Asheville-Buncombe Air Quality Agency

MEMORANDUM

TO: Asheville-Buncombe Air Quality Agency Board of Directors

FROM: Ashley Featherstone, Director

RE: Agenda for May 14, 2026

DATE: May 7, 2026

Enclosed, please find the Agenda for the Asheville-Buncombe Air Quality Agency Board meeting to be held on **Thursday May 14, 2026 at 4:00pm** in the board meeting room located at 35 Woodfin 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.

ASHEVILLE-BUNCOMBE AIR QUALITY AGENCY BOARD OF DIRECTORS
TENTATIVE AGENDA
MAY 14, 2026 BOARD MEETING

1. **Public Comment Protocol Announcement**

2. **Adjustment and Approval of Agenda**

3. **Consent Agenda:**
   A. Approval of minutes from March 26, 2026

4. **Unfinished Business:**
   A. Consideration of FY27 Budget

5. **Director's Report:**
   A. Update on Program Transition
   B. Rule Amendments Update
   C. EPA Air Curtain Incinerator Proposed Rule Change
   D. Clean Air Compliance Awards
   E. Clean Air Excellence Awards
   F. Recognition for WNC Post Helene Air Quality Monitoring Project and AQIQ Contest winners - July
   G. Monitoring Update
   H. Facility Permit Renewals

Facility Name	Type of Facility	Facility Classification	Location	Changes from Existing Permit
Freudenberg Performance Materials	Non-woven and geosynthetic fiber manufacturing facility	Title V	Sand Hill Road, Enka	Removal of propane as a backup fuel. Updates to the equipment list and condition for emergency engine requirements.

   I. New Permits

Facility Name	Type of Facility	Facility Classification	Location	Proposed Equipment
Taylor Frizsell dba Bee Tree Disposal	Solid Waste Facility	Title V	Warren Wilson Road, Swannanoa	Air Curtain Incinerator

6. **New Business:**
   A. None

7. **Other Business:**
   A. Legal Counsel Report
   B. Advisory Committee Report
      i. Committee met April 30, 2026
   C. Calendar
      i. Next meeting June 24, 2026
      ii. July Meeting-reschedule for after July 9
   D. Announcements

8. **Public Comment**

9. **Adjournment**

Asheville-Buncombe Air Quality Agency

MEMORANDUM

TO: Asheville-Buncombe Air Quality Agency Board of Directors

FROM: Ashley Featherstone, Director

RE: Minutes for March 26, 2026

DATE: May 7, 2026

Enclosed, please find the Minutes for the Asheville-Buncombe Air Quality Agency Board meeting held on **Thursday March 26, 2026 at 4:00pm**. The next meeting is scheduled for **Thursday May 14, 2026 at 4:00pm** in the meeting room located at the board meeting room located at 35 Woodfin 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.

The Asheville-Buncombe Air Quality Agency Board of Directors met on Thursday, March 26, 2026, in the board meeting room at the at 35 Woodfin Street, Asheville, N.C.

The attendance of the Board members was as follows:

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

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

Others Present: *Suzanne Avett, County Attorney; Samantha Kirk, CAPE; Drew West, CIBO*

Suzanne Avett called the meeting of the Asheville-Buncombe Air Quality Agency Board of Directors to order on March 26, 2026, at 4:08 pm.

The order of business was as follows:

Suzanne Avett stated that we are without our Board chair and Board vice chair, therefore the board members will need to elect a chair for today's board meeting.

A. Ned Guttman made the motion to elect Garry Whisnant.
B. Caitlin Cook seconded the motion.
C. All present – yes
D. The motion passed 3-0

1. Public Comment Protocol Announcement

E. Garry Whisnant read the public comment protocol.

2. Adjustment and Approval of Agenda

A. Revised agenda approval – item A
B. Ned Guttman made the motion to approve the agenda.
C. Caitlin Cook seconded the motion.
D. All present – yes
E. The motion passed 3-0

3. Consent Agenda

A. Approval of minutes from February 3, 2026
B. Ned Guttman made the motion to approve the minutes.
C. Catlin Cook seconded the motion.
D. All present – yes
E. The motion passed 3-0

4. Unfinished Business

A. Buncombe County Reduce to Rebuild Program

i. Ashey Featherstone said we have completed a public notice period of 30 days for this program fee change. We did not receive any public comments. Staff are recommending that we adopt that change. In this latest version, we did reference the Reduce to Rebuild Program, rather than putting a sunset date, so we will not have to go through rulemaking if the county decides to extend the program again.

ii. Ned Guttman made the motion to adopt the rule change to reduce certain permit fees related to Hurricane Helene, in line with Buncombe County's Reduce to Rebuild Program.

iii. Catlin Cook seconded the motion.

iv. All present – yes

v. The motion passed 3-0.

5. Director's Report

A. Buncombe County Budget Retreat Recommendation and Next Steps

i. Ashley Featherstone said the Buncombe County Board of Commissioners (BOC) had a budget retreat on Tuesday, March 24th, 2026. During the budget retreat, county staff presented their recommendation to bring the Air program under the county. The recommendation was received favorably by the BOC. There was no final action. The next step is there will be additional budget retreats. The Public Hearing on the budget will be on May 19th. The BOC will vote on the budget on June 2nd, and it will be determined then if we are officially included in the county budget.

ii. Ned Guttman asked, if the county moves forward with this and includes us in their budget, will we have any say in the budget?

1) Ashley Featherstone said that this is actually something that will be further determined in the transition process. Part of the transition process is that the current Governing Board will become an Advisory Board or Air Quality Commission, and as a part of that, members could make recommendations to the BOC for the Air Quality Program's budget. Staff were told to present our "first pass" budget to our current Board with the understanding that things could change. But even if the Board is reformed and the Air Program goes under the governance of the county BOC, staff would still be presenting the budget to the Advisory Board every year.

iii. Ashely Featherstone expects that, by the time our budget approval process is supposed to start in May, the process may look different.

iv. For next steps, we could have to be recertified as an air quality program by the North Carolina Environmental Management Commission (NC EMC). We are currently in talks with them as far as whether or not we have to get recertified and, if so, what exactly will be required of us.

1) We will probably have to be recertified, which the timeline for that will revolve around their scheduled meetings in May and July. They might want us to present our plans in May and come back in July with final actions. It is still to be determined.

