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Secretary

MICHAEL ABRACZINSKAS
Director

NORTH CAROLINA
Environmental Quality

July 26, 2018

CERTIFIED MAIL 7017 0660 0001 0937 5844
RETURN RECEIPT REQUESTED

Mr. Waverly Merritt,
President
Pinnacle World Trade, LLC Williamston NC Site
301 Nantucket CT
Winterville, NC 28590

SUBJECT: Request for Additional Information for Application No. 5900126.18A
Pinnacle World Trade, LLC Williamston NC Site
Factory Street
Facility ID: 5900126, Williamston, Martin County, North Carolina

Dear Mr. Merritt:

The North Carolina Division of Air Quality (DAQ) has undertaken a state-wide review of log fumigation facilities using methyl bromide (MeBr), which has been designated as a hazardous air pollutant in the Clean Air Act. DAQ's review has shown that several log fumigation facilities using MeBr in the State are being operated without implementation of sufficient monitoring protocols, recordkeeping, or control measures, thereby posing potential risks to public health. In light of these circumstances, DAQ intends to recommend to the Environmental Management Commission the development of a rule requiring log fumigation facilities using MeBr to implement appropriate measures to address potential public health risks. In addition, DAQ intends to recommend that the Science Advisory Board develop an Acceptable Ambient Level pursuant to 15A NCAC 2D .1100 with respect to methyl bromide.

DAQ is also taking action through its permitting process to address this issue. In taking final action on a permit application, the Director of DAQ is authorized to impose conditions "necessary to carry out the purposes of G.S. Article 21B," 15A NCAC 2Q.0308, which include ensuring that standards of air purity are protective of human health and preserving the State's air resources in a manner that serves the best interest of all citizens.

This letter is written to request additional information for the subject air permit application received by this office on May 7, 2018. The application's emission calculations may be based on the worst case of the emission sources under consideration; however, it contains no indication of how the facility will control hazardous air pollutant emissions and insufficient information on hazardous air pollutant monitoring. In order to continue processing this application I request the following information:

- The DAQ requests additional information on monitoring of the hazardous air pollutant. Please provide a detailed monitoring plan that you will employ as an addendum to your permit application. The DAQ will evaluate the continuous nature of the monitoring, the number of locations at which monitoring will occur, the specific monitoring devices, and the concentration sensitivity of the monitors.

- The DAQ requests additional information on capture and control of the hazardous air pollutant. Please provide a detailed evaluation of controls that demonstrate a minimum combined capture and control of 90% that you will employ as an addendum to your permit application. The DAQ will review the control technology and evaluate if it is appropriate to ensure continuous compliance with minimum 90% combined capture and control efficiency.

- The DAQ requests additional information on operation limitations on the number of containers that can be aerated daily; the number of containers that can be aerated during a specific time period; and that aeration occurs only during periods of the day that provide for the best dispersion of the hazardous air pollutant. Please provide a summary of container operational limitations and time of day operations that you will employ in order to ensure the public's health is safeguarded. The DAQ will review the operational limitations and determine if the limitations are appropriate to ensure protection of public health.

At this time, processing of the permit application will be placed on hold pending your response to this letter.

If you have any questions or concerns regarding this matter, please feel free to call Dr. Yongcheng Chen or me at (252) 946-6481.

Sincerely,

Robert P. Fisher
Regional Supervisor
Division of Air Quality, NCDEQ

cc: Washington Regional Office Files
Central Files