



Carolina Sunrock, LLC.

Environmental Justice Report

North Carolina Department of Environmental Quality
March 15, 2022

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1 Introduction

Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies (US EPA). This evaluation examines the demographic and environmental conditions in Caswell and Alamance Counties, census tracts 9306 and 213, and the one-mile radius around the property boundary of the proposed Carolina Sunrock, LLC. – Burlington North Facility. Finally, the demographics of the entire state of North Carolina are also considered as they compare to both the county and local census tract and radius setting.

An Environmental Justice (EJ) Snapshot was prepared in August 2020, at the beginning of the previous application process. The EJ Snapshot was distributed to interested community members (if known) and published on the DEQ website with the relevant permit application. The purpose of the EJ Snapshot was to encourage comments and suggestions from the surrounding community, industry, and environmental groups throughout the comment period at that time. The public hearing and accompanying comment period was extended three times in 2020 due to COVID-19, community concerns, and inclement weather. Carolina Sunrock LLC did not receive a permit from the Division of Air Quality in 2020, so has reapplied for a similar permit. Public comments will be considered throughout the remainder of the comment period to inform the final version of this EJ Report.

2 Environmental Justice Evaluation

The Department has assessed the permit applications and the potential impact on communities surrounding the sites associated with the requested permit applications. Carolina Sunrock LLC. submitted two separate permit applications for two locations. This EJ Report only includes information regarding the Burlington North Facility. Please review the accompanying EJ Report for information on the Prospect Hill Distribution Center. Accordingly, the EJ Report will include:

- The permit application submitted by Carolina Sunrock, LLC – Burlington North
- Emissions overview for the facility location
- Study of area demographics for the proposed location (determined by utilizing the US EPA Environmental Justice tool (EJSCREEN) <https://ejscreen.epa.gov/mapper/> and current, available census data. <https://data.census.gov/cedsci/>)
- Comparison of local area demographics for the facility to both county and statewide census data
- County health assessment for all counties
- Sensitive receptors surrounding the facility
- Local industrial sites for the facility (using the NCDEQ Community Mapping System <https://ncdenr.maps.arcgis.com/apps/webappviewer/index.html?id=1eb0fbe2bcfb4cccb3cc212af8a0b8c8>).

Demographics for Caswell and Alamance counties, as well as the state, will be compared to the local level data (census tracts and project radius) to identify any disparities surrounding the project area. Using standard environmental justice guidelines from the EPA and National Environmental Policy Act (NEPA) documentation, the following conditions will be flagged as having the potential for environmental justice concerns:

- 10% or more in comparison to the county or state average

- 50% or more minority
- 5% or more in comparison to the county or state average for poverty

3 Proposed Project

Carolina Sunrock, LLC. has submitted permit applications for two proposed sites in Caswell County, North Carolina. One is a hot mix asphalt and concrete batch plant, while the other is a quarry, hot mix asphalt plant, concrete batch plant, and distribution center. They are located approximately nine miles apart from each other. This report only details the Burlington North facility. Please review the accompanying EJ Report for information on the Prospect Hill Distribution Center.

The first proposed site, Carolina Sunrock LLC-Burlington North, will include a hot mix asphalt plant and concrete batch plant. The proposed asphalt plant will include a 250 tons per hour maximum capacity drum-type dryer/mixer with an 80 million BTU per hour maximum heat input capacity burner capable of combusting propane, natural gas, No. 2/4 fuel oils, and recycled No. 2 fuel oil. Particulate matter emissions from the mixer will be controlled by a bag filter.

The plant will include 5 hot mix asphalt storage silos, each with loadouts, and Recycled Asphalt Pavement (RAP) crushing, screening and conveying system. The concrete batch plant is a truck mix plant rated at 120 cubic yards per hour maximum production capacity. Particulate emissions from the plant will be controlled by a bag filter.

Potential emissions of criteria and hazardous air pollutants (after emissions controls and permit limits are taken into account) are shown in Table 1.¹

Table 1. Burlington North Asphalt Facility Emissions Overview

Pollutant	Potential Emissions (with controls and permit limits, tons/year)
PM	34.08
PM ₁₀	19.00
SO ₂	26.06
NO _x	16.63
CO	33.85
VOC	12.06
HAP _{Total}	2.59
HAP _{Highest} (Formaldehyde)	0.80

¹ Accurate as of August 6, 2021. Values may change due to modifications to the permit throughout the permitting process.

4 Geographic Area

The proposed facility, Carolina Sunrock LLC- Burlington North, is located at 12971 S NC Highway 62, Burlington, NC 27127 (Figure 1). The highest off-site ambient air impacts will occur at the plant fence line. A one-mile radius was used to evaluate the local demographics and socioeconomics of the surrounding community and help inform public outreach efforts.

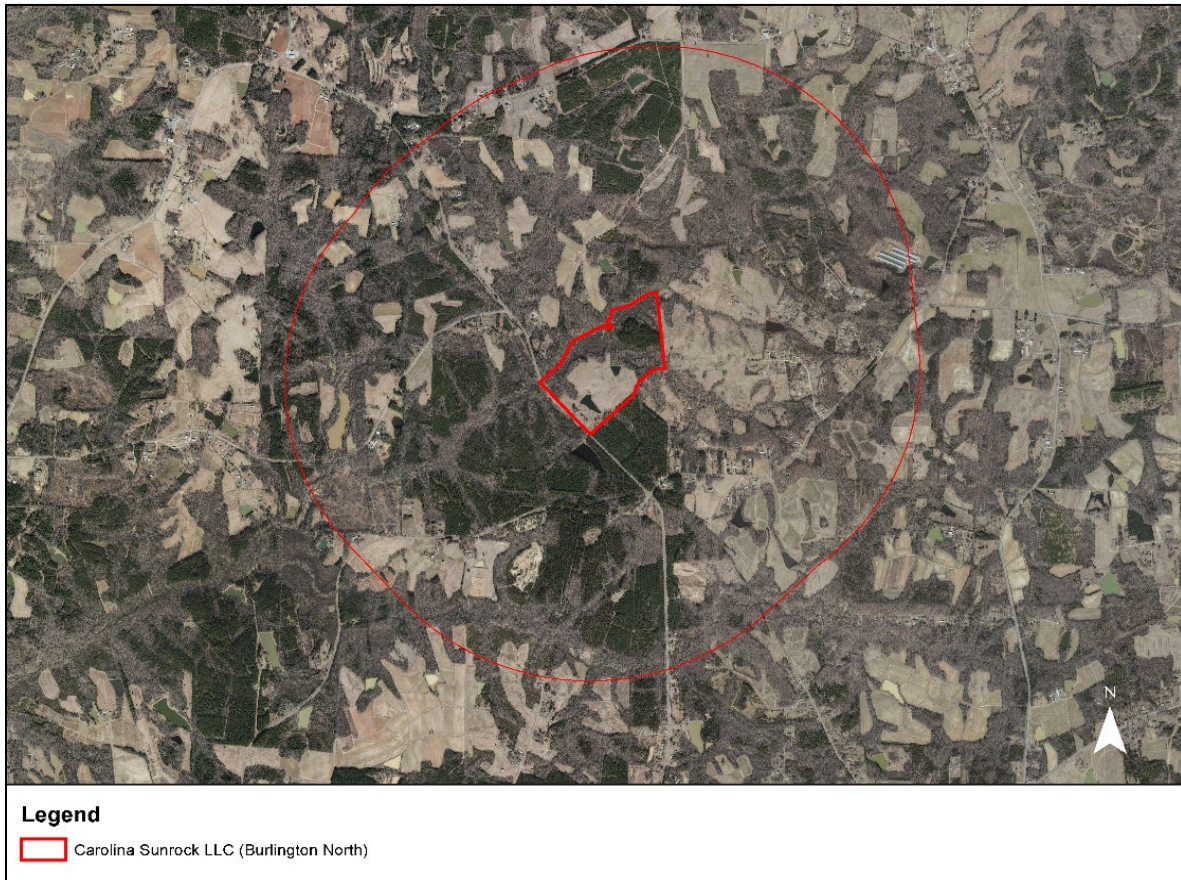


Figure 1. Burlington North asphalt facility location with one-mile radius.