2) The County did provide notice to the City of Asheville prior to March 1, 2026, that they did not want to renew their interlocal agreement for a full year. With that, another option that was talked about was to potentially edit the agreement and extend it by a shorter period of time. That would give us more time for the transition.

v. Suzanne Avett said a lot depends on the NC EMC and their guidance on what they would like us to provide. For example, can the county manager write a letter of intent based on the BOC budget retreat, or do they want a formal resolution that has been approved before moving forward with a recertification?

vi. Garry Whisnant said the NC EMC likely does not have a history of how to do this.
   1) Suzanne Avett confirmed and said the closest example was from us reforming after coming out of the previous agreement with Haywood County.

vii. Ned Guttman asked if the county will still operate within the City or if the City would have its own air program.
   1) Ashley Featherstone said that if the Air Program included Buncombe County, that would include all the municipalities, including the City of Asheville. She did say that we have things to work out with the City, such as coordinating demolition and asbestos permits.

viii. Ashely Featherstone said we have created a historical timeline with what was done previously back in 2000. We can use it as a guide, but that doesn't mean it will go exactly the same way.

ix. Ashely Featherstone said that one of the things our agency was doing to prepare back in 2000 was to make sure the rules are updated to align with the State's rules. She said we will talk about that at a different agenda item. We are looking to try to get the rules updated prior to July so, when we are trying to get recertified, we will have updated rules.

x. Ashely Featherstone said we have put together a lengthy timeline, but once we meet with the state next week, we will have a better idea of the timing and how we think things will go.

B. Budget Year FY26 Expenditure Reduction Plan

i. Ashley Feathersone said, per our last meeting in January where we talked about restricted funds vs unrestricted funds, and how our unrestricted funds were quite lower than what we were calling our fund balance, staff have put together an Expenditure Reduction Plan to make sure we do not spend over that $27K that is available for our fund balance. Items included in the reduction plan include:
   1) We have contingency funds that we do not plan to use
   2) Not filling the vacant position this fiscal year will save us $35K
   3) The biggest item we are putting off is the ozone site. We are putting that off until this summer, after the new fiscal year begins. We were planning to spend around $35K on the site this year.
   4) Other items were things we likely weren't going to spend anyway. For example, Credit Card Processing fees are now paid for by the client, and the File Digitization Project we are not ready to complete.

ii. Even with the Expenditure Reduction Plan, we have enough money for office supplies and other items like that.

iii. We also usually underestimate revenues, so we increased those amounts to more realistic numbers in our estimates.

iv. Garry Whisnant asked what the driver was behind the new ozone monitoring site.

1) Ashley Featherstone explained that Haywood County was removed from the MSA, and that meant that suddenly we would have to add another ozone site based on our population.
2) Steve Ensley confirmed this and said that it is an EPA requirement.

v. Garry Whisnant asked if we cover our entire MSA, or if the North Carolina Department of Air Quality (DAQ) also has some of it.
1) Ashley Featherstone said that DAQ does have some of it.

vi. Ned Guttman asked if we are pushing the ozone site off until FY27.
1) Ashley Feathersone confirmed this and said that there is restricted cash that will be going to the county to help offset that cost.

C. Draft Budget FY27 and Proposed Title V CPI Adjustment
i. Ashley Feathersone said our draft budget for FY27 is $72K more than FY26. A lot of that is us pushing the ozone site over to FY27, as well as some health insurance increases.
ii. Ashley Featherstone said that this budget does include filling that 7th vacant position. We are still in a holding pattern, but hopeful we can fill that position.
iii. The file digitization project is included, however we recognize that while it would be nice to scan the historical files, it is expensive to do that, so we will see if we are financially able to move forward with that according to our budget.
iv. There were some increases in the training budget to pay for asbestos training.
v. Some one-time EPA funds that were included in the FY26 budget will drop out for FY27. That increases the amount we would plan to take out of budget reserves.
vi. We do have a CPI adjustment for Title V fees.
1) We are proposing an increase in Title V fees from $64 to $65 per ton.
2) This adjustment would mean an additional 4K in revenue for next year.
3) Ashley Featehrstone said the Board does not have to vote on this at this time.

D. Air Quality Rule Amendments Update
i. Ashley Featherstone invited Allison Glass up to go over the rule amendment updates.
ii. Allison Glass said that she started working on the rule amendment updates in 2024, and that it has been a very big project.
iii. North Carolina requires readoption of these rules every 10 years. This most recent update started with the 2018 rule adoption. There were 320 rules divided into 6 groups. It took about 6 months to get through all of them. Allison Glass also noted all amendments. She got clean copies of the rules from the state, the draft version from the state, and our current rules, and would make sure all the rules matched.
iv. We are going to submit the rules to the state of North Carolina. It does have to go through a public comment period. The state is looking to do another readoption in November, so we will have to restart the process after that.
v. Garry Whisnant asked where we are in the process and if the board needs to approve them at this point.
1) Ashely Featherstone confirmed that yes, the board does need to vote at this point.
2) Ashely Featherstone said that the board will need to vote to allow us to go to public comment. We will submit the rules to the state, EPA, and county legal, and those parties would like a month to go through them, before it goes to public notice.

3) We are hoping to get direction from the board tonight to move forward to submit to the state and EPA. We would like to receive feedback on any potential issues now, before going to public notice.

vi. Ned Guttman asked if there are any additions from what was sent in the board packet
   1) Ashely Featherstone said no, there were not.

vii. Ashely Featherstone went on to review the groups of rules and the different sections which changes were made to.

viii. Ashley Featherstone noted that we are just updating chapter 4 and 17, but if we edit our governing board structure, we will need to make changes to Chapter 1 and Chapter 3.

ix. Ashley Featherstone shared slides on the rules that are different from the state. There are 4 rules we have that are different from the state, which were highlighted in yellow in the drafts that were shared.

x. Permit exemption rules is one of them, and the state changed these a few years ago. We still permit facilities with potential/actual emissions of 5 tons. The state exempts facilities if they have less than 10 tons of emissions/potential emissions. With the state, if they have emissions greater than 5 but less than 25 tons, they can register them. For us, that would mean that we would not have a small permitting program, but we wanted to continue that program. We believe there is benefit as we do get complaints on some of these facilities and they do have visual emissions and other air quality rules that they are subject to.
   1) Garry Whisnant asked if, under the DAQ model, small facilities would not have to have a permit, and Ashely Featherstone confirmed this.
   2) Ashley Featherstone said that one item to highlight is, with our permitted facilities, there is a permit condition that they must maintain their equipment in working condition to minimize emissions, and we see value in requiringthat.

xi. The fugitive dust rule is another difference between our rules and the State's. The State does not have a fugitive dust rule that applies to construction sites. This is an example of a more strict rule that we have compared to the state. With our rule, we can require reasonable precautions for prevention of the dust becoming airborne and leaving the property boundary.
   1) Ashley Featherstone said that we are proposing to keep this rule the same.

