Enviva Pellets Sampson, LLC Environmental Justice Snapshot

1 EJ Snapshot

The EJ Snapshot is an initial look at the demographics and socioeconomics of the community surrounding the facility. This includes information within a two-mile radius determined by the North Carolina Department of Environmental Quality (Department or DEQ): race and poverty (decennial census year), per capita income and Ability to speak English (most current American Community Survey (ACS) census range), the current North Carolina Department of Commerce county tier, and presence of native American territory. The EJ Snapshot does not include a reconnaissance of the community.

A Snapshot will be conducted at the beginning of the application process when a full EJ Report is already requested or as a tool to aid in determining whether to conduct a full EJ Report. This Snapshot will be distributed to interested community members (if known) and posted to the DEQ website with the relevant permit application before the close of the public comment period. The primary goal is to encourage EJ Report comments and suggestions from the surrounding community, industry, and environmental groups throughout the comment period.

It is important to keep in mind that based on the available data, the following limitations of this study: census data is from 2010 and may be outdated; the more recent census data through 2016 are estimates; EJSCREEN does not provide all of the data categories that were used in this analysis so the census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; census tracts can still be large areas and do not allow for exact locations of each population; some of the census tracts slightly overlap with the two-mile radius; and the Department cannot determine which populations are in that small amount of overlap around the facility.

The Department has conducted this Snapshot of the demographics and socioeconomics of the communities surrounding the Enviva Pellets Sampson, LLC facility to foster communication prior to the Division of Air Quality's discussion on the permit modification for enhanced emission controls (Table 1) and an increase in production. Based on the results of this Snapshot and any public comments received, a full EJ Report may be conducted prior to any final Agency action.

2 Environmental Justice Evaluation

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 Snapshot will examine the demographic and environmental conditions in Sampson County, as well as census tracts, and the two-mile radius around the property boundary of the Enviva Pellets Sampson, LLC facility. Finally, the demographics of the entire state of North Carolina are also considered as they relate to the county, local census tract, and radius settings.

Aware of the potential environmental or public health impacts the Enviva wood pellet facility may pose in this community, the Department reviewed the communities surrounding the existing Enviva wood pellet facility and determined the need to conduct this Environmental Justice Assessment Snapshot, which includes:

- Permit modification application submitted by Enviva Pellets Sampson, LLC.
- Modeled emissions rates
- Study of area demographics [determined by utilizing the US EPA Environmental Justice tool (EJSCREEN) <u>https://ejscreen.epa.gov/mapper/ and current, available</u> <u>census data. http://factfinder.census.gov/faces/nav/jsf/pages/index.xhtml</u>]
- Comparison of local area demographics to both county and statewide census data
- County health assessment
- Surrounding sensitive receptors
- Local industrial sites

3 Proposed Project

Enviva Pellets Sampson, LLC (Enviva) has requested a modification to its existing air quality permit to increase production and include additional air pollution control equipment in their permit.

Enviva was initially permitted to construct a wood pellets manufacturing plant in Sampson County, North Carolina under the authorization of North Carolina Division of Air Quality (NC DAQ) permit 10386R00 on November 17, 2014. Enviva's application incorporates modifications made as part of a special order by consent, including the installation of an air pollution control device. Enviva has also requested an increase in wood pellet production from the currently permitted 537,625 oven-dried tons of pellets per year to 657,000 oven-dried tons of pellets per year.

A description of the wood pellet manufacturing process is detailed in the permit application and is summarized as follows:

- Trucks deliver pre-chipped wood, unchipped logs, or purchased chips and bark to the site, where they are sorted into "green" (i.e. wet) wood or bark fuel storage piles.
- Unchipped logs are sent through the rotary drum de-barker and then the chipper.
- Chipped wood is processed in three green wood hammermills to further reduce the size. Enviva has applied to vent the exhaust from the green wood hammermills directly into the existing wet electrostatic precipitator (WESP). Enviva installed a natural gas-fired regenerative thermal oxidizer (RTO) following the (WESP) to control PM, VOC, and HAP emissions on December 14, 2018 as part of a special order by consent between DAQ and Enviva.
- From the hammermills, the green wood material moves to a single-pass rotary dryer system to reduce the moisture content. (The heat is provided by a 250.4 million BTU furnace fueled with bark and wood chips.) Dryer exhaust through the same WESP/RTO control system as the hammermills.
- Once dry, the wood material is sent to the eight dry hammermills to further reduce the size. Particulate emissions from the dry hammermills are currently controlled by bagfilters.
- After the dry hammermills, the wood material is formed into pellets by the twelve pellet presses and moved by conveyor to be cooled in the six pellet coolers. Exhaust from the pellet press system and pellet press conveyors are vented through the existing cooler aspiration cyclones for PM control. As part of the Settlement agreement reached on May 31, 2019, Enviva will submit an additional application to add and RCO/RTO to control emissions from the dry hammermills.
- The finished pellets are transferred from the coolers to the rail loadout operation and gravity fed into closed-top rail cars.
- As part of this application, Enviva is also proposing to purchase dry shavings for wood pellet production. The dry shavings will be unloaded from trucks into a hopper that feeds the material via enclosed conveyors to a bucket elevator and silo, with enclosed transfer points (except for truck unloading). From the silo, the

