

North Carolina Department of Environmental Quality
December 16, 2021

Roanoke Valley Lumber

Draft Environmental Justice Report

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1 Introduction

Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies (US EPA). This evaluation examines the demographic and environmental conditions in Halifax County in census tract 9301 and the one-mile radius around the property boundary of the proposed Roanoke Valley Lumber facility which also includes census tracts 9302 and 9304. Finally, the demographics of the entire state of North Carolina are also considered as they compare to both the county and the local census tract and radius settings.

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

2 Environmental Justice Evaluation

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

- Permit application submitted by Roanoke Valley Lumber
- Facility emissions overview
- Study of area demographics [determined by utilizing the US EPA Environmental Justice tool (EJSCREEN) <https://ejscreen.epa.gov/mapper/> and current, available census data. <https://data.census.gov/cedsci/>]
- Comparison of local area demographics to the county and statewide census data
- County health assessment
- Sensitive receptors surrounding the area
- Local industrial sites (using the NCDEQ Community Mapping System: <https://ncdenr.maps.arcgis.com/apps/webappviewer/index.html?id=1eb0fbe2bcfb4cccb3cc212af8a0b8c8>).

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

3 Proposed Project

The proposed facility is a new sawmill which is yet to be constructed. It will be constructed in two phases: the first phase will support up to 300 million board-feet per year (bd-ft/yr) of lumber

drying capacity. The second phase will support additional 200 million bd-ft/yr lumber drying capacity bringing the total capacity to 500 million bd-ft/yr.

The mill will process raw southern pine logs into planed pine lumber and wood chips/pine shavings. Pine logs will be delivered to the plant and stored outside. The sawmill will transform the pine logs into green rough-cut lumber through debarking, bucking and rough sawing. Rough-cut lumber will then enter a system of stackers where it will be prepared for the drying kilns. The kilns will dry the lumber to customer- and industry-specified criteria for minimum drying temperature and maximum moisture content. Dried rough-cut lumber from the drying kilns is sent to the planer mill for final processing. The following sections describe in detail each of these manufacturing steps:

Green Lumber Operations

Green lumber operations at Roanoke Valley Lumber involve processing whole logs into rough-sawn lumber of various dimensions. Processes included in this mill area are log debarking, log bucking, lumber sawing, and byproduct material collection, conveyance, and storage.

All green lumber operations (i.e., debarker including log bucking and debarking, sawmill, bark hogs, and block/trim chippers) are insignificant emissions activities, as defined under NC's Title V procedures.

Lumber Drying

Roanoke Valley Lumber proposes to dry the lumber with direct-fired, continuous drying kilns. Each kiln will be equipped with a 45 million Btu/hr natural gas-fired, low NOx burner (LNB) and will have an annual lumber drying capacity of 100 million bd-ft/yr. The facility plans to install three kilns in Phase 1. Up to two additional kilns will be installed in Phase 2.

Planer Mill

Planer mill operations involve processing rough, kiln-dried dimensional lumber into finished lumber. Processes in this mill area include planing and trimming the dried, rough lumber and byproduct material collection, conveyance, and storage. Trim pieces are processed in an enclosed dry wood hog. All planer mill operations are conducted within the planer mill building, limiting the emissions of fugitive Particulate Matter (PM).

Additional Mill Operations

Maintenance and fuel storage activities consist of procedures such as parts degreasing, welding stations, metal fabrication/grinding stations, compressed air system maintenance, and small storage tanks or totes containing diesel oil, hydraulic fluids or lubricants. Maintenance and fuel storage operations are sources of regulated air pollutants; however, the activities are either categorically exempt or insignificant based on size/emission levels under the Title V program.

The following table (Table 1) provides a facility-wide emission summary for the Roanoke Valley Lumber facility. It is based upon the emissions estimate provided in the application¹

Table 1. Potential Emissions

Regulated Air Pollutant	Expected Actual Emissions Tons Per Year	Potential Emissions Before Control Tons Per Year	Potential Emissions After Control Tons Per Year
PM	11.62	59.3	11.62
PM ₁₀	6.52	18.0	6.52
PM _{2.5}	3.43	4.3	3.43
SO ₂	0.54	0.54	0.54
NO _x (as NO ₂)	39.94	39.94	39.94
CO	63.63	63.63	63.63
VOC	1054.3	1054.3	1054.3
Lead	0.0004	0.0004	0.0004
GHG as CO _{2e}	89,843.0	89,843.0	89,843.0
Single Largest Hazardous Air Pollutant (HAP), Methanol	49.8	49.8	49.8
Total HAPs	73.1	73.1	73.1

Additional technical discussion is available in the permit review as well as the application.

4 Geographic Area

As proposed, Roanoke Valley Lumber is located at 290 Power Place Drive, Weldon, NC 27890 (Figure 1). The highest off-site ambient air impacts will occur at the plant fence line. A one-mile radius was used to evaluate the local demographics and socioeconomics to appropriately include the surrounding community and help inform the DAQ's public outreach efforts.

¹ This information is subject to change throughout the permit review process.

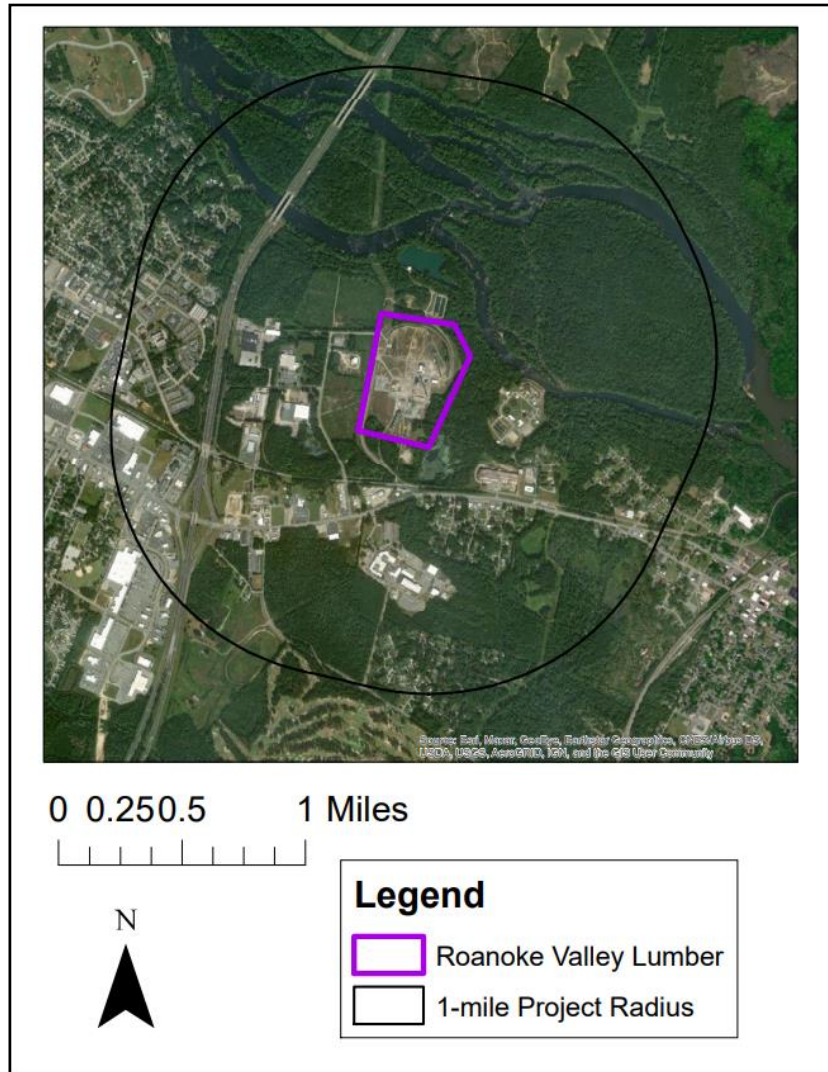


Figure 1. Roanoke Valley Lumber location with the one-mile radius.

