Asheville-Buncombe Air Quality Agency

MEMORANDUM

TO: Asheville-Buncombe Air Quality Agency Board of Directors

FROM: Ashley Featherstone, Director

RE: Agenda for November 20, 2025

DATE: November 13, 2025

Enclosed, please find the Agenda for the Asheville-Buncombe Air Quality Agency Board meeting to be held on **Thursday November 20, 2025 at 4:00pm** in the meeting room located at the previous Buncombe County Permit Office at 30 Valley Street, Asheville, NC 28801.

This meeting will be live streamed on Engage Buncombe which can be accessed at https://engage.buncombecounty.org/s8486. The board meeting documents will also be available on the Engage Buncombe site. The meeting will be recorded and can be viewed later.

A reception will be held at 3:00 pm to recognize Mike Matthews, who is retiring on November 28, for his 30+ years of service to the agency and the county. The recognition will occur at 4:00 pm at the beginning of the Board Meeting. All Board Members, Advisory Committee Members, and others are welcome to attend the reception.

ASHEVILLE-BUNCOMBE AIR QUALITY AGENCY BOARD OF DIRECTORS
TENTATIVE AGENDA
NOVEMBER 20, 2025 BOARD MEETING

1. **Public Comment Protocol Announcement**

2. **Adjustment and Approval of Agenda**

3. **Special Presentation**
   A. Recognition of Mike Matthews for 30 years of service to Air Quality and the County
   B. NC DAQ Purple Air Sensor Loan and WNC Supplementary Monitoring Project, Kimberly Hornberger, Environmental Program Consultant, NC DAQ

4. **Consent Agenda:**
   A. Approval of minutes from September 10, 2025

5. **Unfinished Business:**
   A. None

6. **Director's Report:**
   A. Tropical Storm Helene Response, Recovery Update
      1. Demolitions and asbestos removal permits
      2. Air Curtain Incinerators
      3. Storm Debris Burning
      4. Complaints: Damaged Facilities
      5. Non-Regulatory-Temporary Air Monitoring and Sensors
   B. Staffing Update- Soon to be Vacant Position
   C. Air Quality Rule Amendments Update
   D. Status of Federal Grants-federal fiscal years 2025 and 2026 and Government Shut Down
   E. FY25 Budget Year Update
   F. Annual Reports for 2023 and 2024
   G. Monitoring Update
   H. Facility Permit Renewals

Facility Name	Type of Facility	Facility Classification	Location	Changes from Existing Permit
City of Asheville Water Resources Department- DeBruhl Water Treatment Plant	Drinking Water Treatment Plant	Small	Bee Tree Road, Swannanoa	General Conditions Updated

I. Facility Permit Modifications

Facility Name	Type of Facility	Facility Classification	Location	Changes from Existing Permit
Duke Energy Progress, Inc.	Electric Generating Utility	Title V	46 Duke Energy Lane, Arden	Updating PAL Emission Factors After Recent Emissions Test

J. New Permits

Facility Name	Type of Facility	Facility Classification	Location	Proposed Equipment
Asheville Affordable Tree Men	Wood Waste Management Yard	Title V-General Permit	1239 Charlotte Highway, Fairview	Air Curtain Incinerator

7. New Business:

A. None

8. Other Business:

A. Legal Counsel Report
   i. Repeat violator case
B. Advisory Committee Report
   i. Committee has not met since the last meeting
C. Calendar
   i. 2026 Board Meeting Schedule
   ii. Next meeting TBD
D. Announcements

9. Public Comment

10. Adjournment

Asheville-Buncombe Air Quality Agency

MEMORANDUM

TO: Asheville-Buncombe Air Quality Agency Board of Directors

FROM: Ashley Featherstone, Director

RE: Minutes for September 10, 2025

DATE: November 13, 2025

Enclosed, please find the Minutes for the Asheville-Buncombe Air Quality Agency Board meeting held on **Wednesday September 10, 2025 at 4:00pm**. The next meeting is scheduled for **Thursday November 20, 2025 at 4:00pm** in the meeting room located at the previous Buncombe County Permit Office at 30 Valley Street, Asheville, NC 28801.

A reception will be held at 3:00 pm to recognize Mike Matthews, who is retiring on November 28, for his 30+ years of service to the agency and the county. The recognition will occur at 4:00 pm at the beginning of the Board Meeting. All Board Members, Advisory Committee Members, and others are welcome to attend the reception.

This meeting will be live streamed on Engage Buncombe which can be accessed at https://engage.buncombecounty.org/s8486. The board meeting documents will also be available on the Engage Buncombe site. The meeting will be recorded and can be viewed later.

The Asheville-Buncombe Air Quality Agency Board of Directors met on Wednesday, September 10, 2025, in the meeting room at the former Buncombe County Permit Office located at 30 Valley Street, Asheville, N.C.

The attendance of the Board members was as follows:

Members Present:	**Members Absent:**
Ned Guttman	
Garry Whisnant	
Joel Storrow	
Karl Koon	
Caitlin Crossett	

Staff Present: *Ashley Featherstone, Director; Mike Matthews, Air Quality Specialist II; Steve Ensley, Air Quality Monitoring Coordinator; Allison Glass, Air Quality Specialist I; James Raiford (Virtual), Permitting Program Manager; Hannah Rhodes (Virtual), Air Quality Coordinator*

Others Present: *Amy Broughton, County Attorney; Johanna Cano, CAPE; Timothy Love, Assistant County Manager*

Joel Storrow called the meeting of the Asheville-Buncombe Air Quality Agency Board of Directors to order on September 10, 2025, at 4:00 pm.

The order of business was as follows:

1. **Public Comment Protocol Announcement**
   A. Joel Storrow read the public comment protocol.

2. **Adjustment and Approval of Agenda**
   A. Ned Guttman made the motion to approve the agenda.
   B. Karl Koon seconded the motion.
   C. All present – yes
   D. The motion passed 5-0

3. **Consent Agenda**
   A. Approval of minutes from July 24, 2025
   B. Garry Whisnant made the motion to approve the minutes.
   C. Caitlin Crossett seconded the motion.
   D. All present – yes
   E. The motion passed 5-0

4. **Unfinished Business**
   A. None

5. Director's Report

A. Tropical Storm Helene Response, Recovery Update

i. Post Helene Recovery Update Demolition and Asbestos Removal Permits

1) Ashley Featherstone said that we have issued approximately 30 Helene Recovery related demolition permits. They are in Buncombe County and the Town of Black Mountain, and five more came in yesterday. Mike Matthews and James Raiford are working on those.
2) Garry Whisnant asked if the Agency is being paid by FEMA for those permits.
3) Ashley Featherstone said that Buncombe County is paying for the ones in the County, and then they are getting reimbursed by FEMA.
4) James Raiford said that all of these permit fees should ultimately be reimbursed by FEMA.
5) Ashley Featherstone said that we likely won't have as many of these permits as we had originally thought we would. Some people may be dropping out of the program, potentially to get work done themselves, they may not want to wait on FEMA, or other reasons.
6) Karl Koon asked if someone doing the work themselves will have to get permits for themselves. Mike Matthews confirmed that yes, that is the case.
7) Ashley Featherstone said that there are two programs that FEMA is involved in. One is the buy-out program (hazard mitigation grant program) and the other is the private property debris removal program.

ii. Air Curtain Incinerators

1) Ashley Featherstone said that originally the EPA had issued a no-action assurance letter that was in place up until the end of September to cover the ACIs in operation without permits.
2) There are three currently in operation that would like to keep their ACI's long term: Asheville Affordable Tree Men, North End Stump and Brush, and the Biltmore Estate. They will need to file for a permit for further use. Biltmore is planning to apply for a permit, and we are following up with the other two facilities to request applications from them.
3) The EPA has issued some rule amendments to allow larger ACI's to operate to process storm debris, and the Agency can now grant unlimited extensions as long as they are following the rules and are only burning storm debris. These three facilities would like to keep the ACI's long term, beyond burning Helene storm debris. Therefore, while we can extend their temporary permit to burn storm debris, we need to receive a permit application from them for the long-term if they intend to burn other material.
4) Ashley Featherstone said that the fee for an ACI is 10% of the regular Title V fee. That means that we would likely get $1,200 for the application, and then maybe another $1,000 each year for the annual permit fee.

iii. Complaints: Damaged Facilities and Storm Debris Burning

1) Ashley Featherstone said that the Agency has received multiple dust complaints regarding the Silverline facility's plastic debris chipping.
    a) The dirt/Helene debris that is on the plastic appears to be what is causing the dust.

b) The facility has stopped the operation for now.
c) We determined that this chipping operation needs to be added to their permit. Therefore, the facility cannot perform this operation without a permit modification.
d) Prior to Silverline going through the permit modification process, we have agreed to let them run the operation for a couple days so that Agency staff can observe it to see if they are able to operate it in compliance.
e) As Agency staff check on the operation during these couple days of operation, we would check for compliance with a 20% opacity standard. With the 20% opacity standard, we should be able to see 80% of the background behind the dust or visible emissions. We also look to make sure dust is not leaving the property.
f) Ned Guttman asked with the short staff that we have, how are we able to do all of these inspections and get our regular operations completed?
g) Ashley Featherstone responded that it is challenging, but we are trying to work with facilities and prioritize the items that we need to get done.
h) Ashley Featherstone said that we may have a special meeting to consider this permit so it does not have to wait until November for approval.
i) Ned Guttman asked if it is appropriate from the legal standpoint.
j) Amy Broughton responded that yes it is appropriate, so far.
k) Joel Storrow asked when we would know if we need to issue this permit and have a special meeting.
l) Ashley Featherstone answered that we do not have a time frame. We talked with the facility last week and they are now talking with their management.

2) We have received many odor complaints about Biltmore Oil.
3) We have received several different complaints about Storm Debris burning.
4) We are also receiving complaints about a mulch site in Barnardsville that has caught on fire. The fire department is working on putting the fire out. CAPE has put an alert about it on the Agency's website.
   a) Garry Whisnant asked about what we do about mulch fires.
   b) Ashley Featherstone answered that if it is spontaneous combustion, there is really not anything we can do. It is similar to if a neighbor's house is on fire and creates excess emissions. We're not going to cite your neighbor because it was an accident.
   c) This site in Barndardsville does have permission from Solid Waste to store mulch. Solid Waste has now said that they are not allowed to bring any more mulch to the site because of the fire hazard.
   d) If we found the mulch fire was set deliberately, that is something the Agency could issue a violation for.
5) With complaints, we are receiving so many of them that we are having to come up with new systems to track them by the week to ensure we are responding to all of them (rather than daily).

iv. Non-Regulatory-Temporary Air Monitoring and Sensors

1) Ashley Featherstone said that additional non-regulatory air monitors and sensors are in the draft of the County's Helene response plan.

v. Helene Recovery Projects and Preparedness
   1) Ashley Featherstone and Allison Glass attended a wildfire summit. They two also participated in a department operation center exercise about a heat wave and Canadian wildfire smoke scenario. They worked alongside other County departments to participate in the training.

vi. Outreach: Presentations and Town Halls
   1) Ashley Featherstone reported that Agency staff attended one of the County's last Town Halls and we have done nine presentations to various groups about our Helene response.
   2) Joel Storrow asked if we had more presentations to come.
   3) Ashley Featherstone responded that it is winding down.
   4) We may have a virtual presentation at the next board meeting from the North Carolina Division of Air Quality's monitoring team, who has been working on the WNC Post-Helene monitoring project with us.