The proposed facility would be located in Caswell County. Caswell County is designated as a Tier 1 county by the NC Department of Commerce. The one-mile buffer surrounding the Burlington North facility includes land in Alamance County, which is designated as a Tier 2 county. According to the Department of Commerce, Tier 1 counties encompass the 40 most distressed counties based on average unemployment rate, median household income, percentage growth in population, and adjusted property tax per capita. Tier 2 counties encompass the next 40 counties based on this ranking system.

The one-mile radius used in this analysis is encompassed by two census tracts. The proposed facility site is located in Census Tract 9306 in Caswell County, and the one-mile buffer enters Census Tract 213 in Alamance County (Figure 3). Census tracts are small, relatively permanent statistical subdivisions of a county with a unique numeric code (US Census Bureau). Census Tract 213 in Alamance County encompasses land within the state designated tribal statistical area for the Occaneechi Band of the Saponi Nation.

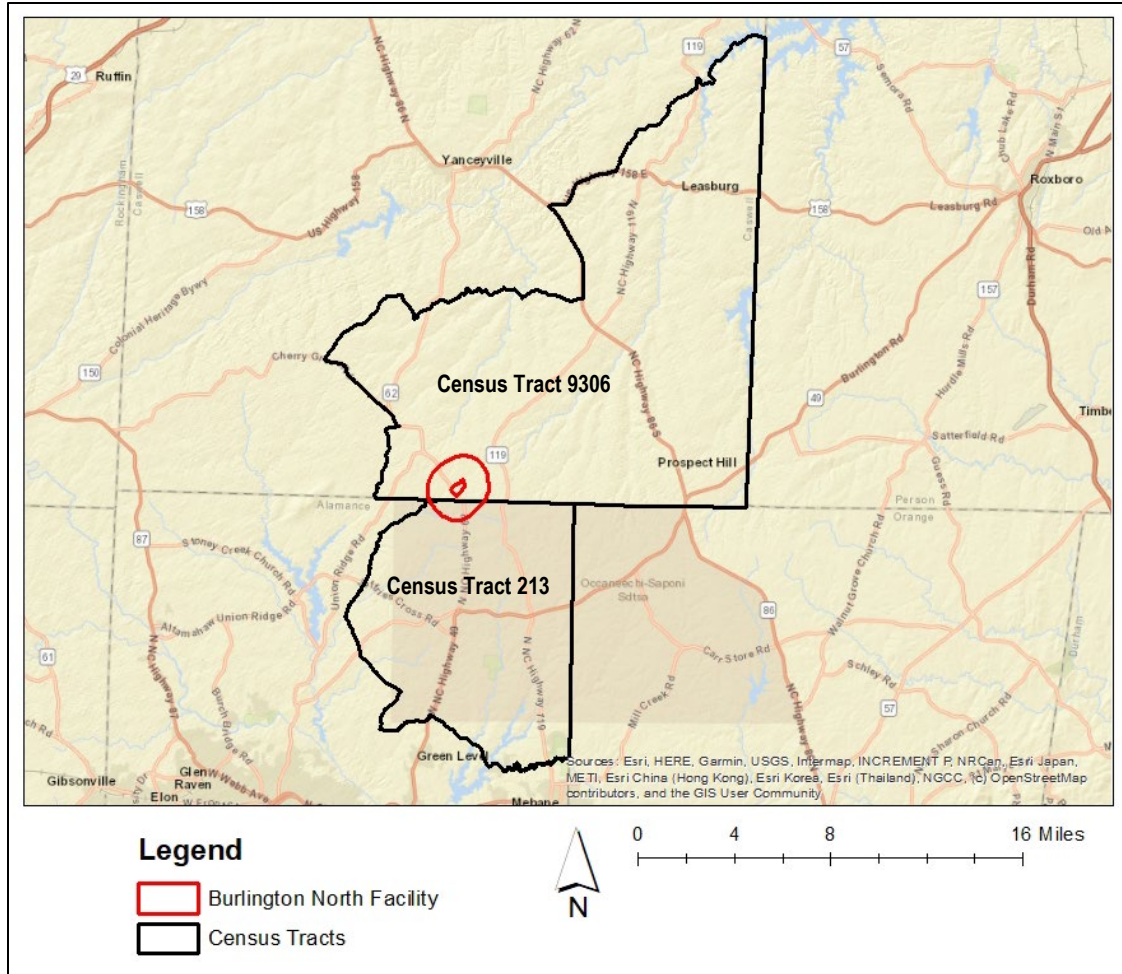


Figure 2. Census tracts surrounding the proposed facility location.

5 Regional and Local Settings

The following sections on race and ethnicity, age and sex, disability, poverty, household income, and Limited English Proficiency (LEP) populations are based on US Census Bureau data, first at a state and county level (regional setting), and then at a census tract and project radius level (local setting). The surrounding census tracts included are those that overlap into the one-mile radius. Demographics of the counties will be compared to the local level data to identify any disparities surrounding the project area. Using standard environmental justice guidelines from the EPA and NEPA documentation, the following conditions will be flagged as potential communities of concern:

1. 10% or more in comparison to the county or state average
2. 50% or more minority
3. 5% or more in comparison to the county or state average for poverty

For example, if a census tract has 35% of the population classified as low income but the county consists of 30% low income, the census tract would exceed the county average by 16.7% and thus be flagged as a potential area of concern. For this report, census data from 2010 and census data estimates from 2011-2015 and 2013-2017 were used. 2010 Census Bureau data is real data gathered every ten years, whereas the estimates from the more recent years are modeled based on the real data. For the data gathered from the 2013-2017 and 2011-2015 estimates, the margin of error (MOE) has been included. This value is a measure of the possible variation of the estimate around the population value (US Census Bureau). The Census Bureau standard for the MOE is at the 90% confidence level and may be any number between 0 and the MOE value in either direction (indicated by +/-).

5.1 Race and Ethnicity

Regional Setting

According to the 2010 US Census Data Table 9: Hispanic or Latino, and Not Hispanic or Latino By Race, North Carolina’s population totaled 9,535,483 individuals (Table 3). The three most common racial groups across the state were White (68.5%), Black or African American (21.5%) and Hispanic or Latino (of any race) at 8.4%.

Caswell County had a total population of 23,719 individuals (Table 3). Alamance County had a total population of 151,131 individuals. The three most common racial or ethnic groups within both counties were White (62.5%, and 71.1%), Black or African American (33.8%, and 18.8%), and Hispanic or Latino (3.1%, and 11.0%). In Caswell County, the Black or African American Population (33.8%) was greater than 10% different when compared to the state (21.5%). In Alamance County, the populations of Some other Race (6.1%) and the Hispanic or Latino population (11.0%) were greater than 10% different when compared to the state (4.3% and 8.4%).

Table 2. Regional Setting - Race and Ethnicity

Race and Ethnicity	North Carolina		Caswell County		Alamance County	
	Number	Percent	Number	Percent	Number	Percent
Total Population	9,535,483	100	23,719	100.0	151,131	100.0
White	6,528,950	68.5	14,819	62.5	107,420	71.1
Black or African American	2,048,628	21.5	8,020	33.8	28,369	18.8
American Indian or Alaska Native	122,110	1.3	85	0.4	1,020	0.7
Asian	208,962	2.2	60	0.3	1,837	1.2
Native Hawaiian and Other Pacific Islander	6,604	0.1	4	0.0	58	0.0
Some other Race	414,030	4.3	350	1.5	9,291	6.1
Two or More Races	206,199	2.2	381	1.6	3,136	2.1
HISPANIC OR LATINO (of any race)	800,120	8.4	744	3.1	16,639	11.0
Mexican	486,960	5.1	607	2.6	11,664	7.7
Puerto Rican	71,800	0.8	42	0.2	861	0.6
Cuban	18,079	2.3	17	0.1	186	0.1
Other Hispanic or Latino	223,281	2.3	78	0.3	3,928	2.6

Source: US Census Bureau, 2010 Census
 All **bolded and orange** cells indicate a difference that is greater than 10% when compared to the State

Local Setting

According to the 2010 US Census Data Table 9: Hispanic or Latino, and Not Hispanic or Latino By race or ethnicity, the largest population within Census Tract 9306 in Caswell County was White at 70.3%, followed by Black or African American at 25.8%, and Hispanic or Latino at 3.2%. The Black or African American population (25.8%) was greater than 10% different compared to the state (21.5%). The largest population within Census Tract 213 in Alamance County was White at 61.8% followed by Black or African American (31.8%) and Hispanic or Latino (5.8%). The Black or African American population is greater than 10% different when compared to the county (18.8%) and the state (21.5%).