Halifax County is designated as a Tier 1 county by the NC Department of Commerce 2021 rankings. According to the Department of Commerce, Tier 1 counties encompass the 40 most distressed counties based on average unemployment rate, median household income, percentage growth in population, and adjusted property tax per capita. The proposed facility and the one-mile radius is located within census tracts 9301, 9302, and 9304 in Halifax County (Figure 2). Census tracts are small, relatively permanent statistical subdivisions of a county with a unique numeric code (US Census Bureau). Halifax County is identified by the N.C. Commission of Indian Affairs as a county in which the state recognized Haliwa-Saponi resides. The census tracts do not encompass land within a state-designated tribal statistical area.

While the one-mile radius does encompass some area within Northampton County, this area of the county does not appear to have any residents or business, but rather remains natural space. Given this, the Department has not included the County or the census tract from Northampton County in this sociodemographic analysis.

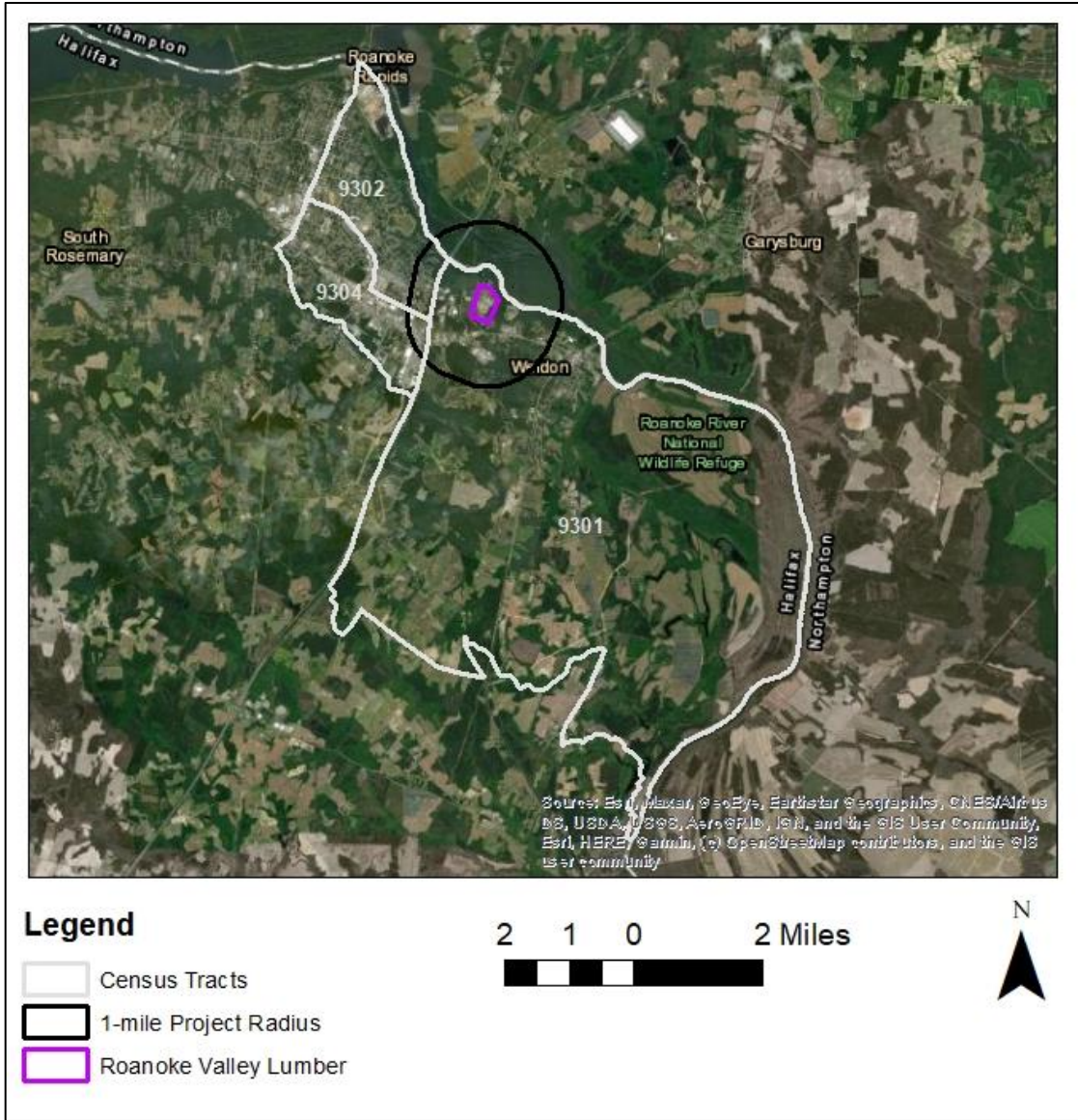


Figure 2. Census Tracts surrounding the facility location.

5 Regional and Local Settings

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

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

For example, if a census tract has 35% of the population classified as low income but the county consists of 30% low income, the census tract would exceed the county average by 16.7% and thus be flagged as a potential area of concern. For this report, census data from 2010, 2020 and census data estimates from 2011-2015 and 2019 were used. 2010 and 2020 Census Bureau data is real data gathered every ten years, whereas the estimates from the more recent years are modeled based on the real data. For the data gathered from the 2019 and 2011-2015 estimates, the margin of error (MOE) has been included. This value is a measure of the possible variation of the estimate around the population value (U.S. Census Bureau). The Census Bureau standard for the MOE is at the 90% confidence level and may be any number between 0 and the MOE value in either direction (indicated by +/-).

5.1 Race and Ethnicity

Regional Setting

According to the 2020 US Census Data Table P2: Hispanic or Latino, and Not Hispanic or Latino by Race, North Carolina’s population totaled 10,439,388 individuals (Table 2). The three most common racial groups across the state were White (60.5%), Black or African American (20.2%), and Hispanic or Latino (of any race) (10.7%).

Halifax County had a total population of 48,622 individuals (Table 2). The two most common racial or ethnic groups in Halifax County were Black or African American (50.9%) and White (39.2%). Black or African American and American Indian or Alaska Native were greater than 10% different when compared to the state.

Table 2. Regional Setting - Race and Ethnicity

Race and Ethnicity	North Carolina		Halifax County	
	Number	Percent	Number	Percent
Total Population	10,439,388	100.0%	48,622	100.0%
White	6,312,148	60.5%	19,070	39.2%
Black or African American	2,107,526	20.2%	24,737	50.9%
American Indian or Alaska Native	100,886	1.0%	1,593	3.3%
Asian	340,059	3.3%	281	0.6%
Native Hawaiian and Other Pacific Islander	6,980	0.1%	11	0.0%
Some other Race	46,340	0.4%	142	0.3%
Two or More Races	406,853	3.9%	1,334	2.7%
HISPANIC OR LATINO (of any race)	1,118,596	10.7%	1,454	3.0%
Source: US Census Bureau, 2020 Census, All bolded and orange highlighted cells indicate a difference that is greater than 10% different when compared to the State.				