B. Status of Federal Grants-federal fiscal years 2025 and 2026
   i. The Federal Fiscal Year 2025 ends September 30th. We have yet to receive the full amount we had thought we were going to get for the year. We have 88% of our funding and are waiting to hear from the EPA. Other air programs in our region have similarly only received a percentage of their award.
   ii. For Federal Fiscal Year 2026, Ashley Featherstone said that Congress has not passed a budget for the year, and there is talk of a possible government shut down due to that. The President proposed cutting all funding, but both the house and senate have drafts with level funding for air agencies. If there was a cut, it wouldn't impact us until July 2026.
   iii. Joel Storrow said that this is one of the main reasons we did not have a retreat today. If we have more transparency in funding by November, we can have a retreat in November.
   iv. Ashley Featherstone said that she has been working with Tim Love and other County staff to see what implications might be if we don't receive the funding we are expecting.

C. Air Quality Rule Amendments
   i. Ashley Featherstone said that Allison Glass has done a great job with editing the rules.
   ii. Ashley Featherstone has submitted Group 1 to the State to review, and she is currently working on reviewing Group 2. We did put Group 1 on the board website so that board members can review the proposed changes. Many of those amendments are just grammatical.
   iii. Originally, Ashely Featherstone stated that she was planning on doing them in batches to present to the board and go to public notice. However, Joel Storrow and Ashley Featherstone have since decided it would be better to have everything reviewed by the State first, then present them on a higher level to the board and put special focus in the presentation on the rules the board does have some ability to make some choices on. This will also save us funds, as we would then only have to do one public notice in Citizen Times.
   iv. Staff are hoping to get all 6 groups of rule updates on the website over the next month.

v. Ned Guttman commented that he looked at Group 1 and was wondering what differentiated Group 1 from the other groups, as well as why certain changes were made. He would like to see something more succinct telling us what we are required to adopt vs what we have a choice to adopt.
vi. Ashley Featherstone responded that, as far as the difference in groups, the NC General Assembly passed a law that all of agencies have to review their rules every few years. They put the rules in these groups based on what is vs. is not required, which ones are getting very minor changes vs. substitutive changes, etc.
vii. Ashley Featherstone also said that the memo for each group should summarize these different requests that Ned Guttman is looking to know more about. While Group 1 was mostly grammatical changes, future group memos will include when our rules differ from the State's and what choices we may have. Also, those rules will get a more in depth presentation during the future board meeting so that the Board can fully understand them.
viii. Ned Guttman asked for there to be a comment in the memo of when a rule differs from the State's rule. Ashely Featherstone said that she is doing those for all of the groups, but if there are not differences from ours to the State's, there will not be an extra comment about it in the memo.
ix. Ashley Featherstone said board members are welcome to call her anytime to answer questions and talk about the rules. We are hoping we will have everything onto the board SharePoint site by the November meeting.

D. Celebration of 10 years Clean Air in NC
i. Ashley Featherstone was able to attend the state's event to celebrate 10 years of clean air in North Carolina. The state has been in attainment with all national ambient air quality standards for this time period. She showed photos from the celebration.

E. Monitoring Update
i. Steve Ensley said the Agency moved its lab to the ground floor of 35 Woodfin Street. He showed photos of the new lab.
ii. Steve Ensley said that we've had several equipment failures recently, but luckily we had spares to put out in the field so we would not lose data, and we are working on getting repairs done.
iii. We have plenty of storage for our equipment now in the new lab.
iv. The Agency is still on track to have the AB Tech site ready to receive the monitoring shelter from DAQ in December 2025.
v. The EPA held a meeting regarding Purple Air sensors. The state is interested in ending their participation in the project around the year mark from the time of Hurricane Helene. We had a meeting with EPA to see about our Agency taking over the Purple Air Sensor loan. The EPA was amenable to that, and we think they will loan the equipment to us going forward.
vi. Steve Ensley went over monitoring data completeness.
1) PM2.5 data completeness: 97%
2) Ozone data completeness: 93%

3) We have another month and a half of the ozone season, and hopefully next year the new monitors will be running at AB Tech.

vii. Joel Storrow asked if we could get a tour of the lab when the board meeting is at the 35 Woodfin board meeting room.

1) Ashley Featherstone said yes, and that the AV equipment should be installed in October, so we are hoping to have the next board meeting in November at 35 Woodfin.

F. Facility Permit Renewals

Facility Name	Type of Facility	Facility Classification	Location	Changes from Existing Permit
BorgWarner Emissions, Thermal & Turbo Systems	Automotive Components Manufacturing Facility	Title V	Brevard Road, Asheville	Modified permit for AEC-1 and AEC-4, diesel-fired internal combustion engine test cells to test natural gas fired combustion engines. Facility name change. Updated general conditions, permitted sources, and insignificant activity list.

i. Ashley Featherstone said that this is a Title V permit and it is up for renewal every 5 years. We did make some changes to the equipment list. Other than that, we are updating some general conditions, and updating the activity list.

ii. Ned Guttman asked if the facility had been 100% compliance over the last several years.

iii. Ashley Featherstone said that yes, they had been in compliance and it has already been through the public comment period.

iv. Garry Whisnant asked how these types of facilities demonstrate compliance.

v. Ashley Featherstone said they are subject to the visible emissions rule. Power Plants have to do annual tests, but for a lot of the facilities such as these, we just use emissions factors to estimate emissions.

vi. James Raiford said that the facility doesn't submit anything additional for emissions factors. They submit their fuel usage, and they do have a fuel oil limit. But there is not any physical testing. There are permit conditions that they have to follow.

vii. Ned Guttman made a motion to approve the above permit renewal.

viii. Garry Whisnant seconded the motion.

ix. All present – yes

x. The motion passed 5-0

A. Facility Permit Modifications

Facility Name	Type of Facility	Facility Classification	Location	Changes from Existing Permit
RTX Corporation, Pratt and Whitney	Airplane Parts Manufacturer	Small	Biltmore Park West, Asheville	Updated air toxics review, including modeling parameters and a new toxics limit.

i. Ashley Featherstone said that Pratt and Whitney have asked for a permit modification to adjust their current permit. She and James Raiford went on to explain that the permit modification was required because emissions of a toxic air pollutant were higher than originally projected in the permit application for the facility due to a change in a product formulation or use of a different product from what was proposed in the application. An air pollution dispersion modeling analysis was conducted with the updated figure and the facility took a limit on the amount of the raw material that they would use in a 24 hour period to comply with the standard.
ii. Ned Guttman asked, if a facility is changing their product or formulation, do our rules require a permit modification? No, a permit modification is not required for a change to a product formulation or a change in product used. Since we are going to modify our rules soon, he wanted to know if the board should consider adding something to the rules specifying when a permit modification is appropriate.
iii. Ashley Featherstone said in this case it is not really possible. With our Agency's structure, we would have to get both the City of Asheville and Buncombe County to agree, and then we would have to go to the state to present it and have the state Environmental Management Commission approve it, which would require us to show why our area should have different requirements from the rest of the state. That being said, Ashley Featherstone said that she doesn't think it's been a big problem and doesn't come up very often.
iv. Joel Storrow asked if this was something that Pratt and Whitney brought to our attention, or if it was something that staff found.
v. Ashley Featherstone said that it is something that the facility asked us about, but that the permit actually requires facilities to tell Agency staff of changes such as these. Also, facilities are required to submit emissions data to the Agency annually, and from these submittals staff should be able to catch any changes in emissions.
vi. Karl Koon made a motion to approve the above permit modification.
vii. Ned Guttman seconded the motion.
viii. All present – yes
ix. The motion passed 5-0

2. New Business

A. None

3. Other Business

A. Legal Counsel Report
   i. None
B. Advisory Committee Report
   i. Committee has not met since last board meeting.
C. Calendar
   i. Next meeting November 20, 2025
   ii. Board Retreat, if we have one, would also be November 20th at 3:00pm
D. Announcements

4. Public Comment

A. None

5. Adjournment

A. Garry Whisnant made the motion to adjourn the meeting.
B. Karl Koon seconded the motion.
C. All present – yes
D. The motion passed 5-0
E. The meeting was adjourned at 5:01pm

	2021 Budgeted	2021 Actual	2022 Budgeted	2022 Actual	2023 Budgeted	2023 Actual	2024 Budgeted	2024 Actual	2025 Budgeted	2025 Actual
Revenues	$898,178	$943,873	$799,275	$924,593	$1,090,272	$1,050,726	$1,116,668	$1,136,330	$1,349,960	$1,202,530
Expenses	$1,018,216	$824,228	$951,344	$925,285	$1,090,272	$1,042,689	$1,116,668	$1,114,216	$1,262,912	$1,235,892
Budgeted Fund Balance Draw	$120,038		$152,069		$109,272		$116,703		$117,260	
Actual Fund Balance Draw		-$119,645		$692		-$8,037		$22,114		$33,362

		2021		2022		2023		2024		2025
~Fund Balance Workday*	Previous Year end	$716,382		$719,071		$715,690		$723,727		$746,841
~Fund Balance est						$723,727		$746,841		$713,479

(negative numbers to fund balance draw reflects money going back into the fund balance)
Note: totals may be subject to liabilities not accounted for here
Note: Full Accrual BCFY 2025 Ending Fund Balance was $236,778.

**Workday reports reflect the fund balance as of the end of the previous BCFY. This changed in recent years.*

**updated 11/7/25: HRhodes*

Revenues *(ledger account)*	BCFY 2021 Budget	BCFY 2021 Actuals	BCFY 2022 Budget	BCFY 2022 Actuals	BCFY 2023 Budget	BCFY 2023 Actuals	BCFY 2024 Budget	BCFY 2024 Actuals	BCFY 2025 Budget	BCFY 2025 Actuals	BCFY 2026 Budget
4110:Interfund Transfer Revenue	$ 16,571.00	$ 16,571.00	$0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
4120:Investment Earnings	$ 9,000.00	$ 93.99	$6,300.00	$ (1,415.15)	$ 100.00	$ 22,940.45	$ 5,000.00	$ 31,904.51	$ 5,000.00	$ 30,048.66	$ 5,000.00
4150:Other Revenue	$ -	$ -	$0.00	$ 16.85	$ 350.00	$ -	$ -	$ -	$ -	$ 100.00	$ 7,500.00
4180:Other Taxes and Licenses	$ 145,000.00	$ 142,430.87	$146,000.00	$ 153,343.85	$ 144,000.00	$ 152,670.47	$ 150,000.00	$ 155,494.37	$ 150,000.00	$ 155,565.41	$ 160,000.00
4190:Permits and Fees	$ 467,250.00	$ 519,186.05	$381,475.00	$ 502,005.30	$ 483,150.00	$ 524,898.10	$ 512,500.00	$ 538,717.53	$ 547,700.00	$ 553,755.90	$ 539,900.00
4210:Restricted Intergovernmental	$ 260,357.00	$ 265,536.00	$265,500.00	$ 270,642.00	$ 352,700.00	$ 350,217.00	$ 332,465.00	$ 410,214.00	$ 530,000.00	$ 463,059.59	$ 353,000.00
4230:Sale of Assets	$ -	$ 55.50	$0.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
4310:Appropriated Fund Balance	$ 120,038.00	$ -	$152,069.00	$ -	$ (977,300.00)	$ -	$ 116,703.00	$ -	$ 117,260.00	$ -	$ 197,512.00
	$ 1,018,216.00	**$ 943,873.41**	**$951,344.00**	**$ 924,592.85**	**$ 3,000.00**	**$ 1,050,726.02**	**$ 1,116,668.00**	**$ 1,136,330.41**	**$ 1,349,960.00**	**$ 1,202,529.56**	**$ 1,262,912.00**