xii. Open burning is another area where some of the rules are different compared to the State's rules.
   1) Ashley Featherstone said that years ago we required a permit for land clearing. We wrote into our rule that a permit was required to open burn machine piled brush.
      a) We are asking to change this rule, as the state passed a law that we could not require a permit. We just have not updated our rule yet, but would like to do so to match the State's law.
      b) We are also proposing to take the machine-pile brush language out. Machine-piled brush was never defined in the rule. It was a tool used to do outreach with the public about when a permit was required, but it has caused problems for us because it is not defined.
   2) There are other open burning-related rules that we are proposing to keep the same. We are proposing to keep the same definition of a log, which is a 12-inch diameter limit, and to prohibit open burning when the County Fire Marshal restricts it due to safety concerns.

a) We would like to keep these rules the same as we find them helpful in reducing emissions.

xiii. For rules surrounding demolition/asbestos removal, we are proposing to keep them the same.
   1) Typically, a county's permits/inspections office issues demolition permits. We have talked with our County's Permits and Inspections Department about that potential. The County is also talking about merging us with the Permits and Inspections department.
   2) We do have more strict rules as we require a permit to remove asbestos from residential buildings. We would like to keep that, but we will change notification requirements from fax to email in the rules.

xiv. Ashley Featherstone said that whenever there is a rule that is more strict (for example, the State added a new air toxic rule), we as a local program are not allowed to have rules less strict than the state. So that is one of the things being updated. We did update the PM2.5 standard to the State's. We updated the Landfill NSPS emissions limit. Regarding mailing lists, we added that electronic email lists can be used, and not physical mail. We are putting in electronic permitting provisions where certain facilities can submit their reports via email. There are still some facilities that we have to get hard copies from and get signatures for. The State is not ready to accept everything electronically, and we certainly are not either, but they have written their rules so that when they are CROMERR compliant we will accept certain documents electronically. Therefore, we are proposing to make all of the same changes to our rules.

xv. Garry Whisnant asked what is required of the board at this point.
   1) Ashely Featherstone does not need a vote to submit pre-hearing drafts, however we do need a vote to post the rules for public comment in May.

xvi. Motion to move to public comment on or before May 15th.
   1) Ned Guttman made the motion to move to public comments on or before May 15th.
   2) Caitlin Cook seconded the motion.
   3) All present – yes
   4) The motion passed 3-0

xvii. It was noted that we will need to set a date for a June meeting.

xviii. Ashley Featherstone asked board members to call her if they have questions about the rule amendments.

E. EPA Rule Updates
   i. Ashley Featherstone said that there is a table from the regional planning organization in the board packet. This table includes updates to rules the EPA is making right now.
   ii. The Greenhouse Gas Endangerment finding is in the table. North Carolina did an assessment of that, and it affects greenhouse gas standards for vehicles. With this change, we do expect to see higher-emitting cars on the road, and that will impact air quality.
   iii. There was also a letter in the board packet regarding Air Curtain Incinerators (ACI's). The rule that ACI's could operate without a permit if they were just burning storm debris was challenged in the court. Therefore, the state is asking for a No Action Assurance. We have already issued two permits and have one more on the agenda for tonight, so this may not impact us that much. However, we have had inquiries about ACI's to burn storm debris, so

that could impact us in the future as we expect to receive more requests to process storm debris from Helene.

F. Electronic payments for facilities
   i. Ashely Featherstone said that the Agency has been taking electronic payments for asbestos and demolition permits for some time. We now have a new process in Accela that we can start taking electronic payments from our other facilities as well. We have had facilities that don't write checks anymore, and so not taking electronic payments for these facilities has been an issue. We have issued all of the Stage I permits for 2026 with the ability to pay electronically, and now we are starting to do that with the industrial facilities. After this, the next step is trying to get our facilities into Accela so we can manage them electronically, instead of in our old Access database.

G. Monitoring Update
   i. Steve Ensley said that, following Hurricane Helene we deployed many Purple Airs monitors throughout the area, in conjunction with the State.
      1) We have decided we are going to recognize those host sites for their contribution. Steve Ensley showed an example of the certification of appreciation they will be receiving. We thought it would be a good way to thank them for their assistance and contribution. We do call these sites from time to time when we see spikes and ask for information, and it's been a good partnership.
      2) Ashely Featherstone said we could present these certificates at the Clean Air Excellence Award reception in July. We got an extension from the State and EPA to keep these low cost sensors for another year, so we will see how long it goes.
   ii. Steve Ensley went over monitoring data completeness.
      1) PM2.5 data completeness: 99.19%
      2) Ozone data completeness: 95.6%
   iii. We were contacted this week by the EPA, who plans to come out and conduct an inspection of our monitoring equipment and the data it is producing.
   iv. Steven Ensley gave an update on the AB Tech monitoring site. The building was delayed because of supply chain issues. They are now nearing completion and expecting delivery as soon as late April, but we now don't plan to pour the concrete pad until July. We also are in limbo about the permitting for the concrete pad and waiting for some action on that. Ideally, we are planning to get all of these items done in July and to get started with taking data in August, but we will see how things progress. The State has said they are looking for data starting mid-season.

H. Facility Permit Renewals

Facility Name	Type of Facility	Facility Classification	Location	Changes from Existing Permit
Amcor Flexibles, Inc.	Manufacturer of Flexible Packaging Products	Title V	Sweeten Creek Road, Arden	Removal of control devices that have been replaced with new equipment,

				minor change to monitoring requirements to align with similar equipment, updates to the insignificant activity list
Glatfelter	Non-woven fiber manufacturing facility	Synthetic Minor	Sand Hill Road, Enka	Ownership Change

v. Amcor
   1) Alex Latta said they haven't used the control device that they are removing in years. They used to have a two-stage system, but they have updated that and they just need one system now.
   2) Ned Guttman made the motion to approve the above permit renewal for Amcor.
   3) Catilin Cook seconded the motion.
   4) All present – yes
   5) The motion passed 3-0

vi. Glatfelter
   1) Ashley Featherstone said this is a simple renewal, and the ownership change is the only change.
   2) Ned Guttman made the motion to approve the above permit renewal for Glatfelter.
   3) Catilin Cook seconded the motion.
   4) All present – yes
   5) The motion passed 3-0

