



North Carolina Department of Environmental Quality
January 14, 2022

Domtar Paper Company, LLC
Draft Environmental Justice Report

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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 Martin, Washington, and Bertie Counties, census tracts 9701, 9502, and 9604, and the one-mile radius around the property boundary of the Domtar Paper Company, LLC. Finally, the demographics of the entire state of North Carolina are also considered as they compare to both the county and the local census tract and radius settings.

The primary goal of this Draft EJ Report is to encourage comments and suggestions from the surrounding community, industry, and environmental groups throughout the comment period. Public comments will be considered throughout the remainder of the comment period to inform the Final EJ Report.

2 Environmental Justice Evaluation

The Department of Environmental Quality (DEQ or Department) has assessed the permit application and the demographics of the communities in the area surrounding the facility. Accordingly, this Draft EJ Report includes:

- Permit application submitted by Domtar Paper Company, LLC
- Facility emissions overview
- Study of area demographics [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 to the county and statewide census data
- County health assessment
- Sensitive receptors surrounding the area
- Local industrial sites (using the NCDEQ Community Mapping System: <https://ncdenr.maps.arcgis.com/apps/webappviewer/index.html?id=1eb0fbe2bcfb4cccb3cc212af8a0b8c8>)
- Outreach recommendations

Demographics for Martin County, Bertie County, and Washington County and the state are compared to the local (census tracts and project radius) level data to identify any disparities surrounding the project area using standard environmental justice guidelines from the EPA and National Environmental Policy Act (NEPA) documentation. Certain areas will be flagged as having the potential for environmental justice concerns using criteria set out in more detail in Section 5, Regional and Local Settings.

3 Proposed Project

Domtar Paper Company, LLC submitted a permit application for modification to the existing paper mill located near Plymouth, Martin County, North Carolina. The facility is classified as a major source for Title V; prevention of significant deterioration (PSD); and hazardous air pollutants (HAPs). This application is a major PSD construction and operation air permit modification request for a proposed project to reconfigure the facility’s Lignin Solids Removal Plant (LSRP). Domtar is proposing the following changes:

- Redesign the system to route a portion of process gases (Main Sources) to a new two-phase packed bed caustic scrubber.
- Reduce corrosion and avoiding over pressurization of the existing high-volume low-concentration (HVLC) system to improve operation of the plant by replacing select tanks.
- Add a dust collection system, including a wet cyclone to control acidic dust created when “wetcake” is dropped from the No. 2 Lignin Filter onto the No. 2 Lignin Filter Horizontal Conveyor during LSRP operation.

Table 1. Overview of LSRP Project Emissions Increases

Pollutant	Post-Project Emissions (tons/yr)	Project Emission Increases (tons/yr)	PSD Significant Emission Rates (tons/yr)
TRS	52.7	36.1	10
H ₂ S	31.1	18.2	10

The projected increased emissions of Total Reduced Sulfur (TRS) and Hydrogen Sulfide (H₂S) shown in Table 1 required an evaluation of the best available control technologies (BACT). Domtar conducted the required BACT analysis, including effects on soils, vegetation, and visibility as part of the application. Additional technical discussion is available in the permit review as well as the application.

4 Geographic Area

Domtar Paper Company, LLC is located at 1375 NC-149, Plymouth, NC 27962 (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 to appropriately include the surrounding community and help inform the DAQ’s public outreach efforts. The one-mile buffer around the facility is located within Martin County, Bertie County, and Washington Counties.

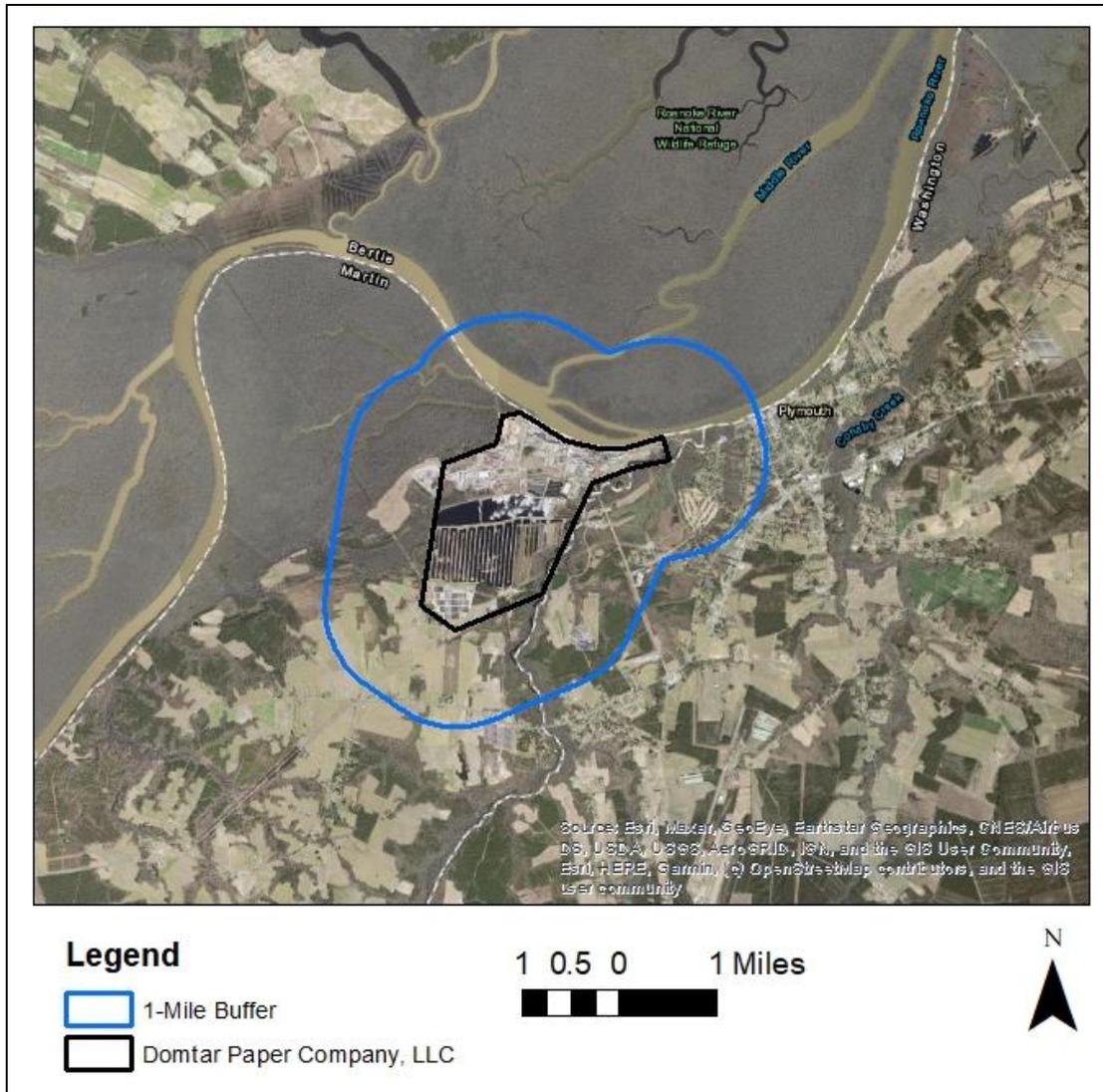


Figure 1. Facility location with the one-mile radius.

Martin, Bertie and Washington Counties are all designated as Tier 1 counties by the NC Department of Commerce 2021 rankings. 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 Domtar Paper company, LLC facility is located within census tract 9701, in Martin County, and the one-mile radius enters into census tracts 9502 and 9604 (Figure 2). Census tracts are small, relatively permanent statistical subdivisions of a county with a unique numeric code (US Census Bureau). Bertie County is identified by the N.C. Commission of Indian Affairs as a county in which the state recognized Meherrin Tribe resides.

