



**North Carolina Department of Environmental Quality**

**October 11, 2023**

**Dura-Supreme, LLC.**  
**Draft Environmental Justice Report**

It is the policy of the North Carolina Department of Environmental Quality (DEQ) that no person shall, on the grounds of race, religion, color, national origin, ethnicity, sex, pregnancy, gender identity or expression, sexual orientation, age, political affiliation, National Guard or veteran status, genetic information, or disability be excluded from participation in, be denied the benefits of or be subjected to discrimination under Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Act of 1987, the Rehabilitation Act of 1973, and all other pertinent nondiscrimination laws and regulations.

In conducting this analysis, the Environmental Justice Program pursues DEQ's mission to "Provide science-based environmental stewardship for the health and prosperity of all North Carolinians" and advance environmental justice in DEQ's activities.



## Table of Contents

List of Tables.....	5
List of Figures .....	5
Executive Summary .....	8
Objective .....	8
Key Findings .....	8
Recommendations .....	9
<b>1. Introduction.....</b>	<b>10</b>
<b>2. Environmental Justice Evaluation Approach.....</b>	<b>10</b>
2.1 Sociodemographic Indicators .....	10
Race and Ethnicity .....	11
Age and Sex .....	11
Disability .....	12
Limited English Proficiency .....	12
Educational Attainment.....	12
Poverty and Low-income.....	12
<b>3. Permit Information and Facility History Overview .....</b>	<b>12</b>
Facility/Permit Details.....	12
<b>4. Geographic Area.....</b>	<b>13</b>
<b>4. Sociodemographic Analysis .....</b>	<b>16</b>
4.1 Race and Ethnicity .....	17
Potential for EJ Concerns.....	17
Results .....	18
4.2 Age and Sex .....	21
Potential for EJ Concerns.....	21
Results .....	21
4.3 Disability .....	23
Potential for EJ Concerns.....	23
Results .....	23
4.4 Limited English Proficiency .....	24
Potential for EJ Concerns.....	24
Results .....	25
4.5 Educational Attainment.....	26

Potential for EJ Concerns.....	26
Results .....	27
4.6 Poverty and Low-income .....	29
Potential for EJ Concerns.....	29
Results .....	29
<b>5. Health &amp; Cumulative Impacts .....</b>	<b>31</b>
5.1 County Health Outcome Ranks .....	31
5.2 CDC/ATSDR EJ Indexes .....	32
5.3 Local Industrial Sites .....	35
<b>6. Local Sensitive Receptors .....</b>	<b>36</b>
<b>8. Conclusion .....</b>	<b>38</b>
Key Findings.....	38
Recommendations .....	38
<b>Appendix.....</b>	<b>40</b>
Appendix A: U.S. Census Data Sources .....	40
Appendix B: Additional Data Sources .....	40
Appendix C: Sociodemographic Indicators and EPA EJScreen ACS Report .....	40
Race & Ethnicity .....	41
Age & Sex .....	42
Disability.....	43
Limited English Proficiency .....	44
Educational Attainment .....	45
Poverty & Low Income .....	46
EPA EJScreen ACS Report .....	46
Appendix D: County-Level Health Rankings.....	51
Appendix E: CDC Environmental Justice Index Model .....	51
Appendix F: CDC Environmental Justice Index Map for Census Tracts within a one-mile radius of Dura-Supreme, LLC.....	51
Appendix G: Census Tract CDC EJI Scores .....	52
Appendix H: Limitations.....	52
Census Data.....	52
Cumulative Impacts and Health.....	53

## List of Tables

<b>Table 1.</b> Estimated Potential to Emit .....	13
<b>Table 2.</b> Geographic area summary of the facility.....	14
<b>Table 3.</b> Race & Ethnicity percentage comparisons to the county and state.....	18
<b>Table 4.</b> Minority percentage comparisons to the county and state .....	19
<b>Table 5.</b> Median Age & Sex for North Carolina and Iredell County .....	21
<b>Table 6.</b> Median Age & Sex for census tracts within a one-mile radius of Dura-Supreme, LLC facility.....	21
<b>Table 7.</b> Median Age & Sex for census tracts within a one-mile radius of Dura-Supreme, LLC facility Continued.....	22
<b>Table 8.</b> Age percentage comparisons to the county and state .....	22
<b>Table 9.</b> Disability percentage comparisons to the county and state .....	23
<b>Table 10.</b> Limited English Proficiency percentage comparisons to the county and state .....	25
<b>Table 11.</b> Educational Attainment percentage comparisons to the county and state (Populations between 18-24 years) .....	27
<b>Table 12.</b> Educational Attainment percentage comparisons to the county and state (Populations age 25 years and over) .....	27
<b>Table 13.</b> Poverty percentage comparisons to the county and state.....	29
<b>Table 14.</b> List of Permits, Incidents, and Sites within the One-Mile Project Area Radius .....	36
<b>Table 15.</b> List of Sensitive Receptors within the One-Mile Project Area Radius .....	36

## List of Figures

<b>Figure 1.</b> Dura-Supreme, LLC facility with a one-mile radius in the DEQ Community Mapping System....	15
<b>Figure 2.</b> Census tracts within a one-mile radius of Dura-Supreme, LLC facility .....	16
<b>Figure 3.</b> Race & Ethnicity percentage comparisons to the county and state .....	19
<b>Figure 4.</b> Minority percentage comparisons to the county and state .....	20
<b>Figure 5.</b> Poverty percentage comparisons to the county and state .....	30
<b>Figure 6.</b> NC County Health Outcome Ranks for 2023.....	31
<b>Figure 7.</b> NC County Health Factors Ranks for 2023.....	32
<b>Figure 8.</b> Project area and census tracts within the one-mile radius and corresponding CDC Environmental Justice Index scores .....	34
<b>Figure 9.</b> EJScreen Environmental Justice Indexes for a one-mile radius around Dura-Supreme, LLC .....	34
<b>Figure 10.</b> NC DEQ Community Mapping Tool Snapshot of the One-Mile Project Area Radius.....	35
<b>Figure 11.</b> EPA EJScreen Snapshot of Potential Sensitive Receptors within the One-Mile Project Area Radius.....	37

## Glossary

TERM	DEFINITION
Age	The length of time in completed years that a person has lived.
Block Group	A block is the smallest geographic unit for which the Census Bureau tabulates decennial census data. Statistical divisions of census tracts are generally defined to contain between 600 and 3,000 people and are used to present data and control block numbering. A block group consists of clusters of blocks within the same census tract that have the same first digit of their four-digit census block number.
Census Tract	<p>A small, relatively permanent statistical subdivision of a county delineated by a local committee of census data users for the purpose of presenting data. Census tracts ideally contain about 4,000 people and 1,600 housing units.</p> <p>Small, relatively permanent statistical subdivisions of a county or statistically equivalent entity that can be updated by local participants prior to each decennial census as part of the Census Bureau’s Participant Statistical Areas Program. Census tracts generally have a population size between 1,200 and 8,000 people, with an optimum size of 4,000 people. A census tract usually covers a contiguous area; however, the spatial size of census tracts varies widely depending on the density of settlement. Census tracts occasionally are split due to population growth or merged as a result of substantial population decline.</p>
Civil Rights Restoration Action of 1987	Amends several anti-discrimination laws, including the Civil Rights Act of 1964, to define the phrase "program or activity" and the term "program" to mean <i>all operations</i> of a (non-religious) entity that receives Federal financial assistance.
Disability	A long-lasting physical, mental, or emotional condition. This condition can make it difficult for a person to do activities such as walking, climbing stairs, dressing, bathing, learning, or remembering. This condition can also impede a person from being able to go outside the home along or to work at a job or business.
Disproportionate Effects	Term used in Executive Order 12898 to describe situations of concern where there exists significantly higher and more adverse health and environmental effects on minority populations, low-income populations, or indigenous peoples.

Environmental Justice (EJ)	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.
Income	The money income received on a regular basis (exclusive of certain money receipts such as capital gains and lump-sum payments) before payments for personal income taxes, social security, union dues, Medicare deductions, etc.
Limited English Proficiency (LEP)	The language currently used by respondents at home, either “English only” or a non-English language which is used in addition to English or in place of English.
Minority Populations	According to the U.S. Census Bureau, population of people who are not single-race white and not Hispanic. Populations of individuals who are members of the following population groups: American Indian or Alaskan Native; Asian or Pacific Islander; Black, not of Hispanic origin; or Hispanic.
Title VI of the Civil Rights Act of 1964	Title VI of the Civil Rights Act of 1964 and the U.S. Environmental Protection Agency (EPA) regulations prohibit discrimination on the basis of race, color, or national origin in any program or activity receiving federal financial assistance. NC DEQ is a recipient of financial assistance from the U.S. EPA and is subject to the provisions of Title VI and EPA’s implementing regulations.
Race	A person’s self-identification with one or more social groups. An individual can report [to the US Census] as White, Black or African American, Asian, American Indian and Alaska Native, Native Hawaiian and Other Pacific Islander, or some other race.
Sensitive Receptors	Areas where the occupants are more susceptible to the adverse effects of exposure to toxic chemicals, pesticides, and other pollutants. Sensitive receptors include, but are not limited to, hospitals, schools, daycare facilities, elderly housing and convalescent facilities.
Sex	A person’s biological sex.

## Executive Summary

### Objective

The primary goal of this Environmental Justice Report is to encourage comments and suggestions from the surrounding community, industry, and environmental groups throughout the comment period for the Dura-Supreme, LLC Air Permit. Using available 2020 American Community Survey 5-year estimates, the report provides recommendations for appropriate enhanced public outreach and engagement to facilitate public input. Specifically, this report highlights census tracts within a one-mile radius of Dura-Supreme, LLC and the potential for environmental justice concerns.

### Key Findings

Based on this report's analysis and using NC DEQ's definition for underserved communities (on the basis of race/ethnicity and poverty)<sup>1</sup> and standard EJ guidelines established by the U.S. EPA and in the National Environmental Policy Act (NEPA) documentation, the potential environmental justice concerns for particular populations have been identified as follows:

- **Race and Ethnicity:**
  - *Total minority populations* – The overall minority population in Census tract 604.
  - *Specific minority populations* – Hispanic or Latino populations in the project area radius and all census tracts within a one-mile radius of the facility.
- **Tribal Communities:**
  - There are no state or federally recognized tribes or Urban Indian Organizations in Iredell County. However, the county and project area have an American Indian or Alaskan Native population greater than 10% higher when compared to the state.
- **Age and Sex:** Populations of individuals 5 years or younger and populations of individuals 65 years or older in four census tracts (604, 610.02, 610.03, or 611.02).
- **Limited English Proficiency:**
  - Spanish-speaking households with limited English proficiency in two census tracts (604 and 610.02).
  - French-, Haitian-, or Cajun-speaking households with limited English proficiency in census tract 610.02.
- **Disability:** Populations living with a disability in three census tracts (604, 605, and 610.03).
- **Education:** Populations of individuals at least 18 years and older whose highest educational attainment is “less than a high school graduate degree” in four census tracts (604, 610.02, 610.03, and 611.02).
- **Poverty:** Populations experiencing “poverty 200% below the poverty level” in four census tracts (604, 605, 610.02, and 610.03).
- **Cumulative Impacts:** Two census tracts (604 and 610.03) within the project area have a “High” Environmental Justice Index score<sup>2</sup>.

---

<sup>1</sup> The screening process for identifying underserved communities is described in more detail in Section 7 of the DEQ Public Participation Plan (URL: <https://files.nc.gov/ncdeq/EJ/Public-Participation-Plan.pdf>)

<sup>2</sup> 2022 *Environmental Justice Index*. Centers for Disease Control and Prevention (CDC) and Agency for Toxic Substances Disease Registry (ATSDR). Accessed July 12, 2023. <https://www.atsdr.cdc.gov/placeandhealth/eji/index.html>.

## Recommendations

Based on the sociodemographic indicator analysis, the Environmental Justice Program recommends the following outreach and engagement for the Dura-Supreme, LLC Air Permit public hearings and public commenting period:

- Spanish- and French-translated public notices and one-page fact sheets with public comment information.
- Spanish interpretation services and availability to request French interpretation if public hearing is conducted.
- Consultation with community leaders about other outreach recommendations including known local American Indian-serving or related organizations and leaders.
- Mailed or emailed public notices and one-page fact sheets in English, Spanish, and French to local sensitive receptors and the town of Statesville.
- Evaluate options to distribute one-page fact sheets in English, Spanish, and French in higher traffic areas of the community.
- Arrange an English, Spanish, and French voicemail line to receive public comments.

## 1. Introduction

The North Carolina Department of Environmental Quality (NC DEQ) and its Environmental Justice Program maintains an ongoing interest in integrating equitable protections for human health, vulnerable communities, the environment, and civil rights into its programs.

The Environmental Justice Program at NC DEQ works to ensure 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.

The term environmental justice describes situations where multiple factors, including both environmental and socio-economic stressors, may act cumulatively to affect health and the environment and contribute to persistent environmental health disparities and overburden communities. The Environmental Protection Agency (EPA) defines overburdened communities as a minority, low-income, tribal or indigenous populations, or geographic locations in the United States that potentially experience disproportionate environmental harms and risks.<sup>3</sup> Disproportionality can result in greater vulnerability to environmental hazards, lack of opportunity for public participation, or other factors. Increased vulnerability may be attributable to an accumulation of negative environmental, health, economic, or social conditions within these populations or places.

The primary goal of this Environmental Justice Report is to encourage comments and suggestions from the surrounding community, industry, and environmental groups throughout the comment period for the Dura-Supreme, LLC Air Permit. Using available 2020 American Community Survey 5-year estimates, the report provides recommendations for appropriate enhanced public outreach and engagement to facilitate public input. Specifically, this report highlights census tracts within a one-mile radius of Dura-Supreme, LLC and the potential for environmental justice concerns.