B. Facility Permit Modifications

Facility Name	**Type of Facility**	**Facility Classification**	**Location**	**Changes from Existing Permit**
Buncombe County Landfill II	Landfill	Title V	Panther Branch Road, Alexander	Modify the permit since the facility is now subject to 40 CFR Part 60, Subpart XXX and updating General Conditions.
Duke Energy	Electric Generating Utility	Title V	46 Duke Energy Lane, Arden	Updating PAL Limit After Recent Update of Emission Factors

i. Buncombe County Landfill II

1) Ashley Featherstone said that the County Landfill triggered a new source performance standard when they increased the size of the landfill. That triggered a different rule, and the requirements for that rule are essentially the same, so we just had to update the permit to adjust the rule citations and check the requirements. The only change was the references to the different rules.
2) Ned Guttman made the motion to approve the above permit modification for the Buncombe County Landfill.
3) Catilin Cook seconded the motion.
4) All present – yes
5) The motion passed 3-0

ii. Duke Energy
1) Alex Latta said this is a limit that they have to re-evaluate every 5 years, and just need to update their permit with the new numbers.
2) Ned Guttman made the motion to approve the above permit modification for Duke Energy.
3) Catilin Cook seconded the motion.
4) All present – yes
5) The motion passed 3-0

C. New Permits

Facility Name	Type of Facility	Facility Classification	Location	Proposed Equipment
North End Stump & Brush Recycling	Wood waste yard	Small	New Stock Road, Weaverville	Air Curtain Incinerator

i. Ashely Featherstone said this one is a smaller ACI. It is the only one of the 3 in the County that does not require a federal Title V permit because it is less than 35 tons per day capacity. They are going to have a small source operating permit.
ii. Ned Guttman asked where on New Stock Road it is, and if it is by any neighborhoods.
iii. Ashely Featherstone said that they have had permission from us to run for a year already due to initially burning storm debris, but they haven't operated it a whole lot. She was not sure how close it is to neighborhoods, but we have not had any complaints. It is a pretty large piece of property, and the people that own the Stump & Brush company also own several acres of land right there, so she thinks they have a pretty good buffer.
iv. The group looked at the address on Google Maps and stated it did not look like there was much out in that area.
v. Alex Latta said that if the ACI is operating properly, the neighbors should not notice that it is even there.
vi. Ashley Featherstone said that the ACI cannot be above 10% opacity. Staff actually went to the Biltmore Estate to look at their ACI on the property. They were not operating it at the

time, but we talked about the fact that, when it is running correctly, it really just has heat waves coming off of it for visible emissions.

vii. Ned Guttman made the motion to approve the above new permit for North End Stump & Brush Recycling.

viii. Caitlin Cook seconded the motion.

ix. All present – yes

x. The motion passed 3-0

6. New Business

A. None

7. Other Business

A. Legal Counsel Report

i. Suzanne Avett said that she is working with Ashely Featherstone and County leadership for the potential transition. They are currently working with NC EMC for our next steps. She hopes to have more updates at the next meeting.

B. Advisory Committee Report

i. Committee has not met since the last meeting

ii. The next meeting is on April 30, 2026.

C. Calendar

i. Board Meeting Schedule & Time

ii. The next meeting is May 14, 2026.

iii. Ashley Featherstone said that having the next meeting on May 14th is still the plan. We will find out from the state if they want us to come to the May EMC meeting. The EMC meets on May 14th, so we may decide to push this board's meeting back so we can report on what happened at that meeting.

iv. There will be a special meeting in June to adopt the rule updates.

1) The board decided to have the meeting on Wednesday, June 24th at 4:00pm.

2) Ashley Featherstone will draft a public notice that says we're going to public notice on a certain date, and that the board is planning to meet on June 24th to have a public hearing.

v. Ashely Featherstone asked if board members would be available at 3pm for some future meetings, depending on board meeting room availability. They said they would be.

D. Announcements

i. Ashley Featherstone said we are taking nominations for the Clean Air Excellence Awards.