Expenses *(ledger account)*	BCFY 2021 Budget	*Workday reports r	BCFY 2022 Budget	BCFY 2022 Actuals	BCFY 2023 Budget	BCFY 2023 Actuals	BCFY 2024 Budget	BCFY 2024 Actuals	BCFY 2025 Budget	BCFY 2025 Actuals	BCFY 2026 Budget
5000:Salaries and Wages	$ 508,647.00	$ 422,244.85	$ 487,674.00	$ 479,548.56	$ 523,036.00	$ 530,229.42	$ 571,445.00	$ 929,254.26	$ 1,000,533.00	$ 620,176.00	$ 627,855.00
5030:Benefits	$ 301,312.00	$ 243,183.34	$ 282,367.00	$ 273,916.36	$ 272,457.00	$ 278,014.65	$ 286,698.00			$ 311,935.00	$ 360,883.00
6000:Utilities	$ 1,800.00	$ 1,450.23	$ 2,040.00	$ 1,487.03	$ 1,450.00	$ 1,996.67	$ -	$ -	$ -	$ -	$ -
6020:Travel and Training	$ 13,791.00	$ 1,067.18	$ 10,005.00	$ 4,502.68	$ 15,835.00	$ 9,568.97	$ 16,436.00	$ 7,670.15	$ 15,124.00	$ 9,705.55	$ 12,996.00
6030:Vehicle Expense	$ 3,000.00	$ 1,841.19	$ 1,793.00	$ 1,042.01	$ 2,500.00	$ 1,474.11	$ 1,050.00	$ 1,566.18	$ 1,500.00	$ 336.49	$ 1,850.00
6060:Office Expenses	$ 13,100.00	$ 7,207.40	$ 9,314.00	$ 8,735.00	$ 13,000.00	$ 6,344.85	$ 12,950.00	$ 9,194.43	$ 15,674.00	$ 10,155.53	$ 16,910.00
6070:Maintenance and Repair	$ 5,150.00	$ 4,164.00	$ 1,600.00	$ 898.00	$ 3,700.00	$ 1,501.87	$ 3,500.00	$ -	$ 2,000.00	$ 1,921.62	$ 7,400.00
6075:Equipment	$ -	$ -	$ -	$ -	$ 87,700.00	$ 85,496.00	$ 44,413.00	$ 44,413.00	$ 56,000.00	$ 8,795.99	$ 25,000.00
6090:Contract and Professional Serv	$ 3,500.00	$ 175.00	$ 1,650.00	$ 190.00	$ 3,400.00	$ 394.50	$ 5,099.00	$ 2,271.48	$ 15,145.00	$ -	$ 11,000.00
6105:Charges and Fees	$ -	$ 416.53	$ 500.00	$ 2,366.34	$ 2,600.00	$ 2,649.06	$ 3,000.00	$ 3,506.47	$ 3,000.00	$ 3,736.91	$ 4,500.00
6140:Meetings and Events	$ 500.00	$ -	$ 500.00	$ -	$ -	$ -	$ -		$ 935.00	$ -	$ -
6160:Advertising	$ 750.00	$ -	$ 1,400.00	$ 894.80	$ 1,000.00		$ 900.00			$ 244.10	$ 1,000.00
6500:Information Technology	$ 1,100.00	$ 959.44	$ 1,000.00	$ 1,155.53	$ 1,800.00	$ 1,027.20	$ 1,320.00	$ 1,545.08	$ 1,500.00	$ 1,540.80	$ 4,150.00
6510:Non Discretionary	$ 150,166.00	$ 141,519.13	$ 151,501.00	$ 150,548.92	$ 158,794.00	$ 123,991.33	$ 154,857.00	$ 114,794.93	$ 173,549.00	$ 153,195.47	$ 174,368.00
6525:Telecommunications	$ 400.00	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -
7000:Capital Outlay	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ -	$ 50,000.00	$ 114,148.28	$ -
9002:Budgetary Contingency	$ 15,000.00	$ -	$ -	$ -	$ 3,000.00	$ -	$ 15,000.00	$ -	$ 15,000.00	$ -	$ 15,000.00
	$ 1,018,216.00	**$ 824,228.29**	**$ 951,344.00**	**$ 925,285.23**	**$ 1,090,272.00**	**$ 1,042,688.63**	**$ 1,116,668.00**	**$ 1,114,215.98**	**$ 1,349,960.00**	**$ 1,235,891.74**	**$ 1,262,912.00**

Change in Fund Balance	**$119,645.12**	**-$692.38**	**$8,037.39**	**$22,114.43**	**-$33,362.18**

Please note that the budget numbers reflect the changes made to the budget during that year. This means that the $15,000 in contingency funds originally budgeted in BCFY 2022, BCFY 2023, BCFY2024, and BCFY 2025 were allocated to Salary and Benefits (2022), Equipment (2023), Retirement Benefits (2024) and Capital Outlay (2025).

updated 11/10/2024 HRhodes

Asheville-Buncombe
Air Quality Agency

2023 Annual Summary Report

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Overview and Mission of the Agency

Clean air was an important factor when Asheville became established as a vacation and health care center for the treatment of tuberculosis in the late 1800s and early 1900s, and continues to be so today in this thriving tourist economy. At the same time, the topography, meteorology and associated temperature inversions, and growing population have led to challenges with air pollution.

Asheville has been a leader in clean air with the adoption of some of the first smoke and air pollution ordinances in the nation. The City adopted their first smoke ordinance in 1916 and hired their first smoke inspector the same year. In 1946, while acknowledging the importance of the tourism industry and the air pollution problem characterized by thick black smoke blanketing the area, the City adopted their first air pollution control ordinance, and a smoke abatement agency was established in 1947. The local air quality agency is an extension of that program. From 1967 to 1970, the agency served four counties, and from 1970 to 2000, the Agency served two counties (Buncombe and Haywood) and the City of Asheville. In 2000, the Western North Carolina Regional Air Quality Agency (WNCRAQA) was re-formed through an interlocal agreement between Buncombe County and the City of Asheville. The purpose of this agreement was to establish, administer, and enforce a local air quality program for the City of Asheville and Buncombe County in accordance with the provisions of North Carolina General Statutes Section 143-215.112. In 2021, the Agency was renamed the Asheville-Buncombe Air Quality Agency to better reflect the area is serves. Other updates were made to the Interlocal Agreement at the request of the Air Quality Board by Buncombe County and the City of Asheville to address agency office space and indirect charges that the agency pays to Buncombe County.

The mission of the Agency is to protect and monitor the area's air quality to safeguard the public health and the environment. The Agency is responsible for implementing and enforcing the provisions of the federal Clean Air Act and all additional state and local air quality regulations in Buncombe County. The agency operates an air pollution monitoring network that is used to determine whether our area is in compliance with the national ambient air quality standards (NAAQS). The program ensures that industrial facilities, gas stations, dry cleaners, grading contractors, and asbestos removal activities comply with all applicable air quality regulations that are put in place to protect the public health and welfare. The agency enforces the open burning regulations and responds to air quality related complaints and emergencies. The agency offers compliance assistance, education and outreach services, and is available to do presentations on air quality at the request of schools, civic groups, and other community organizations. The agency also maintains an indoor air quality webpage for resident inquiries and have partnered with other agencies to distribute free radon test kits.

AB Air Quality is governed by a five-member board. Three members are appointed by the Buncombe County Commissioners, and two members are appointed by the Asheville City Council. The Agency is also served by an advisory committee made up of community members from a wide range of backgrounds.

Air Quality Monitoring Data

Ozone & Fine Particulate Matter ($PM_{2.5}$)

A large part of our program offerings include air quality monitoring. Our area is currently attaining the National Ambient Air Quality Standards (NAAQS) that are set by EPA to protect public health and the environment. The below table shows our values compared to the standards for Ozone and Fine Particle Matter ($PM_{2.5}$).

Report Item	Item Measurement/Explanation	Current National Standard (NAAQS)	CY2023
Design value at Bent Creek monitoring site	Average of the 4th highest 8-hour ozone concentration measured over 3 consecutive years; used to determine compliance with the national health-based standard for ground level ozone	70 parts per billion (ppb)	61 ppb
Particulate matter (PM2.5) measured at county monitoring site	The 98th percentile 24-hour average	35 micrograms per cubic meter ($\mu g/m^3$)	21.8 $\mu g/m^3$
Particulate matter (PM2.5) measured at county monitoring site	Weighted annual mean	12 micrograms per cubic meter ($\mu g/m^3$)	6.3 $\mu g/m^3$

Source of Ozone and Fine Particle data: U.S. EPA AirData https://www.epa.gov/outdoor-air-quality-data. AirData reports are produced from a direct query of the AQS Data Mart. The data represents the best and most recent information available to the EPA from state and local agencies.

Air Quality Index

The AQI is an index for reporting daily air quality. It tells how clean or polluted the air is, and what associated health effects might be of concern. Here in Buncombe County, the air quality index is based on the two pollutants that we monitor: ground level ozone and fine particles.



Number of Days the AQI was:				
Good (Green)	Moderate (Yellow)	Unhealthy for Sensitive Groups (Orange)	Unhealthy (Red)	Total Number of Days with an AQI in 2023
261	104	0	0	365

Source of AQI data: U.S. EPA AirData https://www.epa.gov/outdoor-air-quality-data. AirData reports are produced from a direct query of the AQS Data Mart. The data represents the best and most recent information available to the EPA from state and local agencies.

Clean Air Compliance Awards

Clean Air Compliance awards recognize local facilities for their compliance with air quality regulations and standards. The primary qualification for a facility to receive a Clean Air Compliance Award is that it has operated in compliance with all regulations and permit requirements for the calendar year. All sources receiving Notices of Violation or Deficiency from the Agency during the year are excluded from consideration. In addition, the Agency uses several criteria to exclude other facilities from the awards list, including those facilities that have been the subject of verified citizen complaints (e.g., odor, visible emissions, or dust complaints) and those facilities that have been notified regarding deficiencies (e.g. inadequate recordkeeping and reporting, and other permit deviations during the calendar year).

Number of Clean Air Compliance Awards Given Out in 2023	44
Number of Clean Air Excellence Awards Given Out in 2023	2
Recipients of Clean Air Excellence Awards: Buncombe County Government - Strategy and Innovation; WNC VA Health Care System	

Environmental Management Commission Report Parameters for Calendar Year 2023

Report Item	CY 2023
Number of Staff in Each Program Area (In Person- Years)	
Permitting	1.8
Inspections	2.1
Enforcement	0.35
Monitoring	1.25
Administrative	.50
Number of Facilities, By Category	
Title V	7
Synthetic Minor	10
Small	55
Stage I Vapor Recovery	150
Dry Cleaners	7
Number of Operating Permits Issued, By Category	
Title V	0
Synthetic Minor	3
Small	16
Number of Construction or Modification Permits Issued, By Category	
Title V	1
Synthetic Minor	1
Small	0
Average Time to Process Each Permit, By Category	
Initial Title V	7 months
Synthetic Minor	1.5 month
Small	1.5 month
Construction	2 months
Have emissions inventories been reported to EPA?	Yes
How many stack tests were observed?	2
How many stack test protocols and reports were received, reviewed, and approved?	6
List Number of CEMs, By Type	
CO	3
CO_2	0
NO_x	2
O_2	3
Opacity	2

SO_2	0
Mercury	0
PM	0
Number of Inspections Performed at Each Source Category	
Title V	7
Synthetic Minor	10
Small	23
Stage I Vapor Recovery	150
Dry Cleaners	0
Number of Full Compliance Evaluations	
Title V	7
Synthetic Minor	10
Small	23
Stage I	150
Dry Cleaners	0
Asbestos Permitting Program	
NESHAP Permits	94
Local Permits	284
City of Asheville Permit Reviews	98
Buncombe County Permit Reviews	137
Number of Staff Available to Perform Compliance Evaluations	
Industrial	3
Asbestos	1
Indoor Air Quality (IAQ)	2
Open Burning, Dust, Odor	6
Number of Violations Found During Inspections	2
Number of Complaints Received	
Industry	7
Asbestos	6
Dust, Odor, IAQ	4
Open Burning	63
Stage I Vapor Recovery	1
Number of Complaints Investigated	
Industry	4
Asbestos	6
Dust, Odor, IAQ	4
Open Burning	63
Stage I Vapor Recovery	1
Number of NOVs, by Type	
Industry – Emissions	1
Industry - Procedural	11

Asbestos/Demolition	3
Dry Cleaners	0
112(r) Program	0
Open Burning	13
Stage I Vapor Recovery	9
Number of Enforcement Cases Processed	27
Number of SOCs Issued	0
Number of Penalties Assessed	13
Total Amount of Penalties Assessed	$7,988
Total Amount of Penalties Collected	$17,375
Number of FRVs and HPVs Reported to EPA	11
Was compliance status of the facilities updated in ICIS on a regular basis? How often?	Yes, Bi-Monthly

The Agency submits 100% of all collected penalties to the local school system.

