. Nelson Roberts, Jr., Manager
Air Initiatives and Mobile Sources Section
Bureau of Air Quality

cc: Wendy Boswell, Lowcountry EQC McMillan Office boswelwm@dhec.sc.gov