8. Public Comment

A. None

9. Adjournment

A. Catilin Cook made the motion to adjourn the meeting.

B. Ned Guttman seconded the motion.

C. All present – yes
D. The motion passed 3-0
E. The meeting was adjourned at 5:13pm

Asheville-Buncombe Air Quality Agency Accounts	FY2024 Actuals	FY2025 Actuals	FY2026 Budget	Proposed March 2026 FY2027 Budget	Proposed May 2026 FY2027 Budget	Summary of FY2027 Changes
Revenue Accounts						
4120:Investment Earnings						
4120:RC397 Investment Earnings	$ 31,699.16	$ 29,292.74	$ 5,000.00	$ 5,000.00	$ 5,000.00	
4120:RC000	$ 205.35	$ 755.92	$ -	$ -	$ -	
Total 4120:Investment Earnings	$ 31,904.51	$ 30,048.66	$ 5,000.00	$ 5,000.00	$ 5,000.00	
4150:Other Revenue						
4150:RC437 Rebates	$ -	$ -	$ 7,500.00	$ -	$ -	
4150:RC006 Air Quality Penalties	$ -	$ 100.00	$ -	$ -	$ -	
4150:RC042 Miscellaneous Revenue	$ 1,000.00	$ -	$ -	$ -	$ -	
Total 4150:Other Revenue	$ 1,000.00	$ 100.00	$ 7,500.00	$ -	$ -	
4180:Other Taxes and Licenses						
4180:RC046 North Carolina Gas Tax	$ 155,494.37	$ 155,565.41	$ 160,000.00	$ 160,000.00	$ 160,000.00	
Total 4180:Other Taxes and Licenses	$ 155,494.37	$ 155,565.41	$ 160,000.00	$ 160,000.00	$ 160,000.00	
4190:Permits and Fees						
4190:RC313 Administration Fees 105	$ 415.00	$ 552.00	$ 500.00	$ 550.00	$ 550.00	
4190:RC314 Title V Permit Fees	$ 185,419.00	$ 214,127.00	$ 210,000.00	$ 227,000.00	$ 227,000.00	
4190:RC111 Asbestos Permits	$ 166,007.63	$ 150,879.75	$ 135,000.00	$ 150,000.00	$ 150,000.00	
4190:RC112 Stage I Vapor Recovery	$ 49,050.00	$ 44,675.00	$ 54,000.00	$ 54,000.00	$ 54,000.00	
4190:RC113 Investigative Cost Fees	$ -	$ -	$ 400.00	$ 400.00	$ 400.00	
4190:RC114 City Permit Review Fee	$ 18,721.00	$ 20,879.25	$ 18,000.00	$ 18,000.00	$ 18,000.00	
4190:RC115 County Permit Review Fee	$ 6,200.00	$ 8,000.00	$ 9,000.00	$ 9,000.00	$ 9,000.00	
4190:RC312 AQ - Permit Fee	$ 112,904.90	$ 114,642.90	$ 113,000.00	$ 115,000.00	$ 115,000.00	
Total 4190:Permits and Fees	$ 538,717.53	$ 553,755.90	$ 539,900.00	$ 573,950.00	$ 573,950.00	
4210:Restricted Intergovernmental						
4210:RC310 EPA 105 Grant	$ 280,000.00	$ 222,974.00	$ 230,000.00	$ 230,000.00	$ -	Minus 105 EPA Grant Funds
4210:RC311 EPA 103 Grant - PM	$ 130,214.00	$ 240,085.59	$ 123,000.00	$ 65,000.00	$ -	Minus 103 EPA Grant Funds
Total 4210:Restricted Intergovernmental	$ 410,214.00	$ 463,059.59	$ 353,000.00	$ 295,000.00	$ -	
Total Revenue Accounts	$ 1,137,330.41	$ 1,202,529.56	$ 1,065,400.00	$ 1,033,950.00	$ 738,950.00	
Expense Accounts						
Salaries And Benefits						
5000:Salaries and Wages	$ 636,095.68	$ 620,175.56	$ 627,855.00	$ 628,042.00	$ 228,362.00	Minus 105 and 103 Salaries and Wages
5030:Benefits	$ 293,158.58	$ 311,935.27	$ 360,883.00	$ 403,931.00	$ 183,720.00	Minus 105 and 103 Salaries and Wages
Total Salaries And Benefits	$ 929,254.26	$ 932,110.83	$ 988,738.00	$ 1,031,973.00	$ 412,082.00	
Operating Expenditures - Discretionary						
6020:Travel and Training	$ 7,670.15	$ 9,705.55	$ 12,996.00	$ 17,991.00	$ 8,122.00	Minus 105 Travel/Training
6030:Vehicle Expense	$ 1,566.18	$ 336.49	$ 1,850.00	$ -	$ -	Same
6060:Office Expenses	$ 9,194.43	$ 10,155.53	$ 16,910.00	$ 16,000.00	$ 3,075.00	Minus 105 Office Expenses
6070:Maintenance and Repair						
6070:SC013 Building and Grounds Maintenance	$ -	$ -	$ 10,000.00	$ 16,000.00	$ 16,000.00	Same
6070:SC046 Equipment Maintenance	$ -	$ 1,921.62	$ -	$ 4,170.00	$ -	Minus 105 and 103 Equipment Maintenance
6075:Equipment	$ 10,640.41	$ 8,795.99	$ 25,000.00	$ 46,000.00	$ 53,500.00	Added a second Zero Air Pack
6090:Contract and Professional Services	$ 2,271.48	$ -	$ 11,000.00	$ 7,940.00	$ 2,940.00	Took out $5,000 for File Digitization Project with Addition of Zero Air Pacl
6105:Charges and Fees	$ 3,506.47	$ 3,736.91	$ 4,500.00	$ 100.00	$ 100.00	Same
6160:Advertising	$ -	$ 244.10	$ 1,000.00	$ 1,550.00	$ 930.00	Minus 105 Legal Advertising
6500:Information Technology	$ 1,545.08	$ 1,540.80	$ 1,550.00	$ 4,550.00	$ 3,675.00	Minus 105 Internet
Total Operating Expenditures - Discretionary	$ 36,394.20	$ 36,436.99	$ 84,806.00	$ 114,301.00	$ 88,342.00	
Operating Expenditures - Non-Discretionary						
6510:SC077 Non Discretionary Copier	$ -	$ -	$ 80.00	$ 80.00	$ 80.00	
6510:SC078 Non Discretionary Indirect Cost	$ 91,764.00	$ 141,639.00	$ 147,787.00	$ 147,787.00	$ -	
6510:SC079 Non Discretionary Insurance and Bonds	$ 5,988.00	$ 4,011.00	$ 6,265.00	$ 5,929.00	$ 2,414.00	

6510:SC080 Non Discretionary Motor Fuel	$ 2,958.14	$ 1,690.12	$ 3,600.00	$ 3,600.00	$ 3,600.00	
6510:SC081 Non Discretionary Other Post Employment Benefits	$ 9,009.38	$ -	$ 9,274.00	$ 9,274.00	$ -	
6510:SC082 Non Discretionary Telephone	$ 3,768.41	$ 4,455.36	$ 5,362.00	$ 5,362.00	$ -	
6510:SC775 Non Discretionary Utilities	$ 1,307.00	$ 1,379.99	$ 2,000.00	$ 2,000.00	$ 1,500.00	
6510:SC783 Non Discretionary Electric Vehicle Charging	$ -	$ 20.00	$ -	$ -	$ -	
Total Operating Expenditures - Non-Discretionary	**$ 114,794.93**	**$ 153,195.47**	**$ 174,368.00**	**$ 174,032.00**	**$ 7,594.00**	Updated Non-Discretionary Numbers from Budget
Capital Outlay	**$ 33,772.59**	**$ 114,148.28**	**$ -**	**$ -**	**$ -**	
Contingency	**$ -**	**$ -**	**$ 15,000.00**	**$ 15,000.00**	**$ -**	Contingency for FY27 is now planned on a multi-department leve
Interfund Transfer Expense						
FY26 EPA 105 AQ Grant				$ -	$ 9,330.00	
FY27 EPA 105 AQ Grant				$ -	$ 345,242.00	
				$ -	**$ 354,572.00**	
Expense Subtotal	**$ 1,114,215.98**	**$ 1,235,891.57**	**$ 1,262,912.00**	**$ 1,335,306.00**	**$ 862,590.00**	
Net Impact	**$ (23,114.43)**	**$ 33,362.01**	**$ 197,512.00**	**$ 301,356.00**	**$ 123,640.00**	

Asheville-Buncombe
Air Quality Agency

Air Quality Program Transition from Interlocal to County

To: Tim Love, Assistant County Manager

CC: Joel Storrow, Air Quality Board Chair

Date: May 6, 2026

From: Ashley Featherstone, Director

Subject: Timeline

Summary Statement

This memo serves to document necessary steps and timeline for a transition of the air quality program from a multi-jurisdictional agency to the county.

Purpose

The Mission of the Asheville-Buncombe Air Quality Agency is to protect and monitor the area's air quality to safeguard the public health and the environment.

The agency was established as part of an interlocal agreement by Buncombe County and the City of Asheville pursuant to the provisions of North Carolina General Statute Sections 160A-461, 160A-464, and 143-215.112 (c)(3) for the purpose of developing and administering an air quality program in their respective jurisdictions. The agency is one of three local air pollution control programs certified by the North Carolina Environmental Management Commission to implement air quality regulations and programs.

§ 143-215.112. Local air pollution control programs

https://www.ncleg.gov/EnactedLegislation/Statutes/PDF/BySection/Chapter_143/GS_143-215.112.pdf

Reorganization

The current Air Quality Board's primary responsibility is to govern the overall operations of the Agency, including adopting updates to the rules, approval and oversight of the Agency budget, and final judgment on appealed Notices of Violation. The current Board also approves the issuance of industrial source permits.