## 2. Environmental Justice Evaluation Approach

NC DEQ has assessed the current permit conditions and the demographics of the communities in the area surrounding the facility. Accordingly, this Draft EJ Report includes:

- Permit information and facility history overview
- 2023 county distress ranking as determined by the NC Department of Commerce
- Sociodemographic analysis of census tracts within the one-mile radius and potential EJ concerns based on a comparison of local area demographics to both county and statewide census data
- Presence or absence of state or federally recognized tribes or Urban Indian Associations
- County health assessment from the County Health Rankings and Roadmaps and potential cumulative impacts
- Local sensitive receptors
- Conclusions and outreach recommendations

### 2.1 Sociodemographic Indicators

The Environmental Justice Program examined the following sociodemographic indicators:

---

<sup>3</sup> *EJ 2020 Glossary*. Environmental Protection Agency (EPA). <https://www.epa.gov/environmentaljustice/ej-2020-glossary>

- Race and Ethnicity
- Age and Sex
- Disability
- Limited English Proficiency (LEP)
- Educational Attainment
- Poverty and Low-income

The sociodemographic indicators examined are in alignment with DEQ’s policy that no person shall, on the grounds of race, color, Tribal affiliation, national origin, sex, age, or disability be excluded from participation in, be denied the benefits of or be subjected to discrimination under Title VI of the Civil Rights Act of 1964, the Civil Rights Restoration Action of 1987, the Rehabilitation Act of 1973, and all other pertinent nondiscrimination laws and regulations.

Demographics for the state of North Carolina and its counties are compared to the census tracts on a local geographic scale using data available through the U.S. Census Bureau. See Appendix A for descriptions of all U.S. Census source data used in this report. Demographics for the one-mile radius around Dura-Supreme, LLC – which will be referred to as the project area in this report – are provided through EPA’s EJScreen.<sup>4</sup> See Appendix C for the full EJScreen ACS 2017-2020 report for the project area.

#### Race and Ethnicity

To analyze potential EJ concerns based on race, color, national origin, and ethnicity, the Environmental Justice Program examined populations in the following U.S. Census-defined race and ethnicity categories:

- White (Not Hispanic)
- Black or African American
- Hispanic or Latino
- American Indian or Alaska Native
- Asian
- Native Hawaiian and Other Pacific Islander
- Some Other Race
- Two or More Races

#### Age and Sex

To analyze potential EJ concerns based on age and sex, the Environmental Justice Program examined populations of two different age categories for both males and females. The populations of ≤5 years old, ≤18 and ≥65 years old were examined because the Centers for Disease Control and Prevention (CDC) considers these age ranges as vulnerable.<sup>5</sup>

---

<sup>4</sup> EPA’s *Environmental Justice Screening and Mapping Tool (Version 2.2)*. Environmental Protection Agency (EPA). <https://ejscreen.epa.gov/mapper/>

<sup>5</sup> *Sensitive Populations and Chemical Exposure*. Centers for Disease Control and Prevention (CDC) and Agency for Toxic Substances Disease Registry (ATSDR). <https://www.atsdr.cdc.gov/emes/public/docs/Sensitive%20Populations%20FS.pdf>

## Disability

To analyze potential EJ concerns based on disability status, the total population with a disability was examined.

To analyze potential EJ concerns regarding accessibility to public information and public hearings concerning public health or environmental impacts of programs, policies, and activities the types of difficulties experienced by the total population with a disability was also examined.

## Limited English Proficiency

Spanish-, French-, German-, Chinese-, Vietnamese-, and Arabic-speaking populations are the top 6 non-English languages spoken in North Carolina.<sup>6</sup> In North Carolina, the largest limited English proficiency (LEP) population is Spanish-speaking, making up approximately 3.5% of the state population and approximately 75% of the entire LEP population in North Carolina (American Community Survey 2011-2015). The next largest language groups are Chinese-speaking (approximately 3.5% of the LEP population), Vietnamese-speaking (approximately 3.3% of the LEP population), and other Asian Language-speaking (approximately 2% of the LEP population).

To analyze potential EJ concerns regarding accessibility to public information concerning public health or environmental impacts of programs, policies, and activities, these six identified populations with LEP were examined.

For this EJ report, populations that speak English “Less than very well,” as categorized in the U.S. Census Bureau, are considered populations with LEP.

## Educational Attainment

To analyze potential EJ concerns based on socioeconomic status, populations with varying levels of educational attainment (bachelor’s degree and higher and high school degree and lower) for adults of 25 years or older were examined.

## Poverty and Low-income

To analyze potential EJ concerns based on income levels, populations below the poverty level and the ratio of people 200% below the poverty level were examined. The poverty level for 2019 was defined as having a household income less than \$12,490 for a household with one individual, with an additional \$4,420 per individual added to a household. The US Census Bureau considers a household to be all individuals that occupy a housing unit as their usual place of residence.<sup>7</sup> Analyzed poverty data from the US Census Bureau considered total populations in poverty as a count of individuals, which had already been determined on a household level according to these guidelines.

# 3. Permit Information and Facility History Overview

## Facility/Permit Details

Dura-Supreme, LLC - Statesville (Dura-Supreme) has applied to the N.C. Division of Air Quality for an initial construction and operation permit for a new facility located in Statesville, Iredell County.

---

<sup>6</sup> Tippett, R. (2016, April 21). Hola, xin chào, bonjour: Many languages heard in NC homes. *UNC Chapel Hill Carolina Population Center*. <https://carolinademography.cpc.unc.edu/2016/04/21/hola-xin-chao-bonjour-many-languages-heard-in-nc-homes/>

<sup>7</sup> Household Definition. (n.d.). In *US Census Bureau Glossary*. <https://www.census.gov/glossary/?term=Household>

The facility plans to receive unfinished pre-cut wood products to produce cabinets. Cabinet production would consist of various woodworking, gluing and assembly operations to support the manufacturer of both framed and frameless wood kitchen cabinets and cabinet components.

All woodworking operations will be controlled with an active exhaust/collection system that is vented to two externally mounted baghouse dust collectors. Surface coating operations will consist of several coating booths where hand-spray application of various coatings will be applied to the wood cabinet components. The coating booths will utilize panel filters to control particulate emissions from the spraying operations. Final cabinet assembly with glue will be performed.

The facility’s potential to emit (PTE) for Volatile Organic Compounds (VOCs) is above the major source threshold under the Clean Air Act (CAA)’s Title V operating program, therefore the facility is required to apply for a Title V permit. Pursuant to North Carolina’s Title V Procedures in 15A NCAC 02Q .0504(a) and (b), the facility has requested to obtain a construction and operation permit in accordance with 02Q .0300, before it is required to obtain a Title V permit.

To reduce Hazardous Air Pollutants (HAPs), the wood furniture manufacturing sources shall comply with all requirements of 15A NCAC 02D .1111 “Maximum Achievable Control Technology” (MACT) and 40 CFR Part 63 Subpart JJ “National Emission Standards for Wood Furniture Manufacturing Operations.” MACT Subpart JJ requires limitations on emissions of 10% by weight HAP for thinners and 1.0 volatile HAP per pound of solids for all other finishing materials.

**Table 1.** Estimated Potential to Emit

Pollutant	CO	NOx	PM	PM10	PM2.5	SO2	VOC	CO2e
PTE Before Controls (tpy)	8.3	10.3	1,604.5	1,604.5	1,302.9	0.16	3,962.9	11,690.1
PTE After Controls or Limits (tpy)	8.3	10.3	78.0	78.09	64.8	0.16	249.00	11,690.1

## 4. Geographic Area

NC DEQ defines a Potentially Underserved Community by examining the race/ethnicity and poverty criteria for each block group. The block group is then compared to both the county and the state and is classified by the Department as a Potentially Underserved Block Group if it meets the following criteria for race/ethnicity and poverty:

- **Race/Ethnicity:** Share of nonwhites and Hispanic or Latino (of any race) is over fifty percent OR Share of nonwhites and Hispanic or Latino (of any race) is at least ten percent higher than County or State share. AND
- **Poverty:** Share of population experiencing poverty is over twenty percent AND Share of households in poverty is at least five percent higher than the County or State share.

These selections occur on a block group level<sup>8</sup> and this dataset is a selection of the 2019 ACS data from the data tables B03002—Hispanic or Latino Origin by Race—and S1701—Poverty Status in the Past 12 Months. Learn more about [NC DEQ's Potentially Underserved Block Groups 2019 - Overview](https://arcgis.com) (arcgis.com).

Dura-Supreme, LLC is in census tract 604 in Iredell County and by NC DEQ’s definition, is located in a Potentially Underserved Community. According to the NC Department of Commerce 2023 County Tier Designations for County Distress Rankings, Iredell County is a Tier 3 county (on a scale of Tiers 1-3 with Tie 1 being the most distressed), which is categorized as least distressed, and has an economic distress rank of 89 out of 100 (with a rank of 1 being most economically distressed and 100 being least economically distressed).

County tiers in the state are calculated by the NC Department of Commerce using four factors: average unemployment rate, median household income, percentage growth in population, and adjusted property tax base per capita. Tier 1 encompasses the 40 most distressed counties, Tier 2 encompasses the next 40, and Tier 3 encompasses the 20 least distressed counties. Visit the [NC Department of Commerce’s County Distress Rankings](#) for more details on county tier calculations.

According to EPA’s EJScreen, the project area is in the 63<sup>rd</sup> percentile for broadband internet gaps (See Appendix C).<sup>9</sup> This means 37% of areas in the state have more broadband internet gaps, meaning these areas may have less internet access.

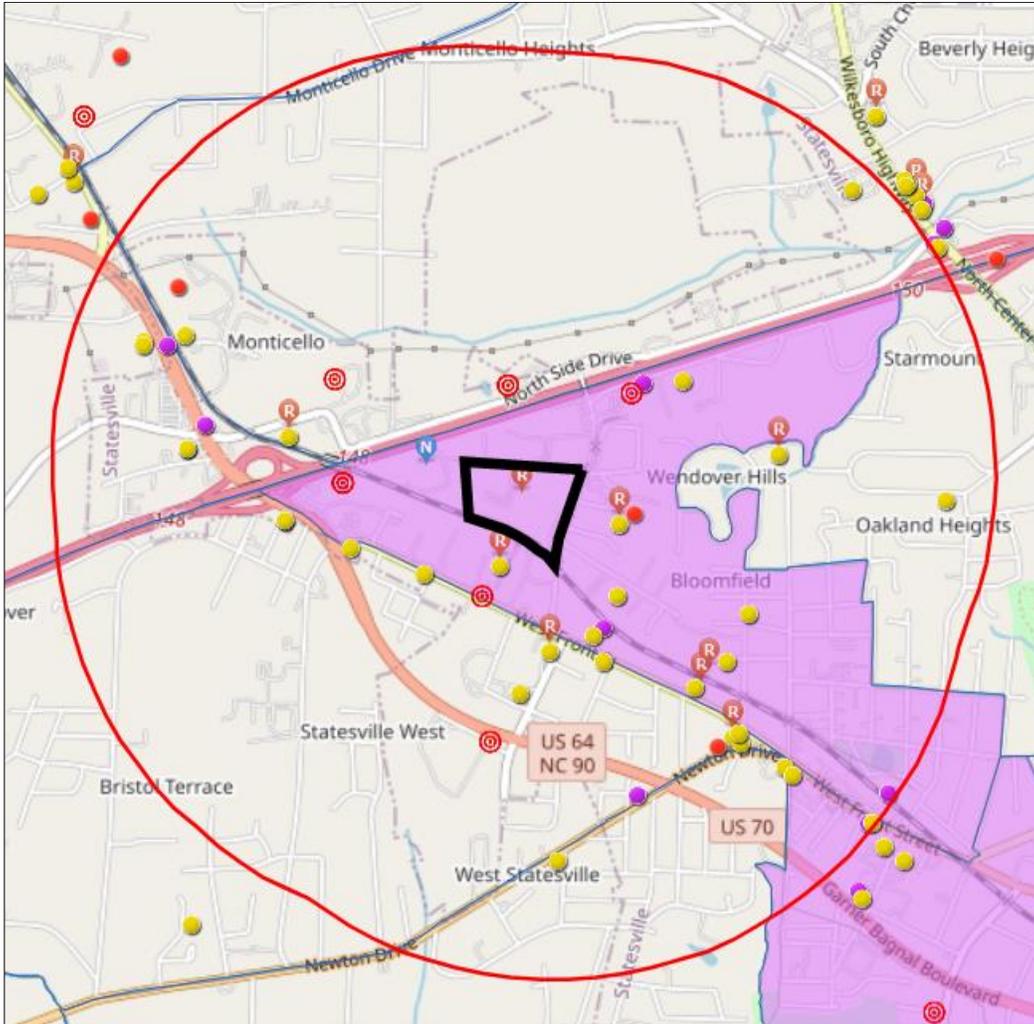
Demographics for the project area and census tracts intersecting the project area were analyzed for this report. Table 1 and Figures 1 and 2 summarize the geographic area and census tracts within a one-mile radius of Dura-Supreme, LLC.

**Table 2.** Geographic area summary of the facility

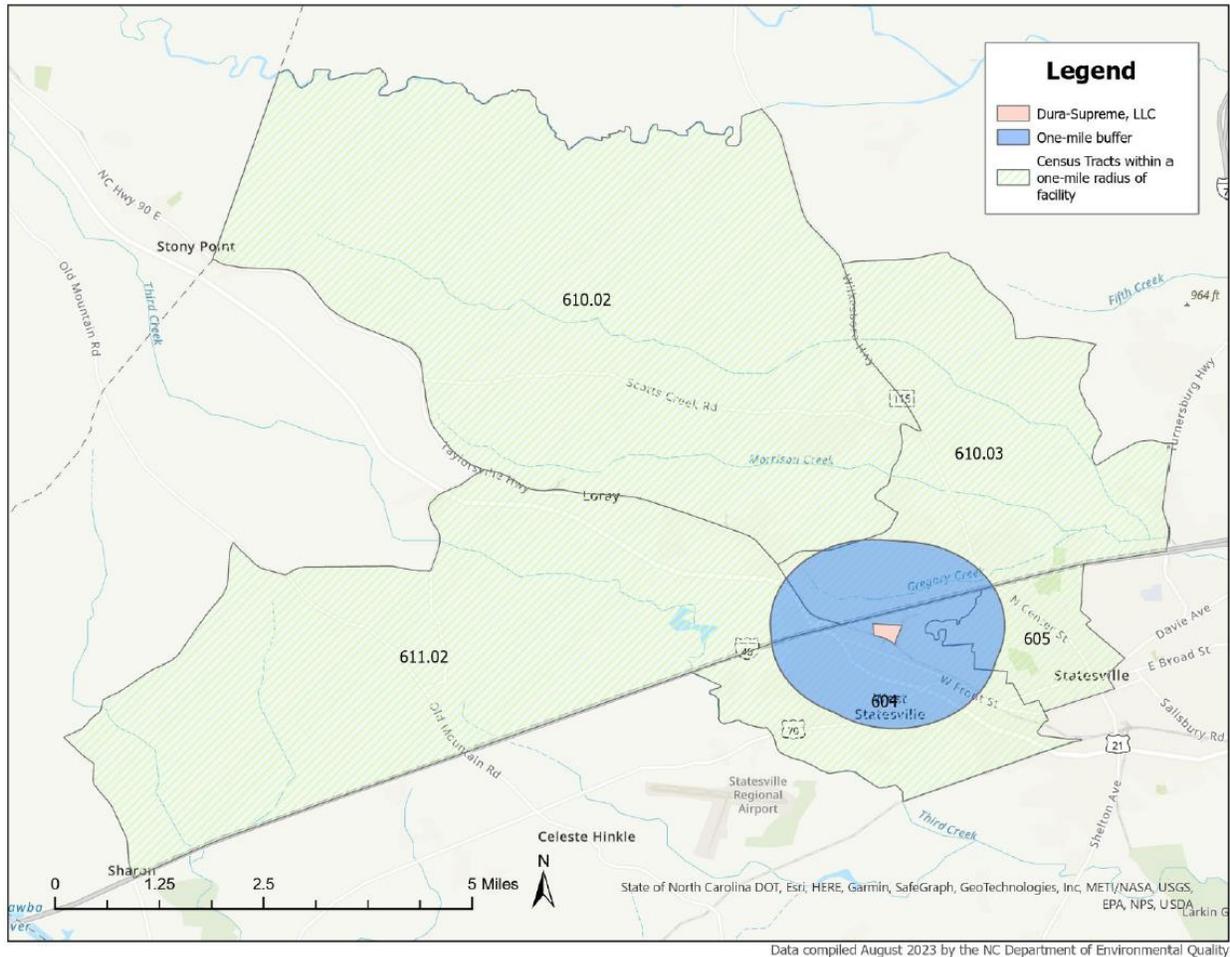
<b>GEOGRAPHIC AREA SUMMARY</b>	
<b>Facility Address</b>	607 Meacham Rd, Statesville, NC 28677
<b>Geographic Coordinates</b>	-80.924 longitude, 35.793 latitude
<b>Located in a PUC (Yes/No)</b>	Yes
<b>County</b>	Iredell County
<b>2023 County Tier for County Distress Rankings</b>	Tier 3
<b>2023 Economic Distress Ranking out of 100</b>	89
<b>Census Tract with the facility</b>	604
<b>Census Tracts within a one-mile radius of facility</b>	605
	610.02
	610.03
	611.02