Additional Highlights for Calendar Year 2023

Education & Outreach and Voluntary Program Initiatives

In addition to our core duties including the implementation of our monitoring, permitting, and enforcement programs, below is a list of Education & Outreach and Voluntary Initiatives activities that were accomplished.

- The Agency partnered with the NC Radon Program to promote Radon Awareness Month in January of 2023. The NC Radon program had a limited amount of test kits to give away. A press release was issued and posted to the website and social media to promote testing and where to obtain free kits and reduced price kits (when free kits were no longer available).

- In November of 2021, the Agency joined the US EPA's Advance Program for ground level ozone and fine particulate matter. The program is a voluntary, collaborative initiative that promotes local actions in attainment areas to reduce ozone and/or fine particle pollution to help areas maintain the National Ambient Air Quality Standards. In 2022, the agency submitted initiatives for the 'Path Forward.' These include working with partners to find funding for the installation of electric vehicle charging infrastructure, replacing diesel school buses with electric school buses, and promoting Energy Star programs with local

breweries. During 2022, agency staff worked with partners to assist the school transportation department with planning for and obtaining grants for electric buses. We also worked with UNCA to support a McCullough Foundation grant to fund a student to set up an Energy Star program to pursue energy efficiency opportunities at breweries. This came to fruition in 2023 when we worked with a student who partnered with four local micro-breweries on how to save energy and be energy efficient.

- The Asheville-Buncombe Air Quality Agency is committed to encouraging reductions in air pollution by encouraging reductions in vehicle miles traveled and cleaner transportation alternatives. We are a member of the local Clean Vehicles Coalition (CVC) that is administered by the Land of Sky Regional Council of Governments. In 2012, the local CVC was designated by the US Department of Energy as an official Clean Cities program for the five-county area surrounding Asheville including Buncombe, Henderson, Haywood, Madison and Transylvania counties. In October of 2012, the Agency signed a Memorandum of Understanding expressing support for the goals of the CVC and Clean Cities Program.

    - Staff are currently serving on a committee that approves grant funding for the NC DAQ's diesel emissions reduction grant program.
    - In 2023, staff collaborated with the County Sustainability Office, the CVC, Duke Energy, and BCS to strategize about electric buses and to help apply for the Duke Park and Plug program "that provides funding for EV charging infrastructure
    - Also, in 2023, staff participated in the CVC Holiday parade in downtown Asheville that featured numerous clean vehicles and electric assist bikes, including one of Buncombe County's new Electric Ford Lightnings

- The Agency maintains a website with information for our permitted facilities as well as information and links to sites concerning air quality, health, climate, and other areas of interest for the residents of Buncombe County. Please go to www.abairquality.org for more information. Please like us on Facebook https://www.facebook.com/ABAirQuality and follow us on Twitter https://twitter.com/ABAirQuality.

- The Agency participated in various public forums and responded to interview requests.

    - Presentation and Field trip with UNCA students to the Ozone Monitoring Site located at Bent Creek. March 31, 2023.
    - Interview with Mountain Xpress April 27, 2023: Air Quality Continues to Improve, but Vigilance Remains Essential. https://mountainx.com/news/air-quality-continues-to-improve-but-vigilance-remains-essential/

- Interview with WLOS June 2023. Wildfire smoke from Canada impacting air quality. https://wlos.com/news/local/were-experiencing-the-effects-of-climate-change-induced-wildfires-unca-professor-says
- Published story to the Air Quality website and the Buncombe County website about air quality and wildfire smoke. June-July 2023.
- Dynamite Roasting Company was recognized and received a Clean Air Excellence Award and did a story about it for Buncombe County which got picked up by Mountain Xpress and Asheville Newsletter. July 31, 2023.
- Participated in story by Asheville Watchdog August 31, 2023, about what is being done to prevent a wildfire like Hawaii. https://avlwatchdog.org/whats-being-done-to-prevent-a-fire-like-hawaiis-from-happening-here/
- Presentation with Buncombe County Strategic Partnerships Grants Committee about grants related to air quality and community partners. September 7, 2023.
- Toured the Particulate Matter monitoring site and the new community sensor shelter at Board of Education with UNCA students. September 22, 2023.
- Published story on Buncombe County website for Children's Health Month. Titled, "Children's Health: Tips for Maintaining Healthy Indoor Air Quality." October – December 2023. https://www.buncombecounty.org/countycenter/news-detail.aspx?id=21078
- Issued press release with WLOS about air quality and fires. November 6, 2023. https://wlos.com/news/local/air-quality-alert-code-red-orange-western-north-carolina-wildfire-smoke-ongoing-particles#

Accomplishments

Buncombe County's air quality continues to be in attainment with the National Ambient Air Quality Standards for fine particles and ground level ozone. In November of 2021, the Agency joined the US EPA's Advance Program for ground level ozone and fine particulate matter. The program is a voluntary, collaborative initiative that promotes local actions in attainment areas to reduce ozone and fine particle pollution to help areas maintain the National Ambient Air Quality Standards. In 2023, EPA reviewed the national standards for fine particles and proposed to make them more stringent. A final rule was issued in February (2024).

In 2023, our local air quality monitoring site at the Buncombe County Board of Education that is part of the national ambient air quality monitoring network was upgraded and expanded with new equipment that will be required (PM-10 monitor) as our Metropolitan Statistical Area approaches the population threshold of 500,000. The agency worked with the Buncombe County Board of Education to move the monitoring site from a roof top to the ground, improving safety and accessibility of the site. Part of the upgrade also included the installation of an EPA provided community science station for low-cost air quality sensors. This will facilitate more resident engagement and citizen science projects as interest in low-cost air

quality sensors is increasing. Funding for the PM-10 monitor, which also measures PM-2.5, was provided by EPA through the American Rescue Plan Act (ARPA). Funding was also secured to replace one of the agency's ground level ozone monitors as part of this grant.

Partnerships with UNCA. The Agency is supporting a UNCA project to use low-cost air quality sensors to determine potential air quality impacts to disadvantaged communities associated with red lining and urban renewal in Asheville. Phase 1 included collocating UNCA sensors with the Agency's regulatory monitors. Now deployed in the community at several City of Asheville schools, some of the sensor data is publicly available and will inform community of air quality levels, increasing awareness and supplementing the data from the Agency's regulatory monitors. This will be especially useful when smoke from fires impacts our area. Purple Air sensor data can be seen alongside the Agency's permanent monitor data on the EPA Fire and Smoke Map at https://fire.airnow.gov/.

In 2023, the agency worked with local partners on different voluntary pollution prevention initiatives with assistance from US EPA, as part the EPA Advance program. Three programs have been identified for our participation, including: expanding electric vehicle (EV) charging infrastructure, assisting with grant funding to obtain electric school buses for the local fleet, and promoting an Energy Star program with local microbreweries to reduce energy use and emissions at their facilities. The following progress was made in these areas:

- Worked with Buncombe County Sustainability office and Land of Sky Clean Vehicles Coalition to obtain grant from North Carolina to replace EV charging equipment at LOS office on New Leicester Highway (open to the public and back in service);
- Worked with local partners including Buncombe County Schools Transportation Department, Sustainability, Clean Vehicles Coalition and Duke Energy on EPA grant applications to replace 5 diesel buses with 5 electric buses (2 applications, one pending); and
- Partnered with UNCA to support a McCullough Fellow on a project to launch the Asheville-Buncombe Sustainable Microbrewery Initiative. With assistance from Land of Sky's Waste Reduction Partners, energy audits or 'treasure hunts' were conducted at 4 microbreweries and opportunities for savings and emissions reductions were identified and reported to the facilities.

Agency data management systems are being modernized to utilize the Accela Government Software program that is used by the City of Asheville and Buncombe County. This will further facilitate more interdepartmental collaboration and improve customer service and

efficiency. The software has enabled the Agency to accept electronic payments and applications for demolition, renovation, and asbestos removal permits. In 2021 and 2022, a complaint module was established that facilitates information sharing with county departments that enforce codes. Staff are participating in a code enforcement workgroup to address repeat violators.

Agency staff worked with the Buncombe County's Communications and Public Engagement (CAPE) Team and others including Public Health and the Fire Marshal's office to put together a media tool kit in response to smoke impacts from Canadian wildfires last summer. The kit is now in place to use when other smoke events from wildfires impact our area's air quality.

The Board and staff continued to promote voluntary programs to increase energy efficiency and reduce air pollution including greenhouse gas (GHG) emissions with our annual Clean Air Excellence Awards program. Dynamite Roasting Company was recognized in 2023 for their projects and associated air pollution emissions reductions related to renewable energy and utilization of the first electric product delivery vehicle in the area.

Potential Budgetary Impact of Goals and/or Recommendation(s)

There are three main sources of funding for air pollution programs: EPA grants, permit fees and to a lesser extent, a portion of the NC gas tax. EPA grant funding has been level since 2004 with no adjustments for inflation. NC Gas Tax revenues have been flat for several years and are projected to remain that way for the next 7 years. Permit fees for the largest permitted sources are based on emissions which have been decreasing with emissions reductions at the Duke Energy Progress Skyland plant. While this has resulted in significant benefits to air quality, staffing levels have decreased over the years while workload has stayed steady or increased as new rules have been implemented. Fees were increased in 2021, which helped to make up for a portion of the loss of permit fees at the Duke Energy Skyland plant that resulted from the emissions reductions when the plant switched from coal to natural gas. In 2022, there was a significant increase in salary and benefits related expenses related to a comprehensive salary study conducted by Buncombe County, which resulted in a projected budget shortfall for future years. In 2023, the agency received a modest increase in recurring grant funds for the first time since 2004. It was not sufficient to fully fund a vacant position, but has the potential to fund a significant portion of one FTE. One time grant funds from the American Rescue Plan and the Inflation Reduction Act were obtained to replace equipment that is part of the air quality monitoring network. The Agency does have a fund balance to draw from, but is actively working on funding strategies to keep the program and the important services it provides in place.

Upcoming Goals

- Complete improvements to air quality monitoring network: Upgrade equipment with funds from the Inflation Reduction Act. Replace older diesel (once biodiesel) truck used by the air quality monitoring team with new electric Ford Lightning if funding is provided by EPA (application pending).
- Restructure the Agency and fill vacant position as key senior staff retire in 2024.
- Continue to work with UNCA on low-cost air quality sensor project to place sensors in the community in former red lined areas and areas impacted by urban renewal to determine impacts and to generate more data that will be useful for the community during air pollution events including fires. Assist with proper siting of monitors, quality control, and interpretation of data.
- Continue work with partners as part of EPA Advance program. Goal to reduce pollution of PM2.5 and NOx with projects that also reduce GHGs in accordance with business plan and City and County goals. Focus on fleet or mobile source projects and Energy Efficiency programs with community partners including Electric School Bus project and Energy Efficiency project with breweries. Incorporate equity and environmental justice where possible with emissions reductions projects.
- Partner with Environmental Health to distribute radon test kits during Radon awareness month in January of 2025.
- Work with IT and Buncombe County on digital vision project to develop a plan to digitize Agency files and implement a document management system to digitize and manage incoming files in accordance with an approved plan for public records (that meets state and federal requirements). This will help with modernization efforts, increase data availability to the public, conserve staff resources (once implemented) and put necessary processes in place for future online permitting and report submittal.
- Data modernization will continue with the Accela software. We plan to work with IT to add permitted facilities to this program. This will enable electronic payments for permit fees, improving customer service.
- The Board and Agency staff pride themselves in leading a totally self-funded program. The Board will continue to assess the level of revenues and expenses in FY 2024-2025 and future years, striving to make sound decisions in continuing our financial independence, while fulfilling our mission of protecting local air quality.