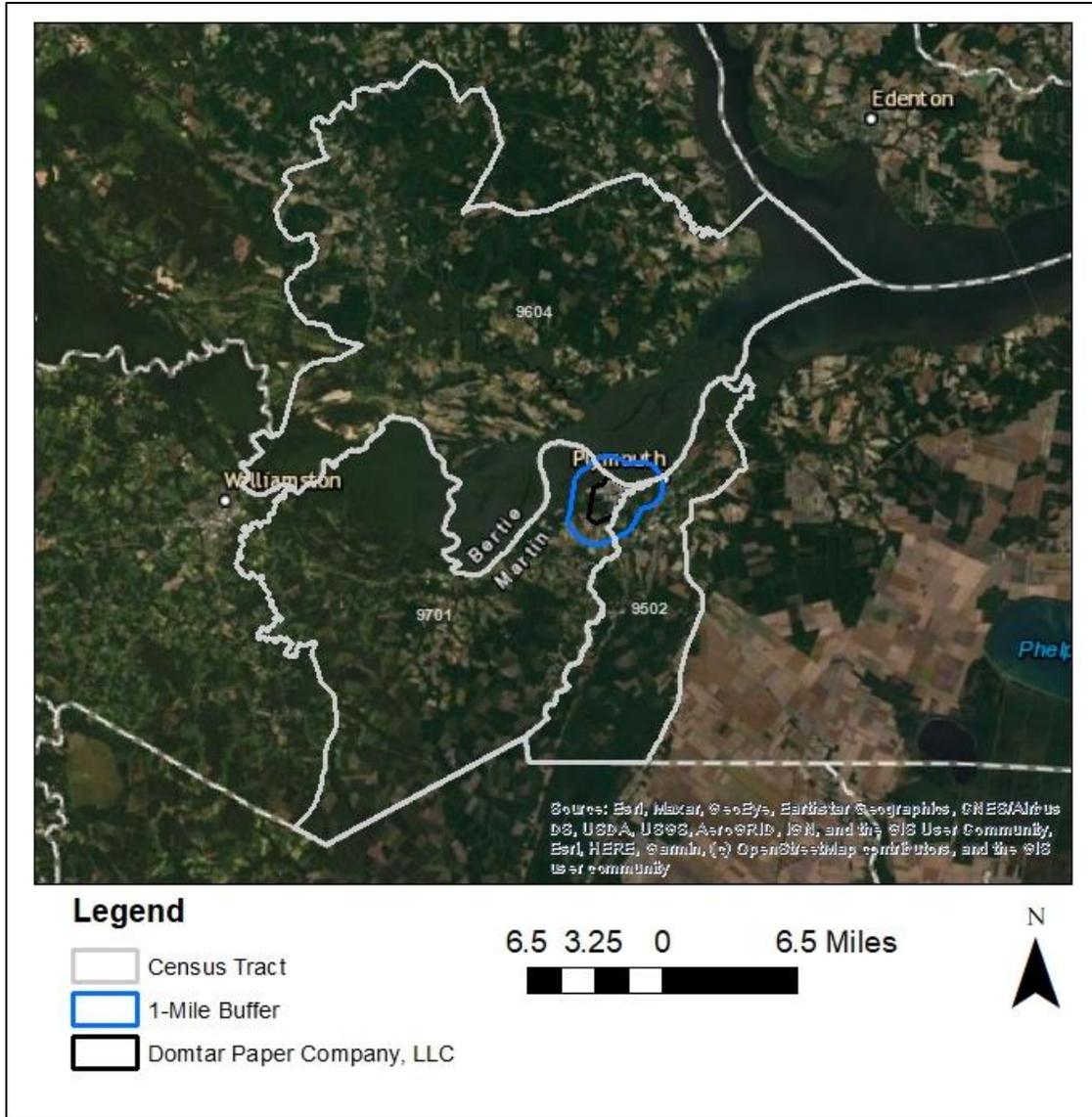


Figure 2. Census Tracts surrounding the facility location.

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 U.S. 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 county 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 communities with the potential for environmental justice concerns:

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 2019 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 2019 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 (U.S. 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 2). The three most common racial groups across the state were White (65.3%), Black or African American (21.2%), and Hispanic or Latino (of any race) at 8.4%.

Martin County had a total population of 24,505 individuals (Table 2). The two most common racial or ethnic groups in Martin County were White (52.2%) and Black or African American (43.3%). Black or African American was greater than 10% different when compared to the state.

Bertie County had a total population of 21,282 individuals (Table 2). The two most common racial or ethnic groups in Bertie County were Black or African American (62.2%) and White (34.7%). Black or African American was greater than 10% different when compared to the state.

Washington County had a total population of 13,228 individuals (Table 2). The two most common racial or ethnic groups in Washington County were Black or African American (49.6%) and White (45.3%). Black or African American was greater than 10% different when compared to the state.

Table 2. Regional Setting - Race and Ethnicity

Race and Ethnicity	North Carolina		Martin County		Bertie County		Washington County	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Total Population	9,535,483	100.0%	24,505	100.0%	21,282	100.0%	13,228	100.0%
White	6,223,995	65.3%	12,790	52.2%	7,393	34.7%	5,998	45.3%
Black or African American	2,019,854	21.2%	10,601	43.3%	13,252	62.2%	6,567	49.6%
American Indian or Alaska Native	108,829	1.1%	65	0.3%	88	0.4%	21	0.2%
Asian	206,579	2.2%	71	0.3%	103	0.5%	38	0.3%
Native Hawaiian and Other Pacific Islander	5,259	0.1%	5	0.0%	0	0.0%	1	0.0%
Some other Race	15,088	0.2%	10	0.0%	6	0.0%	14	0.1%
Two or More Races	155,759	1.6%	194	0.8%	173	0.8%	123	0.9%
HISPANIC OR LATINO (of any race)	800,120	8.4%	769	3.1%	267	1.3%	466	3.5%

Source: US Census Bureau, 2010 Census

All **bolded and orange** highlighted cells indicate a difference that is greater than 10% different 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 9701 was White (69.9%). Black or African American was greater than 10% different when compared with the state (Table 3). The largest population within Census Tract 9604 was Black or African American at 64.3%. Black

or African American was greater than 10% different compared to the state. The largest population within Census Tract 9502 was Black or African American at 58.4%. Black or African American was greater than 10% different compared to the state.

Within the one-mile project radius, the largest population was Black or African American at 64%. Black or African American and Hispanic or Latino (of any race) were greater than 10% different when compared to the state.

Table 3. Local Setting - Race and Ethnicity

Race and Ethnicity	Project Area - 1 Mile		Census Tract 9701		Census Tract 9604		Census Tract 9502	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Total Population	1,299	100.0%	4,183	100.0%	7,985	100.0%	6,623	100.0%
White	323	25.0%	2,924	69.9%	2,537	31.8%	2,492	37.6%
Black or African American	831	64.0%	1,068	25.5%	5,138	64.3%	3,868	58.4%
American Indian or Alaska Native	0	0.0%	29	0.7%	49	0.6%	17	0.3%
Asian	0	0.0%	3	0.0%	84	1.1%	29	0.4%
Native Hawaiian and Other Pacific Islander	0	0.0%	0	0.0%	0	0.0%	1	0.0%
Some other Race	0	0.0%	1	0.0%	2	0.0%	5	0.0%
Two or More Races	0	0.0%	44	1.0%	96	1.2%	48	0.7%
HISPANIC OR LATINO (of any race)	145	11.0%	114	2.7%	79	1.0%	163	2.5%

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

5.2 Age and Sex

Regional Setting

According to the 2010 US Census Data Table P 12: Sex by Age, and Table P13: Median Age, North Carolina had a total population of 9,535,483 individuals (Table 4). The median age for females (38.7) was slightly higher than the median age for males (36).