<sup>8</sup> Block groups are statistical divisions of census tracts, are generally defined to contain between 600 and 3,000 people and are used to present data and control block numbering. A block group consists of clusters of blocks within the same census tract that have the same first digit of their four-digit census block number.

<sup>9</sup> EPA defines broadband gaps as areas with the lowest rate of households with a broadband internet subscription.



**Figure 1.** Dura-Supreme, LLC facility with a one-mile radius in the DEQ Community Mapping System



**Figure 2.** Census tracts within a one-mile radius of Dura-Supreme, LLC facility

## 4. Sociodemographic Analysis

Using standard environmental justice guidelines from the Environmental Protection Agency (EPA) and National Environmental Policy Act (NEPA) documentation, the following conditions are highlighted as communities with the potential for EJ concerns:

1. A 10% or more difference when compared to the county or state for race and ethnicity, age and sex, disability, and educational attainment (up to high school or equivalent level);
2. A 50% or more minority (non-white) population;
3. Share of population experiencing poverty is 20% or more;
4. Percentage increase of 5% or more compared to the county or state average for poverty;
5. At least 5% of the population or 1,000 people (whichever is smaller) speaks English less than very well.

The U.S. Census Bureau uses and provides margins of error which is used as an indicator of potential sampling errors and relative reliability. A larger margin of error corresponds to a larger degree of uncertainty. Estimates and margins of error and DEQ calculated confidence intervals for sociodemographic indicators are provided in Appendix C as available through the U.S. Census Bureau.

## 4.1 Race and Ethnicity

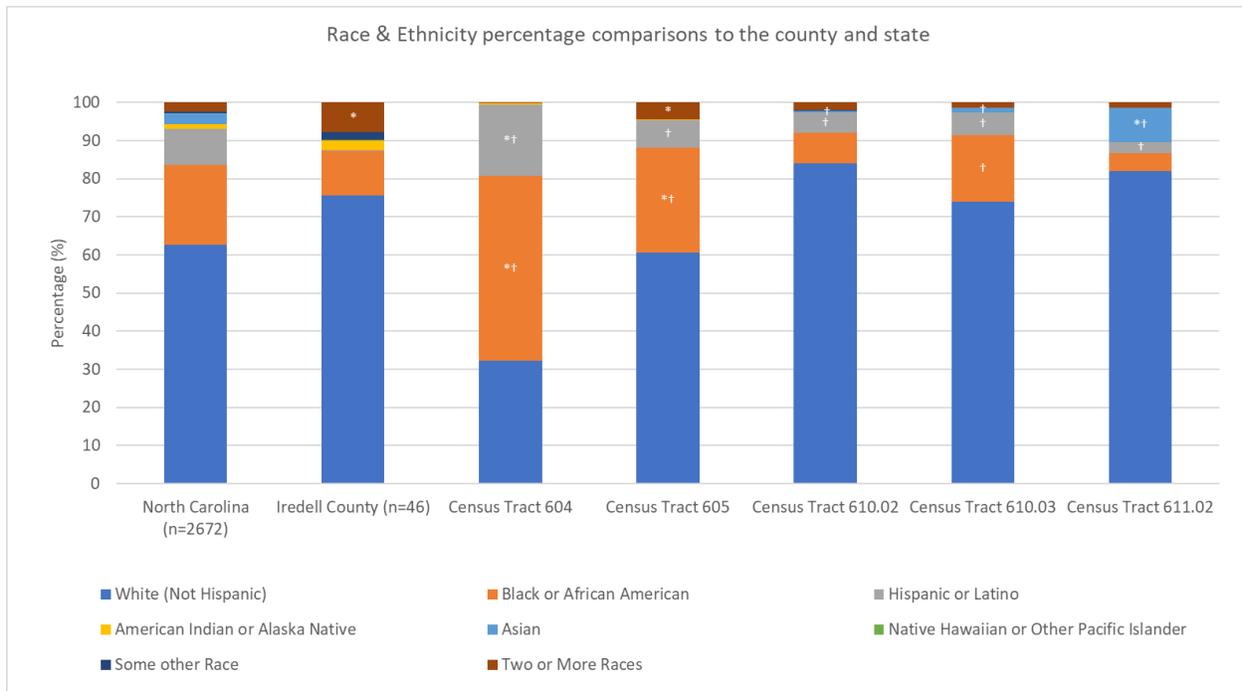
### Potential for EJ Concerns

- The minority population is greater than 50% in Census Tract 604 and is greater than 10% higher when compared to the county and state minority population. Census Tract 605 has a minority population greater than 10% higher when compared to the county (Table 3; Figure 4).
- All five census tracts and the project have Hispanic or Latino populations greater than 10% higher when compared to the county. Both the project area and Census Tract 604 have Hispanic or Latino populations greater than 10% higher when compared to both the county and state (Table 2; Figure 3).
- Two census tracts (604 and 605) have Black or African American populations greater than 10% higher when compared to county and state. Census tract 610.03 has a Black or African American population greater than 10% higher when compared to the county only (Table 2; Figure 3).
- Two census tracts (610.02 and 610.03) have an Asian population greater than 10% higher when compared to county. Census tract 611.02 is greater than 10% higher for Asian population when compared to both county and state (Table 2; Figure 3).
- No state or federally recognized tribes or Urban Indian Organizations are found in Iredell County. However, the American Indian or Alaskan Native population in Iredell County and the project area is greater than 10% higher when compared to the state (Table 2; Figure 3).

Results

**Table 3.** Race & Ethnicity percentage comparisons to the county and state

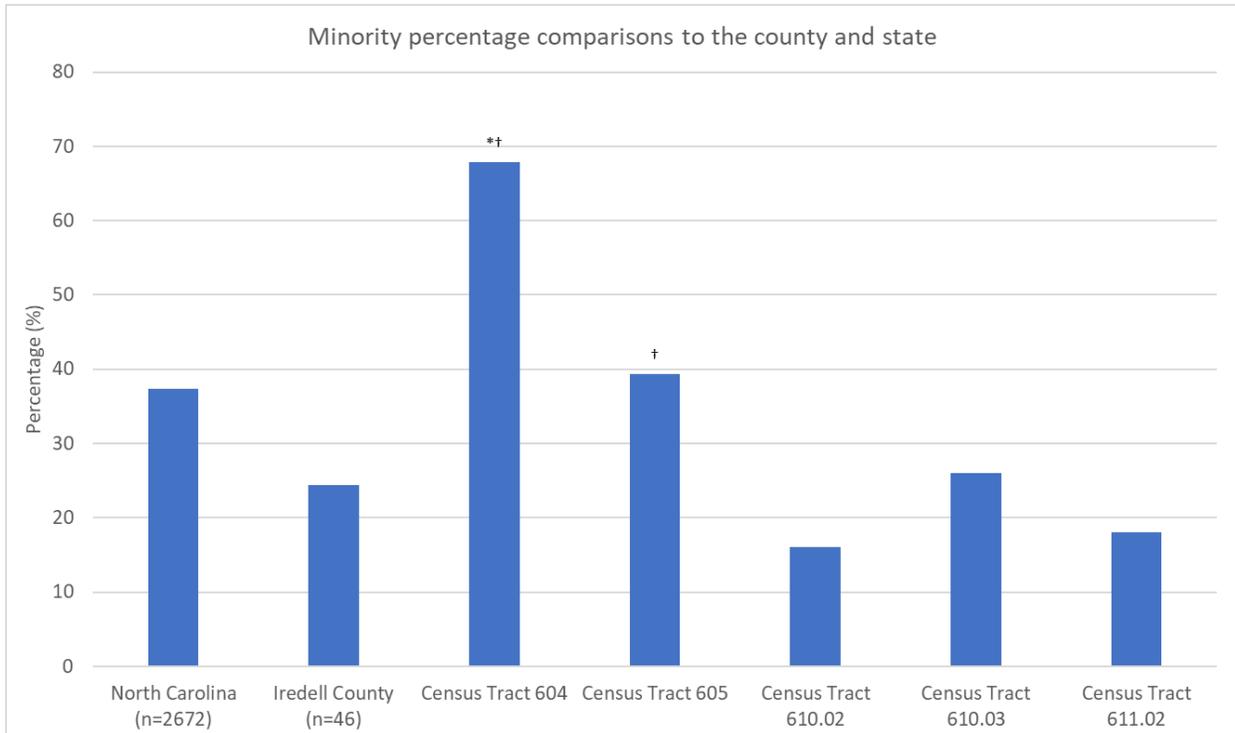
RACE & ETHNICITY (%)								
	NORTH CAROLINA (n=2672)	IREDELL COUNTY (n=46)	PROJECT AREA	CENSUS TRACT 604	CENSUS TRACT 605	CENSUS TRACT 610.02	CENSUS TRACT 610.03	CENSUS TRACT 611.02
White (Not Hispanic)	62.61	75.56	58.00	32.18	60.67	83.94	73.94	82.01
Black or African American	21.01	11.86	<b>29.00*†</b>	<b>48.60*†</b>	<b>27.49*†</b>	8.03	<b>17.44†</b>	4.76
Hispanic or Latino	9.54	0.12	<b>13.00*†</b>	<b>18.73*†</b>	<b>7.20†</b>	<b>5.48†</b>	<b>5.96†</b>	<b>2.91†</b>
American Indian or Alaska Native	1.04	<b>2.41*</b>	<b>2.00*</b>	0.26	0.16	0.00	0.10	0.00
Asian	2.95	0.01	<b>1.00†</b>	0.00	0.00	<b>0.28†</b>	<b>1.22†</b>	<b>9.01*†</b>
Native Hawaiian or Other Pacific Islander	0.06	<b>0.15*</b>	0.00	0.00	0.00	0.00	0.00	0.00
Some other Race	0.29	<b>2.10*</b>	<b>8.00*†</b>	0.00	0.00	0.32	0.00	0.00
Two or More Races	2.49	<b>7.80*</b>	<b>3.00*</b>	0.24	<b>4.48*</b>	1.95	1.34	1.31
<b>Total Population</b>	10,386,227	178,853	3,466	4,202	3,750	4,358	4,095	3,740
<b>Source:</b> US Census Bureau, 2020 American Community Survey (ACS) 5-year estimate								
All <b>bolded*</b> cells indicate a percentage increase of 10% or more for non-white populations in the county or group of census tracts compared to the <b>state</b> .								
All cells <b>bolded†</b> indicate a percentage increase of 10% or more for non-white populations in the group of census tracts when compared to the <b>county</b> .								



**Figure 3.** Race & Ethnicity percentage comparisons to the county and state

**Table 4.** Minority percentage comparisons to the county and state

MINORITY (%)								
	NORTH CAROLINA (n=2672)	IREDELL COUNTY (n=46)	PROJECT AREA	CENSUS TRACT 604	CENSUS TRACT 605	CENSUS TRACT 610.02	CENSUS TRACT 610.03	CENSUS TRACT 611.02
<b>Minority</b>	37.39	24.44	<b>45.00*†</b>	<b>67.82*†</b>	<b>39.33†</b>	16.06	26.06	17.99
<b>Total Population</b>	10,386,227	178,853	3,466	4,202	3,750	4,358	4,095	3,740
<b>Source:</b> US Census Bureau, 2020 American Community Survey (ACS) 5-year estimate								
All <b>bolded*</b> cells indicate a percentage increase of 10% or more in the county or group of census tracts compared to the <b>state</b> .								
All cells <b>bolded†</b> indicate a percentage increase of 10% or more in the group of census tracts when compared to the <b>county</b> .								



**Figure 4.** Minority percentage comparisons to the county and state

## 4.2 Age and Sex

### Potential for EJ Concerns

- Two census tracts (610.03 and 611.02) have a population of individuals who are 65 years or older is greater than 10% higher when compared to the county and state. The population of individuals who are 65 years or older in Census tract 610.02 is greater than 10% higher when compared to the county (Table 7).
- Census tract 604 is has a population of age 5 years or younger greater than 10% higher when compared to county (Table 7).

### Results

**Table 5.** Median Age & Sex for North Carolina and Iredell County

MEDIAN AGE & SEX						
	NORTH CAROLINA (n=2672)			IREDELL COUNTY (n=46)		
	Male	Female	Both	Male	Female	Both
<b>Median Age</b>	39.3	41.8	40.6	39.5	42.6	40.9
<b>Total (%)</b>	48.65	51.35		49.30	50.70	
<b>Source:</b> US Census Bureau, 2020 American Community Survey (ACS) 5-year estimate						
All <b>bolded*</b> cells indicate a percentage increase of 10% or more in the county compared to the <b>state</b> .						