The one-mile radius surrounding the Burlington North facility is majority White (67.0%), followed by Black or African American (29.0%), and Hispanic or Latino (4.0%). The Black or African American population is greater than 10% different when compared to the state (21.5%) but not the County (Table 4).

Table 3. Local Setting: Burlington North – Race and Ethnicity

Subject	Project Area 1-Mile		Census Tract 9306 Caswell County		Census Tract 213 Alamance County	
	Number	Percent	Number	Percent	Number	Percent
Total Population	310	100.0	4,790	100.0	6,057	100.0
White	206	67.0	3,367	70.3	3,743	61.8
Black or African American	89	29.0	1,238	25.8	1,925	31.8
American Indian or Alaska Native	3	1.0	20	0.2	65	1.1
Asian	0	0.0	8	0.2	15	0.2
Native Hawaiian and Other Pacific Islander	0	0.0	0	0.0	0	0.0
Some other Race	5	2.0	84	1.8	188	3.1
Two or More Races	6	2.0	73	1.5	121	2.0
HISPANIC OR LATINO (of any race)						
	11	4.0	151	3.2	353	5.8
Mexican			113	2.4	236	3.9
Puerto Rican			17	0.4	22	0.4
Cuban			0	0.0	7	0.1
Other Hispanic or Latino			21	0.4	88	1.5
Source: US Census Bureau, 2010 Census						
All bolded and orange cells indicate a difference that is greater than 10% when compared to the State						
All bolded and blue cells indicate a difference that is greater than 10% when compared to the county and the State						

5.2 Age and Sex

Regional Setting

According to the 2010 US Census Data Table P 12: Sex by Age, North Carolina had a total population of 9,535,483 individuals (Table 5). The largest percentage of the total state population (63.1%) was between the ages of 18 and 64, followed by under 18 years (23.9%), and 65 years and older (12.9%).

Caswell County had a total population of 23,719 individuals. The largest percentage of the total population (63.56%) was between the ages of 18 and 64, followed by under 18 years (20.6%) and 65 years and older (15.8%).

Alamance County had a total population of 151,131 individuals. The largest percentage of the total population (61.9%) was between the ages of 18 and 64, followed by under 18 years (23.5%) and 65 years and older (14.6%).

In both counties, for both male and female subgroups, as well as the population overall, the populations of 65 years and older is greater than 10% different when compared to the state.

Table 4. Regional Setting- Age Groups and Sex

Subject	North Carolina		Caswell County		Alamance County	
	Number	Percent	Number	Percent	Number	Percent
Total Population:	9,535,483	100	23,719	100	151,131	100
Under 5 years:	632,040	6.6	1,181	5.0	9,524	6.3
Under 18 years:	2,281,635	23.9	4,889	20.6	35,443	23.5
18 to 64 years:	6,019,769	63.1	15,075	63.6	93,607	61.9
65 years and older:	1,234,079	12.9	3,755	15.8	22,081	14.6
Male:	4,645,492	100	12,074	100	71,890	100
Under 5 years:	322,871	7.0	602	5.0	4,846	6.7
Under 18 years:	1,167,303	25.1	2,537	21.0	18,109	25.2
18 to 64 years:	2,954,233	63.6	7,935	65.7	44,687	62.2
65 years and older:	523,956	11.28	1,602	13.3	9,094	12.7
Female:	4,889,991	100	11,645	100	79,241	100
Under 5 years:	309,169	6.32	579	5.0	4,678	5.9
Under 18 years:	1,114,332	22.79	2,352	20.2	17,334	21.9
18 to 64 years:	3,065,536	62.69	7,140	61.3	48,920	61.7
65 years and older:	710,123	14.52	2,153	18.5	12,987	16.4
Source: US Census Bureau, 2010 Census						
All bolded and orange cells indicate a difference that is greater than 10% when compared to the State						

Local Setting

According to the 2010 US Census Data Table P 12: Sex by Age, Census Tract 9306 had a total population of 4,790 individuals (Table 6). The largest percentage of the total population (62.8%) was between the ages of 18 and 64, followed by under 18 years (20.6%), and 65 years and older (16.6%). The total population, as well as the female subgroup have a population of 65 years and older that is greater than 10% different than the state. The male subgroup has a population of 65 years and older that is greater 10% different than the county and the state.

Census Tract 213 had a total population of 6,057 individuals. The largest percentage of the total population (61.9%) was between the ages of 18 and 64, followed by under 18 years (23.4%), and 65 years and older (14.7%). The total population, as well as the male and female subgroups have a population of 65 years and older that is greater than 10% different than the state.

Table 5. Local Setting- Age Groups and Sex

Subject	Census Tract 9306, Caswell County		Census Tract 213, Alamance County	
	Number	Percent	Number	Percent
Total Population:	4,790	100	6,057	100
Under 5 years:	246	5.1	306	5.1
Under 18 years:	988	20.6	1,417	23.4
18 to 64 years:	3,007	62.8	3,752	61.9
65 years and older:	795	16.6	888	14.7
Male:	2,407	100	2,950	100
Under 5 years:	132	5.5	145	4.9
Under 18 years:	535	22.2	707	24.0
18 to 64 years:	1,511	62.8	1,854	62.9
65 years and older:	361	15.0	389	13.2
Female:	2,383	100	3,107	100
Under 5 years:	114	4.8	161	5.2
Under 18 years:	453	19.0	710	22.9
18 to 64 years:	1,496	62.8	1,898	61.1
65 years and older:	434	18.2	499	16.1

Source: US Census Bureau, 2010 Census

All **bolded and orange** cells indicate a difference that is greater than 10% when compared to the State

All **bolded and blue** cells indicate a difference that is greater than 10% when compared to the county and the State

EJSCREEN identified an approximate population of 372 in the 1-mile radius surrounding the Burlington North facility. The largest population was 18+ years, at 78%, followed by 0-17 years at 22% (Table 7).

Table 6. Project Radius- Age Groups and Sex

Subject	1-mile radius	
	Number	Percent
Total Population	372	100
0-4 years	18	6
0-17 years	64	22
18+ years	243	78
65+ years	47	15
Source: US Census Bureau, 2010 Census		

5.3 Disability

Regional Setting

According to the 2013-2017 American Community Survey 5-Year Estimates, Table S1810 Disability Characteristics from the US Census Bureau, the state of North Carolina had an estimated total population of 9,845,238 noninstitutionalized citizens. Of those individuals, an estimated 13.7% (MOE +/- 0.1%) had a disability. The largest population of disabled civilians were 75 years and over (51.0%, MOE +/- 0.5%). The second largest population was the 65 years to 74 years at 27.2% (MOE +/- 0.3%). By race, American Indian and Alaskan Native had the highest estimated disability rate of 18.3% (MOE +/- 0.7%). Black or African American, White, and Native Hawaiian and Other Pacific Islander were the next three highest population estimates with disabilities in North Carolina, at 15.1% (MOE +/-0.2%, 14.0% (MOE +/- 0.1%), and 11.6% (MOE +/- 0.6%), respectively (Table 8).

Caswell County had an estimated total population of 21,970 noninstitutionalized citizens. Of those, an estimated 19.7% (MOE +/- 2%) had a disability. The largest population of disabled civilians were 75 years and over (60.9%, MOE +/- 7.2%) followed by 65 years to 74 years (32.4%, MOE +/-6%). By race, residents of Two or more races had the highest estimated disability rate (50.9%, MOE +/-31%). All populations, excluding American Indian and Alaska Native, Native Hawaiian and Other Pacific Islander, some other race, Hispanic or Latino, and 5 to 17 years displayed estimates that were greater than 10% different when compared to the state.

Alamance County had an estimated total population of 156,660 noninstitutionalized citizens. Of those, an estimated 14.6% (MOE +/- .6%) had a disability (Table 9). The largest population of disabled civilians were 75 years and over (50.1%, MOE +/- 2.8%) followed by 65 years to 74 years (28.4, MOE +/-2.3%). By race, Native Hawaiian and Other Pacific Islander residents had the highest estimated disability rate (28.4%, MOE +/-17.1%). The following population groups displayed estimates that were greater than 10% different when compared to the state: Black or African American, Native Hawaiian and other Pacific Islander, Two or more races, under 5 years, and 5-17 years.