Martin County had a total population of 24,505 individuals. The median age for females (45.1) was slightly higher than the median age for males (42.7) and were both higher than the median age for the state. Bertie County had a total population of 21,282 individuals. The median age for females was higher than the median age for males (39.5), and both were higher than the median age for the state. Washington County had a total population of 13,228 individuals. The median age for females (44.9) was slightly higher than the median age for males (42.8), and both were higher than the median age for the state.

Table 4. Regional Setting - Age Groups and Sex

Age	North Carolina						Martin County					
	Number			Percent			Number			Percent		
	Both sexes	Male	Female	Both sexes	Male	Female	Both Sexes	Male	Female	Both Sexes	Male	Female
Total Population	9,535,483	4,645,492	4,889,991	100%	49%	51%	24,505	11,433	13,072	100%	47%	53%
Median Age	37.4	36.0	38.7				44.0	42.7	45.1			

Source: US Census Bureau, 2010 Census

Age	Bertie County						Washington County					
	Number			Percent			Number			Percent		
	Both Sexes	Male	Female	Both Sexes	Male	Female	Both Sexes	Male	Female	Both Sexes	Male	Female
Total Population	21,282	10,534	10,748	100%	50%	50%	13,228	6,221	7,007	100%	47%	53%
Median Age	42.9	39.5	45.7				44.0	42.8	44.9			

Source: US Census Bureau, 2010 Census

Local Setting

According to the 2010 US Census Data Table P 12: Sex by Age, and Table P13: Median Age, Census Tracts 9701, 9604, and 9502 all had slightly older median ages than the state, though all were younger than their respective counties (Table 5).

Table 5. Local Setting - Age Groups and Sex

Age	Census Tract 9701						Census Tract 9604					
	Number			Percent			Number			Percent		
	Both sexes	Male	Female	Both sexes	Male	Female	Both sexes	Male	Female	Both sexes	Male	Female
Total Population	4,183	2,048	2,135	100%	49%	51%	7,985	4,211	3,774	100%	53%	47%
Median Age	43.2	42.3	43.9				41.9	37	47			

Source: US Census Bureau, 2010 Census

Age	Census Tract 9502					
	Number			Percent		
	Both sexes	Male	Female	Both sexes	Male	Female
Total Population	6,623	3,000	3,623	100%	45%	55%
Median Age	41.9	39.8	42.9			

Source: US Census Bureau, 2010 Census

Project Radius

EJSCREEN identified a population of 1,299 individuals within the one-mile radius surrounding the facility. There was a slightly lower percentage of males than females in this area. EJSCREEN data does not provide the median age (Table 6).

Table 6. Project Radius - Age Groups and Sex

Age	Project Area - 1 Miles					
	Number			Percent		
	Both sexes	Male	Female	Both sexes	Male	Female
Total Population	1,299	635	664	100%	49%	51%
Median Age						

Source: US Census Bureau, 2010 Census. Obtained through EJSCREEN 2019

5.3 Disability

Regional Setting

According to the 2019 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 10,060,249 noninstitutionalized citizens. Of those individuals, an estimated 13.4% (MOE +/- 0.1%) had a disability. American Indian and Alaskan Native had the highest estimated disability rate of 18.2% (MOE +/- 0.8%). Black or African American and White (not Hispanic or Latino) were the next highest population estimates with disabilities in North Carolina, at 14.6% (MOE +/-0.2%) and 14.5% (MOE +/- 0.1%), respectively (Table 7).

Martin County had an estimated total population of 22,698 noninstitutionalized citizens. Of those, an estimated 19.0% (MOE +/- 1.6%) had a disability. The largest population of disabled civilians was American Indian and Alaska Native (33.3%, MOE 44.3%), followed by Two or more races (23.3%, MOE +/- 16.9%). American Indian and Alaska Native, Two or more races, and Hispanic or Latino (of any race) were all greater than 10% different when compared to the state.

Bertie County had an estimated total population of 18,105 noninstitutionalized citizens. Of those, an estimated 22.4% (MOE +/- 1.9%) had a disability. The largest population of disabled civilians was American Indian and Alaska Native (25.5%, MOE 9.9%), followed by Black or African American (23.5%, MOE +/- 2.5%). American Indian and Alaska Native, Two or more races, and Hispanic or Latino (of any race) were all greater than 10% different when compared to the state.

Washington County had an estimated total population of 11,759 noninstitutionalized citizens. Of those, an estimated 21.7% (MOE +/- 2.8%) had a disability. The largest population of disabled civilians was American Indian and Alaska Native (25.0%, MOE 17.3%), followed by Black or African American (15.0%, MOE +/- 1.1%). American Indian and Alaska Native, Two or more races, and Hispanic or Latino (of any race) were all greater than 10% different when compared to the state.

Table 7. Regional Setting – Disability

Subject	North Carolina						Martin 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	10,060,249	2,163	1,352,783	8,378	13.4%	0.1	22,698	65	4,306	367	19.0%	1.6
RACE AND HISPANIC OR LATINO ORIGIN												
White (not Hispanic or Latino)	6,357,724	2,614	919,485	7,082	14.5%	0.1	11,761	75	2,470	285	21.0%	2.4
Black or African American	2,144,532	5,119	312,780	4,850	14.6%	0.2	9,608	153	1,723	227	17.9%	2.3
American Indian and Alaska Native	120,813	1,815	22,048	842	18.2%	0.8	54	54	18	28	33.3%	44.3
Asian	290,103	1,968	15,414	800	5.3%	0.3	139	10	0	23	0.0%	22.0
Native Hawaiian and Other Pacific Islander	6,694	677	638	183	9.5%	2.7	77	85	0	23	0.0%	34.6
Some other Race	313,224	7,444	16,846	1,231	5.4%	0.4	237	154	0	23	0.0%	13.7
Two or more races	265,791	6,168	29,353	1,430	11.0%	0.4	257	132	60	46	23.3%	16.9
Hispanic or Latino	942,342	855	59,694	2,120	6.3%	0.2	911	4	41	43	4.5%	4.7

Source: US Census Bureau, ACS 2019 5-year Estimates
All **bolded and orange** highlighted cells indicate a difference that is greater than 10% when compared to the State

Subject	Bertie County						Washington 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	18,105	187	4,054	352	22.4%	1.9	11,759	86	2,553	334	21.7%	2.8
RACE AND HISPANIC OR LATINO ORIGIN												
White (not Hispanic or Latino)	6,383	97	1,394	222	21.8%	3.4	5,245	59	1,356	261	25.9%	5.0
Black or African American	11,103	202	2,611	289	23.5%	2.5	5,551	251	1,124	226	20.2%	4.1
American Indian and Alaska Native	98	53	25	17	25.5%	9.9	26	38	18	30	69.2%	59.4
Asian	135	19	11	14	8.1%	10.3	26	43	15	25	57.7%	16.0
Native Hawaiian and Other Pacific Islander	1	2	0	19	0.0%	100.0	0	19	0	19	0.0%	**
Some other Race	147	101	0	19	0.0%	21.0	230	203	15	32	6.5%	15.0
Two or more races	154	104	13	23	8.4%	15.5	526	347	12	17	2.3%	3.6
Hispanic or Latino	325	48	53	36	16.3%	10.8	615	10	30	46	4.9%	7.5
Source: US Census Bureau, ACS 2019 5-year Estimates												
All bolded and orange highlighted cells indicate a difference that is greater than 10% when compared to the State												

Local Setting

According to the 2019 American Community Survey 5-Year Estimates, Table S1810 Disability Characteristics from the US Census Bureau, Census Tract 9701 had an estimated total population of 4,494 noninstitutionalized citizens (Table 8). Of those individuals, an estimated 17.8% (MOE +/- 3.8%) had a disability. The subject with the largest population of disabled civilians was Two or more Races (40.3%, MOE +/- 36.1%), followed by Black or African American at 18.7% (MOE +/- 7.8%) and White at 17.2% (MOE +/- 4.9).