**Table 6.** Median Age & Sex for census tracts within a one-mile radius of Dura-Supreme, LLC facility

MEDIAN AGE & SEX									
	Census Tract 604			Census Tract 605			Census Tract 610.02		
	Male	Female	Both	Male	Female	Both	Male	Female	Both
<b>Median Age</b>	33.2	45.3	36.2	38.2	48.1	42.7	43.7	38.7	41.0
<b>Total (%)</b>	48.31	51.69		51.76	48.24		44.52	55.48	
<b>Source:</b> US Census Bureau, 2020 American Community Survey (ACS) 5-year estimate									
All <b>bolded*</b> cells indicate a percentage increase of 10% or more in the group of census tracts compared to the <b>state</b> .									
All cells <b>bolded†</b> indicate a percentage increase of 10% or more in the group of census tracts when compared to the <b>county</b> .									

**Table 7.** Median Age & Sex for census tracts within a one-mile radius of Dura-Supreme, LLC facility  
Continued

MEDIAN AGE & SEX						
	Census Tract 610.03			Census Tract 611.02		
	Male	Female	Both	Male	Female	Both
<b>Median Age</b>	39.1	43.9	39.7	39.0	44.4	43.7
<b>Total (%)</b>	52.97	47.03		47.89	52.11	
<b>Source:</b> US Census Bureau, 2020 American Community Survey (ACS) 5-year estimate						
All <b>bolded*</b> cells indicate a percentage increase of 10% or more in the group of census tracts compared to the <b>state</b> .						
All cells <b>bolded<sup>†</sup></b> indicate a percentage increase of 10% or more in the group of census tracts when compared to the <b>county</b> .						

**Table 8.** Age percentage comparisons to the county and state

AGE (%)								
	NORTH CAROLINA (n=2672)	IREDELL COUNTY (n=46)	PROJECT AREA	Census Tract 604	Census Tract 605	Census Tract 610.02	Census Tract 610.03	Census Tract 611.02
<b>Below 5 Years Old</b>	5.83	5.53	6.00	<b>6.40<sup>†</sup></b>	3.87	4.80	4.44	2.78
<b>Below 18 Years Old</b>	22.16	22.95	19.00	23.30	18.51	18.72	21.10	19.95
<b>Above 65 Years Old</b>	16.26	15.88	17.00	13.99	13.71	<b>17.78<sup>†</sup></b>	<b>21.03*<sup>†</sup></b>	<b>18.10*<sup>†</sup></b>
<b>Source:</b> US Census Bureau, 2020 American Community Survey (ACS) 5-year estimate								
All <b>bolded*</b> cells indicate a percentage increase of 10% or more in the group of census tracts compared to the <b>state</b> .								
All cells <b>bolded<sup>†</sup></b> indicate a percentage increase of 10% or more in the group of census tracts when compared to the <b>county</b> .								

### 4.3 Disability

#### Potential for EJ Concerns

- Three census tracts (604, 605, and 610.03) have a population living with a disability greater than 10% higher when compared to the county (Table 8).
- Census tract 604 has a population living with a disability greater than 10% higher when compared to the state (Table 8).

#### Results

**Table 9.** Disability percentage comparisons to the county and state

DISABILITY (%)							
	NORTH CAROLINA (n=2672)	IREDELL COUNTY (n=46)	Census Tract 604	Census Tract 605	Census Tract 610.02	Census Tract 610.03	Census Tract 611.02
Population with a Disability	13.39	12.27	<b>15.25*†</b>	<b>13.73†</b>	13.49	<b>14.53†</b>	11.82
Type of Difficulty							
Hearing	3.73	3.73	1.48	2.93	<b>4.41*†</b>	<b>5.03*†</b>	3.66
Vision	2.59	2.29	<b>3.45*†</b>	0.85	2.25	1.86	<b>4.52*†</b>
Cognitive	5.07	4.19	2.12	<b>4.75†</b>	4.18	<b>5.27†</b>	1.50
Ambulatory	7.00	6.46	<b>9.85*†</b>	<b>8.45*†</b>	<b>8.19*†</b>	<b>8.74*†</b>	<b>8.53*†</b>
Self-care	2.55	2.35	<b>2.95*†</b>	2.32	1.10	<b>3.42*†</b>	<b>4.89*†</b>
Independent Living	4.63	4.39	<b>5.57*†</b>	<b>5.69*†</b>	3.21	<b>7.59*†</b>	<b>5.03†</b>
<b>Source:</b> US Census Bureau, 2020 American Community Survey (ACS) 5-year estimate							
All <b>bolded*</b> cells indicate a percentage increase of 10% or more in the group of census tracts compared to the <b>state</b> .							
All cells <b>bolded†</b> indicate a percentage increase of 10% or more in the group of census tracts when compared to the <b>county</b> .							

## 4.4 Limited English Proficiency

### Potential for EJ Concerns

- Census tract 604 has a population of Spanish-speaking households with limited-English proficiency greater than 5% higher when compared to both the county and state. Census tract 610.03 has a population of Spanish-speaking households with limited-English proficiency greater than 5% higher when compared to the county (Table 9).
- Census tract 610.03 has households that speak French, Haitian, or Cajun with limited-English proficiency greater than 5% higher than the county and state (Table 9).
- No census tracts had a population estimate of limited-English proficient households for any language above 1,000 households (Appendix C).

Results

**Table 10.** Limited English Proficiency percentage comparisons to the county and state

LIMITED ENGLISH PROFICIENCY (%)							
	NORTH CAROLINA (n=2672)	IREDELL COUNTY (n=46)	Census Tract 604	Census Tract 605	Census Tract 610.02	Census Tract 610.03	Census Tract 611.02
Speak only English	88.18	90.83	82.51	93.09	96.75	91.41	87.24
Spanish	3.07	2.28	<b>9.38<sup>*†</sup></b>	2.36	1.33	<b>2.61<sup>†</sup></b>	1.62
French, Haitian, or Cajun	0.10	0.10	0.00	0.00	0.00	<b>1.71<sup>*†</sup></b>	0.00
German or other West Germanic languages	0.03	0.03	0.00	0.00	0.00	0.00	0.00
Chinese (incl Mandarin, Cantonese)	0.16	0.04	0.00	0.00	0.00	0.00	0.00
Vietnamese	0.15	0.03	0.00	0.00	0.00	0.00	0.00
Arabic	0.10	0.01	0.00	0.00	0.00	0.00	0.00
<b>Total Population 5 Years and over</b>	9,780,928	168,968	3,933	3,605	4,149	3,913	3,636
<b>Source:</b> US Census Bureau, 2020 American Community Survey (ACS) 5-year estimate							
All <b>bolded*</b> cells indicate a percentage increase of 10% or more in the group of census tracts compared to the <b>state</b> .							
All cells <b>bolded<sup>†</sup></b> indicate a percentage increase of 10% or more in the group of census tracts when compared to the <b>county</b> .							

## 4.5 Educational Attainment

### Potential for EJ Concerns

- Three census tracts (610.02, 610.03, and 611.02) have populations between 18 and 24 years of age with less than a high school graduate degree greater than 10% higher when compared to county and state (Table 10).
- Census tract 604 has a population of age 25 years and over with the highest educational attainment being less than a high school graduate degree greater than 10% higher when compared to county and state (Table 11).

Results

**Table 11.** Educational Attainment percentage comparisons to the county and state (Populations between 18-24 years)

EDUCATIONAL ATTAINMENT (%)							
	NORTH CAROLINA (n=2672)	IREDELL COUNTY (n=46)	Census Tract 604	Census Tract 605	Census Tract 610.02	Census Tract 610.03	Census Tract 611.02
Less than High School Graduate	12.37	13.04	3.11	8.94	<b>23.50*†</b>	<b>14.20*</b>	<b>28.05*†</b>
Population age 18-24 years	987,858	14,271	289	425	383	324	303
<b>Source:</b> US Census Bureau, 2020 American Community Survey (ACS) 5-year estimate							
All <b>bolded*</b> cells indicate a percentage increase of 10% or more in the group of census tracts compared to the <b>state</b> .							
All cells <b>bolded†</b> indicate a percentage increase of 10% or more in the group of census tracts when compared to the <b>county</b> .							

**Table 12.** Educational Attainment percentage comparisons to the county and state (Populations age 25 years and over)

EDUCATIONAL ATTAINMENT (%)							
	NORTH CAROLINA (n=2672)	IREDELL COUNTY (n=46)	Census Tract 604	Census Tract 605	Census Tract 610.02	Census Tract 610.03	Census Tract 611.02
Less than 9th grade	4.25	3.23	<b>6.37*†</b>	3.12	1.74	3.37	1.45
9th to 12th grade, no diploma	7.23	6.44	<b>15.10*†</b>	<b>9.20*†</b>	<b>9.12*†</b>	6.23	<b>11.41*†</b>
High school graduate (includes equivalency)	25.45	27.56	<b>33.61*†</b>	23.53	<b>34.38*†</b>	27.07	<b>37.27*†</b>
Bachelor's degree	32.04	29.71	15.78	<b>33.26*</b>	22.16	25.01	13.75

<b>Population age 25 years and over</b>	7,096,773	123,529	2,934	2,631	3,159	2,907	2,691
<b>Source:</b> US Census Bureau, 2020 American Community Survey (ACS) 5-year estimate							
All <b>bolded*</b> cells indicate a percentage increase of 10% or more in the group of census tracts compared to the <b>state</b> .							
All cells <b>bolded†</b> indicate a percentage increase of 10% or more in the group of census tracts when compared to the <b>county</b> .							

## 4.6 Poverty and Low-income

### Potential for EJ Concerns

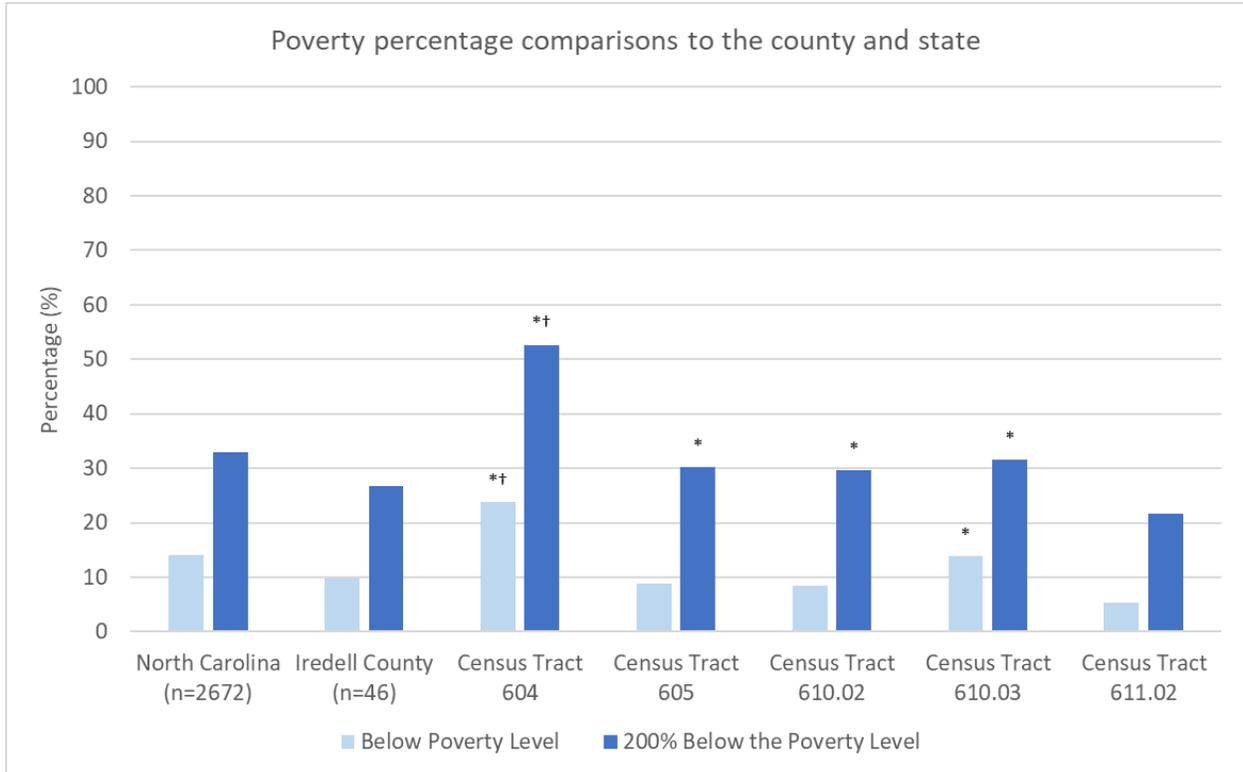
- The project area and 4 census tracts (604, 605, 610.02, and 610.03) have a population experiencing poverty 200% below the poverty level greater than 20% and greater than 10% higher when compared to the county and state (Table 12; Figure 5).

### Results

**Table 13.** Poverty percentage comparisons to the county and state

POVERTY (%)								
	NORTH CAROLINA (n=2672)	IREDELL COUNTY (n=46)	PROJECT AREA <sup>10</sup>	Census Tract 604	Census Tract 605	Census Tract 610.02	Census Tract 610.03	Census Tract 611.02
<b>Below Poverty Level</b>	13.98	9.80		<b>23.77*†</b>	8.74	8.52	<b>13.92*</b>	5.29
<b>200% Below the Poverty Level</b>	32.99	26.69	<b>42.00*†</b>	<b>52.67*†</b>	<b>30.16*</b>	<b>29.56*</b>	<b>31.61*</b>	21.71
<b>Total Population for whom Poverty Status is Determined</b>	10,098,330	177,084		4,202	3,409	4,272	4,094	3,740
<b>Source:</b> US Census Bureau, 2020 American Community Survey (ACS) 5-year estimate								
All <b>bolded*</b> cells indicate a percentage increase of 10% or more in the group of census tracts compared to the <b>state</b> .								
All cells <b>bolded†</b> indicate a percentage increase of 10% or more in the group of census tracts when compared to the <b>county</b> .								

<sup>10</sup> EPA's EJScreen ACS 2017-2020, 5-year estimates data reports the low-income population percentage for a one-mile radius. Low-income is defined by the EPA as the percent of a block group's population in households where the household income is less than or equal to twice the federal poverty level. Neither the "total population for whom poverty status is determined" nor population percentage for those "below poverty level" are reported for the one-mile radius EJScreen report.