Table 7. Regional Setting- Disability

Subject	North Carolina						Caswell County					
	Total		With a Disability		Percent with a Disability		Total		With a Disability		Percent with a Disability	
	Estimate	Margin of Error (+/-)	Estimate	Margin of Error (+/-)	Estimate	Margin of Error (+/-)	Estimate	Margin of Error (+/-)	Estimate	Margin of Error (+/-)	Estimate	Margin of Error (+/-)
Total civilian noninstitutionalized population	9,845,238	1,883	1,344,677	9,296	13.7%	0.1	21,970	136	4,339	445	19.7%	2.0
SEX												
Male	4,734,744	2,356	644,157	5,756	13.6%	0.1	10,738	191	2,216	264	20.6%	2.5
Female	5,110,494	1,611	700,520	5,791	13.7%	0.1	11,232	96	2,123	275	18.9%	2.4
RACE AND HISPANIC OR LATINO ORIGIN												
White alone	6,805,260	7,679	950,044	7,928	14.0%	0.1	13,885	214	2,594	350	18.7%	2.5
Black or African American alone	2,101,735	5,025	316,325	4,035	15.1%	0.2	7,202	228	1,573	257	21.8%	3.7
American Indian and Alaska Native alone	114,961	1,802	20,994	862	18.3%	0.7	23	26	0	22	0.0%	61.8
Asian alone	266,672	1,954	13,149	763	4.9%	0.3	130	22	35	32	26.9%	24.5
Native Hawaiian and Other Pacific Islander alone	5,842	533	678	170	11.6%	3	32	38	0	22	0.0%	52.4
Some other race alone	306,809	7,341	15,461	1,136	5.0%	0.3	429	184	0	22	0.0%	7.3
Two or more races	243,959	5,401	28,026	1,407	11.5%	0.5	269	163	137	106	50.9%	31
Hispanic or Latino (of any race)	895,338	953	53,910	1,944	6.0%	0.2	806	27	10	15	1.2%	1.9
AGE												
Under 5 years	603,917	730	5,099	590	0.8%	0.1	1,080	35	22	33	2.0%	3.1
5 to 17 years	1,682,039	807	95,840	2,124	5.7%	0.1	3,253	38	169	71	5.2%	2.2
18 to 34 years	2,190,572	2,241	144,807	3,125	6.6%	0.1	4,018	103	300	110	7.5%	2.8
35 to 64 years	3,894,704	2,076	560,147	6,001	14.4%	0.2	9,350	140	2,003	321	21.4%	3.4
65 to 74 years	895,249	1,047	243,488	2,801	27.2%	0.3	2,651	47	859	155	32.4%	6
75 years and over	578,757	1,013	295,296	2,759	51.0%	0.5	1,618	56	986	122	60.9%	7.2

Table 8. Regional Setting- Disability cont'd

Subject	Alamance County					
	Total		With a Disability		Percent with a Disability	
	Estimate	Margin of Error (+/-)	Estimate	Margin of Error (+/-)	Estimate	Margin of Error (+/-)
Total civilian noninstitutionalized population	156,660	231	22,895	988	14.6%	0.6
SEX						
Male	74,611	185	10,661	650	14.3%	0.9
Female	82,049	200	12,234	601	14.9%	0.7
RACE AND HISPANIC OR LATINO ORIGIN						
White alone	110,346	1,242	16,922	862	15.3%	0.8
Black or African American alone	29,705	417	4,837	466	16.3%	1.6
American Indian and Alaska Native alone	529	196	96	49	18.1%	7.5
Asian alone	2,378	216	103	63	4.3%	2.7
Native Hawaiian and Other Pacific Islander alone	67	23	19	15	28.4%	17.1
Some other race alone	9,594	1,250	285	161	3.0%	1.6
Two or more races	4,041	621	633	219	15.7%	4.8
Hispanic or Latino (of any race)	19,423	35	772	249	4.0%	1.3
AGE						
Under 5 years	9,226	50	104	70	1.1%	0.8
5 to 17 years	26,696	60	1,801	367	6.7%	1.4
18 to 34 years	34,324	73	2,178	358	6.3%	1
35 to 64 years	61,661	101	9,487	603	15.4%	1
65 to 74 years	14,165	159	4,021	327	28.4%	2.3
75 years and over	10,588	167	5,304	291	50.1%	2.8
Source: US Census Bureau, ACS 5-year Estimates (2013-2017)						
All bolded and orange highlighted cells indicate a difference that is greater than 10% when compared to the State						

Local Setting

According to the 2013-2017 American Community Survey 5-Year Estimates, Table S1810 Disability Characteristics from the US Census Bureau, Census Tract 9306 in Caswell County had an estimated total population of 5,005 noninstitutionalized citizens (Table 10). Of those individuals, an estimated 15.4% (MOE +/- 4.2%) had a disability. The largest population of disabled civilians were 75 years and over (69.2%, MOE +/- 20.8%). The second largest population was the 65 years to 74 years at 35.5% (MOE +/- 14%). By race, Black or African American residents had the highest estimated disability rate of 19.6% (MOE +/- 12%). The following population groups had estimates that were greater than 10% when compared to the state: total civilian noninstitutionalized population, male, Black or African American alone, 35-64 years, and 65-74 years. The population group 75 years and older had an estimate that was greater than 10% when compared to the county and to the state.

Census Tract 213 in Alamance County had an estimated total population of 6,073 noninstitutionalized citizens. Of those individuals, an estimated 15% (MOE +/- 1.7%) had a disability. The largest population of disabled civilians were 75 years and over (52.1%, MOE +/- 7.1%). The second largest population was the American Indian and Alaska Native population at 33.3% (MOE +/- 16.9%). The female subgroup had an estimate that was greater than 10% different when compared to the state. The following population groups had estimates that were greater than 10% when compared to the state and the county: Black or African American alone, American Indian and Alaska native, Asian, and 18-34 years.

Table 9. Local Setting- Disability

Subject	Census Tract 9306, Caswell County						Census Tract 213, Alamance County					
	Total		With a Disability		Percent with a Disability		Total		With a Disability		Percent with a Disability	
	Estimate	Margin of Error (+/-)	Estimate	Margin of Error (+/-)	Estimate	Margin of Error (+/-)	Estimate	Margin of Error (+/-)	Estimate	Margin of Error (+/-)	Estimate	Margin of Error (+/-)
Total civilian noninstitutionalized population	5,005	493	769	227	15.4%	4.2	6,073	266	912	113	15.0%	1.7
SEX												
Male	2,556	270	436	142	17.1%	5.5	2,972	153	430	72	14.5%	2.1
Female	2,449	286	333	123	13.6%	4.5	3,101	176	482	68	15.5%	2.1
RACE AND HISPANIC OR LATINO ORIGIN												
White alone	3,697	377	517	199	14.0%	5.3	3,867	203	550	86	14.2%	2
Black or African American alone	1,289	312	252	165	19.6%	12	1,741	175	323	62	18.6%	2.7
American Indian and Alaska Native alone	0	17	0	17	-	**	42	23	14	8	33.3%	16.9
Asian alone	8	16	0	17	0.0%	100	60	49	4	5	6.7%	8.7
Native Hawaiian and Other Pacific Islander alone	0	17	0	17	-	**	6	10	0	17	0.0%	100
Some other race alone	0	17	0	17	-	**	188	85	7	8	3.7%	4.5
Two or more races	11	22	0	17	0.0%	89.4	169	58	14	16	8.3%	8.8
Hispanic or Latino (of any race)	33	39	0	17	0.0%	51.6	324	103	10	9	3.1%	2.7
AGE												
Under 5 years	324	93	0	17	0.0%	9.5	266	58	0	17	0.0%	11.5
5 to 17 years	854	199	25	28	2.9%	3.4	1,100	117	50	20	4.5%	1.7
18 to 34 years	1,094	209	30	47	2.7%	4.3	881	102	65	25	7.4%	2.7
35 to 64 years	1,959	270	378	150	19.3%	7.2	2,772	141	426	81	15.4%	2.7
65 to 74 years	592	135	210	104	35.5%	14	653	72	162	44	24.8%	5.9
75 years and over	182	69	126	65	69.2%	20.8	401	64	209	41	52.1%	7.1