Census Tract 9604 had a total population of 5,266 noninstitutionalized citizens. Of those individuals, an estimated 23.4% (MOE +/- 4.0) had a disability. The subject with the largest population of disabled civilians was Hispanic or Latino (42.2%, MOE +/- 57.8%), followed by American Indian and Alaskan Native at 29.6% (MOE +/- 7.4%) and Black or African American at 26.4% (MOE +/- 6.3).

Census Tract 9502 had a total population of 2,125 noninstitutionalized citizens. Of those individuals, an estimated 26.4% (MOE +/- 7.5) had a disability. The subject with the largest population of disabled civilians was Two or more Races (29.4%, MOE +/- 20.0), followed by White at 27.6% (MOE +/- 7.6) and Black or African American at 22.8% (MOE +/- 6.8).

In all tracts, the percentage of the population with a disability had a greater than 10% difference when compared to the State with Census Tract 9502 having a greater than 10% difference when compared to both the County and the State. Additionally, across all tracts, of the segments of the population that had a percentage of people with a disability, all had a greater than 10% difference when compared to the State with many having a greater than 10% difference when compared to both the County and the State.

Table 8. Local Setting - Disability

Subject	Census Tract 9701						Census Tract 9604					
	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	4,494	302	798	176	17.8%	3.8	5,266	448	1,233	217	23.4%	4.0
RACE AND HISPANIC OR LATINO ORIGIN												
White (not Hispanic or Latino)	2952	294	507	155	17.2%	4.9	1,762	233	343	99	19.5%	5.3
Black or African American	1325	276	248	123	18.7%	7.8	3,240	436	855	207	26.4%	6.3
American Indian and Alaska Native	26	42	0	12	0.0%	60.4	81	53	24	17	29.6%	7.4
Asian	0	12	0	12	0.0%	**	108	41	11	14	10.2%	11.8
Native Hawaiian and Other Pacific Islander	0	12	0	12	0.0%	**	0	17	0	17	0.0%	**
Some other Race	23	30	0	12	0.0%	64.2	0	17	0	17	0.0%	**
Two or more races	72	52	29	26	40.3%	36.1	49	233	343	99	19.5%	5.3
Hispanic or Latino	125	104	20	28	16.0%	22.9	45	46	19	31	42.2%	57.8

Source: US Census Bureau, ACS 2019 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 both the County and the State

Subject	Census Tract 9502					
	Total		With a Disability		Percent with a Disability	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Total civilian noninstitutionalized population	2,126	297	562	158	26.4%	7.5
RACE AND HISPANIC OR LATINO ORIGIN						
White (not Hispanic or Latino)	2,036	272	562	158	27.6%	7.6
Black or African American	3,296	367	752	230	22.8%	6.8
American Indian and Alaska Native	0	17	0	17	0.0%	**
Asian	0	17	0	17	0.0%	**
Native Hawaiian and Other Pacific Islander	0	17	0	17	0.0%	**
Some other Race	33	57	0	17	0.0%	53.6
Two or more races	34	55	10	16	29.4%	20.0
Hispanic or Latino	90	127	0	17	0.0%	31.1
Source: US Census Bureau, ACS 2019 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 both the County and the State						

5.4 Poverty

Regional Setting

According to the Census Table S1701, Poverty Status in the Past 12 Months, 2019 American Community Survey 5-Year Estimates, from the US Census Bureau, North Carolina had an estimated population of 9,984,891, with 14.7% (MOE +/- 0.2%) below the poverty level (Table 9). Across all subjects, Some Other Race had the highest percent living below the poverty level at 27.2% (MOE +/- 1.2%). The next three subjects with the highest poverty level were Hispanic or Latino at 26.4% (MOE +/- 0.6%), American Indian and Alaska Native at 24.9% (MOE +/- 1.3%), and Black or African American at 22.5% (MOE +/- 0.4%). Households below 200 percent of the federal poverty level¹ are calculated by multiplying the percentage point by the poverty level for the number of individuals in that household. For example, to calculate 200% of the poverty level for a household of four in 2021,² that would be \$53,000 (2.0 x \$26,500).

Martin County had an estimated population of 22,599 with 19.7% (MOE +/-3.1%) living below the poverty level. Across all subjects, Hispanic or Latino had the highest percent living below the poverty level at 42.0% (MOE +/- 22.7%), followed by American Indian and Alaskan Native (33.3%) and Black or African American (23.7%). White, American Indian or Alaska Native, and Hispanic or Latino all had estimates greater than 10% different when compared to the state values.

Bertie County had an estimated population of 18,058 with 23.2% (MOE +/-3.6%) living below the poverty level. Across all subjects, Some other Race had the highest percent living below the poverty level at 40.8% (MOE +/- 40.9%). Some other Race, Black or African American, and Hispanic or Latino all had estimates greater than 10% different when compared to the state values (Table 10).

Washington County had an estimated population of 11,727 with 22.3% (MOE +/- 4.2%) living below the poverty level. Across all subjects, Some other Race had the highest percent living below the poverty level at 48.3% (MOE +/- 48.6%). The total population for whom poverty status is determined, Black or African American and Some other Race all had estimates greater than 10% different when compared to the state values.

¹ <https://www.thebalance.com/federal-poverty-level-definition-guidelines-chart-3305843>

² The poverty level for a household of four in 2021 is an annual income of \$26,500. To calculate the poverty level for larger families, add \$4,540 for each additional person in the household. For smaller families, subtract \$4,540 per person.

Table 9. Regional Setting – Poverty

Subject	North Carolina						Martin 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	9,984,891	1,988	1,467,591	17,844	14.7%	0.2	22,599	96	4,463	701	19.7%	3.10
RACE AND HISPANIC OR LATINO ORIGIN												
White	6,320,337	2,990	644,440	10,085	10.2%	0.2	11,748	76	1,775	508	15.1%	4.30
Black or African American	2,116,769	5,452	475,973	8,126	22.5%	0.4	9,522	160	2,256	448	23.7%	4.60
American Indian and Alaska Native	120,328	1,846	29,981	1,608	24.9%	1.3	54	54	18	28	33.3%	44.30
Asian	285,786	2,021	30,707	2,034	10.7%	0.7	139	10	7	13	5.0%	9.80
Native Hawaiian and Other Pacific Islander	6,630	675	1,360	332	20.5%	4.6	77	85	0	23	0.0%	34.60
Some other Race	311,206	7,397	84,699	4,639	27.2%	1.2	237	154	56	78	23.6%	28.80
Two or more races	262,580	6,121	54,627	2,414	20.8%	0.8	257	132	53	52	20.6%	19.00
Hispanic or Latino	940,295	1,251	248,474	6,013	26.4%	0.6	991	4	383	207	42.0%	22.70
All individuals below:												
200 percent of poverty level	3,420,476	24,183					9,819	766				
Source: American Community Survey 5-year Estimates, 2019												
All bolded and orange cells indicate a difference that is greater than 5% when compared to the State												

Table 10. Regional Setting - Poverty (cont'd)

Subject	Bertie County						Washington 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	18,058	200	4,181	662	23.2%	3.60	11,727	121	2,612	491	22.3%	4.20
RACE AND HISPANIC OR LATINO ORIGIN												
White	6,383	97	583	179	9.1%	2.80	5,173	129	607	265	11.7%	5.00
Black or African American	11,056	213	3,505	617	31.7%	5.60	5,593	238	1,877	394	33.6%	7.30
American Indian and Alaska Native	98	53	0	19	0.0%	29.20	26	38	0	19	0.0%	60.40
Asian	135	19	0	19	0.0%	22.60	26	43	0	19	0.0%	60.40
Native Hawaiian and Other Pacific Islander	1	2	0	19	0.0%	100.00	0	19	0	19	0.0%	**
Some other Race	147	101	60	81	40.8%	40.90	230	203	111	145	48.3%	48.60
Two or more races	154	104	33	53	21.4%	28.50	524	347	4	8	0.8%	2.10
Hispanic or Latino	325	48	79	84	24.3%	25.90	613	12	128	157	20.9%	25.40
All individuals below:												
200 percent of poverty level	8,668	731					5,549	684				
Source: American Community Survey 5-year Estimates, 2019												
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, 2019 American Community Survey 5-Year Estimates, from the US Census Bureau, Census Tract 9701 had an estimated population of 4,436 with 24.3% (MOE +/-7.9%) living below the poverty level (Table 11). The total population for whom poverty status is determined as well as White and Black or African American had poverty levels higher than 5% different when compared to both the county and state.