Local Setting

According to the 2020 US Census Data Table P2: Hispanic or Latino, and Not Hispanic or Latino by race or ethnicity, the largest population within Census Tract 9301 was Black or African American (72.7%). Black or African American was greater than 10% different when compared with the State (Table 3). The largest population within Census Tract 9302 was White (64.0%). Black or African American and Some Other Race was greater than 10% different compared to the State. The largest population within Census Tract 9304 was White (53.7%). Black or African American was greater than 10% different compared to the state.

According to the 2010 US Census Data, Within the one-mile project radius, the two largest populations were White (50.0%) and Black or African American (44.0%). Black or African American was greater than 10% different when compared to the state.

Table 3. Local Setting - Race and Ethnicity

Race and Ethnicity	Project Area - 1 Mile		Census Tract 9301		Census Tract 9302		Census Tract 9304	
	Number	Percent	Number	Percent	Number	Percent	Number	Percent
Total Population	2,179	100.0%	2,908	100.0%	5,164	100.0%	3,467	100.0%
White	1,092	50.0%	624	21.5%	3,306	64.0%	1,861	53.7%
Black or African American	948	44.0%	2,114	72.7%	1,367	26.5%	1,330	38.4%
American Indian or Alaska Native	7	0.0%	12	0.4%	29	0.6%	18	0.5%
Asian	54	2.0%	6	0.2%	147	2.8%	50	1.4%
Native Hawaiian and Other Pacific Islander	0	0.0%	2	0.1%	1	0.0%	0	0.0%
Some other Race	2	0.0%	15	0.5%	6	0.1%	6	0.2%
Two or More Races	26	1.0%	80	2.8%	126	2.4%	101	2.9%
HISPANIC OR LATINO (of any race)	50	2.0%	55	1.9%	182	3.5%	101	2.9%

Source: US Census Bureau, 2020 Census ; Census 2010 obtained through EJSSCREEN (for Project Area - 1 mile)
 All **bolded and orange** highlighted cells indicate a difference that is greater than 10% different when compared to the state
 All **blue and bolded** highlighted cells indicate a difference that is greater than 10% when compared to the state and the county
 All **green and bolded** highlighted cells indicate a difference that is greater than 10% when compared to the county

5.2 Age and Sex

Regional Setting

According to the 2010 US Census Data Table P12: Sex by Age, and Table P13: Median Age, North Carolina had a total population of 9,535,483 individuals (Table 4). The median age for females (38.7) was slightly higher than the median age for males (36).

Halifax County had a total population of 54,691 individuals. The median age for females (43.7) was slightly higher than the median age for males (39.7) and were both higher than the median age for the state.

Table 4. Regional Setting - Age Groups and Sex

Age	North Carolina						Halifax County					
	Number			Percent			Number			Percent		
	Both sexes	Male	Female	Both sexes	Male	Female	Both Sexes	Male	Female	Both Sexes	Male	Female
Total Population	9,535,483	4,645,492	4,889,991	100.0%	49.0%	51.0%	54,691	26,137	28,554	100.0%	48.0%	52.0%
Median Age	37.4	36.0	38.7				41.7	39.7	43.7			

Source: US Census Bureau, 2010 Census

Local Setting

According to the 2010 US Census Data Table P 12: Sex by Age, and Table P13: Median Age, Census Tracts 9301 and 9302 had slightly older median ages than the State (Table 5). Census Tract 9304 had slightly higher median age for females than the state.

Table 5. Local Setting – Age Groups and Sex

Age	Census Tract 9301						Census Tract 9302					
	Number			Percent			Number			Percent		
	Both sexes	Male	Female	Both sexes	Male	Female	Both sexes	Male	Female	Both sexes	Male	Female
Total Population	3,435	1,548	1,887	100.0%	45.0%	55.0%	5,310	2,453	2,857	100.0%	46.0%	54.0%
Median Age	40.6	38.4	42.3				41.6	40	43.2			

Source: US Census Bureau, 2010 Census

Age	Census Tract 9304					
	Number			Percent		
	Both sexes	Male	Female	Both sexes	Male	Female
Total Population	3,629	1,659	1,970	100.0%	46.0%	54.0%
Median Age	36.8	33.7	39			

Source: US Census Bureau, 2010 Census

Project Radius

EJSCREEN identified a population of 2,179 individuals within the one-mile radius surrounding the proposed facility. There was a slightly lower percentage of males than females in this area. EJSCREEN data does not provide the median age (Table 6).

Table 6. Project Radius - Age Groups and Sex

Age	Project Area - 1 Miles					
	Number			Percent		
	Both sexes	Male	Female	Both sexes	Male	Female
Total Population	2,179	976	1,203	100.0%	45.0%	55.0%
Median Age						
Source: US Census Bureau, 2010 Census. Obtained through EJSCREEN 2019						

5.3 Disability

Regional Setting

According to the 2019 American Community Survey 5-Year Estimates, Table S1810 Disability Characteristics from the US Census Bureau, the state of North Carolina had an estimated total population of 10,060,249 noninstitutionalized citizens. Of those individuals, an estimated 13.4% (MOE +/- 0.1%) had a disability. American Indian and Alaskan Native had the highest estimated disability rate of 18.2% (MOE +/- 0.8%). Black or African American and White (not Hispanic or Latino) were the next highest population estimates with disabilities in North Carolina, at 14.6% (MOE +/-0.2%) and 14.5% (MOE +/- 0.1%), respectively (Table 7).

Halifax County had an estimated total population of 49,917 noninstitutionalized citizens. Of those, an estimated 18.5% (MOE +/- 1.1%) had a disability. The largest population of disabled civilians was American Indian and Alaska Native (23.3%, MOE +/- 5.5%), followed by Black or African American (19.3%, MOE +/- 1.8%). Almost all subjects and all disability types were greater than 10% different when compared to the state.

Table 7. Regional Setting – Disability

Subject	North Carolina						Halifax County					
	Total		With a Disability		Percent with a Disability		Total		With a Disability		Percent with a Disability	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Total civilian noninstitutionalized population	10,060,249	2,163	1,352,783	8,378	13.4%	0.1	49,917	252	9,217	549	18.5%	1.1
RACE AND HISPANIC OR LATINO ORIGIN												
White (not Hispanic or Latino)	6,357,724	2,614	919,485	7,082	14.5%	0.1	19,220	149	3,498	338	18.2%	1.7
Black or African American	2,144,532	5,119	312,780	4,850	14.6%	0.2	26,315	280	5,066	472	19.3%	1.8
American Indian and Alaska Native	120,813	1,815	22,048	842	18.2%	0.8	1924	196	448	98	23.3%	5.5
Asian	290,103	1,968	15,414	800	5.3%	0.3	365	95	27	25	7.4%	7.3
Native Hawaiian and Other Pacific Islander	6,694	677	638	183	9.5%	2.7	74	68	6	11	8.1%	15.6
Some other Race	313,224	7,444	16,846	1,231	5.4%	0.4	77	79	6	11	7.8%	19.1
Two or more races	265,791	6,168	29,353	1,430	11.0%	0.4	933	291	133	66	14.3%	6.7
Hispanic or Latino	942,342	855	59,694	2,120	6.3%	0.2	1404	38	64	46	4.6%	3.3
Disability Type												
Hearing difficulty	X	X	375,385	4,061	3.7%	0.1	X	X	2,079	275	4.2%	0.6
Vision difficulty	X	X	263,064	4,326	2.6%	0.1	X	X	1,777	289	3.6%	0.6
Cognitive difficulty	X	X	511,243	5,636	5.4%	0.1	X	X	3,275	355	6.9%	0.7
Ambulatory difficulty	X	X	716,908	6,389	7.6%	0.1	X	X	5,281	423	11.2%	0.9
Source: US Census Bureau, ACS 2019 5-year Estimates												
All bolded and orange highlighted cells indicate a difference that is greater than 10% when compared to the State												

Local Setting

According to the 2019 American Community Survey 5-Year Estimates, Table S1810 Disability Characteristics from the US Census Bureau, Census Tract 9301 had an estimated total population of 3,187 noninstitutionalized citizens (Table 8). Of those individuals, an estimated 18.4% (MOE +/- 4.7%) had a disability. The subject with the largest population of disabled civilians was White (not Hispanic or Latino) (22.1%, MOE +/- 8.7%), followed by Two or more Races at 17.6% (MOE +/- 29.7%) and Black or African American at 17.4% (MOE +/- 5.8%). Black or African American was greater than 10% different compared to the state. White (not Hispanic or Latino) and Two or more Races were greater than 10% different compared to both the county and the state.

