

NORTH CAROLINA
Environmental Quality

ROY COOPER
Governor

MICHAEL S. REGAN
Secretary

MICHAEL ABRACZINSKAS
Director

July 26, 2018

Ms. Anne Bookout
VP & General Counsel
Royal Pest Solutions, Inc.
53 McCullough Drive
New Castle, DE 19720

SUBJECT: 60 Day Notice of Intent to Modify Air Permit
Royal Pest Solutions, Inc.
Air Quality Permit No. 10531R00 (3701 River Rd)
Facility ID: 6500367
New Hanover County, North Carolina

Dear Ms. Bookout:

Pursuant to N.C.G.S. § 143-215.108(c) and 15A NCAC 2Q .0309(a)(6), the North Carolina Division of Air Quality (DAQ) hereby provides notice of its intent to reopen air quality permit No. 10531R00 (3701 River Rd) in 60 days for modification.

The North Carolina Division of Air Quality 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. As set forth below, DAQ is also taking action through its permitting process to address this issue.

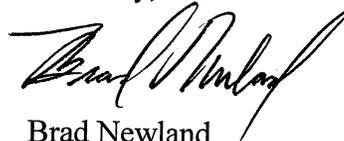
In sixty days, DAQ intends to reopen your permit for modification pursuant to 15A NCAC 02Q .0309(a)(6) and N.C.G.S. 143-215.108(c)(3). These provisions authorize the



Director of DAQ to terminate, modify, or revoke and reissue a permit where “necessary to carry out the purposes of G.S. 143, Article 21B,” 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. Changes to your permit may include but shall not be limited to appropriate monitoring protocols, recordkeeping, or control measures necessary to evaluate and address potential public health risks. Any changes to your permit that result from this process will allow a time period in which to achieve compliance. Pursuant to 15A NCAC 2Q .0306, the Director may require that the draft permit be submitted for public comment.

If you have any questions regarding this letter, please contact Brad Newland, Regional Supervisor at (910) 796-7234.

Sincerely,



Brad Newland
Regional Supervisor
Division of Air Quality, NCDEQ

cc: WiRO Files