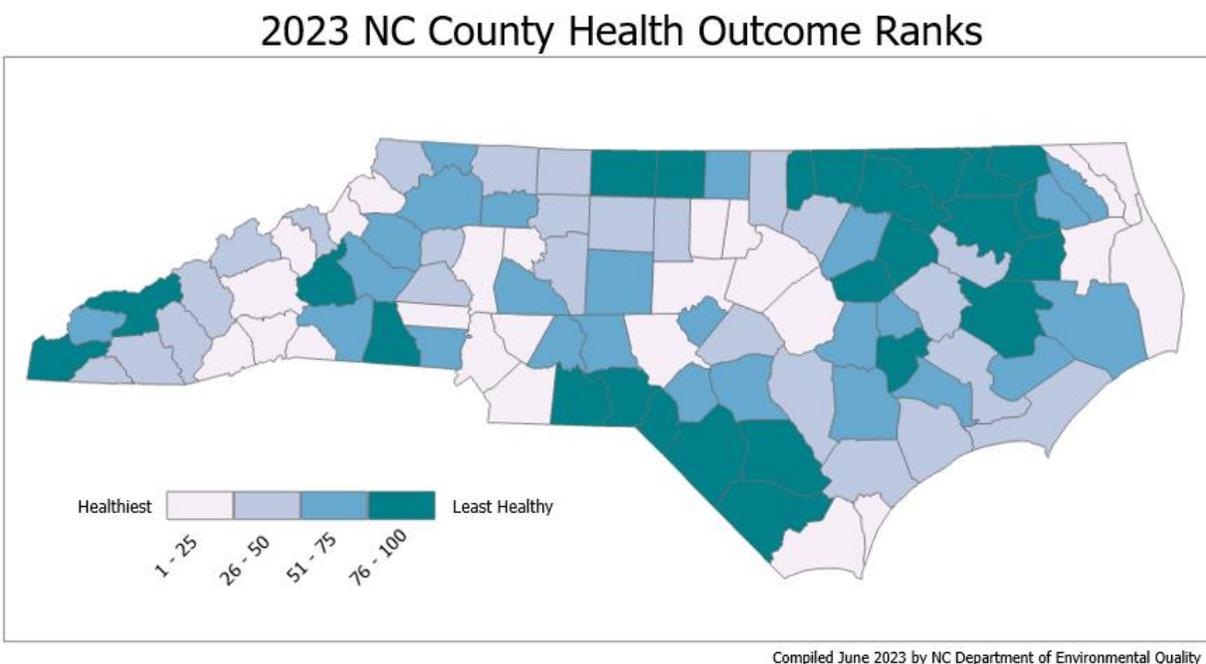
**Figure 5.** Poverty percentage comparisons to the county and state

## 5. Health & Cumulative Impacts

### 5.1 County Health Outcome Ranks

For this report, the Environmental Justice Program examined how sensitive populations (specifically the census tracts identified in Section 4) compared to the rest of the state’s health outcomes and health factors. 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](http://www.countyhealthrankings.org)). This 2023 County Health Rankings National Data<sup>11</sup> is based on health outcomes (such as lifespan and self-reported health status) and health factors (such as environmental, social, and economic conditions). Figures 6 and 7 display rankings for all 100 counties in North Carolina.

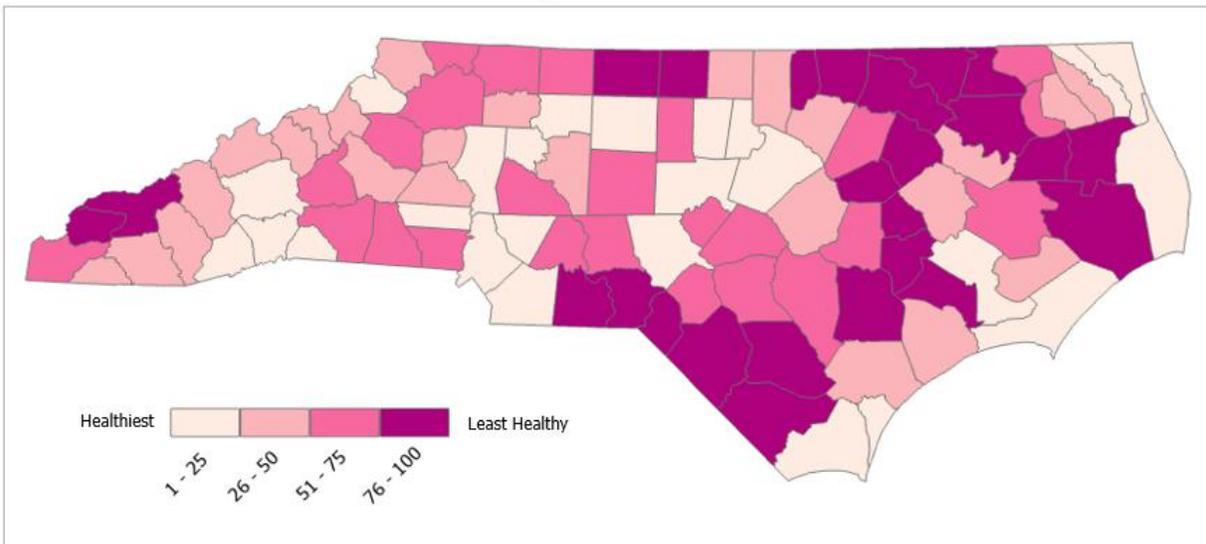
Out of the 100 counties in the state, Iredell County has a health outcome rank of 16 and a health factors rank of 12. This means Iredell County is healthier than 84% and 88% of the state for each respective ranking category and would be categorized as “Healthiest” on a percentile ranking for each category.



**Figure 6.** NC County Health Outcome Ranks for 2023

<sup>11</sup> University of Wisconsin Population Health Institute. 2022 Environmental Justice Index. <https://www.countyhealthrankings.org/explore-health-rankings/rankings-data-documentation>.

## 2023 NC County Health Factors Ranks



Compiled June 2023 by NC Department of Environmental Quality

**Figure 7.** NC County Health Factors Ranks for 2023

### 5.2 CDC/ATSDR EJ Indexes

Cumulative impacts are the combined, environmental burdens, pre-existing health conditions, and social factors which may harm human health.<sup>12</sup> At this time, there is no formal, standardized method to assess cumulative impacts. However, cumulative impacts that may affect public health and quality of life are a frequently raised concern among communities across the nation.

Environmental Justice Index (EJI) scores were sourced from the Centers for Disease Control and Prevention (CDC) and the Agency for Toxic Substances and Disease Registry (ATSDR).<sup>13</sup> The EJI is intended to evaluate the cumulative impacts of environmental injustice on health by ranking census tracts based on combined social, environmental burden, and health vulnerability indicators. Social vulnerability indicators include racial/ethnic minority status, socioeconomic status, household characteristics, and housing type. Environmental burden indicators include air pollution, potentially hazardous and toxic sites, built environment, transportation infrastructure, and water pollution. Health vulnerability is determined based on pre-existing chronic disease burden. The CDC's EJI delivers a single score for each census tract to identify areas most at risk for the health impacts of environmental burden

<sup>12</sup> *Federal Health Agencies Unveil National Tool to Measure Health Impacts of Environmental Burdens.* (2022). Centers for Disease Control and Prevention (CDC). <https://www.cdc.gov/media/releases/2022/p0810-environmental-burdens.html>

<sup>13</sup> *2022 Environmental Justice Index.* Centers for Disease Control and Prevention (CDC) and Agency for Toxic Substances Disease Registry (ATSDR). Accessed July 12, 2023. <https://www.atsdr.cdc.gov/placeandhealth/eji/index.html>.

(See Appendix E for more information on the CDC's EJ Model). More information on the indicators can be found in the CDC's EJ Technical Documentation.<sup>14</sup>

For EJ scores in this analysis, the Environmental Justice Program used the variable representing the percentile score of the health variables model, environmental burden index, and social vulnerabilities model (RPL\_EJI in the CDC's EJ Technical Documentation) which is a value between 0 and 1.

According to the CDC's EJ, census tract 604 – where the Dura-Supreme, LLC facility would be located – has a high EJ rank of 0.99 (Figure 8). This means 99% of census tracts in the state are less vulnerable than census tract 604 and that 1% of census tracts in the state are more vulnerable. Adjacent census tracts within the one-mile radius of the facility have moderate and moderate to high EJ ranks at or above the 60<sup>th</sup> percentile (See Appendix F for a close-up map of census tracts and corresponding CDC EJ scores and Appendix G for each census tracts' CDC quantitative EJ score).

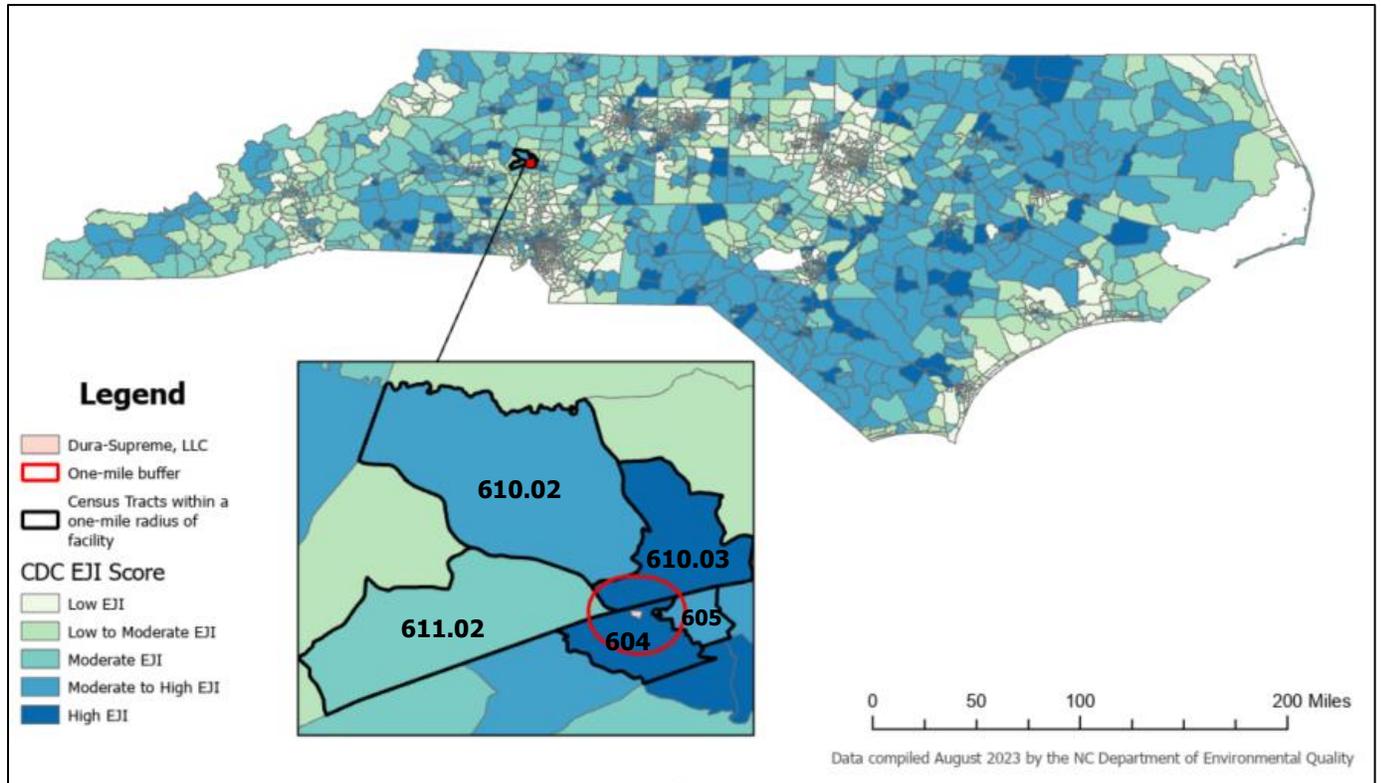
Figure 9 displays the EJ Index generated using EJScreen and represents data from within the one-mile radius of the facility. The EJ Index combines data related to the listed environmental indicators and demographic data, in order from left to right in Figure 9: particulate matter, ozone, diesel particulate matter, air toxics cancer risk, air toxics respiratory hazards index (HI), toxic releases to the air, traffic proximity, lead paint, superfund proximity, Risk Management Program (RMP) facility proximity, hazardous waste proximity, underground storage tanks, and wastewater discharge. The EJ Index analyzes the relative potential environmental justice concern for the area as compared to the state, as well as the U.S., in the form of a percentile from 0 to 100. The higher the EJ Index, the higher the percentile, and the more vulnerable an area. More information on the EJScreen Environmental Justice Indexes can be found on EPA's website.<sup>15</sup>

The area within one mile of the facility is in the top 25<sup>th</sup> percentile in the state for all EJ Indexes and the top 25<sup>th</sup> percentile in the nation for 10 out of 12 of the EJ Indexes. This means 75% of other areas in the state and nation have lower EJ Indexes compared to the area near the facility (Figure 9).