Source: US Census Bureau, American Community Survey (5-year estimates)

All **bolded and orange** highlighted cells indicate a difference that is greater than 10% when compared to the State

All **bolded and blue** highlighted cells indicate a difference that is greater than 10% when compared to the County and State

5.4 Poverty

Regional Setting

According to the Census Table S1701, Poverty Status in the Past 12 Months, 2013-2017 American Community Survey 5-Year Estimates, from the US Census Bureau, North Carolina had an estimated population of 9,783,738, with 16.1% (MOE +/- 0.2%) below the poverty level (Table 11). Across all subjects, Some other race had the highest percent living below the poverty level at 32.0% (MOE +/- 1.4%). The next three subjects with the highest poverty level were Hispanic or Latino at 30.1% (MOE +/- .8%), American Indian and Alaska Native at 26.2% (MOE +/- 1.5%), and Black or African American at 24.9% (MOE +/- .4%). The age group with the highest population below poverty was under 18 (22.9%, MOE +/- 0.4%), followed by 18 to 64 (15.3%, MOE +/- 0.2%).

Caswell County had an estimated population of 21,870 with 21.3% (MOE +/-2.9%) living below the poverty level. Across all subjects, two or more races had the highest percent living below the poverty level at 65.4% (MOE +/- 7.4%). The next subjects with the highest poverty level were Some other race at 59.2% (MOE +/- 32.2%) and Hispanic or Latino at 56.1% (MOE +/- 19.9%). All subject groups had a greater than 5% difference when compared to the state, excluding Native Hawaiian and Other Pacific Islander and American Indian and Alaska Native.

Alamance County had an estimated population of 153,649 with 17.6% (MOE +/-1%) living below the poverty level. Across all subjects, some other race had the highest percent living below the poverty level at 37% (MOE +/- 7.4%). The next subjects with the highest poverty level were American Indian and Alaska Native at 35% (MOE +/- 20.5%) and Hispanic or Latino at 32.2% (MOE +/- 5.2%). The following subject groups had a greater than 5% difference when compared to the state: overall population, under 18, female, Black or African American, American Indian and Alaska Native, Some other race, and Two or more races (Table 12).

Table 10. Regional Setting- Poverty

Subject	North Carolina						Caswell County					
	Total		Below poverty level		Percent below poverty level		Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Population for whom poverty status is determined	9,783,738	1,751	1,579,871	17,833	16.1%	0.2	21,870	156	4,666	650	21.3%	2.9
AGE												
Under 18	2,256,186	1,865	516,821	9,185	22.9%	0.6	4,233	76	1,449	312	34.2%	7.2
18 to 64	6,053,546	1,090	923,859	9,663	15.3%	0.4	13,368	144	2,471	395	18.5%	2.9
65 years and over	1,474,006	881	139,191	2,754	9.4%	0.2	4,269	56	746	199	17.5%	4.6
SEX												
Male	4,733,269	2,259	694,126	9,539	14.7%	0.2	10,709	189	2,255	378	21.1%	3.5
Female	5,050,469	2,443	885,745	10,217	17.5%	0.2	11,161	115	2,411	368	21.6%	3.3
RACE AND HISPANIC OR LATINO ORIGIN												
White	6,776,691	7,591	845,573	13,639	12.5%	0.2	13,814	220	2,263	503	16.4%	3.7
Black or African American	2,077,559	4,736	517,071	8,162	24.9%	0.4	7,188	227	1,950	365	27.1%	5.1
American Indian and Alaska Native	114,751	1,804	30,017	1,757	26.2%	1.5	23	26	4	7	17.4%	36.9
Asian	262,596	1,970	33,282	2,248	12.7%	0.9	130	22	29	41	22.3%	31.8
Native Hawaiian and Other Pacific Islander	5,886	537	1,097	297	18.6%	4.9	32	38	0	22	0.0%	52.4
Some other race	305,431	7,334	97,609	5,276	32.0%	1.4	429	184	254	204	59.2%	32.2
Two or more races	240,824	5,455	55,222	2,570	22.9%	1	254	162	166	165	65.4%	43.5
Hispanic or Latino	894,810	1,312	268,985	7,035	30.1%	0.8	806	27	452	160	56.1%	19.9
All individuals below:												
50 percent of poverty level	688,118	10,757					1,965	538				
125 percent of poverty level	2,094,292	20,441					5,709	679				
150 percent of poverty level	2,596,452	22,139					6,652	697				
185 percent of poverty level	3,291,075	23,334					8,328	753				
200 percent of poverty level	3,571,557	25,056					9,398	764				

Table 11. Regional Setting- Poverty cont'd

Subject	Alamance County					
	Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Population for whom poverty status is determined	153,649	450	26,996	1,473	17.6	1.0
AGE						
Under 18	35,598	152	9,296	798	26.1	2.3
18 to 64	93,298	383	15,152	932	16.2	1.0
65 years and over	24,753	194	2,548	338	10.3	1.4
SEX						
Male	73,579	326	11,355	838	15.4	1.1
Female	80,070	333	15,641	895	19.5	1.1
RACE AND HISPANIC OR LATINO ORIGIN						
White	107,948	1,261	14,381	1,398	13.3	1.3
Black or African American	29,487	432	7,707	794	26.1	2.6
American Indian and Alaska Native	525	195	184	158	35.0	20.5
Asian	2,202	227	95	80	4.3	3.7
Native Hawaiian and Other Pacific Islander	61	23	1	2	1.6	3.2
Some other race	9,498	1,226	3,518	794	37.0	7.4
Two or more races	3,928	617	1,110	412	28.3	8.6
Hispanic or Latino	19,127	109	6,157	1,007	32.2	5.2
All individuals below:						
50 percent of poverty level	10,201	1,191				
125 percent of poverty level	36,793	1,785				
150 percent of poverty level	44,823	1,900				
185 percent of poverty level	57,083	1,664				
200 percent of poverty level	61,966	1,721				
Source: American Community Survey 5-year Estimates, 2013-2017						
All bolded and orange cells indicate a difference that is greater than 5% when compared to the State						

Local Setting

According to the Census Table S1701, Poverty Status in the Past 12 Months, 2013-2017 American Community Survey 5-Year Estimates, from the US Census Bureau, Census Tract 9306 in Caswell County had an estimated population of 4,956 with 22.3% (MOE +/-7.5%) living below the poverty level (Table 13). Across all subjects, Asian (100%, MOE +/- 100%) and two or more races (100% MOE +/- 89.4%) had the highest percent living under the poverty level. The next subjects with the highest poverty level were Hispanic or Latino at 69.7% (MOE +/- 50.5%), and under 18 at 39.8% (MOE +/- 17.2%). The following subject groups had a greater than 5% difference when compared to the county and the state: under 18, male, white, Black or African American, American Indian and Alaska Native, Asian, Two or more races, and Hispanic or Latino. The following groups had a greater than 5% difference when compared to the state: total population, 18 to 64 years, and female.

Census Tract 213 in Alamance County had an estimated population of 6,076 with 14.1% (MOE +/-2.4%) living below the poverty level (Table 13). Across all subjects, some other race had the highest percent living below the poverty level at 37.2% (MOE +/- 25.7%). The next subjects with the highest poverty level were Hispanic or Latino at 25.3% (MOE +/- 16.9%), and under 18 at 21.4% (MOE +/- 6%). The following subject groups had a greater than 5% difference when compared to the state: Asian and Native Hawaiian and Other Pacific Islander.