Census Tract 9302 had a total population of 4,617 noninstitutionalized citizens. Of those individuals, an estimated 12.9% (MOE +/- 3.6%) had a disability. The subject with the largest population of disabled civilians was Black or African American (20.5%, MOE +/- 9.9%), followed by White (not Hispanic or Latino) at 11.8% (MOE +/- 4.2%). Black or African American was greater than 10% different compared to the state.

Census Tract 9304 had a total population of 3,902 noninstitutionalized citizens. Of those individuals, an estimated 17.0% (MOE +/- 5.1%) had a disability. The subject with the largest population of disabled civilians was Black or African American (22.1%, MOE +/- 9.4%), followed by White at 18.9% (MOE +/- 7.6%). White (not Hispanic or Latino) was greater than 10% different compared to the state. Black or African American was greater than 10% different compared to both the county and the state.

Table 8. Local Setting - Disability

Subject	Census Tract 9301						Census Tract 9302					
	Total		With a Disability		Percent with a Disability		Total		With a Disability		Percent with a Disability	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Total civilian noninstitutionalized population	3,187	336	586	155	18.4%	4.7	4,617	352	595	166	12.9%	3.6
RACE AND HISPANIC OR LATINO ORIGIN												
White (not Hispanic or Latino)	707	146	156	65	22.1%	8.7	3,109	307	367	129	11.8%	4.2
Black or African American	2,453	351	427	150	17.4%	5.8	1,111	272	228	105	20.5%	9.9
American Indian and Alaska Native	0	12	0	12	-	**	33	31	0	12	0.0%	53.6
Asian	0	12	0	12	-	**	127	134	0	12	0.0%	23.8
Native Hawaiian and Other Pacific Islander	0	12	0	12	-	**	0	12	0	12	-	**
Some other Race	5	9	0	12	0.0%	100.0	0	12	0	12	-	**
Two or more races	17	18	3	5	17.6%	29.7	63	90	0	12	0.0%	38.8
Hispanic or Latino	12	15	0	12	0.0%	88.8	174	123	0	12	0.0%	18.1
Disability Type												
Hearing difficulty	X	X	149	65	4.7%	1.9	X	X	115	79	2.5%	1.7
Vision difficulty	X	X	101	57	3.2%	1.8	X	X	40	48	0.9%	1.0
Cognitive difficulty	X	X	307	114	10.5%	4	X	X	160	92	3.6%	2.0
Ambulatory difficulty	X	X	362	99	12.4%	3.4	X	X	364	135	8.2%	3.0
Source: US Census Data, 2019 ACS 5-Year Estimates, All bolded and orange highlighted cells indicate a difference that is greater than 10% when compared to the State All bolded and blue highlighted cells indicate a difference that is greater than 10% when compared to both the County and the State												

Subject	Census Tract 9304					
	Total		With a Disability		Percent with a Disability	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Total civilian noninstitutionalized population	3,902	339	662	189	17.0%	5.1
RACE AND HISPANIC OR LATINO ORIGIN						
White (not Hispanic or Latino)	1,739	303	329	142	18.9%	7.6
Black or African American	1,506	325	333	140	22.1%	9.4
American Indian and Alaska Native	1	3	0	12	0.0%	100.0
Asian	106	114	0	12	0.0%	27.5
Native Hawaiian and Other Pacific Islander	0	12	0	12	-	**
Some other Race	0	12	0	12	-	**
Two or more races	19	24	0	12	0.0%	70.6
Hispanic or Latino	531	324	0	12	0.0%	6.4
Disability Type						
Hearing difficulty	X	X	144	87	3.7%	2.2
Vision difficulty	X	X	150	77	3.8%	2
Cognitive difficulty	X	X	302	126	8.3%	3.5
Ambulatory difficulty	X	X	280	110	7.7%	3
Source: US Census Data, 2018 ACS 5-Year Estimates						
All bolded and orange highlighted cells indicate a difference that is greater than 10% when compared to the State						
All bolded and blue highlighted cells indicate a difference that is greater than 10% when compared to both the County and the State						

5.4 Poverty

Regional Setting

According to the Census Table S1701, Poverty Status in the Past 12 Months, 2019 American Community Survey 5-Year Estimates, from the US Census Bureau, North Carolina had an estimated population of 9,984,891, with 14.7% (MOE +/- 0.2%) below the poverty level (Table 9). Across all subjects, Some Other Race had the highest percent living below the poverty level at 27.2% (MOE +/- 1.2%). The next three subjects with the highest poverty level were Hispanic or Latino at 26.4% (MOE +/- 0.6%), American Indian and Alaska Native at 24.9% (MOE +/- 1.3%), and Black or African American at 22.5% (MOE +/- 0.4%). Households below 200 percent of the federal poverty level² are calculated by multiplying the percentage point by the poverty level for the number of individuals in that household. For example, to calculate 200% of the poverty level for a household of four in 2021,³ that would be \$53,000 (2.0 x \$26,500).

² <https://www.thebalance.com/federal-poverty-level-definition-guidelines-chart-3305843>

³ The poverty level for a household of four in 2021 is an annual income of \$26,500. To calculate the poverty level for larger families, add \$4,540 for each additional person in the household. For smaller families, subtract \$4,540 per person.

Halifax County had an estimated population of 49,855 with 25.8% (MOE +/- 2.2%) living below the poverty level. Across all subjects, American Indian and Alaska Native had the highest percent living below the poverty level at 33.9% (MOE +/- 7.2%), followed by Black or African American (32.5%) and Two or more Races (31.1%). White, Black or African American, American Indian or Alaska Native, and Two or more Races all had estimates greater than 5% different when compared to the state values.