Asheville-Buncombe
Air Quality Agency

2024 Annual Summary Report

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Overview and Mission of the Agency

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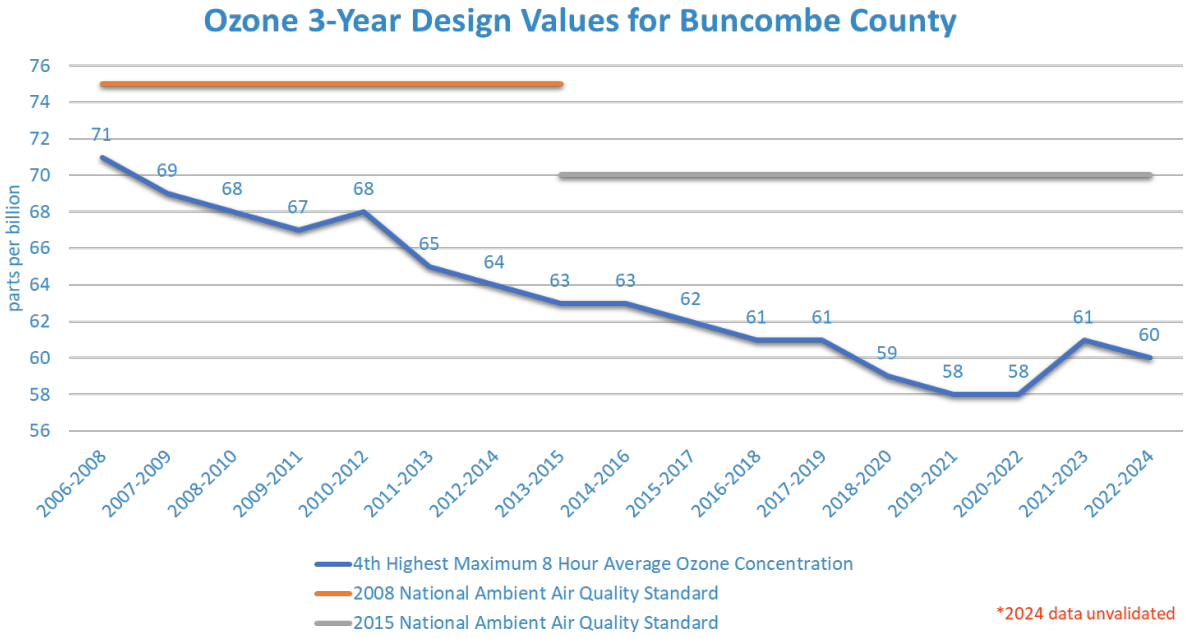
Air Quality Monitoring Data

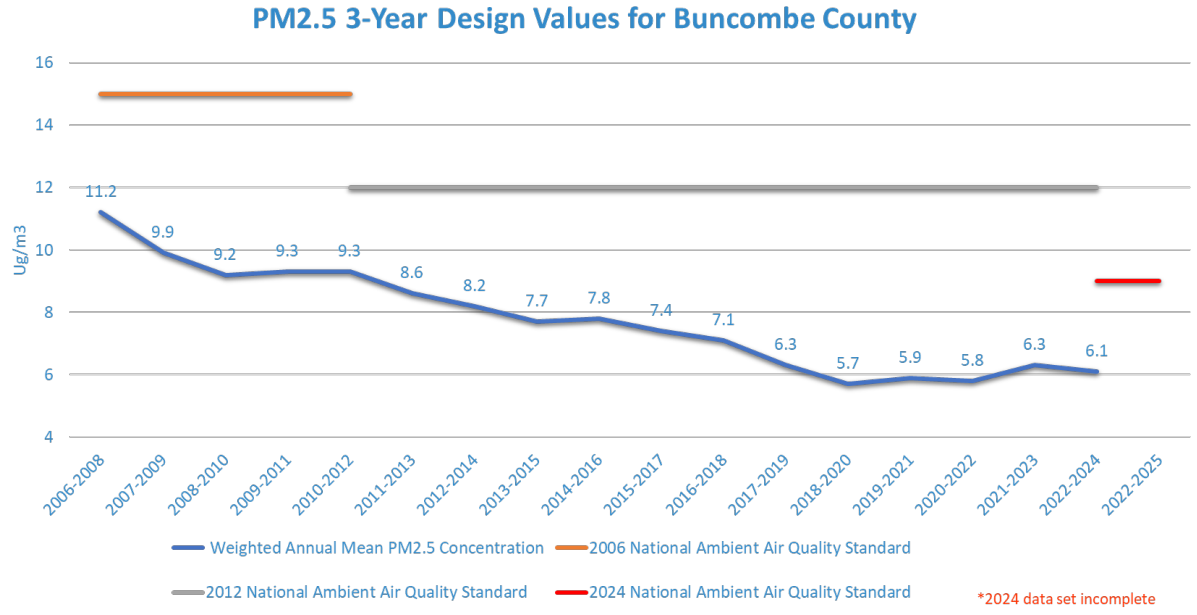
Ozone & Fine Particulate Matter ($PM_{2.5}$)

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Particulate matter (PM2.5) measured at county monitoring site	The 98th percentile 24-hour average	35 micrograms per cubic meter ($\mu g/m^3$)	15.1 $\mu g/m^3$
Particulate matter (PM2.5) measured at county monitoring site	Weighted annual mean	9 micrograms per cubic meter ($\mu g/m^3$)*	6.0 $\mu g/m^3$

*The weighted annual mean standard decreased from 12 $\mu g/m^3$ to 9 $\mu g/m^3$ in February 2024.





Source of Ozone and Fine Particle data: U.S. EPA AirData https://www.epa.gov/outdoor-air-quality-data. AirData reports are produced from a direct query of the AQS Data Mart. The data represents the best and most recent information available to the EPA from state and local agencies.

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The AQI is an index for reporting daily air quality. It tells how clean or polluted the air is, and what associated health effects might be of concern. Here in Buncombe County, the air quality index is based on the two pollutants that we monitor: ground level ozone and fine particles.



Number of Days the AQI was:				
Good (Green)	Moderate (Yellow)	Unhealthy for Sensitive Groups (Orange)	Unhealthy (Red)	Total Number of Days with an AQI in CY2024
243	120	0	0	363

Source of AQI data: U.S. EPA AirData https://www.epa.gov/outdoor-air-quality-data. AirData reports are produced from a direct query of the AQS Data Mart. The data represents the best and most recent information available to the EPA from state and local agencies.

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Clean Air Compliance awards recognize local facilities for their compliance with air quality regulations and standards. The primary qualification for a facility to receive a Clean Air Compliance Award is that it has operated in compliance with all regulations and permit requirements for the calendar year. All sources receiving Notices of Violation or Deficiency from the Agency during the year are excluded from consideration. In addition, the Agency uses several criteria to exclude other facilities from the awards list, including those facilities that have been the subject of verified citizen complaints (e.g., odor, visible emissions, or dust complaints) and those facilities that have been notified regarding deficiencies (e.g. inadequate recordkeeping and reporting, and other permit deviations during the calendar year).

Number of Clean Air Compliance Awards Given Out in 2024	46
Number of Clean Air Excellence Awards Given Out in 2024	1
Recipients of Clean Air Excellence Awards: Green Built Alliance for its Appalachian Offsets Program	

Environmental Management Commission Report Parameters for Calendar Year 2024

Report Item	CY 2024
Number of Staff in Each Program Area (In Person- Years)	
Permitting	2.05
Inspections	2.35
Enforcement	0.35
Monitoring	1.75
Administrative	0.5
Number of Facilities, By Category	
Title V	8
Synthetic Minor	9
Small	55
Stage I Vapor Recovery	151
Dry Cleaners	7
Number of Operating Permits Issued, By Category	
Title V	0
Synthetic Minor	0
Small	3
Number of Construction or Modification Permits Issued, By Category	
Title V	1
Synthetic Minor	3
Small	3
Average Time to Process Each Permit, By Category	
Initial Title V	7 months
Synthetic Minor	1.5 month
Small	1.5 month
Construction	2 months
Have emissions inventories been reported to EPA?	Yes
How many stack tests were observed?	5
How many stack test protocols and reports were received, reviewed, and approved?	6
List Number of CEMs, By Type	
CO	3
CO_2	0
NO_x	2
O_2	3
Opacity	2
SO_2	0
Mercury	0

PM	0
Number of Inspections Performed at Each Source Category	
Title V	7
Synthetic Minor	9
Small	22
Stage I Vapor Recovery	0
Dry Cleaners	0
Number of Full Compliance Evaluations	
Title V	7
Synthetic Minor	9
Small	22
Stage I	0
Dry Cleaners	0
Asbestos Permitting Program	
NESHAP Permits	139
Local Permits	240
City of Asheville Permit Reviews	346
Buncombe County Permit Reviews	144
Number of Staff Available to Perform Compliance Evaluations	
Industrial	5
Asbestos	2
Indoor Air Quality (IAQ)	2
Open Burning, Dust, Odor	7
Number of Violations Found During Inspections	1
Number of Complaints Received	
Industry	5
Asbestos	2
Dust, Odor, IAQ	8
Open Burning	69
Stage I Vapor Recovery	0
Number of Complaints Investigated	
Industry	5
Asbestos	2
Dust, Odor, IAQ	8
Open Burning	69
Stage I Vapor Recovery	0
Number of NOVs, by Type	
Industry – Emissions	1
Industry - Procedural	4
Asbestos	0
Dry Cleaners	0
112(r) Program	0
Open Burning	5

Stage I Vapor Recovery	0
Number of Enforcement Cases Processed	10
Number of SOCs Issued	0
Number of Penalties Assessed	1
Total Amount of Penalties Assessed	$6,644
Total Amount of Penalties Collected	$10,379
Number of FRVs and HPVs Reported to EPA	3
Was compliance status of the facilities updated in ICIS on a regular basis? How often?	Yes, Bi-Monthly

The Agency submits 100% of all collected penalties to the local school system.

Additional Highlights for Calendar Year 2024

Hurricane Helene-Related Activities

In late September of 2024, Hurricane Helene devasted Western North Carolina. Buncombe County's normal operations were halted for about a month so that county employees could instead work at water distribution sites, care shelters, emergency response, and anything else that was needed.

Once normal operations resumed, the Asheville-Buncombe Air Quality Agency immediately reached out to permitted facilities that were damaged, started damage assessments in Buncombe County and City of Asheville, started quickly processing demolition permits, and prepared for the uptick in debris burning. There were about 100 demolition permits that came through that were Helene related from the end of September to December 31, 2024, and the number continues to rise through 2025. About 3,800 damage assessments were completed by Buncombe County. Seventeen permitted Stage I facilities were damaged.

To prepare for the increase in smoke in the area, the Agency borrowed two EBAMs (mobile PM2.5 monitors) from DEQ (North Carolina's Division of Air Quality) and eight Purple Air sensors from the EPA as part of a loan program granted to DEQ (Environmental Protection Agency). These non-regulatory monitors and sensors were strategically placed in areas of the county that were damaged and did not have sufficient PM coverage (See figure below). It was estimated that 10 million cubic yards of debris needed to be collected and disposed of in Buncombe County. One solution to this was for companies to bring in Air Curtain Incinerators (ACIs). The agency granted permission to operate for four ACIs, and one of our Title V facilities brought in one as well (see figure below). The damage from Hurricane Helene was immense, and Buncombe County will be working on recovery-related efforts for years to come.

