



NORTH CAROLINA
Environmental Quality

ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

MICHAEL ABRACZINSKAS
Director

July 25, 2018

MEMORANDUM

TO: William Willets, P.E., Chief
Permitting Section
Brad Newland, P.E., Supervisor
Wilmington Regional Office
Division of Air Quality – DEQ

FROM: Michael A. Abraczinskas, Director

SUBJECT: Malec Brothers Transport, LLC, Permit Application Number 2400165.17A and Draft Air Permit Number 10560R00

I have reviewed the Hearing Officer's Report and Recommendations for the Malec Brothers Transport, LLC, public hearings held on May 3 and May 15, 2018. I have also reviewed and considered an analysis of the area emissions inventory as well as the DEQ Environmental Justice report for the area. Based on this review, we will proceed as follows:

- The case-by-case MACT evaluation submitted by Malec in their permit application appears to contain some inaccurate information regarding the availability of feasible control technologies. DAQ should re-evaluate the MACT determination provided and evaluate appropriate air emissions control.
- The DAQ should re-evaluate the aeration process, emissions capture methodologies, ducting and stack parameters in concert with the re-evaluation of air emissions control.
- After determining final control scenarios, DAQ should conduct modeling to ensure protection of community health.
- Monitoring for container leaks, monitoring at multiple locations at the property boundary and the frequency of monitoring should be re-evaluated.
- Finally, consistent with the Hearing Officer's recommendations, and as a part of a broader strategy to address emissions of this hazardous air pollutant from log fumigation operations, I have requested that an evaluation of the inhalation risks of methyl bromide be prioritized by the Scientific Advisory Board and that an Acceptable Ambient Level, or AAL, be recommended.

Feel free to give me a call at (919) 707-8447 if you have questions regarding this memorandum.

Cc: Lisa Edwards, WSRO Supervisor