Table 9. Regional Setting – Poverty

Subject	North Carolina						Halifax County					
	Total		Below poverty level		Percent below poverty level		Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Population for whom poverty status is determined	9,984,891	1,988	1,467,591	17,844	14.7%	0.2	49,855	255	12,864	1,088	25.8%	2.2
RACE AND HISPANIC OR LATINO ORIGIN												
White	6,320,337	2,990	644,440	10,085	10.2%	0.2	19,188	154	2,994	577	15.6%	3.0
Black or African American	2,116,769	5,452	475,973	8,126	22.5%	0.4	26,292	281	8,556	814	32.5%	3.1
American Indian and Alaska Native	120,328	1,846	29,981	1,608	24.9%	1.3	1,924	196	652	142	33.9%	7.2
Asian	285,786	2,021	30,707	2,034	10.7%	0.7	365	95	18	18	4.9%	5.4
Native Hawaiian and Other Pacific Islander	6,630	675	1,360	332	20.5%	4.6	74	68	15	17	20.3%	28.7
Some other Race	311,206	7,397	84,699	4,639	27.2%	1.2	77	79	2	4	2.6%	5.2
Two or more races	262,580	6,121	54,627	2,414	20.8%	0.8	926	276	288	132	31.1%	12.0
Hispanic or Latino	940,295	1,251	248,474	6,013	26.4%	0.6	1,404	38	373	314	26.6%	22.4
All individuals below:												
200 percent of poverty level	3,420,476	24,183					25,929	1,150				
Source: US Census Data, 2019 ACS 5-Year Estimates												
All bolded and orange cells indicate a difference that is greater than 5% when compared to the State												

Local Setting

According to the Census Table S1701, Poverty Status in the Past 12 Months, 2019 American Community Survey 5-Year Estimates, from the US Census Bureau, Census Tract 9301 had an estimated population of 1,050 with 32.9% (MOE +/-10.9%) living below the poverty level (Table 10). The total population for whom poverty status is determined as well as Black or African American had poverty levels higher than 5% different when compared to both the county and the state. White (not Hispanic or Latino) had poverty levels higher than 5% different when compared to the state.

Census Tract 9302 had an estimated population of 4,617 individuals, with 6.4% (MOE +/- 3.1%) living below the poverty level. No subjects had poverty levels higher than 5% different when compared to the state or to the county.

Census Tract 9304 had an estimated population of 3,894 individuals, with 34.3% (MOE +/- 12.1%) living below the poverty level (Table 11). The total population for whom poverty status is determined as well as White (not Hispanic or Latino), Black or African American, American Indian and Alaska Native, and Hispanic or Latino had poverty levels higher than 5% different when compared to both the county and the state.

Table 10. Local Setting- Poverty

Subject	Census Tract 9301						Census Tract 9302					
	Total		Below poverty level		Percent below poverty level		Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Population for whom poverty status is determined	3,187	336	1,050	354	32.9%	10.9	4,617	352	296	147	6.4%	3.1
RACE AND HISPANIC OR LATINO ORIGIN												
White	707	146	84	60	11.9%	8.6	3,109	307	193	128	6.2%	3.9
Black or African American	2,453	351	966	355	39.4%	13.9	1,111	272	103	86	9.3%	8.8
American Indian and Alaska Native	0	12	0	12	-	**	33	31	0	12	0.0%	53.6
Asian	-	12	-	12	-	**	127	134	-	12	0.0%	23.8
Native Hawaiian and Other Pacific Islander	-	12	-	12	-	**	-	12	-	12	-	**
Some other Race	5	9	-	12	0.0%	100.0	-	12	-	12	-	**
Two or more races	17	18	-	12	0.0%	74.6	63	90	-	12	0.0%	38.8
Hispanic or Latino	12	15	-	12	0.0%	88.8	174	123	-	12	0.0%	18.1
All individuals below:												
200 percent of poverty level	1,927	301					1,659	456				

Source: US Census Data, 2019 ACS 5-Year Estimates

All **bolded and blue** cells indicate a difference that is greater than 5% when compared to the county and the State.

All **bolded and orange** cells indicate a difference that is greater than 5% when compared to the State.

Table 11. Local Setting – Poverty (cont'd)

Subject	Census Tract 9304					
	Total		Below poverty level		Percent below poverty level	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Population for whom poverty status is determined	3,894	339	1,335	494	34.3%	12.1
RACE AND HISPANIC OR LATINO ORIGIN						
White	1,731	301	358	237	20.7%	13.4
Black or African American	1,506	325	719	278	47.7%	15.6
American Indian and Alaska Native	1	3	1	3	100.0%	100.0
Asian	106	114	-	12	0.0%	27.5
Native Hawaiian and Other Pacific Islander	-	12	-	12	-	**
Some other Race	-	12	-	12	-	**
Two or more races	19	24	-	12	0.0%	70.6
Hispanic or Latino	531	324	257	325	48.4%	51.6
All individuals below:						
200 percent of poverty level	2,197	489				
Source: US Census Data, 2019 ACS 5-Year Estimates						
All bolded and blue cells indicate a difference that is greater than 5% when compared to the county and the State.						

5.5 Household Income

Regional Setting

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

The household income range for Halifax County with the highest percent was \$50,000 to \$74,999 at 15.6% (MOE +/- 1.7%). The median income was \$35,502 and the mean income was \$51,994, both lower than that of the state. The income ranges below \$35,000 were all greater than 10% different when compared to the state.

Table 12. Regional Setting - Household Income

Subject	North Carolina		Halifax County	
	Households		Households	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Total	3,965,482	10,327	21,017	478
Less than \$10,000	6.4%	0.1	11.9%	1.4
\$10,000 to \$14,999	5.0%	0.1	9.3%	1.3
\$15,000 to \$24,999	10.3%	0.1	15.1%	1.4
\$25,000 to \$34,999	10.3%	0.1	13.2%	1.7
\$35,000 to \$49,999	13.9%	0.1	15.1%	1.7
\$50,000 to \$74,999	18.0%	0.1	15.6%	1.7
\$75,000 to \$99,999	12.4%	0.1	8.6%	1.4
\$100,000 to \$149,999	13.1%	0.1	7.2%	1.1
\$150,000 to \$199,999	5.1%	0.1	2.8%	0.8
\$200,000 or more	5.4%	0.1	1.4%	0.4
Median income (dollars)	54,602	231	35,502	1,818
Mean income (dollars)	76,940	352	51,994	2,961
Per Capita Income	30,783	154	21,848	1,274

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

Local Setting

The household income ranges for Census Tract 9301 with the highest percent was \$25,000 to \$34,999 at 15.1% (MOE +/- 4.6%) and \$50,000 to \$74,999 at 15.1% (MOE +/- 6.9%). The median income was \$30,969 and the mean income was \$44,167 (Table 13). The income ranges from Less than \$10,000 to \$34,999 had percentages that were more than 10% greater than either the state or county. The income range \$15,000 to \$24,999 had a greater than 10% difference when compared to the state. The income ranges from Less than \$10,000 to \$14,999 and \$25,000 to \$34,999 had a greater than 10% difference when compared to both the county and the state.

The household income range for Census Tract 9302 with the highest percent was \$35,000 to \$49,999 at 21.0% (MOE +/- 7.8%). The median income was \$48,094 and the mean income was \$75,990. The income ranges \$10,000 to \$14,999 and \$150,000 to \$199,999 all had a greater than 10% difference when compared to the state, with \$35,000 to \$49,999 having a greater than 10% difference when compared to both the county and the state.

The household income range for Census Tract 9304 with the highest percent was Less than \$10,000 at 19.8% (MOE +/- 7.1%). The median income was \$32,162 and the mean income was \$40,954. The income ranges Less than \$10,000 to \$34,999 had a greater than 10% difference when compared to the state. The income range Less than \$10,000 had a greater than 10% difference when compared to both the county and the state.

The household income range for the one-mile radius with the highest percent was Less than \$15,000 at 26.0% (MOE +/- 96.0%). EJSCREEN data provides different income ranges that cannot be compared in the same manner. (Table 14).