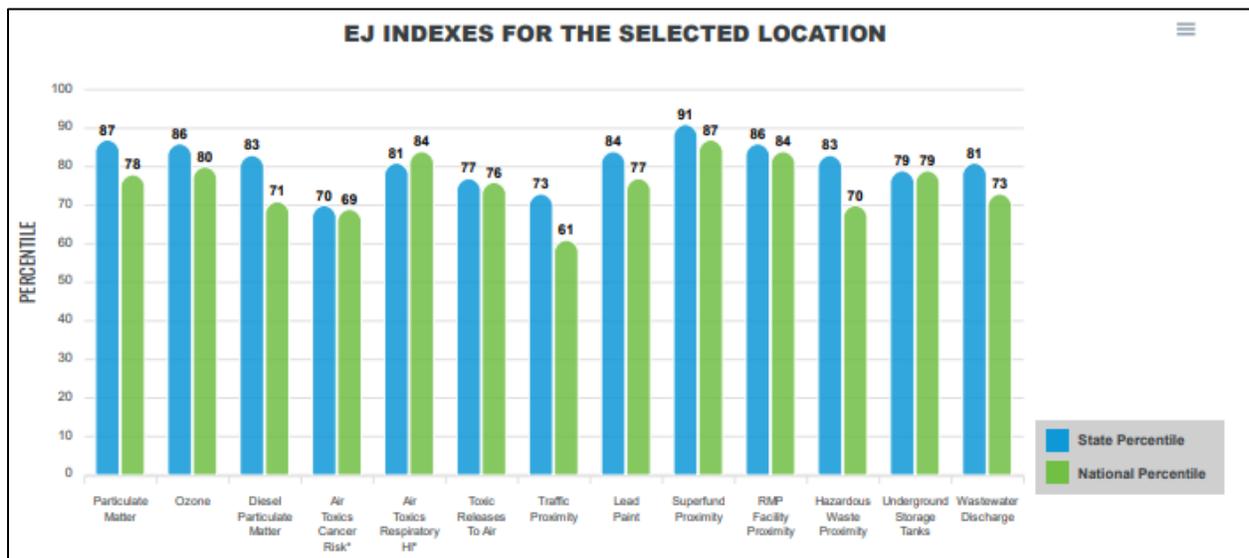
---

<sup>14</sup> *EJI Technical Documentation*. Centers for Disease Control and Prevention and Agency for Toxic Substances Disease Registry. Accessed July 12, 2023. [https://www.atsdr.cdc.gov/placeandhealth/eji/technical\\_documentation.html](https://www.atsdr.cdc.gov/placeandhealth/eji/technical_documentation.html)

<sup>15</sup> EJScreen EJ Index Metadata: <https://www.epa.gov/ejscreen/ej-and-supplemental-indexes-ejscreen#What>



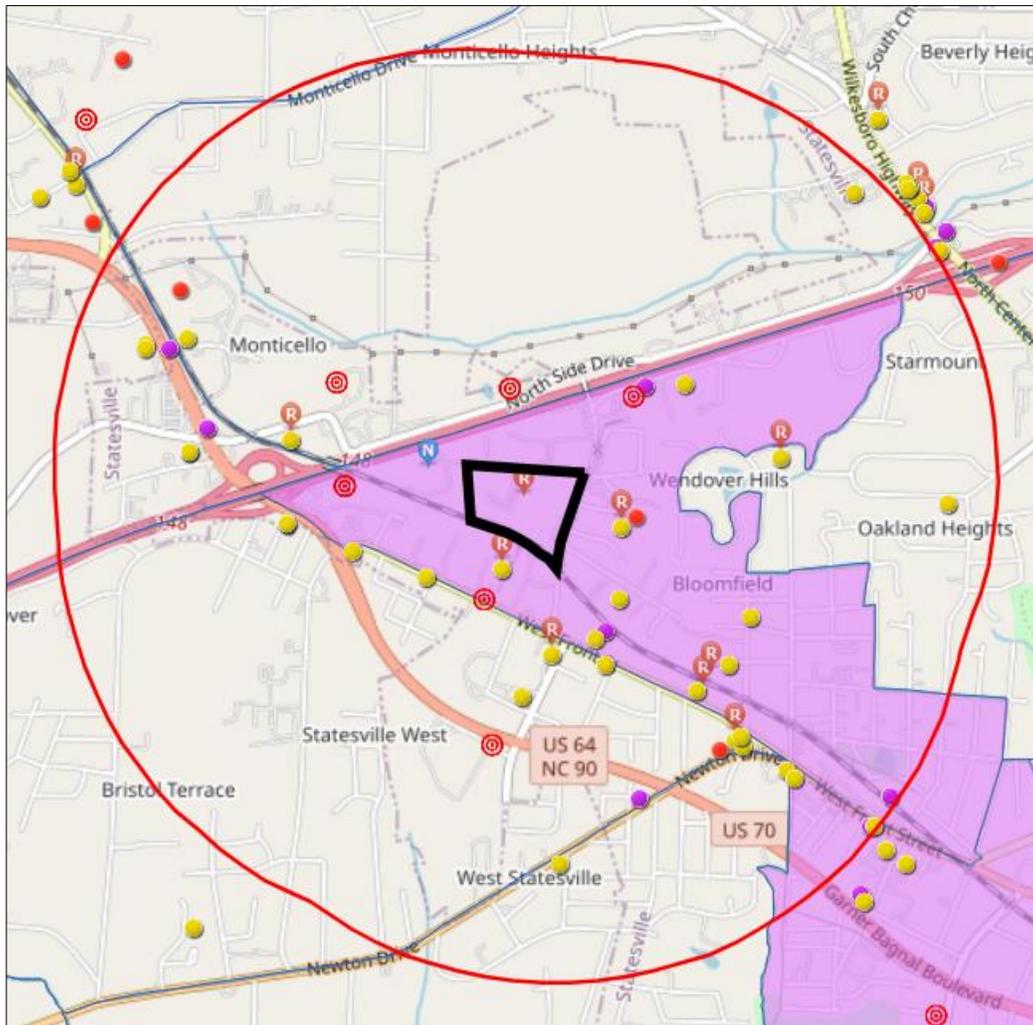
**Figure 8.** Project area and census tracts within the one-mile radius and corresponding CDC Environmental Justice Index scores



**Figure 9.** EJScreen Environmental Justice Indexes for a one-mile radius around Dura-Supreme, LLC

### 5.3 Local Industrial Sites

According to the DEQ Community Mapping System, there are a total of 20 permits and 33 incidents within the one-mile radius of Dura-Supreme, LLC as of June 28, 2023 (Figure 10; Table 13).



**Figure 10.** NC DEQ Community Mapping Tool Snapshot of the One-Mile Project Area Radius

**Table 14.** List of Permits, Incidents, and Sites within the One-Mile Project Area Radius

List of Permits, Incidents, and Sites		
Type	Quantity	Details
Permits	20	<ul style="list-style-type: none"> <li>• Air quality permits – 10</li> <li>• NPDES Stormwater permits – 9</li> <li>• NC Mining permits – 1</li> </ul>
Incidents	33	<ul style="list-style-type: none"> <li>• Underground storage tank incidents – 30</li> <li>• Aboveground storage tank incidents – 3</li> </ul>
Sites and Active Facilities	20	<ul style="list-style-type: none"> <li>• Underground storage tank active facilities – 8</li> <li>• Hazardous waste sites – 6</li> <li>• Brownfield program sites – 4</li> <li>• Federal Remediation Branch sites – 1</li> <li>• Pre-regulatory landfill sites – 1</li> </ul>

## 6. Local Sensitive Receptors

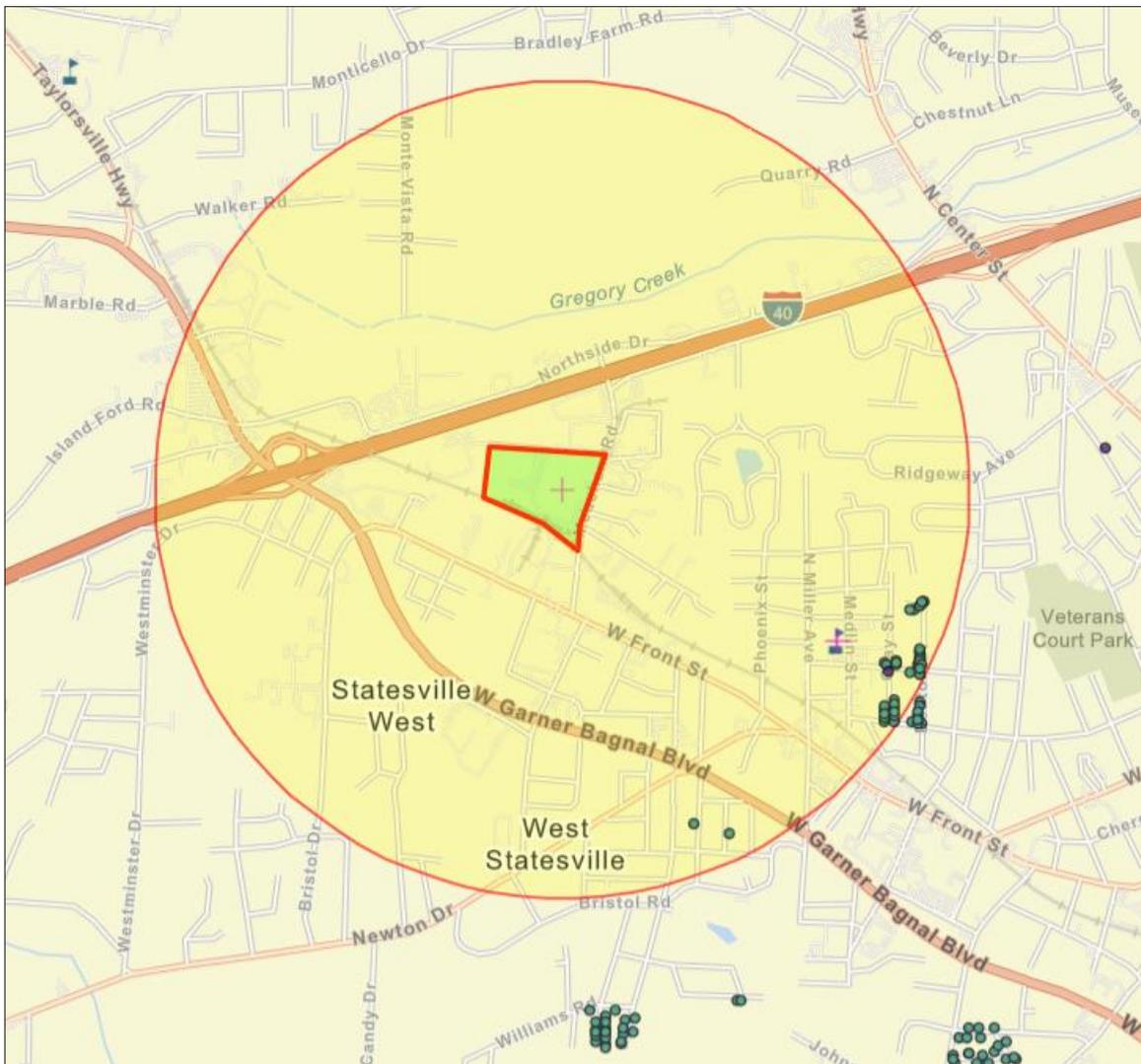
The U.S. Environmental Protection Agency suggests that sensitive receptors include, but are not limited to, hospitals, schools, daycare facilities, elderly housing, and convalescent facilities. These are areas where the occupants are more susceptible to the adverse effects of exposure to toxic chemicals, 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 healthy individuals aged between 18 and 64.

Within and near the one-mile radius surrounding the facility location, the following EPA EJScreen-identified and NC DEQ-identified sensitive receptors are listed below (Table 14; Figure 11):

**Table 15.** List of Sensitive Receptors within the One-Mile Project Area Radius

Sensitive Receptor Type	Name
SCHOOLS & DAYCARES	N B Mills Elementary School
	Kiddie Kollege Early Learning Center (Day care center)
	His Little Ones Child Care
PLACES OF WORSHIP	Summit Village Public Housing
	Oaktree Village Public Housing
	First Church of the Nazarene
	Calvary Community Church
	Oakland Presbyterian Church
	Front Street Baptist Church
	Iglesia Pentecostal El Mesias
	Westminster Church of God
	Living With Hope Ministry
COMMUNITY CENTERS	N.C. Cooperative Extension – Iredell County Center
	Bristol Road Community Center
PUBLIC AND SUBSIDIZED HOUSING	Fox Avenue Group Home

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



**Figure 11.** EPA EJScreen Snapshot of Potential Sensitive Receptors within the One-Mile Project Area Radius

## 8. Conclusion

If an affected community has a large percentage of LEP individuals (typically greater than 5%), the Department will implement appropriate LEP measures. These measures may include having a bilingual DEQ staff member or interpreter present at public hearings or information sessions, disseminating Department information sheets or public notices in multiple languages, distributing media notices in different languages, or communicating with community organizations and leaders to determine other appropriate measures to reach LEP individuals.

### Key Findings

Based on this report's analysis and using NC DEQ Potentially Underserved Block Groups (on the basis of Race/Ethnicity and Poverty) and standard EJ guidelines established by the U.S. EPA and in the NEPA documentation, the potential environmental justice concerns for particular populations have been identified as follows:

- **Race and Ethnicity:**
  - *Total minority populations* – The overall minority population in Census tract 604.
  - *Specific minority populations* – Hispanic or Latino populations in the project area radius and all census tracts within a one-mile radius of the facility.
- **Tribal Communities:**
  - There are no state or federally recognized tribes or Urban Indian Organizations in Iredell County. However, the county and project area have an American Indian or Alaskan Native population greater than 10% higher when compared to the state.
- **Age and Sex:** Populations of individuals 5 years or younger and populations of individuals 65 years or older in four census tracts (604, 610.02, 610.03, or 611.02).
- **Limited English Proficiency:**
  - Spanish-speaking households with limited English proficiency in two census tracts (604 and 610.02).
  - French-, Haitian-, or Cajun-speaking households with limited English proficiency in census tract 610.02.
- **Disability:** Populations living with a disability in three census tracts (604, 605, and 610.03).
- **Education:** Populations of individuals at least 18 years and older whose highest educational attainment is “less than a high school graduate degree” in four census tracts (604, 610.02, 610.03, and 611.02).
- **Poverty:** Populations experiencing “poverty 200% below the poverty level” in four census tracts (604, 605, 610.02, and 610.03).
- **Cumulative Impacts:** Two census tracts (604 and 610.03) within the project area have a “High” Environmental Justice Index score.

### Recommendations

Based on the sociodemographic indicator analysis, the Environmental Justice Program recommends the following outreach and engagement for the Dura-Supreme, LLC Air Permit public hearings and public commenting period:

- Spanish- and French-translated public notices and one-page fact sheets with public comment information.

- Spanish interpretation services and availability to request French interpretation if public hearing is conducted.
- Consultation with community leaders about other outreach recommendations including known local American Indian-serving or related organizations and leaders.
- Mailed or emailed public notices and one-page fact sheets in English, Spanish, and French to local sensitive receptors and the town of Statesville.
- Evaluate options to distribute one-page fact sheets in English, Spanish, and French in higher traffic areas of the community.
- Arrange an English, Spanish, and French voicemail line to receive public comments.

## Appendix

### Appendix A: U.S. Census Data Sources

All data for this report accessed from data.census.gov and collected at a census tract level for all tracts in North Carolina. Data is from 2020 American Community Survey (ACS) 5-year estimates.