dry shavings will then be transferred via an enclosed screw conveyor to the dry hammermills for additional processing.

Appendix A provides a systematic overview of the pellet manufacturing process at Enviva Pellets Sampson, LLC after permit modification.

Enviva's proposed modifications will include:

- Increase permitted production rate from 537,625 ODT per year to 657,000 ODT per year by upgrading pellet dies with a new prototype;
- Increase the amount of softwood processed from 75% to a maximum of 100% (Table 1);
- Add the RTO following the current WESP on the wood-fired direct heat drying system to the permit;
- Remove the green wood hammermill bin vents/baghouses and recirculate the exhaust directly to the WESP/RTO system;
- Decrease the amount of wood assumed to bypass the dry hammermills from 25% to 15%; and
- Add dry shavings handling and storage silo to allow the facility to process purchased shavings that will not require drying.

Table 1. Emissions Associated with the Softwood Expansion Project										
Pollutant	Baseline Actual Emissions (tpy)	Potential Project Emissions (tpy)	Emission Increase after Modification (tpy)	PSD Significant Threshold (tpy)	PSD Significant Modification? (Yes/No)					
CO	230	219	-11	100	No					
NO _X	219	219	-0.4	40	No					
PM	169	239	70	25	Yes					
PM ₁₀	106	106	-0.1	15	No					
PM _{2.5}	62	43	-20	10	No					
SO ₂	27.4	27.4	0	40	No					
VOCs	627	840	214	40	Yes					
CO₂e	229,828	256,230	26,402	75,000	No					

Notes:

• Emissions include all emission sources except for emergency engines (ID Nos. IES-EG and IES-FWP) and associated diesel fuel tanks. These emission sources are not impacted by the SWEP.

- Baseline emissions are based on potential emissions as provided in previous Enviva Sampson PSD applications dated August 2014 and October 2015.
- Emissions for SWEP based on the following:
 - \circ Emission factors developed, in part, from emission testing at other Enviva facilities.
 - Production rate of 657,000 ODT.
 - \circ Maximum of 100% softwood processed.
 - \odot Bypass of the dry hammermill estimated at 15%.
- $\,\circ$ Control efficiency of the RTO estimated at 95% control of VOC.
- Detailed emission calculations are provided Appendix C of Air Permit Application No. 8200152.18A.
- CO₂ equivalent is defined as the sum of individual greenhouse gas pollutant emission times their global warming potential, converted to metric tons.

4 Geographic Area

The facility is located at 5 Connector Road, Faison, NC, 28341 (Sampson County). The highest off-site ambient air impacts from Enviva Pellets Sampson dispersion modeling occur at the plant fence line. Enviva's contribution to the total impact is over 99%. A two-mile radius was used for analyzing the local demographics and socioeconomic factors and includes portions of both Sampson and Duplin counties (Figure 1).