Under Buncombe County, the Board of Commissioners would act as the governing board and have responsibility for maintaining the program to meet the requirements in the statute. Pursuant to § 143-215.112(c)(4), the current board would need to be reformed into a commission or advisory board that can hear appeals of agency actions and also advise the BOC

on rule updates, technical standards related to air quality, budget recommendations, etc. Since the current Board approves industrial source permits, that duty will need to be the responsibility of the Air Quality Director, which will be addressed in the updated rules (Chapter 1- administrative procedures where interlocal agreement is now).

Key Actions and Timeline Summary

- March 1: County Notified City-Interlocal agreement to expire July 1
- May 13: AQC EMC Program Update-request recertification, propose process with checklist provided by EMC Staff
- June 2: Air Quality Budget Approval – BOC
- June 3 (target date): Submit checklist with draft responses to DAQ & EMC for review
- June 10-15: Meet again with DAQ & EMC to discuss check list responses, any needed edits, board materials to be submitted by June 25
- June 16: Extend Interlocal past July 1 (may require BOC action)
- June 16: Reform Air Quality Governing Board to an advisory board- BOC action
- June 24: Update Current Air Quality code (Air Quality Board Special Meeting to adopt after Public Comment Period May 22-June 21, potential public hearing June 22, Pre Draft Review April 17-May 17)
- July 9: EMC Recertification Request Presented
- July 21: BOC Adopts Air Quality Code by Reference, Updates to Administrative Code in Chapter 1 (Public notice to be issued at least 30 days prior)

ASSISTANT ADMINISTRATOR FOR ENFORCEMENT AND COMPLIANCE ASSURANCE
WASHINGTON, D.C. 20460

April 22, 2026

Via E-Mail

Mr. Michael Abraczinskas
Director
Division of Air Quality
North Carolina Department of Environmental Quality
217 West Jones Street
Raleigh, North Carolina 27699-1641
Michael.Abraczinskas@dep.nc.gov

RE: Request for No Action Assurance for the Use of Air Curtain Incinerators to Manage Debris Caused By Hurricane Helene in North Carolina

Dear Mr. Abraczinskas:

The U.S. Environmental Protection Agency is in receipt of North Carolina Department of Environmental Quality's (NC DEQ) March 10, 2026, letter requesting a "No Action Assurance" (NAA) to allow for continued use of large air curtain incinerators for disaster debris management in North Carolina without first obtaining a Title V permit. Due to the extraordinary amount of disaster debris caused by Hurricane Helene that still remains and the significant potential for wildfires, the EPA is extending the March 12, 2025 NAA to September 30, 2026.

At North Carolina's request, US EPA issued an NAA on November 21, 2024, which allowed the use of Air Curtain Incinerators (ACIs) with capacities greater than 35 tons per day in North Carolina without the owner/operator first obtaining a Title V permit pursuant to 40 C.F.R. § 60.2242. EPA determined that the NAA was in the public interest because using larger capacity ACIs to dispose of the debris is cleaner and safer than other options, which include open burning without any controls. The NAA also allowed the State to manage debris disposal more quickly than would be possible with the smaller capacity ACIs, thereby advancing recovery efforts across the State. The NAA was granted, subject to certain conditions, through March 1, 2025, and extended through September 1, 2025, due to the substantial amount of disaster debris caused by Hurricane Helene.

On August 26, 2025, EPA published an interim final rule (IFR) for "Commercial and Industrial Solid Waste Incineration (CISWI) Units: Temporary-Use Incinerators and Air Curtain Incinerators Used in

Disaster Recovery," that was effective immediately. The IFR established temporary-use disaster recovery and emergency provisions for CISWI units to allow certain ACIs to operate for disaster and emergency recovery on a temporary basis without the need to comply with the requirements and standards set for CISWI under Clean Air Act section 129 and 40 CFR Part 60, Subparts CCCC and DDDD. Under the IFR, ACIs operating for disaster and emergency recovery on a temporary basis were no longer required to obtain a Title V permit. EPA, however, has rescinded the IFR after determining that, "the immediate near-term context that motivated expedited issuance has changed, and the EPA has determined that it is appropriate to revisit the temporary-use provisions through notice-and-comment rulemaking." 91 Fed. Reg. 13225, 13226 (March 19, 2026). The recission of the IFR eliminated the regulatory framework allowing for the operation of ACIs without a Title V permit.

Given this change in regulation and that disaster recovery is still underway, your letter requests an NAA to allow the State to continue its management of the 6.8 million tons of vegetative fuels, including 822,000 acres of damaged timber, across western North Carolina. The remaining levels of debris have maintained the elevated risk of wildfires in the region: The North Carolina Fire Service reports an increase of over 2,000 wildfires in 2025 compared to the state average and double the acreage of wildfires compared to 2024.[1] The 2026 spring wildfire season running from March through May has already begun. As a result, the continued use of large ACIs to clear vegetative debris remains critical for reducing the extreme wildfire fuel loads in an efficient and safe manner to mitigate wildfire risks and further recovery efforts in the State.

In light of this ongoing emergency situation, the EPA has determined that an extension of the NAA is necessary to serve the public interest because incinerating debris with the larger capacity ACI is cleaner and safer than other options and will allow the State to manage debris disposal from the Hurricane more quickly than would be possible with the small capacity ACIs, thereby advancing recovery efforts across the State. EPA will not enforce the CISWI requirement to obtain a Title V permit for large ACIs through September 30, 2026, for those brought online to help remediate debris from Hurricane Helene, if such ACIs are operated in accordance with the following conditions:

1. The owner/operator notifies EPA Region 4 (see below for notification contact) prior to initiation of the use of an ACI subject to Title V permitting under CISWI.

2. Owners/operators comply with all other applicable CISWI requirements, including opacity limits, monitoring, testing, and recordkeeping and reporting.

3. Owners/operators comply with all conditions imposed by State or local authorities on these emergency operations.

Notifications (prior to initiation of the use of an ACI subject to Title V permitting) should be sent via email to Jason Dressler at dressler.jason@epa.gov or by phone at (404) 562-9208 (a message left on voicemail is sufficient).

EPA's grant of this extension of the NAA demonstrates its commitment to address the unique circumstances caused by Hurricane Helene. The EPA reserves the right to revoke, modify, or extend the

[1] N.C. Forest Service - Wildfire Statistics, N.C. Dep't of Agric. & Consumer Services, https://www.ncagr.gov/divisions/nc-forest-service/fire-control-and-prevention/wildfire-stats (last visited Apr. 1, 2026).

NAA prior to termination if the EPA believes that such action is necessary to protect public health and the environment. If you have any questions please contact Sparsh Khandeshi, Acting Director, Air Enforcement Division at (202) 564-9913 or khandeshi.sparsh@epa.gov.