Census Tract 9604 had an estimated population of 5,266 individuals, with 27.9% (MOE +/- 5.1%) living below the poverty level. The total population for whom poverty status is determined as well as Black or African American had poverty levels higher than 5% different when compared to both the county and state.

Census Tract 9502 had an estimated population of 5,459 individuals, with 27.6% (MOE +/- 8.3%) living below the poverty level. The total population for whom poverty status is determined as well as Black or African American had poverty levels higher than 5% different when compared to both the county and state.

Table 11. Local Setting- Poverty

Subject	Census Tract 9701						Census Tract 9604					
	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	4,436	290	1,076	373	24.3%	7.90	5,266	448	1,467	334	27.9%	5.10
RACE AND HISPANIC OR LATINO ORIGIN												
White	2,915	293	564	348	19.3%	11.20	1,762	233	106	56	6.0%	3.10
Black or African American	1,304	265	506	211	38.8%	13.90	3,240	436	1,361	337	42.0%	7.50
American Indian and Alaska Native	26	42	0	12	0.0%	60.40	81	53	0	17	0.0%	33.50
Asian	0	12	0	12	0.0%	**	108	41	0	17	0.0%	27.10
Native Hawaiian and Other Pacific Islander	0	12	0	12	0.0%	**	0	17	0	17	0.0%	**
Some other Race	23	30	0	12	0.0%	64.20	0	17	0	17	0.0%	**
Two or more races	72	52	6	9	8.3%	14.90	49	64	0	17	0.0%	44.00
Hispanic or Latino	125	104	6	9	4.8%	8.30	45	46	19	31	42.2%	57.80
All individuals below:												
200 percent of poverty level	1,885	389					2,612	442				
Source: American Community Survey 5-year Estimates, 2019												
All bolded and blue cells indicate a difference that is greater than 5% when compared to the county and the State.												

Subject	Census Tract 9502					
	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	5,459	410	1,506	432	27.6%	8.30
RACE AND HISPANIC OR LATINO ORIGIN						
White	1,964	281	221	130	11.3%	6.70
Black or African American	3,338	364	1,285	403	38.5%	11.80
American Indian and Alaska Native	0	17	0	17	0.0%	**
Asian	0	17	0	17	0.0%	**
Native Hawaiian and Other Pacific Islander	0	17	0	17	0.0%	**
Some other Race	33	57	0	17	0.0%	53.60
Two or more races	34	55	0	17	0.0%	52.80
Hispanic or Latino	90	127	0	17	0.0%	31.10
All individuals below:						
200 percent of poverty level	2,679	494				
Source: American Community Survey 5-year Estimates, 2019						
All bolded and blue cells indicate a difference that is greater than 5% when compared to the county and the State.						

5.5 Household Income

Regional Setting

The following table (Table 12) was compiled using data from the Census Table S1901, Income in the Past 12 Months (in 2019 Inflation-Adjusted Dollars) 2019 American Community Survey 5-Year Estimates for North Carolina. The North Carolina household income range with the highest percent was for \$50,000 to \$74,999, at 18.0%. The state median household income was \$54,602 and the mean income was \$76,940.

The household income range for Martin County with the highest percent was \$35,000 to \$49,999 at 17.9% (MOE +/- 2.6%). The median income was \$40,090 and the mean income was \$55,603, both lower than that of the state. All income ranges below \$49,999 were all greater than 10% different when compared to the state.

The household income range for Bertie County with the highest percent was \$15,000 to \$24,999 at 16.6% (MOE +/- 2.9%). The median income was \$35,527 and the mean income was \$55,018, both lower than that of the state. All income ranges below \$49,999 were all greater than 10% different when compared to the state.

The household income range for Washington County with the highest percent was \$50,000 to \$74,999 at 20.8% (MOE +/- 4.2%). The median income was \$35,979 and the mean income was \$48,062, both lower than that of the state. The income ranges below \$24,999 and between \$35,000 and \$74,999 were all greater than 10% different when compared to the state.

Table 12. Regional Setting - Household Income

Subject	North Carolina		Martin County		Bertie County		Washington County	
	Households		Households		Households		Households	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Total	3,965,482	10,327	9,378	286	7,909	321	4,977	293
Less than \$10,000	6.4%	0.1	9.3%	2.2	11.7%	2.8	18.4%	4.4
\$10,000 to \$14,999	5.0%	0.1	7.3%	1.9	9.5%	2.3	6.3%	2.4
\$15,000 to \$24,999	10.3%	0.1	13.6%	2.2	16.6%	2.9	14.8%	4.7
\$25,000 to \$34,999	10.3%	0.1	14.3%	2.7	11.5%	2.7	8.7%	2.5
\$35,000 to \$49,999	13.9%	0.1	17.9%	2.6	15.1%	3.1	16.6%	3.4
\$50,000 to \$74,999	18.0%	0.1	15.5%	2.4	16.2%	2.7	20.8%	4.2
\$75,000 to \$99,999	12.4%	0.1	12.0%	2.2	6.9%	1.7	9.3%	3
\$100,000 to \$149,999	13.1%	0.1	5.7%	1.3	6.0%	1.4	3.1%	1.2
\$150,000 to \$199,999	5.1%	0.1	1.9%	0.9	4.3%	1.6	0.6%	0.7
\$200,000 or more	5.4%	0.1	2.4%	1.1	2.4%	1.3	1.4%	1.2
Median income (dollars)	54,602	231	40,090	2,822	35,527	2,262	35,979	5,671
Mean income (dollars)	76,940	352	55,603	5,612	55,018	6,638	48,062	8,294
Per Capita Income	30,783	154	23,575	2,099	22,947	2,469	23,431	4,351

Source: US Census, 2019 ACS 5-Year Estimates.
 All **orange and bolded** highlighted cells indicate a difference that is greater than 10% when compared to the state

Local Setting

The household income range for Census Tract 9701 with the highest percent was \$50,000 to \$74,999 at 17.4% (MOE +/- 5.5%). The median income was \$45,963 and the mean income was \$61,469 (Table 13). The income ranges from \$10,000 to \$24,999 had percentages that were more than 10% greater than either the state or county. The income ranges from \$10,000 to \$24,999 had a greater than 10% difference when compared to the State, with \$10,000 to \$14,999 having a greater than 10% difference when compared to both the County and the State.

The household income range for Census Tract 9604 with the highest percent was \$10,000 to \$14,999 at 16.0% (MOE +/- 4.9%). The median income was \$32,770 and the mean income was \$55,249. The income ranges less than \$34,999 all had a greater than 10% difference when compared to the state, with \$10,000 to \$14,999 having a greater than 10% difference when compared to both the County and the State.

The household income range for Census Tract 9502 with the highest percent Less than \$10,000 at 24.1% (MOE +/- 7.3%). The median income was \$29,760 and the mean income was \$43,753. The income ranges Less than \$10,000 and \$15,000 to \$24,999 had a greater than 10% difference when compared to both the County and the State.