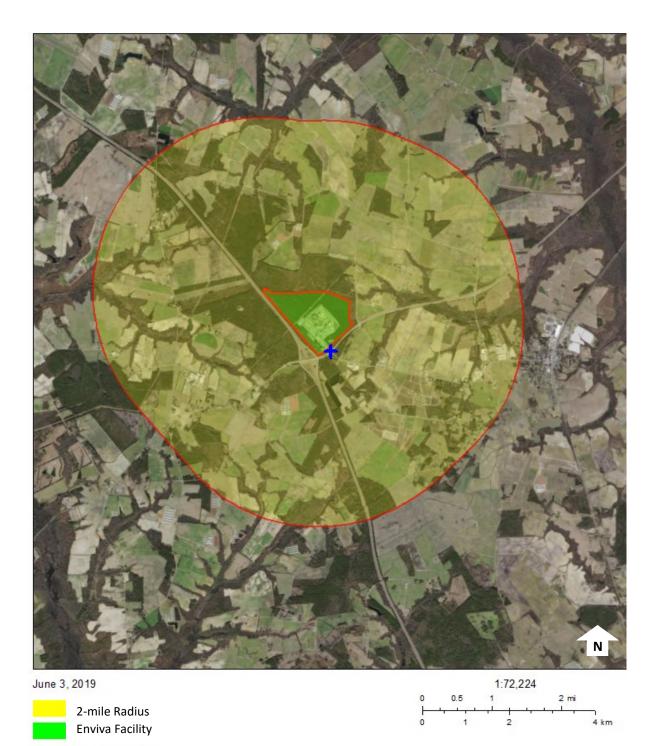


Figure 1. Facility location with the two-mile radius.

Regional Setting

Sampson and Duplin counties are designated as Tier 1 county by the NC Department of Commerce. Tier 1 counties must have less than 12,000 people or have a population of less than 50,000 people and a poverty rate of 19% or greater. Sampson and Duplin counties were previously Tier 2 counties but were adjusted to Tier 1 in the 2019 rankings. The twomile radius used in this analysis is within Sampson and Duplin counties and is encompassed by census tracts 902 and 9701 (Figure 2). Census tracts are small, relatively permanent statistical subdivisions of a county with a unique numeric code (US Census Bureau). Census Tract 9701 crosses into a portion of the Coharie state designated tribal area. Census Tract 902 does not encompass any Federal or State American Indian Reservation, Off-Reservation Trust Land, Statistical Area, Designated Tribal Area, or Native Regional Corporation. However, this does not mean that there are no Native American or Alaska Native persons living within Census Tract 902.

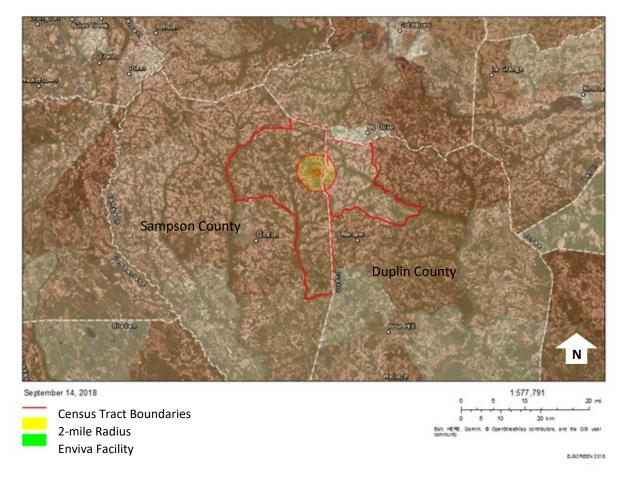


Figure 2. Census tracts and counties around facility location.

Demographics (including race and ethnicity, poverty status, and per capita incomes (Tables 2 through 7)) for Sampson and Duplin counties 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 U.S. EPA and National

Environmental Policy Act (NEPA) documentation, the following conditions will be flagged as potential communities of concern:

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

	North C	arolina	Duplin	County	Sampson County	
Race and Ethnicity	Number	Percent	Number	Percent	Number	Percent
Total Population	9,535,483	100.0	58,505	100	63,431	100.0
White	6,528,950	68.5	33,449	57.2	35,985	56.7
Black or African American	2,048,628	21.5	14,773	25.30	17,128	<u>27</u>
American Indian or Alaska Native	122,110	1.3	267	0.50	1,297	2
Asian	208,962	2.2	155	0.30	242	0.4
Native Hawaiian and Other Pacific Islander	6,604	0.1	65	0.10	72	0.1
Some other Race	414,030	4.3	8,856	<u>15.10</u>	7,430	<u>11.7</u>
Two or More Races	206,199	2.2	940	1.60	1,277	2
HISPANIC OR LATINO (of any race)	800,120	8.4	12,059	<u>20.60</u>	10,440	<u>16.5</u>
Mexican	486,960	5.1	7,150	12.20	7,482	<u>11.8</u>
Puerto Rican	71,800	0.8	261	0.40	510	0.8
Cuban	18,079	2.3	83	0.10	50	0.1
Other Hispanic or Latino	223,281	2.3	4,565	7.80	2,398	<u>3.8</u>