Dataset ID	Name
<b>B03002</b>	“Hispanic or Latino Origin by Race”
<b>S0101</b>	“Age and Sex”
<b>S1810</b>	“Disability Characteristics”
<b>C16001</b>	“Language Spoken at Home for the Population 5 Years and Older”
<b>S1501</b>	“Educational Attainment”
<b>S1701</b>	“Poverty Status in the Last 12 Months”

### Appendix B: Additional Data Sources

DATA SOURCES			
Organization	Source	Date Accessed	Year Published
<b>NC Department of Commerce</b>	<a href="#">2023 County Distress Rankings</a>	8/15/23	2023
<b>University of Wisconsin Population Health Institute</b>	<a href="#">2023 County Health Rankings National Data</a>	6/13/23	2023
<b>Centers for Disease Control &amp; Prevention</b>	<a href="#">Environmental Justice Index</a>	8/10/23	2022

### Appendix C: Sociodemographic Indicators and EPA EJScreen ACS Report

The tables below display estimates and margins of error as available from the U.S. Census Bureau 2020 ACS 5-year estimates and calculations performed for each sociodemographic indicator. Calculations are displayed as averages and upper and lower confidence intervals.

Race & Ethnicity

RACE & ETHNICITY								
	NORTH CAROLINA (n=2672)				IREDELL COUNTY (n=46)			
	Estimate	Average	95% CI (+/-)		Estimate	Average	95% CI (+/-)	
			Lower	Upper			Lower	Upper
White	6,503,292	2433.87	2380.36	2487.37	135,146	2937.96	2608.54	3267.37
Black or African American	2,182,623	816.85	783.05	850.65	21,209	461.07	312.18	609.95
Hispanic or Latino	991,051	370.90	354.73	387.07	206	4.48	1.95	7.00
American Indian and Alaska Native	108,223	40.50	31.40	49.60	4,308	93.65	52.44	134.86
Asian	306,140	114.57	104.67	124.47	16	0.35	-0.33	1.03
Native Hawaiian and other Pacific Islander	6,249	2.34	1.84	2.84	263	5.72	0.33	11.11
Some Other Race	30,335	11.35	9.25	13.45	3,747	81.46	64.01	98.90
Two or More Races	258,314	96.67	92.75	100.60	13,958	303.43	239.16	367.71
Total Population	10,386,227				178,853			

RACE & ETHNICITY					
	Census Tract 604	Census Tract 605	Census Tract 610.02	Census Tract 610.03	Census Tract 611.02
	Estimate	Estimate	Estimate	Estimate	Estimate
White	1,352	2,275	3,658	3,028	3,067
Black or African American	2,042	1,031	350	714	178
Hispanic or Latino	787	270	239	244	109
American Indian and Alaska Native	11	6	0	4	0
Asian	0	0	12	50	337
Native Hawaiian and other Pacific Islander	0	0	0	0	0
Some Other Race	0	0	14	0	0
Two or More Races	10	168	85	55	49
Total Population	4,202	3,750	4,358	4,095	3,740

Age & Sex

AGE								
	NORTH CAROLINA (n=2672)				IREDELL COUNTY (n=46)			
	Estimate	Average	95% CI (+/-)		Estimate	Average	95% CI (+/-)	
			Lower	Upper			Lower	Upper
≤5 Years	605,299	226.53	220.28	232.79	9,885	214.89	188.25	241.53
≤18 Years	2,301,596	861.38	842.05	880.70	41,053	892.46	796.40	988.52
≥65 Years	1,688,354	631.87	618.07	645.66	28,396	617.30	546.37	688.24

AGE					
	Census Tract 604	Census Tract 605	Census Tract 610.02	Census Tract 610.03	Census Tract 611.02
	Estimate	Estimate	Estimate	Estimate	Estimate
≤5 Years	269	145	209	182	104
≤18 Years	979	694	816	864	746
≥65 Years	588	514	775	861	677

SEX								
	NORTH CAROLINA (n=2672)				IREDELL COUNTY (n=46)			
	Estimate	Average	95% CI (+/-)		Estimate	Average	95% CI (+/-)	
			Lower	Upper			Lower	Upper
Male	5,052,667	1890.97	1858.65	1923.28	88,179	1916.93	1756.67	2077.20
Female	5,333,560	1996.09	1962.93	2029.25	90,674	1971.17	1784.59	2157.76

SEX					
	Census Tract 604	Census Tract 605	Census Tract 610.02	Census Tract 610.03	Census Tract 611.02
	Estimate	Estimate	Estimate	Estimate	Estimate
Male	2,030	1,941	1,940	2,169	1,791
Female	2,172	1,809	2,418	1,926	1,949

Disability

DISABILITY										
	NORTH CAROLINA (n=2672)					IREDELL COUNTY (n=46)				
	ESTIMATE	MOE (+/-)	Average	95% CI (+/-)		ESTIMATE	MOE (+/-)	Average	95% CI (+/-)	
				Lower	Upper				Lower	Upper
<b>Population with a Disability</b>	1,363,146	10,334	510.16	499.55	520.77	21,810	991	474.13	426.45	521.81
<b>Type of Difficulty</b>										
Hearing	379,973	5,120	142.21	138.40	146.01	6,624	649	144.00	123.34	164.66
Vision	263,954	5,052	98.79	95.61	101.96	4,076	582	88.61	70.33	106.89
Cognitive	515,673	7,341	192.99	187.94	198.04	7,445	652	161.85	134.22	189.48
Ambulatory	711,995	6,660	266.47	260.15	272.78	11,475	778	249.46	217.88	281.03
Self-care	259,404	4,710	97.08	94.15	100.01	4,180	543	90.87	75.53	106.21
Independent Living	471,622	5,619	176.51	171.95	181.06	7,805	666	169.67	143.06	196.29
<b>Total civilian noninstitutionalized population</b>	10,178,084	2,246				177,741	182			

DISABILITY										
	Census Tract 604		Census Tract 605		Census Tract 610.02		Census Tract 610.03		Census Tract 611.02	
	Estimate	MOE (+/-)	Estimate	MOE (+/-)	Estimate	MOE (+/-)	Estimate	MOE (+/-)	Estimate	MOE (+/-)
<b>Population with a Disability</b>	641	209	468	127	588	191	595	185	442	166
<b>Type of Difficulty</b>										
Hearing	62	37	100	53	192	85	206	92	137	109
Vision	145	130	29	31	98	70	76	73	169	121
Cognitive	89	78	162	69	182	106	216	92	56	41
Ambulatory	414	131	288	94	357	161	358	146	319	143
Self-care	124	70	79	52	48	33	140	72	183	116
Independent Living	234	80	194	77	140	89	311	143	188	118
<b>Total civilian noninstitutionalized population</b>	4,202	517	3,409	459	4,358	423	4,095	479	3,740	552

Limited English Proficiency

LIMITED ENGLISH PROFICIENCY										
	NORTH CAROLINA (n=2672)					IREDELL COUNTY (n=46)				
	Estimate	MOE (+/-)	Average	95% CI (+/-)		Estimate	MOE (+/-)	Average	95% CI (+/-)	
				Lower	Upper				Lower	Upper
Speak only English	8,625,292	9,068	3228.03	3175.41	3280.64	153,479	919	3336.50	3031.87	3641.13
Spanish	299,813	4,674	112.21	105.17	119.24	3,850	424	83.70	56.59	110.80
French, Haitian, or Cajun	9,926	1,718	3.71	2.75	4.68	175	156	3.80	-1.00	8.61
German or other West Germanic languages	2,920	620	1.09	0.79	1.39	53	43	1.15	-0.03	2.34
Chinese (incl Mandarin, Cantonese)	15,639	1,218	5.85	4.94	6.77	73	48	1.59	0.06	3.11
Vietnamese	14,929	1,929	5.59	4.35	6.82	45	47	0.98	-0.44	2.39
Arabic	10,254	1,538	3.84	3.10	4.57	15	23	0.33	-0.27	0.92
Total Population 5 Years and over	9,780,928	893				168,968	68			

LIMITED ENGLISH PROFICIENCY										
	Census Tract 604		Census Tract 605		Census Tract 610.02		Census Tract 610.03		Census Tract 611.02	
	Estimate	MOE (+/-)	Estimate	MOE (+/-)	Estimate	MOE (+/-)	Estimate	MOE (+/-)	Estimate	MOE (+/-)
Speak only English	3,245	552	3,356	459	4,014	451	3,577	405	3,172	505
Spanish	369	192	85	64	55	56	102	100	59	48
French, Haitian, or Cajun	0	13	0	13	0	13	67	104	0	13
German or other West Germanic languages	0	13	0	13	0	13	0	13	0	13
Chinese (incl Mandarin, Cantonese)	0	13	0	13	0	13	0	13	0	13
Vietnamese	0	13	0	13	0	13	0	13	0	13
Arabic	0	13	0	13	0	13	0	13	0	13
Total Population 5 Years and over	3,933	506	3,605	432	4,149	438	3,913	405	3,636	544

Educational Attainment

EDUCATIONAL ATTAINMENT								
	NORTH CAROLINA (n=2672)				IREDELL COUNTY (n=46)			
	ESTIMATE	Average	95% CI (+/-)		ESTIMATE	Average	95% CI (+/-)	
			Lower	Upper			Lower	Upper
Less than High School Graduate	122236	45.75	43.79	47.70	1861	40.46	31.95	48.96
Population age 18-24 years	987858				14271			
Less than 9th grade	301823	112.96	108.49	117.43	3995	86.85	68.53	105.16
9th to 12th grade, no diploma	513393	192.14	186.34	197.93	7950	172.83	137.80	207.85
High school graduate (includes equivalency)	1806403	676.05	661.13	690.97	34043	740.07	646.60	833.53
Bachelor's degree	2273890	851.01	824.49	877.52	36698	797.78	636.25	959.32
Population age 25 years and over	7096773				123529			

EDUCATIONAL ATTAINMENT					
	Census Tract 604	Census Tract 605	Census Tract 610.02	Census Tract 610.03	Census Tract 611.02
	Estimate	Estimate	Estimate	Estimate	Estimate
Less than High School Graduate	9	38.00	90	46.00	85.00
Population age 18-24 years	289	425	383	324	303
Less than 9th grade	187	82.00	55	98.00	39.00
9th to 12th grade, no diploma	443	242.00	288	181.00	307.00
High school graduate (includes equivalency)	986	619.00	1086	787.00	1003.00
Bachelor's degree	463	875.00	700	727.00	370.00
Population age 25 years and over	2934	2631	3159	2907	2691

Poverty & Low Income

POVERTY										
	NORTH CAROLINA (n=2672)					IREDELL COUNTY (n=46)				
	Estimate	MOE (+/-)	AVERAGE	95% CI (+/-)		Estimate	MOE (+/-)	AVERAGE	95% CI (+/-)	
				Lower	Upper				Lower	Upper
Below Poverty Level	1,411,939	17,543	528	512	544	17,360	1,520	377	303	452
200% Below the Poverty Level	3,331,937	25,024	1,247	1,217	1,277	47,262	2,163	1,027	874	1,181
Total Population for whom Poverty Status is Determined	10,098,330	2,221				177,084	363			

POVERTY										
	Census Tract 604		Census Tract 605		Census Tract 610.02		Census Tract 610.03		Census Tract 611.02	
	Estimate	MOE (+/-)	Estimate	MOE (+/-)	Estimate	MOE (+/-)	Estimate	MOE (+/-)	Estimate	MOE (+/-)
Below Poverty Level	999	373	298	140	364	242	570	334	198	174
200% Below the Poverty Level	2,213	470	1,028	269	1,263	380	1,294	428	812	295
Total Population for whom Poverty Status is Determined	4,202	517	3,409	459	4,272	425	4,094	480	3,740	552

EPA EJScreen ACS Report

The following ACS 2017-2021 report shows the demographics and information provided through EPA EJScreen for the one-mile radius around Dura-Supreme, LLC.

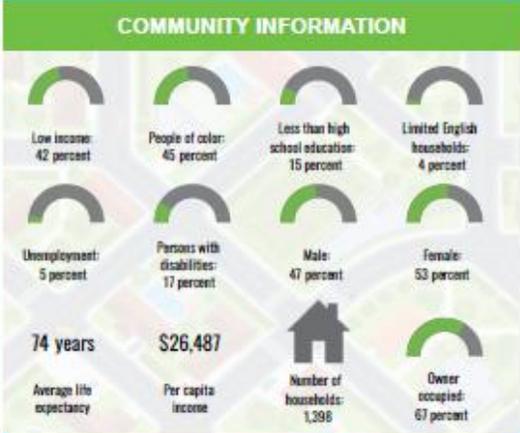


# EJScreen Community Report

This report provides environmental and socioeconomic information for user-defined areas, and combines that data into environmental justice and supplemental indexes.

## Statesville, NC

**1 mile Ring around the Area**  
Population: 3,446  
Area in square miles: 4.11



### LANGUAGES SPOKEN AT HOME

LANGUAGE	PERCENT
English	89%
Spanish	11%
Total Non-English	11%



Notes: Numbers may not sum to totals due to rounding. Hispanic population can be of any race. Source: U.S. Census Bureau, American Community Survey (ACS) 2017-2021. Life expectancy data comes from the Centers for Disease Control.

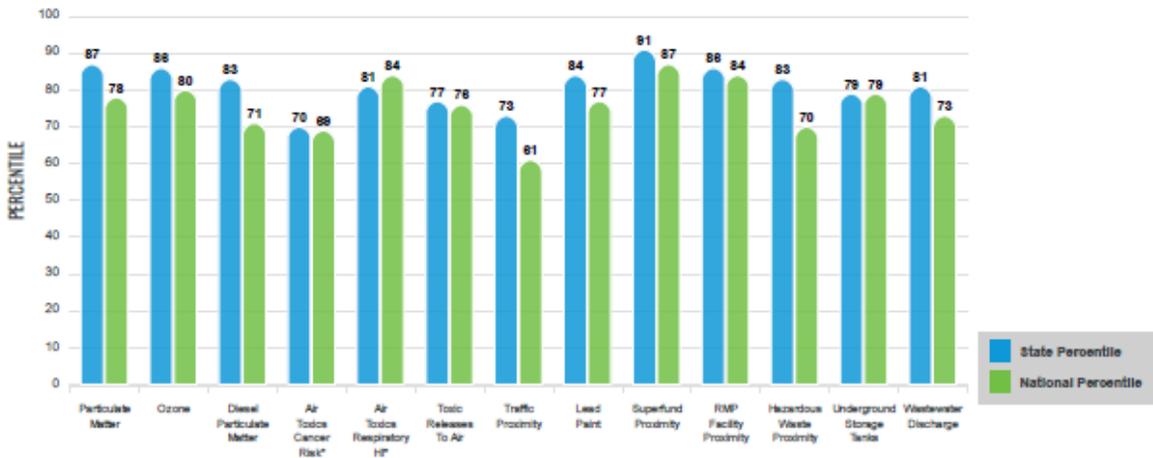
## Environmental Justice & Supplemental Indexes

The environmental justice and supplemental indexes are a combination of environmental and socioeconomic information. There are thirteen EJ indexes and supplemental indexes in EJScreen reflecting the 13 environmental indicators. The indexes for a selected area are compared to those for all other locations in the state or nation. For more information and calculation details on the EJ and supplemental indexes, please visit the [EJScreen website](#).