The household income range for the one-mile radius with the highest percent was Less than \$15,000 at 41.0%. EJSCREEN data provides different income ranges that cannot be compared in the same manner. (Table 14).

Table 13. Local Setting - Household Income

Subject	Census Tract 9701		Census Tract 9604		Census Tract 9502	
	Households		Households		Households	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Total	1,739	137	2,446	242	2,592	239
Less than \$10,000	6.2%	3.6	11.7%	3.8	24.1%	7.3
\$10,000 to \$14,999	8.5%	4.3	16.0%	4.9	5.2%	3.4
\$15,000 to \$24,999	13.0%	4.8	14.2%	5.6	16.9%	6.6
\$25,000 to \$34,999	11.2%	4.1	12.1%	5.3	5.9%	2.9
\$35,000 to \$49,999	14.5%	3.8	10.7%	4.6	12.4%	4.4
\$50,000 to \$74,999	17.4%	5.5	15.0%	4.8	20.5%	6.9
\$75,000 to \$99,999	13.3%	5.1	8.0%	2.9	11.7%	5.4
\$100,000 to \$149,999	8.5%	3.4	5.9%	3	1.6%	1.4
\$150,000 to \$199,999	5.6%	3.7	4.8%	2.9	0.0%	1.3
\$200,000 or more	1.8%	1.7	1.6%	1.4	1.7%	1.9
Median income (dollars)	45,963	6,459	32,770	4,785	29,760	13,156
Mean income (dollars)	61,469	7,952	55,249	10,917	43,753	9,172
Per Capita Income	24,683	3,070	21,680	3,954	24,736	5,029

Source: US Census, 2019 ACS 5-Year Estimates.
All **orange and bolded** highlighted cells indicate a difference that is greater than 10% when compared to the state
All **blue and bolded** highlighted cells indicate a difference that is greater than 10% when compared to the state and the county

Table 14. Project Radius - Household Income

Subject	1 mile		
	Number	Percent	MOE
Number of Households	513	100%	
Per Capita Income (dollars)	22,648		
Household Income			
<\$15,000	209	41.0%	154
\$15,000-\$25,000	71	14.0%	127
\$25,000-\$50,000	104	20.0%	116
\$50,000-\$75,000	64	12.0%	53
\$75,000+	65	13.0%	76
Source: EJSscreen 2019			

Per Capita Income

The following table (Table 12) was compiled using data from the Census Table S1901, Income in the Past 12 Months (in 2019 Inflation-Adjusted Dollars) 2019 American Community Survey 5-Year Estimates for North Carolina. The North Carolina household income range with the highest percent was for \$50,000 to \$74,999, at 18.0%. The state median household income was \$54,602 and the mean income was \$76,940.

The household income range for Martin County with the highest percent was \$35,000 to \$49,999 at 17.9% (MOE +/- 2.6%). The median income was \$40,090 and the mean income was \$55,603, both lower than that of the state. All income ranges below \$49,999 were greater than 10% different when compared to the state.

The household income range for Bertie County with the highest percent was \$15,000 to \$24,999 at 16.6% (MOE +/- 2.9%). The median income was \$35,527 and the mean income was \$55,018, both lower than that of the state. All income ranges below \$49,999 were greater than 10% different when compared to the state.

The household income range for Washington County with the highest percent was \$50,000 to \$74,999 at 20.8% (MOE +/- 4.2%). The median income was \$35,979 and the mean income was \$48,062, both lower than that of the state. The income ranges below \$24,999 and between \$35,000 and \$74,999 were greater than 10% different when compared to the state.

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 5% 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 5% 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 based on EPA guidance for LEP persons and implemented by DEQ when deemed appropriate. Only languages where an estimated population of greater than 0 who speak English less than “very well” are included in this analysis. The population 5 years and over who speak English less than “very well” for Spanish in Census Tract 9701 was greater than 5% (8.3%).

Table 15. Limited English Proficiency

LANGUAGE SPOKEN AT HOME	Census Tract 9701		Census Tract 9604		Census Tract 9502	
	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Total (population 5 years and over):	4,391	421	7,519	500	5,967	416
Speak only English	4,095	413	7,044	489	5,881	382
Spanish or Spanish Creole:	294	190	403	126	86	147
Speak English "very well"	72	58	247	140	86	147
Speak English less than "very well"	222	192	156	83	0	17
Chinese:	0	0	27	33	0	0
Speak English "very well"	0	0	13	16	0	0
Speak English less than "very well"	0	0	14	17	0	0
Thai:	0	0	5	7	0	0
Speak English "very well"	0	0	0	17	0	0
Speak English less than "very well"	0	0	5	7	0	0
Laotian:	0	0	5	8	0	0
Speak English "very well"	0	0	0	17	0	0
Speak English less than "very well"	0	0	5	8	0	0
Vietnamese:	0	0	8	16	0	0
Speak English "very well"	0	0	0	17	0	0
Speak English less than "very well"	0	0	8	16	0	0
Tagalog:	0	0	19	31	0	0
Speak English "very well"	0	0	0	17	0	0
Speak English less than "very well"	0	0	19	31	0	0

Source: US Census, ACS 5-Year estimates 2011-2015

7 Educational Attainment

Regional Setting

The following data was obtained through the US Census Bureau Table S1501, American Community Survey 2019 5-year Estimates (Table 16). Martin County, Bertie County, and Washington County had very higher percentages of individuals who graduated from high school (or equivalent) while also having considerably lower percentages of individuals who had attained a Bachelor's degree when compared to the state.

Table 16. Regional Setting- Educational Attainment (above 25 years old)

Subject	North Carolina				Martin County			
	Number		Percent		Number		Percent	
	Estimate	MOE +/-	Estimate	MOE +/-	Estimate	MOE +/-	Estimate	MOE +/-
Total Above 25	6,983,859	1,636			16,495	77		
Less than 9th grade	314,545	4,322	4.5%	0.1	963	191	5.8%	1.2
9th to 12th grade, no diploma	538,851	6,801	7.7%	0.1	1,782	275	10.8%	1.7
High school graduate (includes equivalency)	1,791,532	12,844	25.7%	0.2	5,590	478	33.9%	2.9
Bachelor's degree or higher	2,182,853	16,331	31.3%	0.2	2,705	384	16.4%	2.3

Source: US Census, ACS 5-Year estimates 2019

Subject	Bertie County				Washington County			
	Number		Percent		Number		Percent	
	Estimate	MOE +/-	Estimate	MOE +/-	Estimate	MOE +/-	Estimate	MOE +/-
Total Above 25	14,396	69			8,175	188		
Less than 9th grade	901	196	6.3%	1.4	723	279	8.8%	3.4
9th to 12th grade, no diploma	2,212	310	15.3%	2.1	610	199	7.5%	2.4
High school graduate (includes equivalency)	5,487	435	38.1%	3.1	3,059	320	37.4%	4
Bachelor's degree or higher	1,964	376	13.6%	2.6	941	246	11.5%	2.9

Source: US Census, ACS 5-Year estimates 2019

Local Setting

The following data was obtained through the US Census Bureau Table S1501, American Community Survey 2019 5-year Estimates. All Census Tracts had similar percentages of high school graduates (or equivalent) and Bachelor's degree attainment to their respective counties (Table 17). Both census tracts and the one-mile radius also had higher percentages of individuals with a 9th to 12th grade education, but no diploma. Additionally, the percentage of individuals with a Bachelor's degree or higher are significantly lower for the project radius (Table 18) when compared to the local and regional settings.