Table 12. Local Setting- Poverty

Subject	Census Tract 9306, Caswell County						Census Tract 213, Alamance County					
	Total		Below poverty level		Percent below poverty level		Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Population for whom poverty status is determined	4,956	496	1,106	401	22.3	7.5	6,076	268	857	156	14.1	2.4
AGE												
Under 18	1,129	210	449	239	39.8	17.2	1,365	126	292	90	21.4	6
18 to 64	3,053	354	587	224	19.2	6.9	3,657	179	433	80	11.8	2.1
65 years and over	774	124	70	59	9.0	7.6	1,054	77	132	41	12.5	4
SEX												
Male	2,556	270	616	289	24.1	10.6	2,975	154	412	90	13.8	2.9
Female	2,400	293	490	191	20.4	7.4	3,101	176	445	86	14.4	2.5
RACE AND HISPANIC OR LATINO ORIGIN												
White	3,648	380	705	303	19.3	8	3,871	204	439	97	11.3	2.5
Black or African American	1,289	312	382	261	29.6	17.5	1,740	175	319	92	18.3	4.5
American Indian and Alaska Native	0	17	0	17	-	**	42	23	0	17	0.0	45.8
Asian	8	16	8	16	100.0	100	60	49	9	8	15.0	15.8
Native Hawaiian and Other Pacific Islander	0	17	0	17	-	**	6	10	1	2	16.7	43.4
Some other race	0	17	0	17	-	**	188	85	70	65	37.2	25.7
Two or more races	11	22	11	22	100.0	89.4	169	58	19	16	11.2	8.5
Hispanic or Latino	33	39	23	32	69.7	50.5	324	103	82	66	25.3	16.9
All individuals below:												
50 percent of poverty level	414	250					329	78				
125 percent of poverty level	1,148	402					1,212	172				
150 percent of poverty level	1,238	413					1,502	193				
185 percent of poverty level	1,418	430					1,851	208				
200 percent of poverty level	1,862	515					2,053	213				

5.5 Household Income

Regional Setting

The following table was compiled using data from the Census Table S1901, Income in the Past 12 Months (in 2017 Inflation-Adjusted Dollars) 2013-2017 American Community Survey 5-Year Estimates for North Carolina. The North Carolina household income range with the highest percent was \$50,000 to \$74,999, at 18.1%. The median household income was \$50,320 and the mean income was \$70,523 (Table 14).

The household income range for Caswell County with the highest percent was \$50,000 to \$74,999 at 16.7% (MOE +/- 2.6%). The median income was \$39,428 and the mean income was \$52,548. All income ranges less than \$50,000 had percentages that were more than 10% higher than the state ranges. The household income range for Alamance County with the highest percent was \$50,000 to \$74,999 at 16.6% (MOE +/- 1%). The median income was \$44,281 and the mean income was \$61,661. The income ranges \$15,000 to \$34,999 had percentages that were more than 10% higher than the state ranges

Table 13. Regional Setting- Household Income

Subject	North Carolina		Caswell County		Alamance County	
	Households		Households		Households	
	Estimate	Margin of Error (+/-)	Estimate	Margin of Error (+/-)	Estimate	Margin of Error (+/-)
Total	3,874,346	8,789	9,160	276	63,035	641
Less than \$10,000	7.3%	0.1	9.1%	2	7.4%	0.7
\$10,000 to \$14,999	5.8%	0.1	10.2%	2.5	5.8%	0.7
\$15,000 to \$24,999	11.1%	0.1	13.5%	2.3	14.2%	0.9
\$25,000 to \$34,999	11.0%	0.1	12.1%	2.2	12.2%	0.8
\$35,000 to \$49,999	14.5%	0.1	16.6%	2.7	15.8%	1.1
\$50,000 to \$74,999	18.1%	0.1	16.7%	2.6	16.6%	1
\$75,000 to \$99,999	11.8%	0.1	10.4%	2.1	11.3%	0.8
\$100,000 to \$149,999	11.7%	0.1	7.1%	1.7	11.3%	0.7
\$150,000 to \$199,999	4.4%	0.1	2.4%	1.2	3.2%	0.4
\$200,000 or more	4.3%	0.1	1.9%	1.1	2.2%	0.4
Median income (dollars)	50,320	204	39,428	2,039	44,281	1,192
Mean income (dollars)	70,523	287	52,548	3,820	61,661	1,701
Source: US Census, ACS 5-year Estimates 2013-2017. All orange and bolded cells indicate a difference of greater than 10% increase when compared to the state.						

Local Setting

The household income range for Census Tract 9306 in Caswell County with the highest percent was \$50,000 to \$74,999 at 19.1% (MOE +/- 7.2%). The median income was \$55,975 and the mean income was \$62,498 (Table 15). The income range \$10,000 to \$14,999 had percentages that were more than 10% higher than the state ranges. The household income range for Census Tract 213 in Alamance County with the highest percent was \$50,000 to \$74,999 at 19.8% (MOE +/- 2.7%). The median income was \$51,098 and the mean income was \$67,798. The income

range \$25,000 to \$34,999 had an estimate that was more than 10% greater than the state estimate. The income ranges \$50,000 to \$74,999 and \$100,000 to \$149,999 had estimates that were greater than 10% different from the state and the county.

Table 14. Local Setting- Household Income

Subject	Census Tract 9306, Caswell County		Census Tract 213, Alamance County	
	Households		Households	
	Estimate	Margin of Error (+/-)	Estimate	Margin of Error (+/-)
Total	1,821	190	2,344	98
Less than \$10,000	6.0%	6.2	7.0%	1.5
\$10,000 to \$14,999	9.6%	5.4	5.8%	1.4
\$15,000 to \$24,999	12.0%	4.8	9.8%	1.7
\$25,000 to \$34,999	9.3%	4.6	12.3%	2.6
\$35,000 to \$49,999	11.4%	5.1	14.4%	2.3
\$50,000 to \$74,999	19.1%	7.2	19.8%	2.7
\$75,000 to \$99,999	15.5%	7.1	9.6%	1.9
\$100,000 to \$149,999	10.8%	5.4	13.9%	2.4
\$150,000 to \$199,999	3.5%	3.8	4.5%	1.6
\$200,000 or more	2.7%	3.4	3.1%	1.3
Median income (dollars)	55,795	15,776	51,098	4,760
Mean income (dollars)	62,498	10,639	67,798	3,746

Source: US Census, 2013-2017 ACS 5-Year Estimates.
 All **orange and bolded** highlighted cells indicate a difference that is greater than 5% when compared to the state.
 All **bolded and blue** highlighted cells indicate a difference that is greater than 5% when compared to the county and the state.

In the one-mile radius from the Burlington North facility, the household income range with the highest percent was less than \$75,000+ at 33%, followed by \$25,000-\$50,000 at 25% (Table 16).

Table 15. Project Radius- Household Income

Subject	1-mile (Burlington North)	
	Households	
	Estimate	Percent
Total	93	100.0%
Less than \$15,000	13	14.0%
\$15,000 to \$25,000	13	14.0%
\$25,000 to \$50,000	24	25.0%
\$50,000 to \$75,000	12	13.0%
\$75,000+	31	33.0%

Source: EJSscreen. US Census, 2013-2017 ACS 5-year Estimates

Per Capita Income

Per Capita Income data was obtained through the Census Table B19301, Per Capita Income in the Past 12 Months (In 2017 Inflation-Adjusted Dollars), 2013-2017 American Community

Survey 5-Year Estimates. The North Carolina per capita income estimate was \$28,123. The estimates for the counties are: \$21,692 in Caswell County and \$25,157 in Alamance County. The estimates for the census tracts are: \$22,753 (9306) and \$26,427 (213). Both the county and the census tracts had a lower Per Capita Income compared to the state (Table 17).

The EJSCREEN analysis also provided per capita income estimates for the one-mile buffer surrounding facility sites. The Burlington North facility has an estimated per capita income of \$21,076.

Table 16. Per Capita Income

Location	Subject		Per Capita Income in Last 12 Months (Dollars)
North Carolina	Per Capita Income	Estimate	\$28,123
		Margin of Error +/-	130
Caswell County	Per Capita Income	Estimate	\$21,692
		Margin of Error +/-	1,521
Alamance County	Per Capita Income	Estimate	\$25,157
		Margin of Error +/-	738
Census Tract 9306 Caswell County	Per Capita Income	Estimate	\$22,753
		Margin of Error +/-	3,182
Census Tract 213 Alamance County	Per Capita Income	Estimate	\$26,427
		Margin of Error +/-	1,538
Project Area 1-mile Burlington North	Per Capita Income	Estimate	\$21,076
		Margin of Error +/-	***
Source: American Community Survey 5-year Estimates, 2013-2017			

6 Limited English Proficiency (LEP)

Per the Safe Harbor Guidelines, should an LEP Group be identified during the permit application process, written translations of vital documents for each eligible LEP language group that constitutes five percent or includes 1,000 members (whichever is less) of the population of persons eligible to be served or likely to be affected or encountered. If there are fewer than 50 persons in a language group that reaches the five percent trigger, then DEQ will not translate vital written materials, but instead will provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost. The safe harbor provisions apply to the translation of written documents only. Safe harbor guidelines are per the EPA guidance for LEP persons and implemented by DEQ when deemed appropriate.