Sincerely,

Jeffrey A. Hall

cc: Kevin J. McOmber, Regional Administrator, EPA Region 4

JOSH STEIN
Governor
D. REID WILSON
Secretary
MICHAEL ABRACZINSKAS
Director

NORTH CAROLINA
Environmental Quality

May 4, 2026

United States Environmental Protection Agency
EPA Docket Center (EPA/DC)
Docket ID No. EPA-HQ-OAR-2025-0068
Docket ID No. EPA-HQ-OAR-2003-0119
1200 Pennsylvania Ave. NW
Washington, DC 20460

Subject: Comments on Proposed Rulemaking for "Standards for Air Curtain Incinerators That Only Burn Wood Wastes, Yard Wastes and Clean Lumber; Provision for Commercial and Industrial Solid Waste Incineration Units: Temporary Use Incinerators and Air Curtain Incinerators Used in Disaster Recovery"

To Whom It May Concern:

The North Carolina Department of Environmental Quality (NCDEQ)'s Division of Air Quality (DAQ) is providing comments on the U.S. Environmental Protection Agency's (EPA) Proposed Rulemaking for "*Standards for Air Curtain Incinerators That Only Burn Wood Wastes, Yard Wastes and Clean Lumber; Provision for Commercial and Industrial Solid Waste Incineration Units: Temporary Use Incinerators and Air Curtain Incinerators Used in Disaster Recovery*," published in the Federal Register (FR) on March 20, 2026 (91 FR 13543).[1] To provide context for our comments, we provide an overview of the state's actions to facilitate the use of air curtain incinerators (ACIs) to assist with cleanup and disposal of disaster debris in western North Carolina in the wake of Hurricane Helene. We then provide comments specific to EPA's proposed rulemaking followed by our conclusions.

I. Background

A. Federal ACI Regulations

Currently, 40 CFR Part 60 contains eight different Subparts with regulations that apply to ACIs. The largest ACIs (processing at least 250 tons per day of municipal solid waste) are covered under the Large Municipal Waste Combustor (LMWC) Rules in Subparts Cb and Eb ("LMWC Rules"), while small ACIs (processing between 35 and 250 tons per day of municipal solid waste) are captured under the Small Municipal Waste Combustor (SMWC) Rules in Subparts AAAA and BBBB ("SMWC Rules"), and very small ACIs (processing less than 35 tons per day of waste) are subject to the Other Solid Waste Incineration (OSWI) Rules in Subparts EEEE and FFFF ("OSWI Rules"), along with ACIs processing *any* amount of institutional waste generated onsite. Further, ACIs processing greater than or equal to 35 tons per day of solid waste that are located at commercial or industrial facilities are covered by the Commercial and Industrial Solid

[1] EPA, Proposed Rule, "Standards for Air Curtain Incinerators That Only Burn Wood Wastes, Yard Wastes and Clean Lumber; Provision for Commercial and Industrial Solid Waste Incineration Units: Temporary Use Incinerators and Air Curtain Incinerators Used in Disaster Recovery," *Federal Register* 91, no. 54 (March 20, 2026): 13543. https://www.federalregister.gov/d//2026-05491

Waste Incineration (CISWI) Unit Rules under Subparts CCCC and DDDD ("CISWI Rules"). Although each of these subparts applies to units processing solid waste, they each contain specific provisions for ACIs that burn only clean lumber, yard waste, and/or wood waste, despite this type of ACI being specifically excluded from the definition of a "solid waste incineration unit" in Section 129 of the Clean Air Act (CAA).[2]

On April 17, 2024, the EPA finalized changes to 40 CFR Part 60, Subparts EEEE and FFFF to remove the Title V permitting requirement for OSWI ACIs that only burn wood waste, clean lumber, yard waste, or a mixture of these materials.[3] The EPA did not make changes to 40 CFR Part 60 Subpart CCCC *Standards of Performance for Commercial and Industrial Solid Waste Incineration Units,* 40 CFR Part 60 Subpart DDDD *Emissions Guidelines and Compliance Times for CISWI Units*, or 40 CFR Part 62 Subpart IIIa *Federal Plan Requirements for Commercial and Industrial Solid Waste Incineration Units That Commenced Construction On or Before June 4, 2010, and Have Not Been Modified or Reconstructed Since August 7, 2013*, which regulate ACIs that process greater than or equal to 35 tons per day. Consequently, these larger units are still required to obtain Title V permits. Additionally, 40 CFR Subparts CCCC and DDDD and 40 CFR Part 62 Subpart IIIa do not have the temporary-use disaster provisions that are in 40 CFR Subparts EEEE and FFFF.

B. Hurricane Helene and Disaster Debris Management

Hurricane Helene, a strong category 4 storm with maximum sustained winds of 140 miles per hour, began impacting the State of North Carolina on September 26, 2024, bringing unprecedented flooding, landslides, tornadoes, and wind damage. Highest local rainfall maximums across the state exceeded 30 inches for only the second time in recorded state history. The rain swelled streams and rivers, many of which were already in flood stage, to record highs, producing record breaking river crests and 1,000-year flood events and in several counties.[4] On September 28, 2024, the President of the United States issued a major disaster declaration for the State of North Carolina under the Stafford Act.[5] Hurricane Helene is one of the deadliest US storms of the 21st century, with over 200 lives lost, and there was widespread infrastructure and property damage that Western North Carolina will be recovering from for many years. In the aftermath of the storm, the state was left with an enormous amount of disaster debris, amounting to millions of cubic yards. Mulching or grinding of the disaster debris came with challenges. In many instances, mulch piles were not properly maintained, leading to numerous instances of large fires. Proper use of ACIs to reduce debris is cleaner and safer than open burning; however, inconsistencies and unnecessary complexities within the various federal regulations for ACIs, including provisions for permitting, notification, and throughput limitations, posed significant challenges to the State and operators utilizing this technology to aid Western North Carolina in its recovery.