Table 2	Race and	Ethnicity-	Regional	Setting
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	Project Are	ea - 1 Mile	Project Are	a - 2 Miles	Census T	ract 902	Census Tract 9701	
Race and Ethnicity	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Total Population	189	100	845	100	4,341	100.0	7,110	100.0
White	74	39	364	43	2,273	52.4	3,756	52.8
Black or African American	55	29	219	26	1,089	25.1	1,870	<u>26.3</u>
American Indian or Alaska Native	5	3	12	1	15	0.3	83	1.2
Asian	0	0	2	0	10	0.2	13	0.2
Native Hawaiian and Other Pacific	0	0	0	0	4	0.1	11	0.2
Some other Race	48	26	223	26	863	<u>19.9</u>	1,241	<u>17.5</u>
Two or More Races	6	3	24	3	87	2	136	<u>1.9</u>
HISPANIC OR LATINO (of any race)	69	36	295	35	1,048	24.1	1,748	24.6
Mexican					843	<u>19.4</u>	1,331	18.7
Puerto Rican					9	0.2	71	1
Cuban					1	0	5	0.1
Other Hispanic or Latino					195	4.5	341	<u>4.8</u>
% Minority (2010 Census)		68		63				
All <mark>highlighted</mark> cells indicate a differ								

Table 3. Race and Ethnicity- Local Setting

All highlighted cells indicate a difference that is greater than 10% when compared to the county. All **bolded** and <u>underlined</u> cells indicate a difference that is greater than 10% when compared to the State. Source: US Census, 2012-2016 ACS 5-Year Estimates

Subject	Tota	al	Below pove	erty level	Percent belo	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Population for whom poverty status is determined	9,685,511	1,782	1,631,704	17,281	16.8	0.2
AGE						
Under 18	2,254,721	2,050	539,417	8,484	23.9	0.4
18 to 64	6,012,888	1,258	955,430	9,789	15.9	0.2
65 years and over	1,417,902	1,068	136,857	2,562	9.7	0.2
SEX						
Male	4,684,761	2,068	719,985	8,902	15.4	0.2
Female	5,000,750	1,846	911,719	9,880	18.2	0.2
RACE AND HISPANIC OR LATINO ORIGIN						
White	6,220,770	2,615	718,254	11,602	11.5	0.2
Black or African American	2,056,688	4,872	537,538	7,834	26.1	0.4
American Indian and Alaska Native	114,277	1,759	32,101	1,831	28.1	1.5
Asian	248,665	1,763	32,044	1,973	12.9	0.8
Native Hawaiian and Other Pacific Islander	6,227	910	1,229	363	19.7	5.3
Some other Race	293,512	8,038	98,899	5,189	33.7	1.5
Two or more races	233,951	5,773	57,525	2,970	24.6	1.1
Hispanic or Latino	867,229	835	273,081	2,970	24.6	0.8
All individuals below:						
50 percent of poverty level	709,029	10,824				
125 percent of poverty level	2,156,665	18,666				
150 percent of poverty level	2,675,626	22,058				
185 percent of poverty level	3,374,865	23,762				
200 percent of poverty level	3,649,420	24,199				
Source: US Census, 2012-2016 ACS 5-Year Es	stimates					