Table 17. Local Setting- Educational Attainment (above 25 years old)

Subject	9701 Census Tract				9604 Census Tract			
	Number		Percent		Number		Percent	
	Estimate	MOE +/-	Estimate	MOE +/-	Estimate	MOE +/-	Estimate	MOE +/-
Total Above 25	3,126	223			4,907	301		
Less than 9th grade	106	58	3.4%	1.8	330	119	6.7%	2.5
9th to 12th grade, no diploma	265	121	8.5%	3.7	881	201	18.0%	3.9
High school graduate (includes equivalency)	1,078	179	34.5%	5.5	1,501	240	30.6%	4.4
Bachelor's degree or higher	581	163	18.6%	4.8	743	190	15.1%	3.8
Source: US Census ACS 2019 5-year estimates								

Subject	9502 Census Tract			
	Number		Percent	
	Estimate	MOE +/-	Estimate	MOE +/-
Total Above 25	3,932	300		
Less than 9th grade	475	215	12.1%	5.3
9th to 12th grade, no diploma	281	147	7.1%	3.9
High school graduate (includes equivalency)	1,350	211	34.3%	4.9
Bachelor's degree or higher	490	184	12.5%	4.3
Source: US Census ACS 2019 5-year estimates				

Table 18. Project Radius - Educational Attainment (above 25 years old)

Subject	Project Radius			
	Number		Percent	
	Estimate	MOE +/-	Estimate	MOE +/-
Total Above 25	920	100		
Less than 9th grade	264	199	29.0%	
9th to 12th grade, no diploma	79	83	9.0%	
High school graduate (includes equivalency)	233	146	25.0%	
Bachelor's degree or higher	64	107	7.0%	
Source: EJSCREEN 2019				

8 County Health

The University of Wisconsin Population Health Institute, in collaboration with the Robert Wood Johnson Foundation, calculated County Health Rankings 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), Martin County ranks 88th in health outcomes and 76th in health factors. Bertie County ranks 87th in both health outcomes and health factors. Washington County ranks 91st in health outcomes and 88th in health factors.

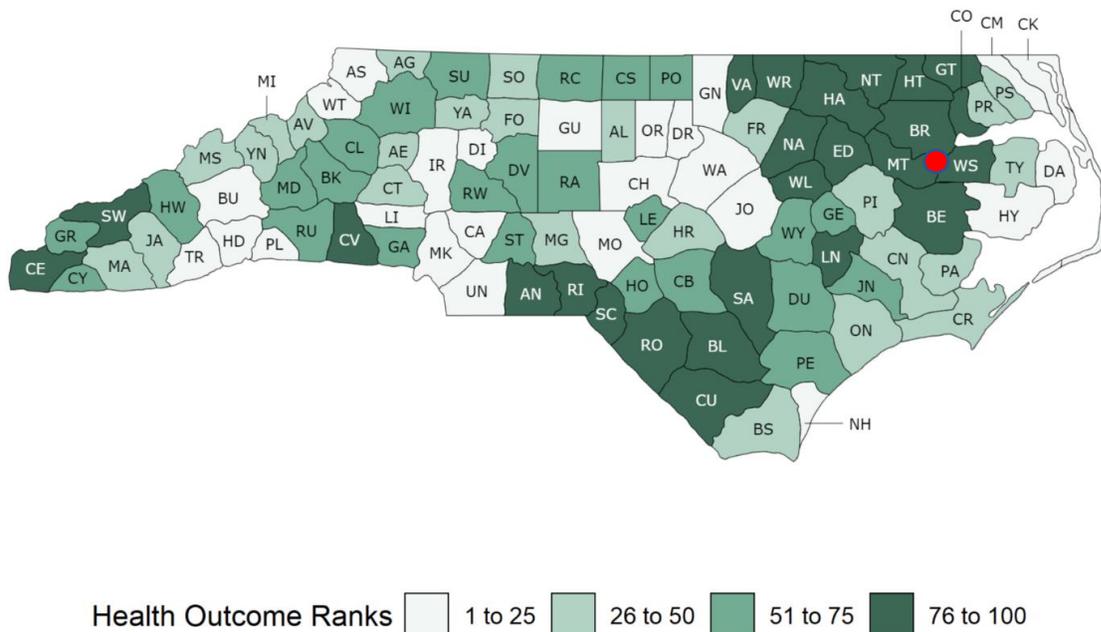


Figure 3. County Health Rankings for Health Factors in North Carolina provided by University of Wisconsin Public Health Institute.

According to the NC DEQ Community Mapping System Environmental Justice Tool, the health outcome causes of death in this particular intersection of Martin County, Bertie County, and Washington County overall are considerably higher than the state averages except for stroke, which is similar to the state average. However, the hospitalizations due to asthma in this area is 43 (per 100,000 individuals), as compared to the state at 90 (per 100,000 individuals). Finally, the number of primary care physicians in this area (3.831 per 10,000 residents) is slightly lower than the state average (4.812 per 10,000 residents).

Table 19. Health Outcomes

Cause of Death	Martin County	Bertie County	Washington County	North Carolina
Cancer	190.7	166.5	172.8	169.1
Heart Disease	241.4	179.1	219.9	163.7
Stroke	48.6	43.9	37.2	43.1
Cardiovascular Disease	306.8	254.2	285.7	221.9
Diabetes	41.7	57.7	21.5	22.8

Source: NCDEQ 2020 EJ Tool

9 Local Sensitive Receptors

The U.S. 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.

Just beyond the one-mile radius surrounding the facility location, the following sensitive receptors were identified (Figure 4):

- Plymouth Methodist Church
- Grace Church
- Temple of Christ Church
- Ministry of Power and Evangelism
- Church of God
- Plymouth Church – The Nazarene
- Gospel Light Church
- Ware Chapel
- Promised Land Church of Christ
- Plymouth Housing Authority – Public Housing Complex
- Washington Regional Medical Center
- Roanoke Landing Nursing and Rehabilitation Center

Additional sensitive receptors may be identified during the remainder of the permit application process.