Table 13. Local Setting - Household Income

Subject	Census Tract 9301		Census Tract 9302		Census Tract 9304	
	Households		Households		Households	
	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-	Estimate	Margin of Error +/-
Total	1,328	125	2,182	170	1,382	140
Less than \$10,000	13.9%	6.1	6.0%	3.1	19.8%	7.1
\$10,000 to \$14,999	12.8%	5.3	7.1%	4	5.9%	5.2
\$15,000 to \$24,999	13.6%	6.8	11.1%	6	15.8%	6.7
\$25,000 to \$34,999	15.1%	4.6	7.5%	4.9	13.5%	5.7
\$35,000 to \$49,999	14.2%	7.6	21.0%	7.8	14.0%	7.1
\$50,000 to \$74,999	15.1%	6.9	19.3%	7.2	14.2%	6.8
\$75,000 to \$99,999	6.1%	4	4.8%	2.9	12.4%	5.3
\$100,000 to \$149,999	6.5%	2.7	13.1%	4.4	2.5%	2.1
\$150,000 to \$199,999	1.7%	1.4	5.8%	4.6	1.9%	2.6
\$200,000 or more	1.1%	1.5	4.2%	2.5	0.0%	2.5
Median income (dollars)	30,969	8,213	48,094	10,723	32,162	5,666
Mean income (dollars)	44,167	7,141	75,990	18,577	40,954	6,022
Per Capita Income	18,504	2,915	36,352	9,299	14,945	2,150

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

Table 14. Project Radius - Household Income

Subject	1 mile		
	Number	Percent	MOE
Number of Households	1,059	100.0%	156
Per Capita Income (dollars)	22,504		
Household Income			
<\$15,000	274	26.0%	96
\$15,000-\$25,000	96	9.0%	79
\$25,000-\$50,000	299	28.0%	147
\$50,000-\$75,000	144	14.0%	108
\$75,000+	246	23.0%	105

Source: EJSCREEN 2019

Per Capita Income

Per Capita Income data was obtained through the Census Table B19301, Per Capita Income in the Past 12 Months (In 2019 Inflation-Adjusted Dollars), 2019 American Community Survey 5-Year Estimates. The North Carolina per capita income estimate was \$30,783. The estimate for Halifax County was \$21,848. The estimate for Census Tract 9301 was \$18,504, the estimate for Census Tract 9302 was \$36,352, and the estimate for Census Tract 9304 was \$14,945.

The EJSCREEN analysis also provided the Per Capita Income estimate for the one-mile radius surrounding facility site, which was \$22,504. All Per Capita Income estimates were lower than that of the state except for Census Tract 9302.

6 Limited English Proficiency (LEP)

Per the Safe Harbor Guidelines, should an LEP Group be identified during the permit application process, written translations of vital documents for each eligible LEP language group that constitutes 5% or includes 1,000 members (whichever is less) of the population of persons eligible to be served or likely to be affected or encountered. If there are fewer than 50 persons in a language group that reaches the 5% trigger, then DEQ will not translate vital written materials, but instead will provide written notice in the primary language of the LEP language group of the right to receive competent oral interpretation of those written materials, free of cost. The safe harbor provisions apply to the translation of written documents only. Safe harbor guidelines are based on EPA guidance for LEP persons and implemented by DEQ when deemed appropriate. Only languages where an estimated population of greater than 0 who reside in a Limited English-speaking household are included in this analysis. The population over 5 years and over who reside in a Limited English-speaking household in Census Tract 9302 and 9304 was greater than 0 but less than 5% of the total population (Table 15).

Table 15. Limited English Proficiency

Household Language by Household Limited English Speaking Status	Census Tract 9301			Census Tract 9302			Census Tract 9304		
	Estimate	Margin of Error +/-	Percent	Estimate	Margin of Error +/-	Percent	Estimate	Margin of Error +/-	Percent
Total:	1328	125	100.0	2182	170	100.0	1382	140	100.0
English only	1289	141	97.1	2047	183	93.8	1274	161	92.2
Spanish:	32	37	2.4	82	48	3.8	85	69	6.2
Limited English speaking household	0	12	0.0	19	33	0.9	41	56	3.0
Not a limited English speaking household	32	37	2.4	63	50	2.9	44	66	3.2
Other Indo-European languages:	7	8	0.5	35	41	1.6	0	12	0.0
Limited English speaking household	0	12	0.0	0	12	0.0	0	12	0.0
Not a limited English speaking household	7	8	0.5	35	41	1.6	0	12	0.0
Asian and Pacific Island languages:	0	12	0.0	18	24	0.8	17	18	1.2
Limited English speaking household	0	12	0.0	0	12	0.0	0	12	0.0
Not a limited English speaking household	0	12	0.0	18	24	0.8	17	18	1.2
Other languages:	0	12	0.0	0	12	0.0	6	12	0.4
Limited English speaking household	0	12	0.0	0	12	0.0	0	12	0.0
Not a limited English speaking household	0	12	0.0	0	12	0.0	6	12	0.4

7 Educational Attainment

Regional Setting

The following data was obtained through the US Census Bureau Table S1501, American Community Survey 2019 5-year Estimates. Halifax County had a higher percentage of individuals who attained less than 9th grade, 9th to 12th grade (no diploma) and graduated from high school (or equivalent) while also having a lower percentage of individuals who had attained a Bachelor's degree when compared to the state (Table 16).

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

Subject	North Carolina				Halifax County			
	Number		Percent		Number		Percent	
	Estimate	MOE +/-	Estimate	MOE +/-	Estimate	MOE +/-	Estimate	MOE +/-
Total Above 25	6,983,859	1,636			36,147	128		
Less than 9 th grade	314,545	4,322	4.5%	0.1	2,598	342	7.2%	0.9
9 th to 12 th grade, no diploma	538,851	6,801	7.7%	0.1	5,132	439	14.2%	1.2
High school graduate (includes equivalency)	1,791,532	12,844	25.7%	0.2	13,453	561	37.2%	1.6
Bachelor's degree or higher	2,182,853	16,331	31.3%	0.2	5,222	481	14.4%	1.3

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

Local Setting

The following data was obtained through the US Census Bureau Table S1501, American Community Survey 2019 5-year Estimates. Census Tract 9301 had a higher percentage of individuals who had attained less than 9th grade, 9th to 12th grade (no diploma), and High school graduate (includes equivalency) when compared to the state (Table 17). Census Tract 9301 had a lower percentage of individuals who had attained a Bachelor's degree or higher when compared to the county and the state.

Census Tract 9302 had a higher percentage of individuals who had attained a Bachelor's degree or higher when compared to both the county and the state. Census Tract 9302 had a lower percentage of individuals had attained a less than 9th grade education when compared to the county and the state. Census Tract 9304 had a higher percentage of individuals who had attained less than 9th grade and 9th to 12th grade (no diploma) education when compared to both the county and the state (Table 18).

The educational attainment within the project radius had similar percentages of Less than 9th grade and 9th to 12th grade (no diploma) compared to the county; as well as similar percentages of High School graduate (includes equivalency) and Bachelor's degree or higher compared to the state (Table 19).

