



NORTH CAROLINA
Environmental Quality

ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

MICHAEL ABRACZINSKAS
Director

March 8, 2019

Mr. Kevin Sproull
Site Manager
Fortron Industries LLC
4600 Hwy 421 N
Wilmington, N.C. 28401

SUBJECT: Determination of Objectionable Odor
Requirement for Maximum Feasible Control
Fortron Industries LLC
Wilmington, North Carolina / New Hanover County
Air Quality Permit No. 07323T21
Facility ID: 6500303
Fee Class: Title V

Dear Mr. Sproull,

For several years now, the Division of Air Quality's (DAQ) Wilmington Regional Office (WiRO) staff have responded to numerous odor complaints regarding the 4-Methyl-4-Mercapto-2-Pentanone (MMP) or "catty" odor associated with acetone and mesityl oxide emissions from your operations which reacts with reduced sulfur compounds to form MMP. In 2018, WiRO received 25 complaints regarding 18 odor events related to your facility. So far in 2019, 23 complaints have been filed regarding 12 odor events related to your facility.

The relevant section of 15A NCAC 02D .1806 Control and Prohibition of Odorous Emissions is included below:

(g) Determination of the existence of an objectionable odor. A source or facility is causing or contributing to an objectionable odor when:

- (1) A member of the Division staff determines by field investigation that an objectionable odor is present by taking into account nature, intensity, pervasiveness, duration, and source of the odor and other pertinent factors; or*
- (2) The source or facility emits known odor causing compounds such as ammonia, total volatile organics, hydrogen sulfide, or other sulfur compounds at levels that cause objectionable odors beyond the property line of that source or facility;*

DAQ-WiRO staff have determined by field investigation in response to complaints that your facility is causing or contributing to an objectionable odor based on the factors in 15A NCAC 02D .1806(g). Based on my consideration of DAQ-WiRO staff reports and observations, I have determined that your facility is causing or contributing to an objectionable odor pursuant to 15A NCAC 02D .1806(g) considering the following:



- Odor nature – which is described as that of a “catty” or a “strong chemical odor”,
- Intensity – which has been documented by staff to be up to a 3 on our odor scale,
- Pervasiveness– odor issues resulting from your facility can become more widespread over time (and distance) as the emitted precursors have more time to react with reduced sulfur compounds in the atmosphere to form MMP. For this reason, the “catty” odor has been observed at significant distances from the facility in both New Hanover and Brunswick Counties,
- Source – Fortron Industries is the only known significant source of MMP precursors in the area, and
- Fortron Industries emits mesityl oxide, a precursor to MMP which is a known odorous compound.

A finding that you are causing or contributing to an objectionable odor requires the application of maximum feasible controls per 15A NCAC 02D .1806 Control and Prohibition of Odorous Emissions:

(f) Maximum feasible controls. If the Director determines that a source or facility subject to this Rule is emitting an objectionable odor by the procedures described in Paragraph (g) of this Rule, the Director shall require the owner or operator to implement maximum feasible controls for the control of odorous emissions. (Maximum feasible controls shall be determined according to the procedures in Rule .1807 of this Section.) The owner or operator shall:

(1) within 180 days of receipt of written notification from the Director of the requirement to implement maximum feasible controls, complete the determination process outlined in 15A NCAC 2D .1807 and submit the completed maximum feasible control determination process along with a permit application for maximum feasible controls and a compliance schedule to the Division of Air Quality; the compliance schedule shall contain the following increments of progress:

- (A) a date by which contracts for the odorous emission control systems and equipment shall be awarded or orders shall be issued for purchase of component parts;*
- (B) a date by which on-site construction or installation of the odorous emission control systems and equipment shall begin;*
- (C) a date by which on-site construction or installation of the odorous emission control systems and equipment shall be completed; and*
- (D) a date by which final compliance shall be achieved.*

(2) within 18 months after receiving written notification from the Director of the requirement to implement maximum feasible controls, have installed and begun operating maximum feasible controls.

The owner or operator shall certify to the Director within five days after the deadline for each increment of progress in this Paragraph whether the required increment of progress has been met.

Please submit the required elements as outlined above to the following address within 180 days of receiving this letter:

Brad Newland, Regional Supervisor
DAQ Wilmington Regional Office
127 Cardinal Dr. Ext.
Wilmington, NC 28405

Mr. Kevin Sproull, Fortron Industries LLC

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Required deadlines and the maximum feasible control determination process are contained in 15A NCAC 02D .1806 and .1807.

If we can provide additional information or assistance concerning this letter, please contact Mark Hedrick, or Brad Newland, Regional Supervisor, in DAQ's Wilmington Regional Office at (910) 796-7215.

Sincerely,

A handwritten signature in blue ink that reads "Michael A. Abraczinskas". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Michael A. Abraczinskas, Director
Division of Air Quality, NCDEQ

cc: Wilmington Regional Office Files
Michael Pjetraj – DAQ
Gary Saunders – DAQ
Brent Hall – DAQ
Steve Hall – DAQ