### EJ INDEXES

The EJ indexes help users screen for potential EJ concerns. To do this, the EJ index combines data on low income and people populations with a single environmental indicator.

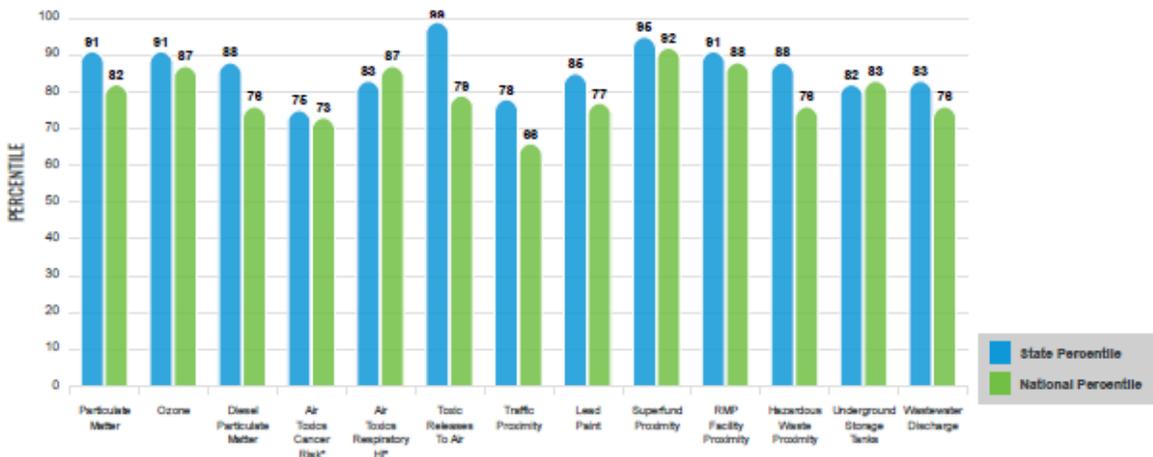
#### EJ INDEXES FOR THE SELECTED LOCATION



### SUPPLEMENTAL INDEXES

The supplemental indexes offer a different perspective on community-level vulnerability. They combine data on percent low-income, percent linguistically isolated, percent in school education, percent unemployed, and low life expectancy with a single environmental indicator.

#### SUPPLEMENTAL INDEXES FOR THE SELECTED LOCATION



These percentiles provide perspective on how the selected block group or buffer area compares to the entire state or nation.

Report for 1 mile Ring around the Area

## EJScreen Environmental and Socioeconomic Indicators Data

SELECTED VARIABLES	VALUE	STATE AVERAGE	PERCENTILE IN STATE	USA AVERAGE	PERCENTILE IN USA
<b>POLLUTION AND SOURCES</b>					
Particulate Matter ( $\mu\text{g}/\text{m}^3$ )	8.79	7.8	81	8.08	67
Ozone (ppb)	64.9	61.7	83	61.6	74
Diesel Particulate Matter ( $\mu\text{g}/\text{m}^3$ )	0.245	0.168	83	0.261	57
Air Toxics Cancer Risk* (lifetime risk per million)	30	28	22	28	35
Air Toxics Respiratory HI*	0.39	0.34	54	0.31	31
Toxic Releases to Air	1,000	3,100	59	4,600	60
Traffic Proximity (daily traffic count/distance to road)	68	79	66	210	47
Lead Paint (% Pre-1960 Housing)	0.34	0.17	83	0.3	61
Superfund Proximity (site count/km distance)	0.99	0.081	99	0.13	98
RMP Facility Proximity (facility count/km distance)	1.2	0.26	96	0.43	90
Hazardous Waste Proximity (facility count/km distance)	0.91	0.52	83	1.9	59
Underground Storage Tanks (count/km <sup>2</sup> )	5.1	3.9	77	3.9	77
Wastewater Discharge (toxicity-weighted concentration/m distance)	0.003	0.25	72	22	57
<b>SOCIOECONOMIC INDICATORS</b>					
Demographic Index	43%	36%	67	35%	68
Supplemental Demographic Index	19%	15%	73	14%	74
People of Color	45%	37%	64	39%	62
Low Income	42%	34%	65	31%	71
Unemployment Rate	8%	6%	73	6%	73
Limited English Speaking Households	4%	2%	83	5%	72
Less Than High School Education	15%	12%	69	12%	72
Under Age 5	6%	5%	64	6%	62
Over Age 64	17%	18%	55	17%	58
Low Life Expectancy	25%	21%	89	20%	90

\*Diesel particulate matter, air toxics cancer risk, and air toxics respiratory hazard index are from the EPA's Air Toxics Data Update, which is the Agency's ongoing, comprehensive evaluation of air toxics in the United States. This effort aims to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that the air toxics data presented here provide broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. Cancer risks and hazard indices from the Air Toxics Data Update are reported to one significant figure and any additional significant figures here are due to rounding. More information on the Air Toxics Data Update can be found at: <https://www.epa.gov/air-toxics-data-update>.

### Sites reporting to EPA within defined area:

Superfund .....	1
Hazardous Waste, Treatment, Storage, and Disposal Facilities .....	1
Water Dischargers .....	11
Air Pollution .....	15
Brownfields .....	0
Toxic Release Inventory .....	12

### Other community features within defined area:

Schools .....	1
Hospitals .....	0
Places of Worship .....	2

### Other environmental data:

Air Non-attainment .....	No
Impaired Waters .....	Yes

Selected location contains American Indian Reservation Lands* .....	No
Selected location contains a "Justice40 (CEIST)" disadvantaged community .....	Yes
Selected location contains an EPA IRA disadvantaged community .....	N/A

Report for 1 mile Ring around the Area

## EJScreen Environmental and Socioeconomic Indicators Data

HEALTH INDICATORS					
INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Low Life Expectancy	25%	21%	89	20%	90
Heart Disease	7.7	6.5	71	6.1	80
Asthma	10.4	9.4	81	10	66
Cancer	6.5	6.2	51	6.1	54
Persons with Disabilities	17.1%	14%	71	13.4%	76

CLIMATE INDICATORS					
INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Flood Risk	5%	10%	40	12%	44
Wildfire Risk	0%	9%	0	14%	0

CRITICAL SERVICE GAPS					
INDICATOR	HEALTH VALUE	STATE AVERAGE	STATE PERCENTILE	US AVERAGE	US PERCENTILE
Broadband Internet	18%	16%	63	14%	69
Lack of Health Insurance	17%	11%	85	9%	89
Housing Burden	No	N/A	N/A	N/A	N/A
Transportation Access	Yes	N/A	N/A	N/A	N/A
Food Desert	Yes	N/A	N/A	N/A	N/A

Footnotes

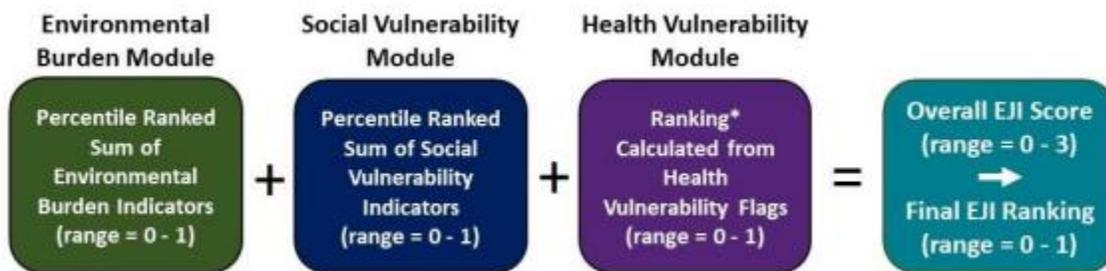
Report for 1 mile Ring around the Area

### Appendix D: County-Level Health Rankings

County health ranks and corresponding quartiles for both the health outcomes and health factors categories were taken from the University of Wisconsin Population Health Institute 2023 County Health Rankings National Data

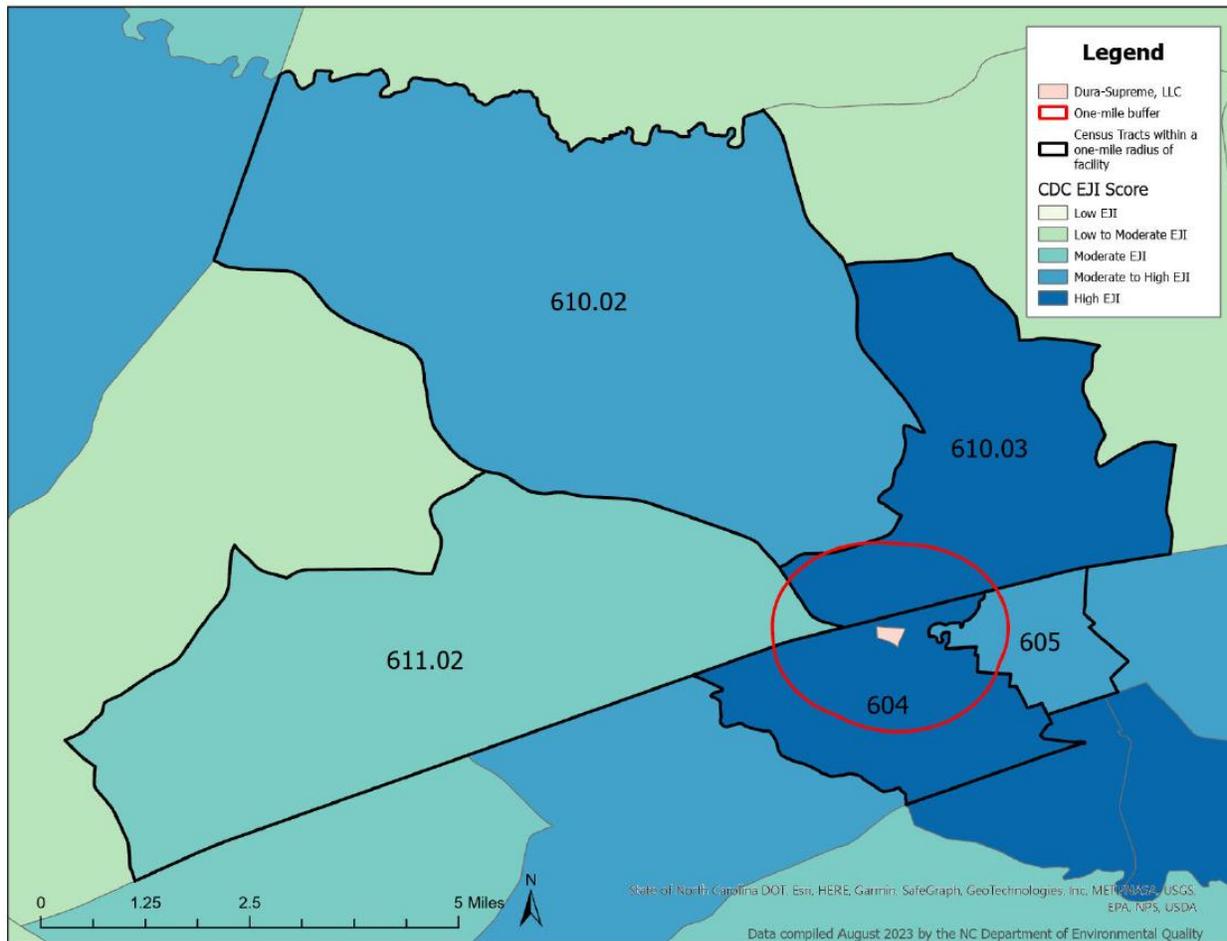
### Appendix E: CDC Environmental Justice Index Model

Ranking calculated by multiplying the sum of health vulnerability flags (n = 5) by 0.2 to produce a number between 0 - 1. Note: Due to a lack of scientific evidence supporting a specific weighting scheme, all modules are weighted equally in calculating the Overall EJI Score. This method of equal weighting for all modules aligns with that used by the Environmental Justice Screening Method (Sadd et al., 2011). Overall EJI Scores are percentile ranked to produce a final EJI Ranking with a range of between 0 - 1



### Appendix F: CDC Environmental Justice Index Map for Census Tracts within a one-mile radius of Dura-Supreme, LLC

The following figure represents a close-up map of the census tracts intersecting a one-mile radius of the Dura-Supreme, LLC facility and the associated CDC EJI score for the corresponding census tracts.



### Appendix G: Census Tract CDC EJI Scores

The following table lists the census tracts intersecting a one-mile radius of the Dura-Supreme, LLC facility and the corresponding EJI score value (0-1).

Census Tract	EJI Score
604	0.99
605	0.77
610.02	0.75
610.03	0.88
611.02	0.64

### Appendix H: Limitations

#### Census Data

Census data is collected at a national level every 10 years. Data used in this report was collected between 2010 - 2019. For each sociodemographic indicator described, the most recent available data since 2020 at a census tract level was utilized. Since not all data from the 2020 census has been published, all data utilized was collected before 2020 to maintain comparability at the tract level. Specific data tables and years available are listed in Appendix A.

Furthermore, reporting affects sample size which then affects interpretation of data. The U.S. Census Bureau uses and provides margins of error which is used as an indicator of potential sampling errors and relative reliability. A larger margin of error corresponds to a larger degree of uncertainty. Margins of error for sociodemographic indicators are provided in Appendix C as available through the U.S. Census Bureau.

- Data available through EJScreen is not compatible with all categories of data from U.S. Census Bureau data. Therefore, not all comparison tables contain the project area percentages or estimates.
- Data retrieved through EPA EJScreen is based on a one-mile radius of Dura-Supreme, LLC whereas U.S. Census Bureau data is based on census tracts. As such, the evaluated populations will differ.
- A significantly smaller portion of census tract 610.02 is included within the one-mile radius of Dura-Supreme, LLC compared to other intersecting census tracts. Despite this, the census tract is still included in the analysis as it is still within proximity of the facility.

For more information about census data collection methods and sources, please visit [www.data.census.gov](http://www.data.census.gov).

#### Cumulative Impacts and Health

As previously mentioned, there is no standardized methodology to assess for cumulative impacts at this current time. This analysis does however examine the factors that may contribute to cumulative impacts. However, this analysis does not establish or imply any direct causal link between the environmental source exposures used in this analysis and health outcomes.