Seven potential LEP language groups were identified during this initial screening of demographic data (Table 18). However, none of the language groups identified in this screening reached the

5% threshold. If larger LEP groups are identified during the site visit or specific translation requests are received, then DEQ will revisit the Safe Harbor Guidelines.

Table 17. Limited English Proficiency

Language Spoken at Home	Census Tract 9306, Caswell County		Census Tract 213, Alamance County	
	Estimate	Margin of Error	Estimate	Margin of Error
Total:	4,576	+/-420	5,720	+/-287
Speak only English	4,536	+/-407	5,301	+/-251
Spanish or Spanish Creole:	40	+/-59	330	+/-99
Speak English "very well"	14	+/-22	237	+/-75
Speak English less than "very well"	26	+/-56	93	+/-44
German:	0	+/-12	47	+/-51
Speak English "very well"	0	+/-12	17	+/-18
Speak English less than "very well"	0	+/-12	30	+/-34
Vietnamese:	0	+/-12	7	+/-8
Speak English "very well"	0	+/-12	3	+/-4
Speak English less than "very well"	0	+/-12	4	+/-5
Tagalog:	0	+/-12	11	+/-11
Speak English "very well"	0	+/-12	8	+/-10
Speak English less than "very well"	0	+/-12	3	+/-6
Source: American Community Survey 5-year Estimates, 2011-2015				

7 County Health

The University of Wisconsin Population Health Institute, in collaboration with the Robert Wood Johnson Foundation, calculated a County Health Rankings system for all the States in the United States (www.countyhealthrankings.org). This ranking is based on health outcomes (such as lifespan and self-reported health status) and health factors (such as environmental, social and economic conditions). According to this 2021 report, out of all 100 counties in North Carolina (with 1 indicating the healthiest), Caswell County ranks 73rd in health factors and 78th in health outcomes. Alamance County ranks 46th in health factors and 38th in health outcomes (Figure 3).

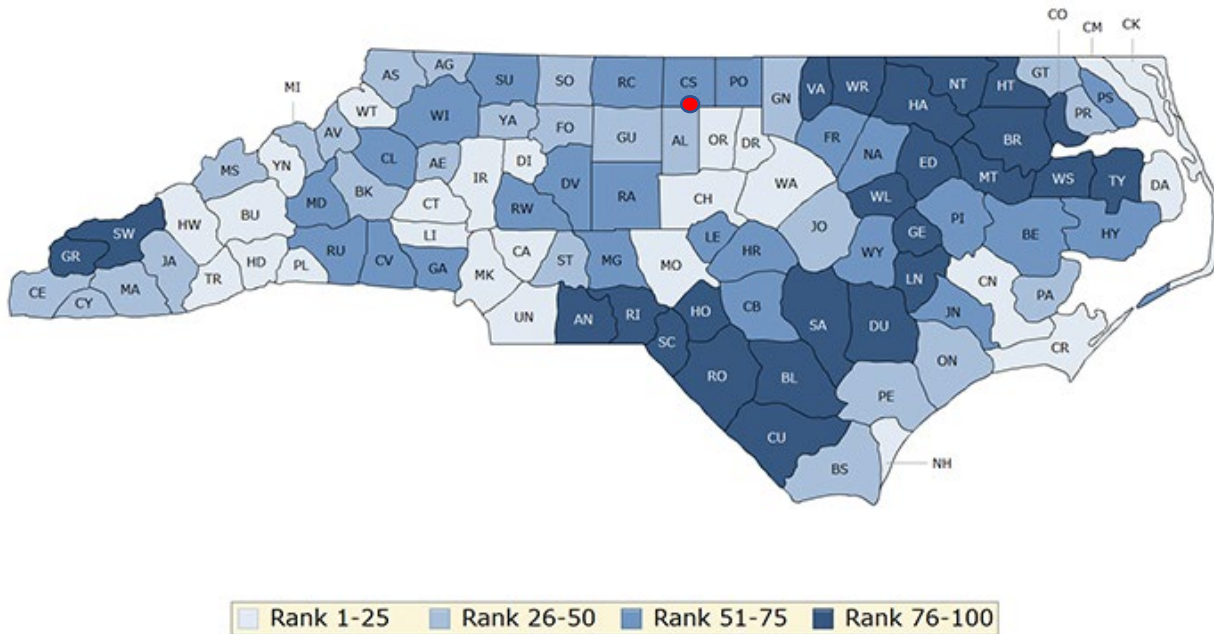


Figure 3. County Health Rankings for Health Factors in North Carolina provided by University of Wisconsin Public Health Institute.

According to the NC DEQ Community Mapping System Environmental Justice Tool, Table 19 demonstrates the rates of death due to various causes in the counties surrounding the proposed facility, as compared to the state.

Table 18. Health Outcomes

Cause of Death	Caswell	Alamance	North Carolina
Cancer	198.7	175.1	169.1
Heart Disease	169.6	164.2	163.7
Stroke	37.6	41.8	43.1
Cardiovascular Disease	218.8	223.7	221.9
Diabetes	27.9	22.9	22.8
Source: NCDEQ 2020 EJ Tool			

8 Local Sensitive Receptors

The Environmental Protection Agency suggests that sensitive receptors include, but are not limited to, hospitals, schools, daycare facilities, elderly housing, and convalescent facilities. These are areas where the occupants are more susceptible to the adverse effects of exposure to toxic chemicals, pesticides, and other pollutants. Extra care must be taken when dealing with contaminants and pollutants in close proximity to areas recognized as sensitive receptors. For instance, children and the elderly may have a higher risk of developing asthma from elevated levels of certain air pollutants than a healthy individual aged between 18 and 64.

Within the one-mile project radius from the Burlington North facility, the following potential sensitive receptors were identified (Figure 4):

- Bethel United Church of Christ
- Living Home Church

Additional sensitive receptors may be identified during the permit application process, such as during the field reconnaissance visit or through public comment.