Table 4. Poverty Status- North Carolina

			Duplin	,		Tegiona	Sampson County						
Subject	То	otal	Below lev	poverty /el	povert	t below y level		Total		Below poverty level		nt below ty 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	58,308	240	16,106	1,594	<u>27.60</u>	2.70	62,915	191	15,207	1,269	<u>24.20</u>	2.00	
AGE													
Under 18	14,332	195	5,898	665	<u>41.20</u>	4.60	15,534	122	5,520	679	<u>35.50</u>	4.40	
18 to 64	34,834	143	8,833	1,025	<u>25.40</u>	2.90	37,447	135	8,350	744	<u>22.30</u>	2.00	
65 years and over	9,142	169	1,375	238	<u>15.00</u>	2.60	9,934	163	1,337	221	<u>13.50</u>	2.20	
SEX													
Male	28,477	187	7,313	860	<u>25.70</u>	3.00	30,890	124	6,960	714	<u>22.50</u>	2.30	
Female	29,831	169	8,793	914	<u>29.50</u>	3.00	32,025	152	8,247	759	<u>25.80</u>	2.40	
RACE AND HISPANIC OR LATINO ORIGIN													
White	30,534	99	4,808	846	<u>15.70</u>	2.80	32,775	126	4637	756	<u>14.10</u>	2.30	
Black or African American	14,346	238	5,094	756	<u>35.50</u>	5.10	15,966	371	5,342	746	<u>33.50</u>	4.50	
American Indian and Alaska Native	92	94	-	28	0.00	29.00	1,210	251	243	102	20.10	8.70	
Asian	181	56	24	32	13.30	17.60	291	29	12	17	4.10	5.90	
Native Hawaiian and Other Pacific Islander	25	40	-	28	0.00	59.30	11	19	11	19	<u>100.00</u>	89.40	
Some other Race	4,948	920	2,590	842	<u>52.30</u>	11.30	4,409	889	1,632	619	<u>37.00</u>	12.70	
Two or more races	904	284	377	222	<u>41.70</u>	18.10	1,770	397	509	250	<u>28.80</u>	12.10	
Hispanic or Latino	12,439	110	5,838	832	<u>46.90</u>	6.60	11,541	65	4,598	794	<u>39.80</u>	6.90	
All individuals below:													
50 percent of poverty level	6,041	1,062					5,777	988					
125 percent of poverty level	21,302	1,542					19,478	1,403					
150 percent of poverty level	26,328	1,452					23,857	1,403					
185 percent of poverty level	30,457	1,471					29,450	1,394					
200 percent of poverty level	32,201	1,452					31,952	1,313					
All bolded and <u>underlined</u> c				is greater	than 10%	6 when co	mpared t	o the Stat	e.				

Table 5. Poverty Status- Regional Setting

Source: US Census, 2012-2016 ACS 5-Year Estimates

Table 6. Poverty Status Local Setting												
			Census T	ract 902	-		Census Tract 9701					
Subject	Tot	al	Below poverty level		Percen poverty		Total		Below poverty level		Percent below poverty level	
Subject	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	4,481	527	1,109	404	<u>24.70</u>	7.6	7,307	728	1,703	414	<u>23.30</u>	5.30
determined												
AGE												
Under 18	1,236	326	492	243	<u>39.80</u>	14.6	1,713	358	536	200	<u>31.30</u>	11.90
18 to 64	2,710	328	530	188	<u>19.60</u>	6.2	4,487	465	1,114	303	<u>24.80</u>	6.20
65 years and over	535	87	87	60	<u>16.30</u>	11	1,107	239	53	49	4.80	4.40
SEX												
Male	2,276	328	599	248	<u>26.30</u>	9.4	3,941	482	839	214	<u>21.30</u>	4.90
Female	2,205	299	510	194	<u>23.10</u>	7.3	3,366	366	864	288	<u>25.70</u>	8.60
RACE AND HISPANIC OR LATINO ORIGIN												
White	1,718	241.0	126.0				3367.0	559.0	462.0	251.0	13.7	7.0
Black or African American	1,020	314.0	462.0	289.0	45.3	21.1	1994.0	552.0	460.0	291.0	23.1	12.5
American Indian and Alaska Native	-	12.0	0.0	12.0	-	-	2.0	4.0	0.0	17.0	0.0	100.0
Asian	30	43.0	0.0	12.0	0.0	54.1	41.0	43.0	8.0	16.0	19.5	41.0
Native Hawaiian and Other Pacific Islander	-	12.0	0.0	12.0	-	-	0.0	17.0	0.0	17.0	-	-
Some other Race	634	311.0	278.0	202.0	43.8	24.1	914.0	577.0	387.0	274.0	42.3	29.7
Two or more races	88	87.0	0.0	12.0	0.0	29.9	249.0	201.0	4.0	9.0	1.6	4.2
Hispanic or Latino	1,648	510.0	521.0	284.0	31.6	14.5	1774.0	607.0	769.0	336.0	43.3	16.7
All individuals below:												
50 percent of poverty level	566	274					794	338				
125 percent of poverty level	1,716	485					2,337	497				
150 percent of poverty level	1,946	573					2,790	542				
185 percent of poverty level	2,254	576					3,573	704				
200 percent of poverty level All <mark>orange</mark> highlighted cel	2,390	570					3,996	712				