Helene AQ response

Locations of ABAQA temporary monitors

2 views

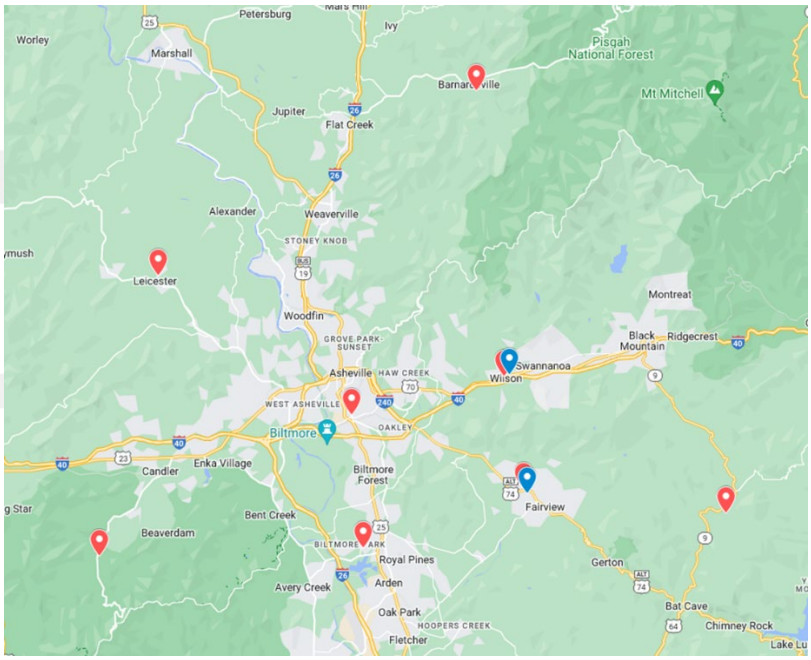
Last edit was 12 days ago

Add layer Share Preview

Untitled layer

Individual styles

- Leicester Library (PA)
- Barnardsville FD (PA)
- Upper Hominy Fire (PA)
- Biltmore Village (PA)
- Art Space (PA)
- ARO (EBAM)
- Skyland Library (PA)
- Fairview Library (PA)
- Fairview Elementary (EBAM)
- Broad River FD (PA)



Buncombe County ACI locations

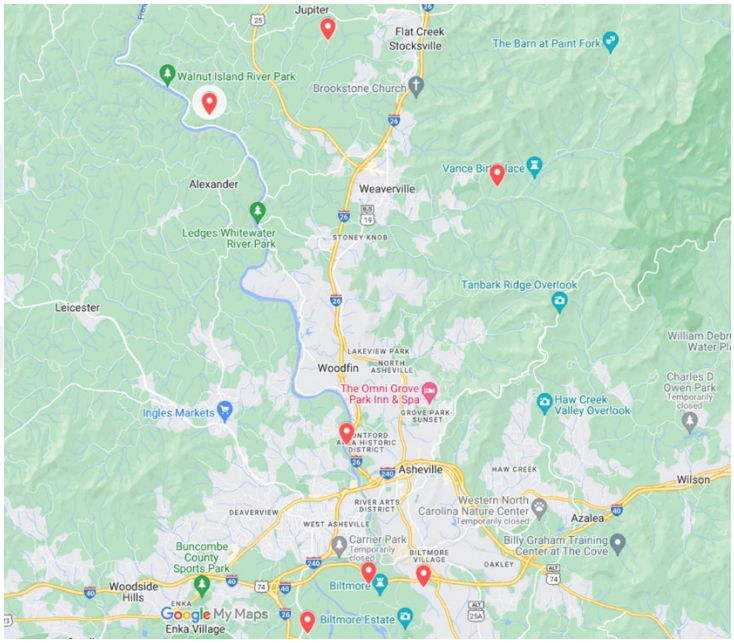
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ACI Locations

Individual styles

- North End Stump and Brush
- Riverside Stump Dump
- SDR Town of Weaverville
- Biltmore Estate SawMill
- Biltmore Estate Stump Dump
- Biltmore Estate Brevard Road
- Buncombe County Landfill



Education & Outreach and Voluntary Program Initiatives

In addition to our core duties including the implementation of our monitoring, permitting, and enforcement programs, below is a list of Education & Outreach and Voluntary Initiatives activities that were accomplished.

- **Radon Awareness Month - January 2024**
  A press release (announcement on website and social media) was sent out to promote Radon Awareness Month. NC Radon program had a limited amount of test kits to give away. Promoted testing and where to buy an inexpensive kit.

- **NC DAQ Annual Air Quality Monitoring Workshop**
  Local Air Quality Program Update
  James Raiford
  February 7, 2024

- **Air Quality Monitoring Station and Sensor Shelter Meeting**
  Buncombe County Board of Education-Nesbitt Discovery Academy
  Ashley Featherstone, James Raiford, Kevin Lance, Johanna Cano (CAPE)
  Meeting with BOE and Nesbitt faculty about Educational Display with School
  February 20, 2024

- **Clean Air Excellence Awards**
  Press Release Taking Nominations
  February 28, 2024

- **Buncombe County Environmental and Energy Stewardship Subcommittee Meeting**
  Electric School Bus Update
  Ashley Featherstone
  March 15, 2024

- **Air Quality Action Day Story on Website**
  CAPE
  April 30, 2024

- **Air Quality Awareness Week**
  May 6-10, 2024
  Proclamation from Board of Commissioners
  Proclamation presented to Agency at BOC meeting on May 7, 2024
- **Asheville-Buncombe Sustainable Microbrewery Initiative (2023-2024)**

Partnership with EPA Advance Program, UNC Asheville, Land of Sky Waste Reduction Partners and Four Local Breweries: Cellarest Beer Project, Hi-Wire Brewing, River Arts District Brewing and Wicked Weed Brewing
Asheville Beer Week, May 21, 2024
Brewing some Good for the Environment
Participated in round table function to promote Energy Star Treasure Hunts at breweries, media outreach
Presented to National EPA Advance Partners
April 24, 2025

- **Clean Air Excellence Awards**
  Appalachian Offsets Program of Greenbuilt Alliance was recognized. Did story for CAPE for website, also picked up by Asheville.com.
  https://www.asheville.com/news/2024/07/asheville-buncombe-air-quality-agency-presents-2024-air-quality-excellence-awards/
  July 11, 2024

- **Air Quality and Open Burning News Stories Post Hurricane Helene**
  Numerous stories on County Website and Air Quality Website
  First ran October 18, 2024, updated regularly
  Air Quality Concerns Related to Tropical Storm Helene.
  https://www.buncombenc.gov/CivicAlerts.aspx?AID=163
  Open Burning in Response to Tropical Storm Helene
  https://www.buncombenc.gov/CivicAlerts.aspx?AID=203
  Press Conference Statements about burning issued October 17, 2024

- **Asheville Watchdog**
  Buncombe Air Quality Post-Helene Has not been Greatly Affected by Dust, but Smoke Risk Rises, Agency Says
  Ashley Featherstone Interview
  November 1, 2024. Story ran November 13, 2024
  https://avlwatchdog.org/buncombe-air-quality-post-helene-has-not-been-affected-greatly-by-dust-but-smoke-risk-rises-agency-says/

Accomplishments

- Worked with NC DAQ and EPA to install and operate between 8 and 10 Purple Airs and an EBAM for non-regulatory PM monitoring post Helene. Purpose was to monitor and increase public awareness about potential for increased PM pollution from debris burning, clean up and rebuilding, etc.
- Completed a reorganization of the agency that included filling positions of 2 senior staff and hired a new staff member in a position that had been vacant for several years.
- Purchased additional air quality monitoring equipment with one-time funds from EPA grants (ozone and PM monitoring equipment, a nasal ranger, and a Ford F150 Lightning to replace our 18-year-old diesel truck).
- Adopted a nondiscrimination policy and procedures as required of federal grant recipients and posted it to our website.
- Received a proclamation from Buncombe County Government for Air Quality Awareness Week.
- Participated in a recognition ceremony and roundtable and continued to promote the Asheville-Buncombe Sustainable Microbrewery Initiative with local breweries. This included continuing to work with a UNCA McCollough Fellow, and hiring an intern who made more progress with the program until it was discontinued due to Helene impacts.
- Finalized and made available procedures for residents to use our Citizen Science Shelter at the Buncombe County Board of Education.
- Continued partnership with UNCA on air quality sensor project that is looking at quantifying any disparities in pollution levels in the community related to historical red lining practices.
- Worked with Buncombe County on outreach and damage assessments, processed over 100 building demolitions related to Helene during the last 3 months of the year.
-

Upcoming Goals

- Establish and begin operating an additional ground level ozone monitoring site at AB Tech, as required by EPA based on population for our area.
- Continue to maintain data completeness and increase cross training for air quality monitoring equipment that is part of the national network for determining compliance with national standards.
- Work with IT to add permitted facilities to Accela and begin taking electronic payments from permitted facilities.

- Submit file retention policy and file digitization plan to state for approval. This is necessary for moving towards electronic permits for industrial facilities and will increase access to emissions and compliance data for residents.
- Continue Partnerships with UNCA including low-cost air sensors in community at Asheville City Schools.
- Continue to increase community outreach related to Helene-Air Quality Index and temporary monitors, open burning and storm debris burning, indoor air hazards including asbestos, lead, and mold.
    - Continue with Neighborhood and Built Environment Workgroup with the Department of Health and Human Services.
- Complete Community Engagement Policy for permitted facilities.
- Increase outreach and provide EPA Burn Wise materials for fire wood banks that formed in Buncombe County post Helene.
- Put up an educational display at the Community Science Shelter and Air Quality monitoring site
- Work with Strategy and Innovation to review and improve agency processes and improve customer service to regulated community and residents.
- Increase community engagement and language access resources.

Asheville-Buncombe Air Quality Agency Facility Inspection Report

Facility Inspection Information					
Facility Name:	City of Asheville Water Resources Department - DeBruhl Water Treatment Plant				
Date of Inspection:	August 5, 2025		**Last Inspected:**	September 9, 2024	
Mailing Address:	1370 Bee Tree Lake Road Swannanoa, NC 28778		**Physical Location:**	1370 Bee Tree Lake Road Swannanoa, NC 28778	
Contact Name:	Judson "Jud" Bledsoe, Oliver Burns		**Phone Number:**	(828)-298-7866	
Contact Email:	jbledsoe@ashevillenc.gov				
Permit #:	11-876-17	**Issued:**	November 13, 2017	**Expires:**	November 30, 2025
Inspector(s):	Alexander (Alex) Latta				
Results:	Appears in Compliance		**Inspection Time:**	1005 Hours	

Introduction

On the above date, a comprehensive inspection was conducted at City of Asheville Water Resources Department - DeBruhl Water Treatment Plant. The purpose of this inspection was to determine compliance under the Asheville-Buncombe Air Quality Agency Air Quality Code (AB Air Quality Code). City of Asheville Water Resources Department - DeBruhl Water Treatment Plant, otherwise known as the facility, is a municipal water treatment plant. Operation of this facility is granted under permit number 11-876-17 which was issued on November 13, 2017, and expires on November 30, 2025. The inspection was conducted by Alex Latta. The facility was represented by Oliver Burns as the main contact Judson "Jud" Bledsoe was on vacation. The following is a summary of the inspection results:

Safety Equipment / Special Instructions

Hearing protection is recommended while the generator is operating. Steel-toed boots, a safety vest, and safety glasses may be needed if walking through the treatment plant.

Permitted Equipment

- ES-1: One (1) Cummins Model DFEH diesel-fired emergency-use generator with a rated output capacity of 400 kilowatts

ES-1 was observed in operation during the inspection. Post run, the hour meter reading was 1009.6 hours. Facility representatives noted the generator is scheduled to run every Tuesday at 10:00 AM.