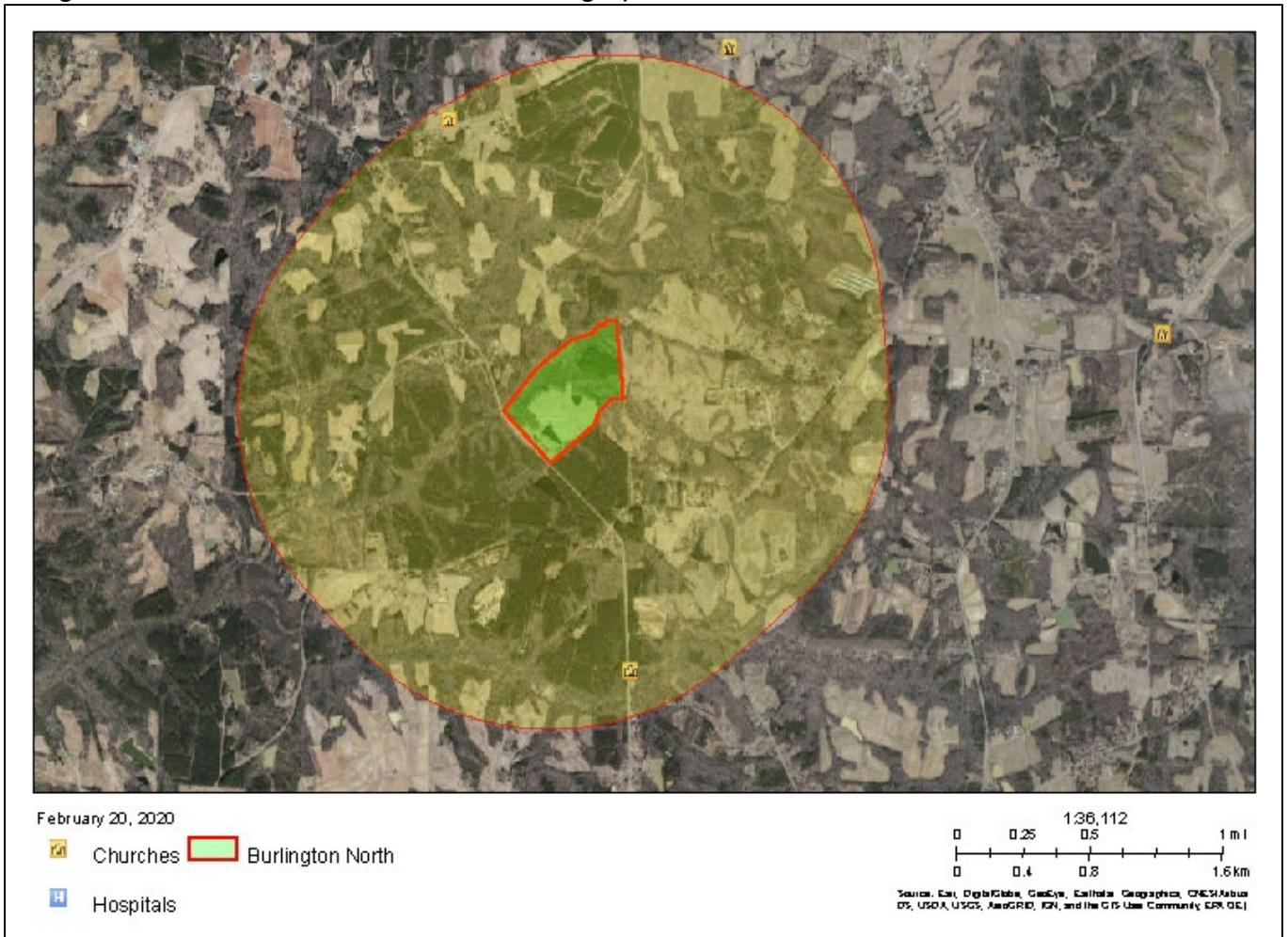


Figure 4. Sensitive receptors surrounding Burlington North facility

9 Local Industrial Sites

Within the one-mile radius, there are no other² facility permits or incident reports (as of August 4, 2021) (Figure 5).

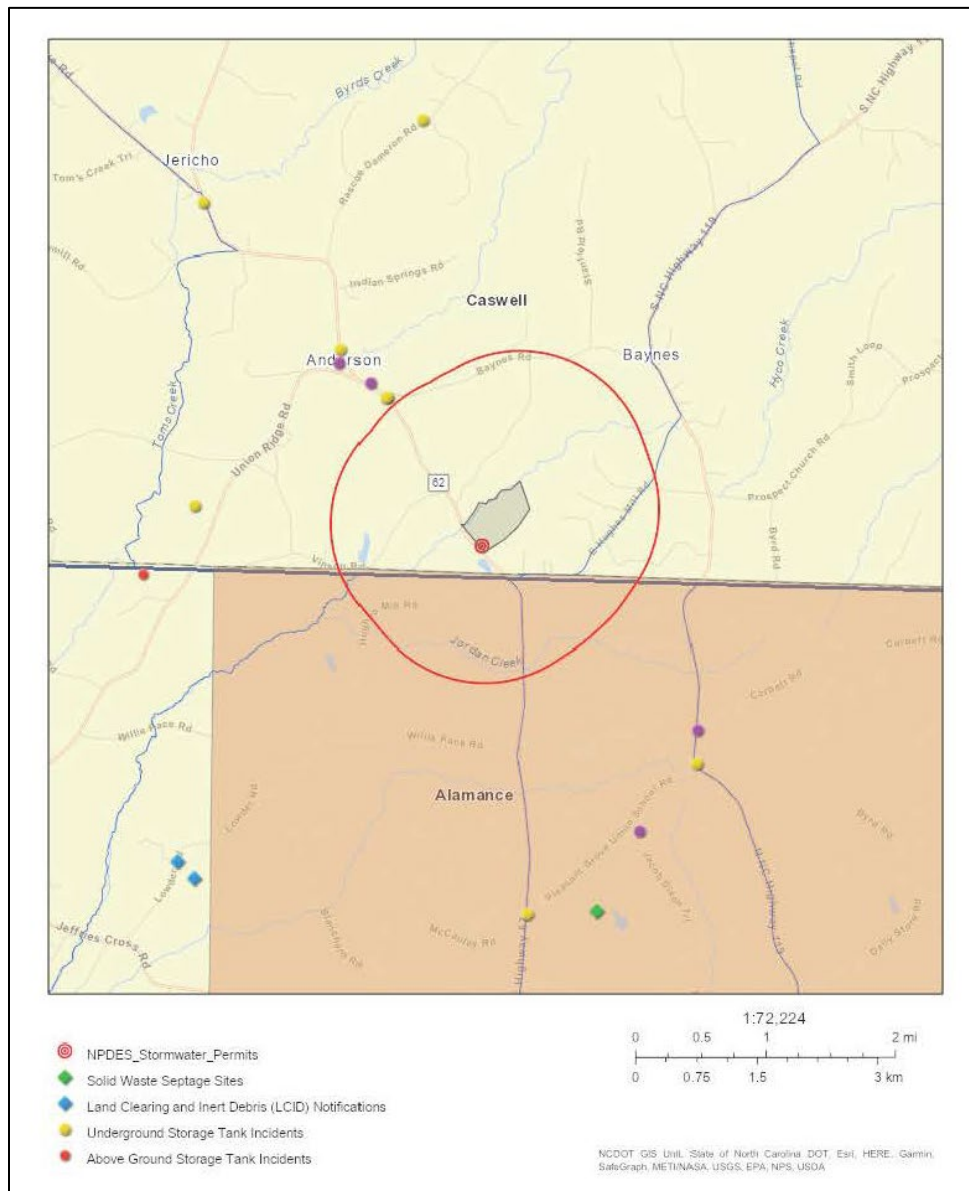


Figure 5. Permitted facilities and incidents with the one-mile radius surrounding the Burlington North facility.

² There is one NPDES Permit belonging to the facility itself. Just outside the one-mile radius of the Burlington North facility, are several Underground Storage Tank Facilities and reported past incidents.

10 Conclusion

Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies (US EPA). This report examined the demographic and environmental conditions in the state of North Carolina, Caswell, and Alamance counties, census tracts 213 and 9306, and the one-mile radius around the Carolina Sunrock LLC, Burlington North Facility. Potential emissions rates outlined in the permit application and county level health data were also included, as well as data from the NCDEQ Community Mapping System.

It is important to keep in mind that based on the available data, the following limitations of this report: census data is from 2010 and may be outdated; the more recent census data through 2017 are estimates; EJSCREEN does not provide all of the data categories that were used in this analysis so the census tracts data and county data cannot be compared to the radius used surrounding the facility boundary for all criteria; census tracts can still be large areas and do not allow for exact locations of each population; some of the census tracts slightly overlap with the one-mile radius; and the Department cannot determine which populations may be located in that small amount of overlap around the facility.

The census tracts and the one-mile radius surrounding the Burlington North facility display slightly higher percentages of Black or African American populations. However, the census tract data for the census tracts surrounding the Burlington North facility differ significantly from state and county estimates, as well as from the census tract and radius data for African American populations. The surrounding census tracts display a population of individuals over 65 years old that is higher than the state average.

Census Tract 9306 that encompasses the facility displays overall poverty estimates that are greater than 10% different than the state and the county. Both census tracts have the largest population within the \$50,000 to \$74,900 range for household income. The project radius estimates have the largest population falling in the \$75,000+ income bracket. Both census tracts display a per capita income lower than the state, and slightly lower than the counties. The Burlington North facility displays a Per Capita Income level moderately lower than the state.

Caswell County ranks 71th in health factors and 64th in health outcomes, and Alamance County ranks 53rd in health factors and 33rd in health outcomes. There were no permitted facilities or incidents within one mile from the proposed facility.

Based on this EJ Report, the following outreach will be conducted:

- The Occaneechi Band of the Saponi Nation will be kept informed throughout the permitting process.
- Extra attention will be given to ensure language data is accurate and that translation or interpretation will be considered if more LEP populations are identified at any point throughout the process.
- The list of sensitive receptors will be consulted while considering additional outreach options that may best fit this community's needs.
- Known community leaders will be consulted.