Table 6. Poverty Status Local Setting

All orange highlighted cells indicate a difference that is greater than 10% when compared to the county All **bolded** and <u>underlined</u> cells indicate a difference that is greater than 10% when compared to the State. Source: US Census, 2012-2016 ACS 5-Year Estimates

1 mile		2 miles		Sampson County		Duplir	Duplin County		Census Tract 902		Census Tract 9701	
Subject	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error	Estimate	Margin of Error
Number of Households	69		338		23,451	446	21,770	485	1,483	123	2,480	198
Per Capita Income (dollars)	15,432		15,513		19,871	1,063	17,960	924	17,865	2,433	16,985	1,859
Source: U.S. Census,	ource: U.S. Census, ACS 2012-2016											

Table 7. Per Capita Income

5. Limited English Proficiency (LEP)

In accordance with the Safe Harbor Guidelines, when an LEP Group is identified during the pre-permit issuance process, written translations of vital documents will be prepared and made available for each eligible LEP language group that constitutes five percent or includes 1,000 members (whichever is less) of the population of persons eligible to be served or likely to be affected or encountered. If fewer than 50 persons in a language group reaches the five percent trigger, then DEQ will not translate vital written materials, but will provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost. The safe harbor provisions apply to the translation of written documents only. Safe harbor guidelines are per the EPA guidance for LEP persons and are followed by DEQ when deemed appropriate. Within both census tracts, Spanish or Spanish Creole was the main language identified as having individuals who "speak English less than very well" (Table 7). The total number across both census tracts was 1,459, meaning the potential need for translation of vital documents will be considered throughout the process.

	Census	Fract 902	Census Tract 9701		
1. LANGUAGE SPOKEN AT HOME	Estimate	Margin of Error	Estimate	Margin of Error	
Total (population 5 years and over):	3,969	424	6,755	635	
Speak only English	2,668	314	5,352	507	
Spanish or Spanish Creole:	1,288	444	1,396	454	
Speak English "very well"	486	240	539	196	
Speak English less than "very well"	802	266	857	336	
Other Native North American Languages	0	12	7	18	
Speak English "very well"	0	12	0	17	
Speak English less than "very well"	0	12	7	18	

Table 8. Language spoken at home

6. County Health

The University of Wisconsin Population Health Institute, in collaboration with the Robert Wood Johnson Foundation, calculated a County Health Rankings system for all the States in the United States (www.countyhealthrankings.org). This ranking is based on health outcomes (such as lifespan and self-reported health status) and health factors (such as environmental, social and economic conditions). According to this 2019 report, North (with Carolina indicating out of all 100 counties in 1 the healthiest), Sampson County is ranked 81st in health factors and 78th in health outcomes. Duplin County is ranked 87th in health factors and 65th in health outcomes (Figure 3).

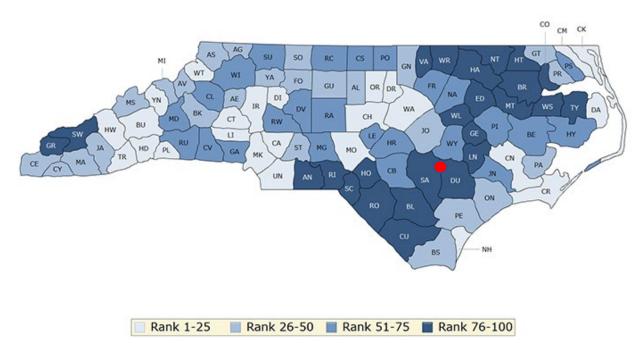


Figure 3. County Health Rankings for Health Factors in North Carolina provided by University of Wisconsin Public Health Institute.

7. Local Sensitive Receptors

The EPA 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 close 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. Distribution of sensitive receptors is shown in Figure 4.

Within the two-mile project radius, the following were identified as potential sensitive receptors:

- East Coast Migrant Headstart
- Poplar Grove Baptist Church
- Bethlem Church
- New Church of Christ