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

Subject	Census Tract 9301				Census Tract 9302			
	Number		Percent		Number		Percent	
	Estimate	MOE +/-	Estimate	MOE +/-	Estimate	MOE +/-	Estimate	MOE +/-
Total Above 25	2,210	232			3,223	254		
Less than 9th grade	132	59	6.0%	2.5	75	50	2.3%	1.5
9th to 12th grade, no diploma	253	82	11.4%	3.6	225	122	7.0%	3.8
High school graduate (includes equivalency)	887	216	40.1%	7.8	897	233	27.8%	7
Bachelor's degree or higher	251	80	11.4%	3.4	1,061	247	32.9%	7.4

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

Table 18 Local Setting- Educational Attainment (above 25 years old) (cont'd)

Subject	Census Tract 9304			
	Number		Percent	
	Estimate	MOE +/-	Estimate	MOE +/-
Total Above 25	2,498	249		
Less than 9th grade	209	124	8.4%	4.8
9th to 12th grade, no diploma	443	139	17.7%	5.5
High school graduate (includes equivalency)	860	159	34.4%	6.5
Bachelor's degree or higher	388	183	15.5%	6.7

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

Table 19. Project Radius - Educational Attainment (above 25 years old)

Subject	Project Radius			
	Number		Percent	
	Estimate	MOE +/-	Estimate	MOE +/-
Total Above 25	1,524	255		
Less than 9th grade	112	128	7.0%	
9th to 12th grade, no diploma	216	105	14.0%	
High school graduate (includes equivalency)	368	185	24.0%	
Bachelor's degree or higher	444	164	29.0%	

Source: EJSCREEN 2019
 All **orange and bolded** highlighted cells indicate a difference that is greater than 10% when compared to the state
 All **green and bolded** highlighted cells indicate a difference that is greater than 10% when compared to the county

8 County Health

The University of Wisconsin Population Health Institute, in collaboration with the Robert Wood Johnson Foundation, calculated County Health Rankings for all the States in the United States (www.countyhealthrankings.org). This ranking is based on health outcomes (such as lifespan and self-reported health status) and health factors (such as environmental, social and economic conditions). According to this 2021 report, out of all 100 counties in North Carolina (with 1 indicating the healthiest), Halifax County ranks 95th in health outcomes and 98th in health factors.

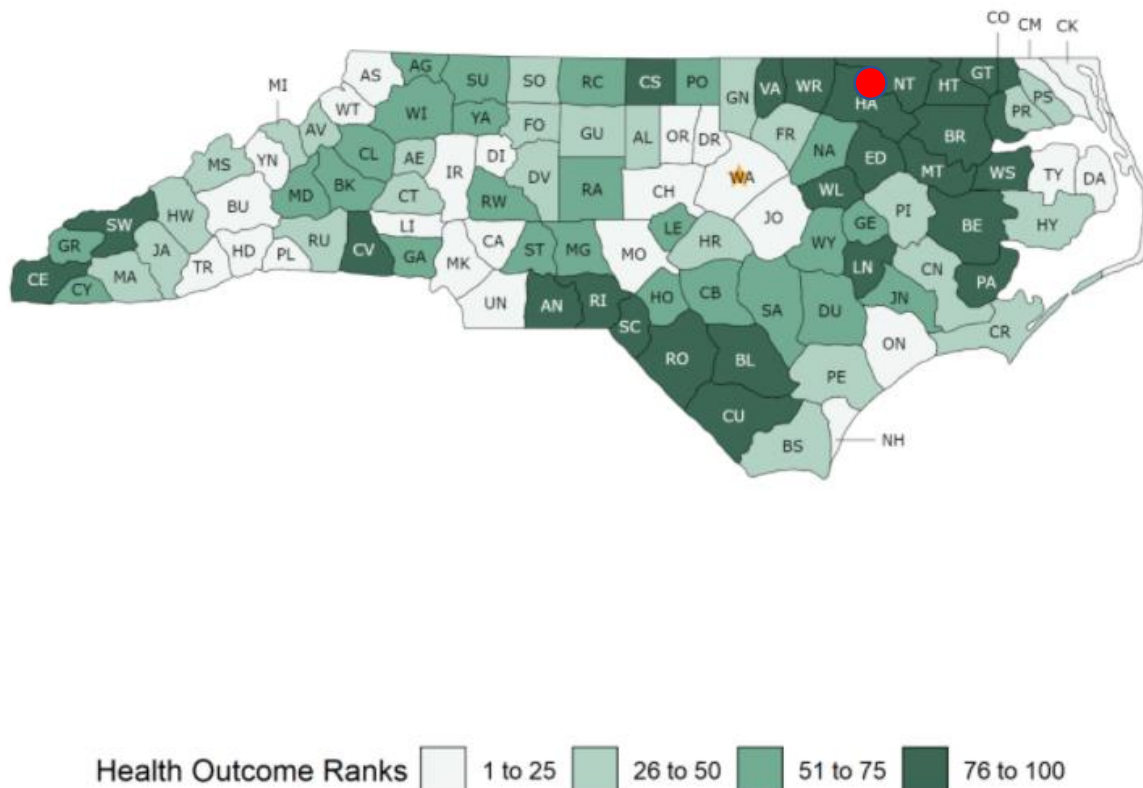


Figure 3. County Health Rankings for Health Factors in North Carolina provided by University of Wisconsin Public Health Institute.

According to the NC DEQ Community Mapping System Environmental Justice Tool, the health outcome causes of death in this project area overall are higher than the state averages. However, the hospitalizations due to asthma in this area is 42 (per 100,000 individuals), as compared to the state at 90 (per 100,000 individuals). Finally, the number of primary care physicians in this area (4.938 per 10,000 residents) is slightly higher than the state average (4.812 per 10,000 residents).

Table 20. Health Outcomes

Cause of Death	Project Area	North Carolina
Cancer	190.95	169.1
Heart Disease	173.95	163.7
Stroke	45.7	43.1
Cardiovascular Disease	248.25	221.9
Diabetes	44.7	22.8

9 Local Sensitive Receptors

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

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

- Roanoke Valley Early College
- Chockoyotte Church
- Halifax Community College
- Community Missionary Baptist church
- Grant Park Laundry
- Apostle Olivia Sharp
- Valley Community Church
- Ponderosa Campground and RV Park
- 3 Public or subsidized housing units (one for Elderly, another for developmentally disabled): Barton Apartments, Roanoke Rapids Housing Authority, Subsidized Housing 800012570