Exempt Sources:

The following exempt equipment was observed during the inspection:

- One (1) 2,380-gallon sodium bicarbonate storage silo with emissions controlled by one (1) U.S. Filter Baghouse
- One (1) 8,000-gallon aboveground sodium hydroxide (caustic soda) storage tank
- One (1) 8,000-gallon aboveground zinc orthophosphate (phosphate) storage tank
- One (1) 4,500-gallon aboveground hydrofluosilic acid (fluoride) storage tank. It should be noted this tank is listed as 8,000-gallons on the permit, but, according to facility representatives, the 8,000-gallon tank has been replaced with a temporary smaller tank.
- One (1) 4,500-gallon aboveground sodium hypochlorite storage tank. It should be noted this tank is listed as 8,000-gallons on the permit, but, according to facility representatives, the 8,000-gallon tank has been replaced with a temporary smaller tank.
- One (1) 600-gallon aboveground diesel fuel storage tank.
- One (1) 275-gallon aboveground diesel fuel storage tank.

During the inspection, facility personnel mentioned that the hydrofluosilic acid (fluoride) and sodium hypochlorite storage tanks both broke which resulted in the facility using smaller 4,500-gallon temporary tanks while the facility works to procure new tanks. Facility representatives noted that the new hydrofluosilic acid (fluoride) tank is expected to be 8,000 gallons and the new sodium hypochlorite tank is expected to be 10,000 gallons. As of the inspection, the facility was still using the temporary 4,500 gallon storage tanks.

Permit Conditions:

The following does not represent all permitted conditions, only the permit conditions that are directly relevant to the inspection. For all the conditions, please review the permit.

- **A.7 – This condition requires that the permittee maintain and operate the facility at all times so that the overall reduction in air pollutants, in accordance with applicable standards, is achieved. The facility has developed a maintenance schedule for equipment and is maintaining records of all maintenance. Additionally, the facility is maintaining an inventory of spare parts for equipment. The facility has established standard operating procedures for equipment and is training equipment operators on the procedures.** *The unit is serviced by Cummins. The most recent service inspections by Cummins occurred on August 26, 2024 and May 6, 2025. The reports shows no major issues were noted. The generator received its annual maintenance on May 6, 2025. During this service, a load test was conducted as well as an oil change and the air filters were changed.*
- **A.8 – This condition requires that the facility notify the Agency in the event of a malfunction.** *The facility has not experienced any malfunctions during the reporting period.*
- **A.11 – This condition requires that the facility pay their annual permit fee on a timely basis.** *The facility is up-to-date on fee payments. The facility last submitted their fee payment on January 21, 2025.*
- **A.12 – This condition states that the facility is required to submit a permit renewal request no later than ninety (90) days prior to permit expiration.** *The facility submitted their permit renewal request on July 31, 2025.*
- **A.14 – This condition requires the facility retain a copy of the permit on the premises.** *The facility had a copy of their current operating permit on-site.*
- **B.2 – This condition states the facility shall be operated to prevent odorous emissions from being emitted beyond the boundary of the facility.** *The facility was not producing any odorous emissions during the inspection.*
- **B.3 – This condition states the facility shall be operated to ensure visible emissions do not exceed 20% opacity over a six-minute average.** *At the time of the inspection, the generator was not exhibiting an opacity during operation.*

- **B.4 - This condition establishes the sulfur dioxide emission limit for the facility.** *The AP-42 SO2 emission factor for diesel fuel combustion is 0.51 lb/MMBtu, and using the required ULSD, the emission factor is 0.0015 lb/MMBtu. Thus, the facility is in compliance.*
- **B.5 – This condition states that equipment ID ES-1 is subject to the general provisions of 40 CFR 60.1 to 60.19 and the standards for compression ignition engines from 40 CFR 60.4200 to 60.4219. As such, the engine shall be certified by the manufacturer. The engine is required to use fuel oil with a maximum sulfur content of 15 ppm and with either a minimum cetane index of 40 or a maximum aromatic content of 35 volume percent. The facility is required to maintain the subject generator according to manufacturer's specifications over the life of the engine. Each subject generator is required to be equip with a non-resettable hour meter. Non-emergency operations are limited to testing and maintenance only as allowed in 60.4211(e) not to exceed 100 hours. Notification must be made to the Agency if the generator operates for more than 100 hours per year for maintenance and testing. Additionally, the facility is required to notify the Agency in the event the generator operates over 500 hours per year, including hours for testing and maintenance.** *The facility maintains fuel certifications showing only ULSD is used in the generator and submits hours operated annually as well as annual fuel use. The generator operated for 70.9 hours in 2024 and used approximately 451.1 gallons of fuel.*
- **B.6 – This condition states that equipment ID ES-1 is subject to the requirements of 40 CFR 63 Subpart ZZZZ.** *The facility is meeting the requirements of this subpart by meeting the requirements of condition B.5.*
- **B.7 – This condition requires the facility to submit annual reports by February 15th.** *The facility is submitting annual reports as required. The most recent annual report was postmarked on February 14, 2025, received February 18, 2025, and contained all the required information. The facility used 451.1 gallons of fuel during 2024. The generator operated for 70.9 hours during 2024.*

Compliance History:

The facility does not have any history of recorded violations in the last five (5) years.

Conclusion:

Based on the above information, City of Asheville Water Resources Department - DeBruhl Water Treatment Plant appears to be in compliance with all applicable regulations of the AB Air Quality Code. It is recommended that this permit be renewed.

Signature: _____ **Date:** 8/29/25

Reviewer Signature: _____ **Date:** 10/30/25

Asheville-Buncombe Air Quality Agency

Memo

To: Air Quality Board

From: James Raiford, Alex Latta

CC: Ashley Featherstone

Date: November 13, 2025

Re: Permit Amendment for Duke Energy Progress, LLC

In a letter dated December 2, 2024, Duke Energy Progress, LLC proposed emission factors to be revalidated for their Plantwide Applicability Limits (PAL) as required by Permit Condition 2.6.A(2)(b) of Permit No. 11-628-22B. This condition states that the permittee shall revalidate the emission factors for PM and PM-10 emissions through performance testing or other scientifically valid means once every five years after the issuance of the PAL Permit (Permit No. 11-628-16B issued May 18, 2020).

Asheville-Buncombe Air Quality Agency reviewed the proposed emission factors submitted for revalidation and responded on December 18, 2024 (see letter for additional information). The Agency followed the guidance for revalidation set forth by the United States Environmental Protection Agency's (EPA) memorandum issued on August 4, 2020 by Anne L. Austin.

For Units 5 and 7 when burning natural gas, the facility submitted the same emission factors that were originally part of the PAL permit and were based on vendor specifications. The Agency did not believe that the proposed factors for Units 5 and 7 met the definition of contemporaneous, and we requested that a performance test be conducted to revalidate the emission factor for combusting natural gas in Units 5 and 7.

For Units 5 and 7 when burning oil, and for the remaining auxiliary equipment (Auxiliary Boiler, Emergency Generators, Fire Pump Engine, Dew Point Heaters, Cooling Towers, Gas Heaters, Ash Handling and Haul Roads), the Agency accepted the proposed emission factors since they are not significant sources of particulate matter emissions. Units 3 and 4 were recently tested and the emission factors for those units will not change.

The facility submitted the required notification to conduct testing on January 29, 2025. On February 27, 2025, Duke Energy Progress, LLC performed the required five year revalidation

testing which changed the permitted natural gas emission factors for Units 5 & 7 from 6.20 lb/hr to 10.82 lb/hr. This permit amendment changes this emission factor in the table found in condition 2.6.A(3)(a), which is used to calculate emissions for comparison with the PAL emissions limit. The facility submitted a complete application to change these emission factors on April 22, 2025, and included the required administrative amendment permit fee.

Conclusions, Comments, and Recommendations.

I recommend that the Board approve the permit amendment to update the emission factor for the PAL limit.

Signature: James C. Raiford **Date**: 11/13/2025

Director Signature: Ashley J Featherstone **Date:** 11/13/2025

Asheville-Buncombe Air Quality Agency
APPLICATION REVIEW SUMMARY

SECTION A: FACILITY INFORMATION			
Company Name:	Asheville Affordable Tree Men		
Site Name:	Char Yard		
Mailing Address:	46 English Road, Candler, NC 28715		
Site Address:	1239 Charlotte Highway, Fairview NC 28730		
General Description of Business:	Tree Cutting Business Operating a Wood Waste Management Yard		
Facility Classification:	Title V	**Site Status:**	New

SECTION B: APPLICATION INFORMATION			
Date Of Application:	September 25, 2025	**Application Tracking No.:**	N/A
Date Complete Application Received:	October 8, 2025	**Board Meeting Date:**	November 20, 2025
Confidentiality Requested?	No	**Board Agenda Type:**	New
Application Results:	The purpose of this review is to issue a general TV permit for an air curtain incinerator subject to NSPS CCCC.		
Permit No. / Date Issued by Application:	11-925-25 / November 20, 2025		
Permit No. / Date Voided by Application:	N/A		

SECTION C: REGULATORY INFORMATION	
AB Air Quality Regulations:	4.0524, 4.1904, 17.0500, 17.0509, 17.0510

SECTION D: FACILITY-WIDE EMISSIONS INFORMATION		
Pollutants Reviewed as a Result of this Application or AB Air Quality Action:	**Actual Emissions (TONS/YR) [1]**	**Potential Emissions (TONS/YR) [1]**
PM-Total	--	12.93
PM-10/PM-2.5	--	5.17
SO_2	--	1.00
NO_X	--	11.27
CO	--	24.19
VOC	--	10.21
Greenhouse Gases (GHG), $CO2_e$	--	30,337.4
All Hazardous Air Pollutants (HAPs)	--	0.002
List all HAPs >10TPY of potential emissions	None	

***Emission numbers denoted with an (*) reflect "controlled" emissions (i.e. emissions reduced by a pollution control device). [1]Potential emissions reported to be <100 are capped at those levels with federally enforceable permit limits.**

IN COMPLIANCE WITH EMISSION STANDARDS / RECOMMEND APPROVAL			
Prepared By:	James C. Raiford/ James C. Raiford	**Date Completed:**	11/12/2025
Reviewed By:	Ashley J. Featherstone/	**Date Reviewed:**	
Director:	Ashley J. Featherstone/ Ashley J Featherstone	**Date Approved:**	11/13/2025

SECTION A DETAILS

FACILITY INFORMATION

[Detailed discussion of any items in Section A]

Asheville Affordable Tree Men has applied for a general Title V permit to operate an air curtain incinerator at the address listed above. The facility is a tree cutting and trimming business and plans to operate the incinerator to dispose of excess tree waste. Specifically, they are a commercial wood-waste management yard with an air curtain incinerator handling only wood waste/clean lumber/yard waste from land-clearing operations. No municipal solid waste, treated/painted wood, or prohibited materials. They plan to operate no more than 8 hours per day.

In April of 2025, they requested to operate the ACI to dispose of storm debris from Helene. The agency granted permission for this operation for several weeks in accordance with the disaster declaration and EPA's no action assurance letter. Agency staff observed the site in July. The owner has indicated that they have completed storm debris processing and would like to continue to operate the unit to process wood waste going forward.

The agency submitted a draft general permit for air curtain incinerators to EPA for review and also issued a public notice for the general permit on August 1, 2019. General permits for owners and operators can be issued without going back to notice and EPA review, as described below. NC DAQ has modified their state burning regulations after our initial public notice was issued. Permit condition 2.1A.2.(f) contains a requirement that has been removed from the state rule. The agency is in the process of updating our rules and will issue a revised general permit to public notice to reflect the update.