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

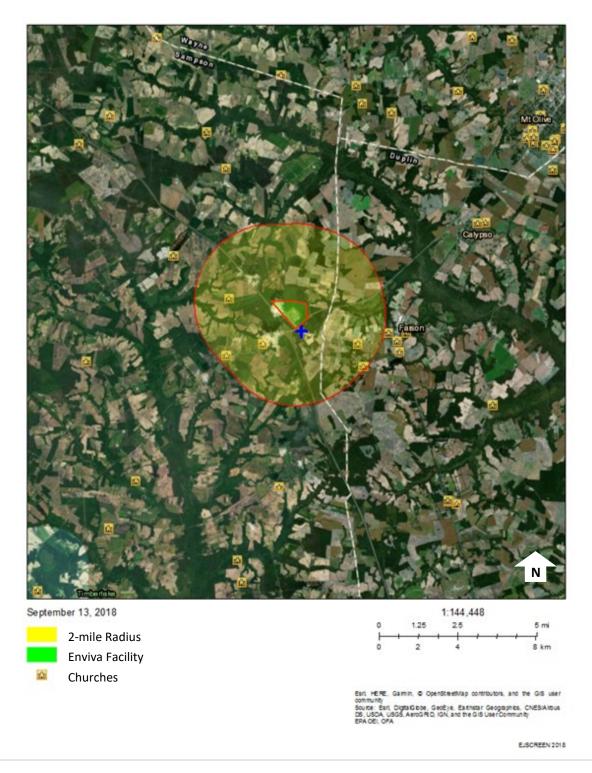


Figure 4. Sensitive receptors within the two-mile radius.

8. Local Industrial Sites

Within the 2-mile radius, there are a total nine permitted activities, facilities, or incidents (as of June 3, 2019), not including Enviva's air quality and NPDES permits (Figure 5). Of those nine, four are swine animal feeding operations permits, and three are underground

storage tank incidents. The remaining are one National Pollutant Discharge Elimination System (NPDES) stormwater permit for Southern Produce Distributors, Inc, and one synthetic minor air quality permit for Barnhill Contracting Faison Plant.

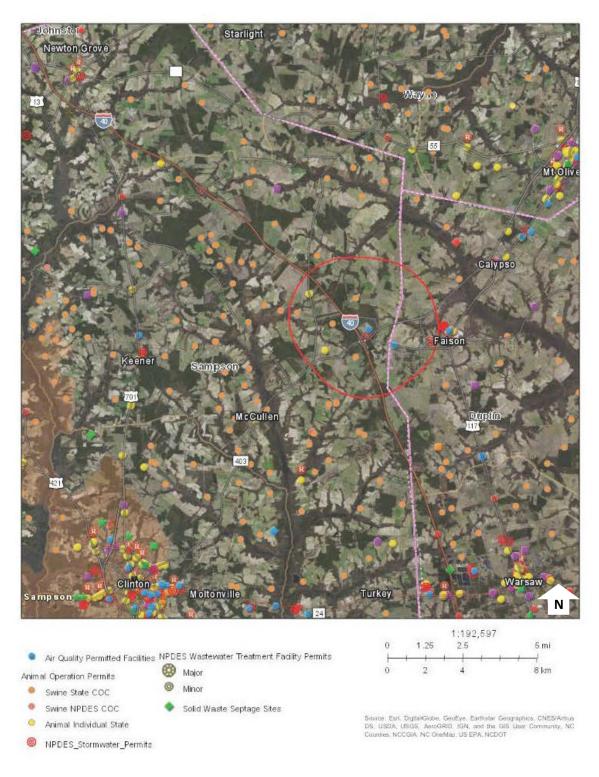


Figure 5. Permitted facilities and incidents with the 2-mile radius surrounding the Enviva Facility.

9. Conclusion

The EJ Snapshot is an initial look at the demographics and socioeconomics of the surrounding community area. This includes information within a radius determined by the Department (2 miles for this project) on race and poverty (decennial census year), per Capita income and Ability to speak English (most current ACS census range), current NC Commerce county tier, and yes/no – native American territory. The EJ Snapshot does not include a reconnaissance of the community.

The Enviva facility is in an area designated with both low health factors and low health outcomes (lower 50 percentile for NC) in comparison to other areas in the state (Section 6). Both Sampson and Duplin counties are also designated as Tier 1 by the NC Department of Commerce. Poverty levels across most subjects are flagged for potential areas of concern for both county level and census tracts. Additionally, Some other Race as well as Hispanic or Latino of any race were flagged as the two races with the largest differences when compared to that of the State to county as well as County/State to census tracts. DEQ recognizes the need for consultation with the Coharie Tribe in Sampson County and will facilitate communications throughout the permit process. Finally, there is the potential need for translation services to Spanish or Spanish Creole based on the results from Section 5 (Limited English Proficiency).

Appendix A.