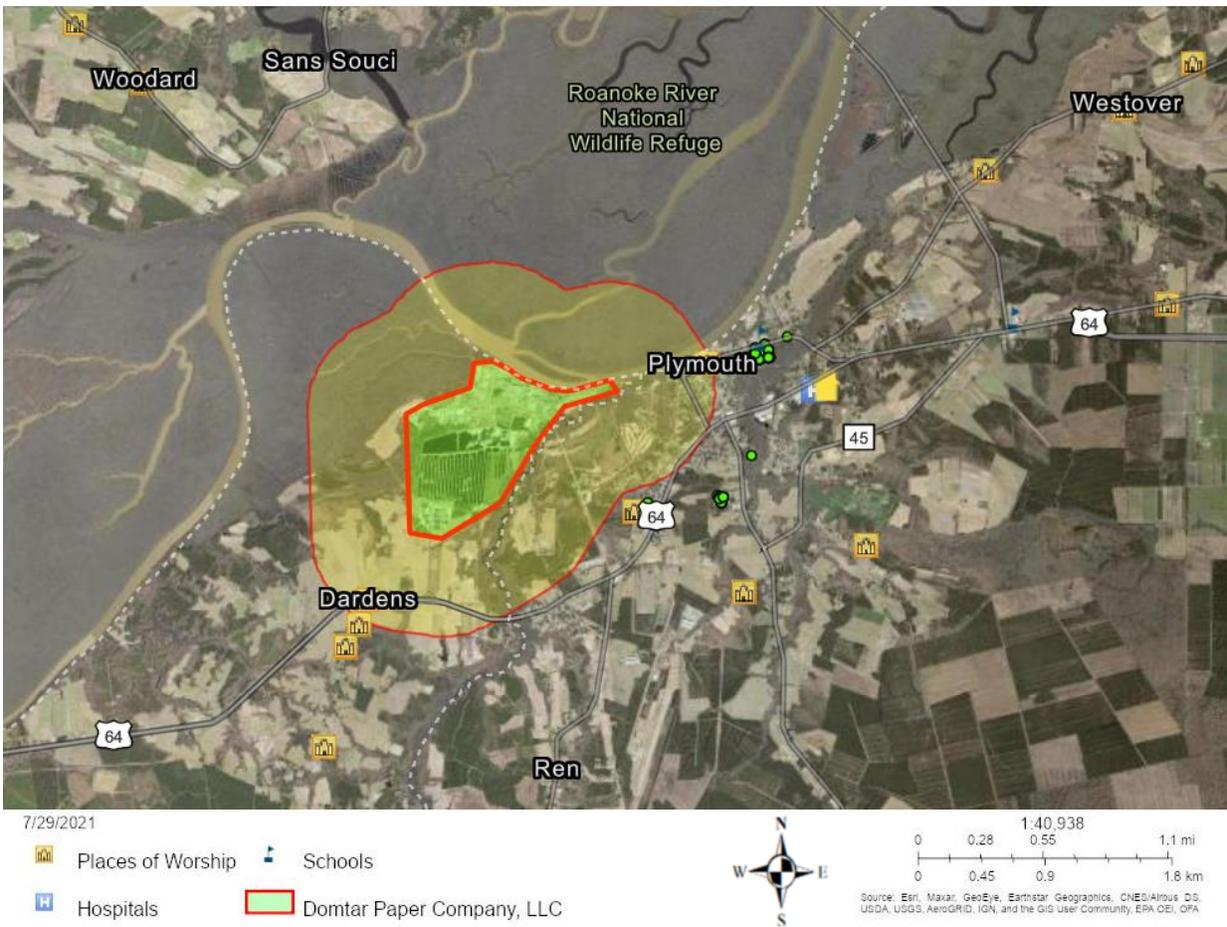


Figure 4. Sensitive receptors surrounding Domtar Paper Company, LLC

10 Local Industrial Sites

Within the one-mile radius of the facility, there are 23 permits or incidents (as October 4, 2021) (Figure 5).

- 3 Air Quality Permitted sites
- 1 NPDES Wastewater Treatment Facility
- 4 Permitted Solid Waste Landfills
- 1 Inactive Hazardous Site
- 1 Hazardous Waste Site
- 5 Underground Storage Tank Incidents
- 5 Above Ground Storage Tank Incidents
- 3 Land Use Restriction and/or Notices

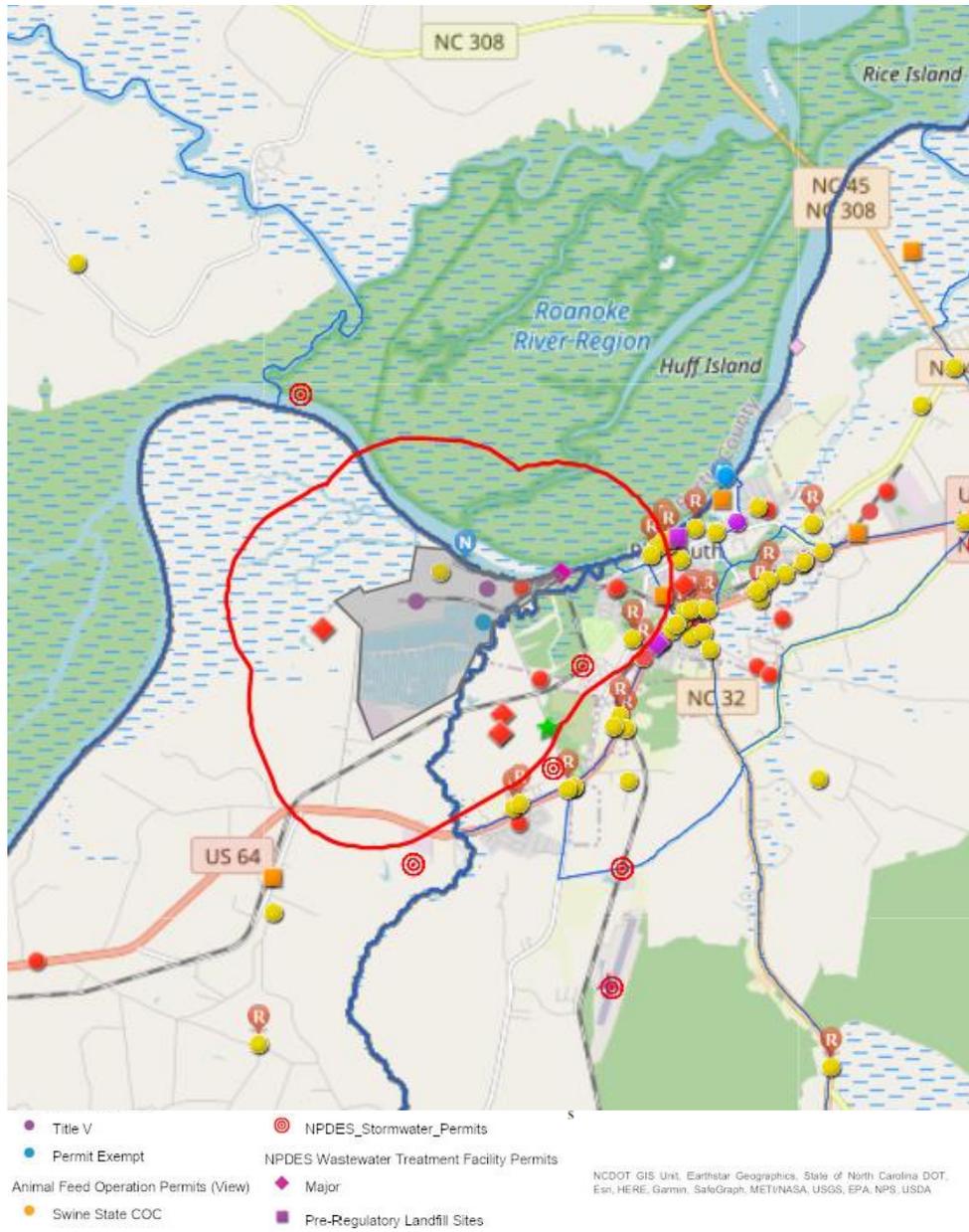


Figure 5. Permitted facilities and incidents with the one-mile radius surrounding the facility.

11 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 Draft EJ report examined the demographic and environmental conditions in North Carolina and the one-mile radius around the Domtar Paper Company facility encompassing Census Tract 9701 in Martin County, Census Tract 9604 in Bertie County, and Census Tract 9502 in Washington County. Potential emissions rates outlined in the permit application and county level health data are 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 2019 are estimates; 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 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; and the Department cannot determine which populations are in that small amount of overlap around the facility.

The Department assessed the available demographic and socioeconomic data of the community surrounding the Domtar Paper Company Facility regarding its permit application. All three counties, the project area data from the radius used, and the census tracts generally exceed the state estimates for Black and African American individuals present. The area also showed higher percentages of individuals earning the lowest income ranges and elevated poverty rates (as compared to the State and County). One LEP group was identified (Spanish or Spanish Creole) in Census Tract 9701.

Martin County ranks 88th in health outcomes and 76th in health factors. Bertie County ranks 87th in both health outcomes and health factors. Washington County ranks 91st in health outcomes and 88th in health factors. All three counties performed worse than the state average for most death rates that are included in the DEQ EJ Tool. There were 10 permits or incidents recorded within one mile of the facility, though several incidents were recorded just outside the one-mile radius.

Based on this Draft EJ Report, the following outreach is recommended:

- Translation services will be considered in accordance with the Department LEP-Language Access Plan.
- The list of sensitive receptors should be consulted while considering additional outreach options that may best fit this community's needs.
- Project information should be provided to officials in the Town of Plymouth as well as all 3 counties included in the project radius
- The Meherrin Tribe will be informed of the permit application information
- Known community leaders should be consulted for additional outreach options.