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

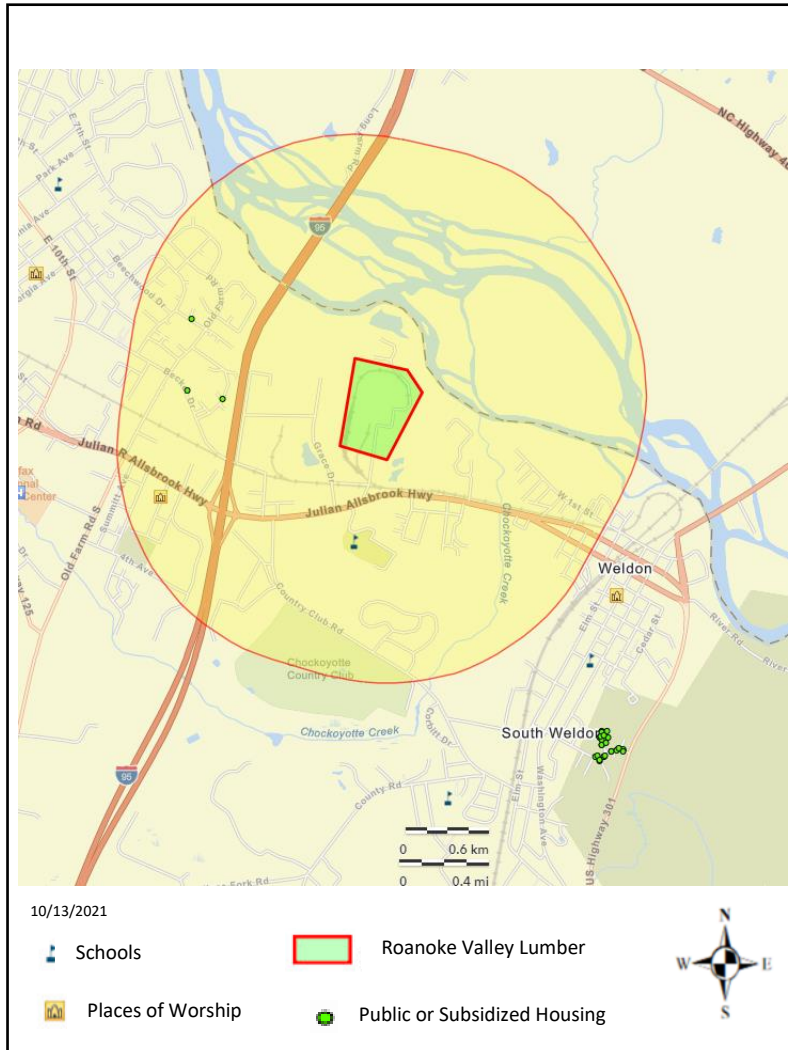


Figure 4. Sensitive receptors surrounding Roanoke Valley Lumber

10 Local Industrial Sites

Within the one-mile radius of the proposed facility, there are 53 permits or incidents (as of October 13, 2021) (Figure 5).

- 3 Air Quality Permitted Sites
- 2 NPDES Wastewater Treatment Facility
- 4 Coal Ash Structural Fills (CCB) (Closed)
- 1 Inactive Hazardous Site
- 1 Brownfields Program Site
- 3 Hazardous Waste Sites
- 20 Underground Storage Tank Incident
- 6 Above Ground Storage Tank Incidents
- 10 Underground Storage Tank Active Facilities
- 3 Land Use Restriction and/or Notice

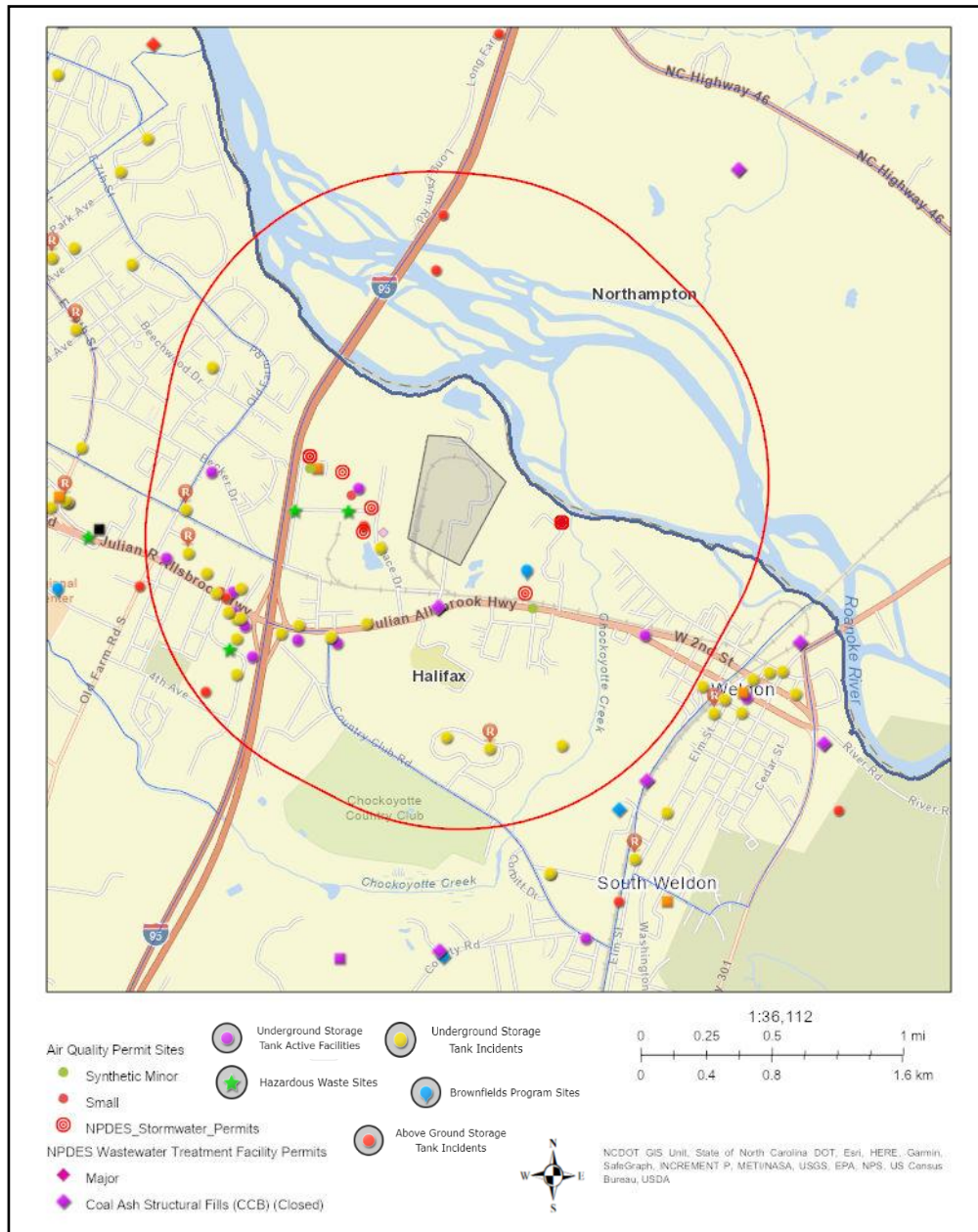


Figure 5. Permitted facilities and incidents with the one-mile radius surrounding the proposed project.

11 Conclusion

Environmental justice is the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income, with respect to the development, implementation, and enforcement of environmental laws, regulations, and policies (US EPA). This Draft EJ report examined the demographic and environmental conditions in North Carolina and the one-mile radius around the Roanoke Valley Lumber facility encompassing Census Tract 9301, 9302, and 9304 in Halifax County. Potential emissions rates outlined in the permit application and county level health data are included, as well as data from the NCDEQ Community Mapping System. It is important to keep in mind that based on the available data, the following limitations of this report: census data—for Age & Sex—is from 2010 and may be outdated; the more recent census data through 2019 are estimates; EJSCREEN does not provide all of the data categories that were used in this analysis so the census tract and county data cannot be compared to the radius used surrounding the facility boundary for all criteria; census tracts can still be large areas and do not allow for exact locations of each population; and the Department cannot determine which populations are in that small amount of overlap around the facility.

The Department assessed the available demographic and socioeconomic data of the community surrounding the Roanoke Valley Lumber Facility regarding its permit application. The county, the project area data from the radius used, and the census tracts generally exceed the state estimates for Black and African American individuals present. The area—except Census Tract 9302—also showed higher percentages of individuals earning the lowest income ranges and elevated poverty rates (as compared to the State and County). No LEP groups was identified as requiring translation or interpretation services.

Halifax County ranks 95th in health outcomes and 98th in health factors. The project area performed worse than the state average for all death rates that are included in the DEQ EJ Tool. There were 53 permits or incidents recorded within one mile of the proposed facility.

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

- The Haliwa-Saponi Indian Tribe will be provided information regarding this permit application and associated opportunities for public comment
- The list of sensitive receptors should be consulted while considering additional outreach options that may best fit this community's needs.
- Project information should be provided to officials in the Town of Weldon.
- Known community leaders should be consulted for additional outreach options.