Information for the General Title V Permit:

An air curtain incinerator (ACI) means a stationary or portable incinerator that operates by forcefully projecting a curtain of air across an open, integrated combustion chamber (fire box) or open pit or trench (trench burner) in which combustion occurs. Incinerators of this type can be constructed above or below ground and with or without refractory walls and floor. Air curtain incinerators are different from conventional combustion devices which typically have enclosed fireboxes and controlled air technology such as mass burn, modular, and fluidized bed combustors.

Section 129 of the Clean Air Act directs the Environmental Protection Agency's (EPA) Administrator to develop regulations under Section 111 of the Act limiting emissions of nine air pollutants (i.e., particulate matter, carbon monoxide, dioxins/furans, sulfur dioxide, nitrogen oxides, hydrogen chloride, lead, mercury, and cadmium) from four categories of solid waste incineration units: municipal solid waste; hospital, medical and infectious solid waste; commercial and industrial solid waste; and other solid waste. EPA promulgated the New Source Performance Standards (NSPS) and Emission Guidelines (EG) to reduce air pollution from commercial and industrial solid waste incineration (CISWI) units, under Subparts CCCC and DDDD. Those standards and guidelines apply to incinerators, also known as CISWI units, used by commercial and industrial facilities to burn non-hazardous solid waste. NSPS Subpart CCCC applies to new CISWI units that commenced construction after June 4, 2010, or that commenced reconstruction or modification after August 7, 2013 while NSPS Subpart DDDD applies to existing CISWI units.

An air curtain incinerator is a CISWI unit that shall meet certain provisions of NSPS Subpart CCCC if the following conditions are met. Pursuant to 40 CFR 60.2020, air curtain incinerators that burn only the materials listed in paragraphs (1) through (3) below are only required to meet the requirements under ''Air Curtain Incinerators'' (40 CFR 60.2245 through 60.2260)

(1) 100 percent wood waste: *Wood waste means untreated wood and untreated wood products, including tree stumps (whole or chipped), trees, tree limbs (whole or chipped), bark, sawdust, chips, scraps, slabs, millings, and shavings. Wood waste <u>does not</u> include: Grass, grass clippings, bushes, shrubs, and clippings from bushes and shrubs from residential, commercial/retail, institutional, or industrial sources as part of maintaining yards or other private or public lands, construction, renovation, or demolition wastes, or clean lumber.*

(2) 100 percent clean lumber: *Clean lumber means wood or wood products that have been cut or shaped and include wet, air-dried, and kiln-dried wood products. Clean lumber <u>does not</u>*

include wood products that have been painted, pigment-stained, or pressure-treated by compounds such as chromate copper arsenate, pentachlorophenol, and creosote.

(3) 100 percent mixture of only wood waste, clean lumber, and/or yard waste. *Yard waste means grass, grass clippings, bushes, shrubs, and clippings from bushes and shrubs. They come from residential, commercial/retail, institutional, or industrial sources as part of maintaining yards or other private or public lands.*

Also, the owner or operator of each CISWI and air curtain incinerator (ACI) shall apply for and obtain a Title V operating permit pursuant to 40 CFR 60.2242 as required by Section 129(e) and Title V of the Clean Air Act.

Therefore, air curtain incinerators shall be subject to AB Air Quality Code 17.0500, Title V Procedures. The owner or operator of a new ACI as defined above and in 40 CFR 60.2015 that meets the requirements in 40 CFR 60.2020(i) shall obtain a General Title V Operating Permit pursuant to AB Air Quality Code 17.0509 Permitting of Numerous Similar Facilities. Pursuant to AB Air Quality Code 17.0509, the Director may issue, after notice and opportunity for public participation provided in AB Air Quality Code 17.0521, a permit to cover numerous similar facilities or sources.

The purpose of this engineering review is to evaluate the rules and standards applicable to the commercial air curtain incinerators that burn 100 percent wood waste, 100 percent clean lumber, and 100 percent mixture of only wood waste, clean lumber and/or yard waste.

SECTION B DETAILS

APPLICATION INFORMATION

[List all emission sources (permitted and exempt) reviewed as a result of this application, their associated control devices and pollutants. Provide a detailed discussion of any other items in Section B at bottom under "Application Notes"]

Emission Source ID	Emission Source Description 1. Type, manufacturer, capacity 2. Control device with ID (if any)	Pollutant(s) Emitted	Miscellaneous Notes
AC1	AirBurners Firebox S119 Air Curtain Incinerator	PM, PM-10, PM-2.5, CO, SO2, NOx, VOC, CO2e	Maximum charge rate of 5 tons per hour. Manufactured in April of 2025. Powered by a 74 Horsepower EPA Tier 4 rated engine.

APPLICATION NOTES

The application fee was receive with the application on September 30, 2025. Facility emailed Buncombe County Planning Department on September 23, 2025 asking for a zoning consistency determination. The Agency has not received a zoning consistency determination from Buncombe County planning, but fifteen days have elapsed since the email and therefore fulfills the requirement that the zoning authority is notified. Specific Condition 2.E states that the permittee is required to comply with all lawfully adopted local ordinances, and that the local zoning authority is responsible for enforcing those ordinances.

SECTION C DETAILS

REGULATORY INFORMATION

(Identify the AB Air Quality Regulations reviewed because of this application. At a minimum, the regulations already listed should be reviewed and reason given for applicability or non-applicability. If a regulation has a standard, list the standard and indicate how the source is in compliance.)

AB Air Quality Regulation Number / Title	Emission Source ID No(s). Subject	Notes on Regulation (Compliance demonstration, applicability, etc.)
17.0500 – Title V Procedures	NA	Title V does apply to this facility at this time. Calculated potential emissions for this facility are below Title V permitting thresholds, however, Section 129(e) and Title V of the Clean Air Act require the owner or operator of each CISWI and air curtain incinerator (ACI) to apply for and obtain a Title V operating permit pursuant to 40 CFR 60.2974.
4.0524 – New Source Performance Standards	AC1	NSPS does apply to this facility. This facility is subject to 40 CFR Part 60 Subpart CCCC "Standards of Performance for Other Solid Waste Incineration Units for Which Construction is Commenced After June 4, 2010, or for Which Modification or Reconstruction is Commenced on or After August 7, 2013". Visible emissions are limited to 10 percent opacity (6-minute average), except 35 percent opacity (6-minute average) during the startup period that is within the first 30 minutes of operation. EPA Method 9 testing for opacity is required initially and annually.
4.1904 – Air Curtain Burners	AC1	Air quality permits are required for air curtain burners subject to 40 CFR Part 60 Subpart CCCC 60.2245 through 60.2260. WNCRAQA Code 4.1904 has several work practice standards that apply, including a setback requirement of 300 feet from the nearest occupied dwelling not located on the property where the burning is conducted.
4.1806 – Control and Prohibition of Odorous Emissions	AC1	The facility must not cause or contribute to objectionable odors beyond the facility's boundary.

REGULATORY NOTES

17.0509 Permitting of Numerous Similar Facilities

Air curtain incinerators are very similar facilities with regard to operation and resulting emissions, and therefore may be granted a General Title V Permit by the Director in accordance with AB Air Quality Code 17.0509 below.

17.0509 Permitting of Numerous Similar Facilities

(a) The Director may issue, after notice and opportunity for public participation provided in Rule .0521 of this Section (Title V Procedures), a permit to cover numerous similar facilities or sources.

(b) The Director shall not issue a permit under this Rule unless the following conditions are met:

(1) There is no unique difference that would require special permit conditions for any individual facility; and
(2) No unique analysis is required for any facility covered under the permit.

(c) A permit issued under this Rule shall comply with all the requirements of this Section.
(d) A permit issued under this Rule shall identify criteria by which facilities or sources may qualify for the permit. To facilities or sources that qualify, the Director shall grant the terms and conditions of the permit.
(e) The facility or source shall be subject to enforcement action for operating without a permit if the facility or source is later determined not to qualify for the terms and conditions of the permit issued under this Rule.
(f) Sources subject to Title IV shall not be eligible for a permit issued under this Rule.
(g) The owner or operator of a facility or source that qualifies for a permit issued under this Rule shall apply for coverage under the terms of the permit issued under this Rule or shall apply for a regular permit under this Section.
(h) The Agency need not repeat the public participation procedures required under Rule .0521 of this Section (Title V Procedures) when it grants a request by a permit applicant to operate under a permit issued under this Rule.

17.0510 Permitting of Facilities at Multiple Temporary Sites
Since air curtain burners are often built as temporary mobile operations, AB Air Quality Rule 17.0510 states that the Director can issue a single permit for operation at multiple temporary sites under the following conditions.

17.0510 Permitting of Facilities at Multiple Temporary Sites

(a) The Director may issue a single permit authorizing emissions from similar operations by the same facility owner or operator at multiple temporary sites.
(b) In order for a facility to qualify for a permit for multiple temporary site under this Rule, the operation must involve at least one change of site during the term of the permit.
(c) Sources subject to Title IV shall not be eligible for a permit under this Section.
(d) Permits for facilities at multiple temporary sites shall include:
(1) identification of each site;
(2) conditions that will assure compliance with all applicable requirements at all authorized locations;
(3) requirements that the permittee notify the Agency at least 10 days in advance of each change of location; and
(4) conditions that assure compliance with all other provisions of this Section.

A condition will be included in the permit to require that the permittee notify the agency at least 10 days in advance of each change of location and obtain a zoning consistency letter for each location.
North Carolina General Statute § 143-215.108(f) requires that applications for air quality permits for new or expanded facilities include a request for a zoning consistency determination.

4.1904 Air Curtain Burners
Chapter 4.1904(b)(5) requires dispersion modeling analysis to be performed to protect the ambient air quality standard and prevention of significant deterioration (PSD) increment for particulate. This modeling analysis was performed by James Raiford of this Agency via memorandum on November 11, 2025. This modeling shows compliance with the total solid particulate state standard, and the PM10 and PM2.5 National Ambient Air Quality Standards. While the PM2.5 modeling number was close to the 24 hour national standard, it was conservatively modeled assuming 24 hours of operation. This facility is limited to operating for only 10 hours a day per Chapter 4.1904(c)(4), so compliance with the standards is expected. See the table below. The modeling demonstration is documented here and not included in the general permit.

Pollutant	Averaging Period	Background Concentration ($\mu g/m^3$)	Modeled Impact ($\mu g/m^3$)	Total ($\mu g/m^3$)	AAQS ($\mu g/m^3$)	% AAQS
PM2.5	24-hour	16	17.95	33.95	35	97.00%
	Annual	6.1	1.75	7.85	9	87.22%
PM10	24-hour	12.4	25.22	37.62	150	25.10%
TSP	24-hour	--	98.24	98.24	150	65.49%
	Annual	--	2.22	2.22	75	2.96%

SECTION D DETAILS				
EMISSION INFORMATION				
Calculation Method Codes (List all that apply)	**1 = Stack test result** **2 = Material (mass) balance** **3 = EPA approved information (AP-42, CTG, etc.)** **4 = Other (specify in table below)**			
Calculation Rejection Codes (List all that apply)	**1 = Calculation error** **2 = Wrong emission factor(s) used** **3 = Control efficiency(ies) not accepted** **4 = Other (specify in table below)**			
Emission Source (ID No.)	**Calculation Method Code**	**Accept or Reject?**	**Calculation Rejection Code**	**AB Air Quality Calculations Attached?**
AC1	3,4	NA	NA	Yes

EMISSION NOTES

Emissions calculations come from two sources: San Joaquin Valley APCD, and USDA Forest Service. SJV APCD was used for PM, SO_x, NOX, CO and VOC, while Greenhouse Gas emissions were obtained from USDA Forest Service. Emissions were also calculated for the engine using AP-42.

Total emissions included those from the internal combustion engine.

SECTION E

SUPPORTING DOCUMENTATION

(Provide brief description of any attachments)

1. Draft of permit
2. Emissions estimates prepared by agency staff
3. Permit application and copy of check for fee
4. Zoning consistency email
5. Modeling Memo