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[2] 42 U.S.C. § 7429(g)(1), March 9, 2026. uscode.house.gov/download/annualhistoricalarchives/pdf/2024/2024usc42.pdf
[3] EPA, 89 FR 27392, April 17, 2024. https://www.federalregister.gov/documents/2024/04/17/2024-08270/other-solid-waste-incinerators-air-curtain-incinerators-title-v-permitting-provisions
[4] NC OSBM, Hurricane Helene Recovery, December 13, 2024. https://www.osbm.nc.gov/hurricane-helene-dna/open
[5] Federal Emergency Management Agency, 4827-DR-NC Initial Notice, September 28, 2024. https://www.fema.gov/disaster-federal-register-notice/4827-dr-nc-initial-notice

With recovery efforts underway, including major repairs to water and wastewater infrastructure, transportation, and other critical infrastructure, North Carolina began to look at all options for managing disaster debris, including the use of ACIs for burning vegetative debris, yard waste, and clean lumber, with public health and safety of our communities at the forefront. While assisting stakeholders, including federal, state, and local governments, with navigating the aforementioned federal regulations for ACIs, the DEQ encountered a number of permitting, notification, and throughput limitations that presented unnecessary complications in the disaster response. On October 24, 2024, the DAQ sent a letter to the EPA requesting relief in the State of North Carolina from specific provisions of federal ACI regulations in 40 CFR Part 60, Subparts CCCC, DDDD, EEEE, and FFFF (the CISWI and OSWI Rules).[6] In the letter, the DAQ emphasized its preference for the use of ACIs over open burning to manage the enormous amount of disaster debris generated from Hurricane Helene, as these units are safer (from a wildfire prevention perspective) and produce less particle pollution. Additionally, the DAQ expressed its belief that 40 CFR Part 60, Subparts CCCC, DDDD, EEEE, and FFFF are inconsistent with the CAA's definition of a "Solid Waste Incineration Unit." Title I, Part A, Section 129 *Solid Waste Combustion*, paragraph (g) *Definitions,* subparagraph (1) *Solid Waste Incineration Unit* (42 U.S.C. § 7429 provides the following definition:

> *"The term 'solid waste incineration unit' means a distinct operating unit of any facility which combusts any solid waste material from commercial or industrial establishments or the general public (including single and multiple residences, hotels, and motels). [...] The term "solid waste incineration unit" does not include [...] (C) air curtain incinerators provided that such incinerators only burn wood wastes, yard wastes and clean lumber and that such air curtain incinerators comply with opacity limitations to be established by the Administrator by rule."*[2]

Despite this explicit distinction within the CAA, the federal rules establish requirements for ACIs of this type beyond opacity limitations. In our October 24, 2024 letter, the DAQ requested a waiver of the Title V permitting requirements in the CISWI Rules and permission to temporarily use CISWI units to aid in Hurricane Helene recovery. Additionally, the DAQ requested that the EPA allow State and local Air Quality agencies to adjust the time before the ACI operator must officially request an extension from 16 weeks to 52 weeks under the ACI temporary disaster debris provisions. On November 6, 2024, EPA responded with a letter that addressed some of the DAQ's concerns but did not make changes to the Title V permitting requirements or temporary-use disaster provisions for CISWI units.[7]

In addition to the request for relief, the DAQ sent a letter to the EPA on November 15, 2024, requesting a No Action Assurance (NAA) letter to help facilitate the efficient and safe processing of certain disaster debris using ACIs.[8] Per §§ 60.2242 and 60.2805 in Subparts CCCC and DDDD, respectively, CISWI units are required to obtain a Title V operating permit. The DAQ requested that EPA grant a NAA letter for the provisions in §§ 60.2242 and 60.2805 so that ACIs processing greater than or equal to 35 tons per day of only wood waste, clean lumber, and yard waste could be exempt from the obligation to obtain a Title V operating permit, provided that they were not otherwise required to obtain this permit. The DAQ stated that using one large ACI

[6] NCDEQ, Request for Relief Concerning Air Curtain Incinerator Use in the State of North Carolina, October 24, 2024. https://www.deq.nc.gov/media/46541/download?attachment
[7] EPA Region 4, November 6, 2024. https://www.deq.nc.gov/media/46685/download?attachment
[8] NCDEQ, Request for No Action Assurance Concerning Air Curtain Incinerator Use in the State of North Carolina, November 15, 2024. https://www.deq.nc.gov/media/46728/download?attachment

in lieu of multiple small ACIs or open burning would decrease particle pollution, reduce risks to public safety, and help prevent wildfires.

On November 21, 2024, the EPA issued a NAA through March 1, 2025, for the use of new CISWI ACIs with a capacity greater than 35 tons per day used to remove disaster debris in North Carolina without first obtaining a Title V permit pursuant to § 60.2242.[9] The EPA stated that the owner/operator of each ACI must notify EPA Region 4 prior to beginning use. Also, the owner/operator must comply with all other applicable CISWI requirements, including opacity limits, monitoring, testing, and recordkeeping and reporting, and with all conditions imposed by State or local authorities on these emergency operations. On February 28, 2025, the DAQ sent a letter to the EPA requesting an extension of the NAA.[10] The letter stated that Hurricane Helene added an estimated 6.8 million tons of vegetative fuels into the environment, and it was important to continue reducing this debris using larger capacity ACIs. The EPA extended the NAA an additional six months to September 1, 2025.[11]

On August 26, 2025, the EPA issued an interim final rule (IFR) adding temporary-use disaster provisions that essentially mirror those in the OSWI regulations to the CISWI Rules and Federal Plan (40 CFR Part 60, Subparts CCCC and DDDD and 40 CFR Part 62 Subpart IIIa).[12] The IFR stated that as long as the CISWI units meet certain conditions, they will not be bound by the CAA Section 129 emission standards that apply during ordinary circumstances. The practical impact of this action meant that the DAQ did not seek an extension of EPA's NAA for CISWI ACIs used for processing Hurricane Helene disaster debris, which expired on September 1, 2025. The EPA rescinded the IFR on March 19, 2026, stating that with the close of the 2025 hurricane and wildfire disaster seasons, the EPA is revisiting the subject matter through the notice-and-comment rulemaking that is the subject of this comment letter.[13] Consequently, the DAQ sent a letter on March 10, 2026, requesting another NAA.[14] The EPA responded on April 22, 2026, and extended the March 12, 2025, NAA to September 30, 2026.[15]

EPA's proposed rulemaking aligns with the DAQ's needs in the wake of Hurricane Helene. We agree with the addition of temporary-use disaster provisions for CISWI units as well as the EPA's proposal to remove the Title V permitting requirement for ACIs that only burn wood waste, yard waste, and clean lumber. Additionally, we believe that the consolidation of regulations for these types of ACIs in 40 CFR Part 60 Subpart Ca would make the requirements more understandable

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[9] EPA, No Action Assurance for the Use of Air Curtain Incinerators to Manage Debris Caused By Hurricane Helene in North Carolina, November 21, 2024. https://www.deq.nc.gov/media/46792/download?attachment
[10] NCDEQ, Request for Extension of the No Action Assurance for the Use of Air Curtain Incinerators to Manage Debris Caused by Hurricane Helene in North Carolina, February 28, 2025. https://www.deq.nc.gov/media/47826/download?attachment
[11] EPA, No Action Assurance Extension for the Use of Air Curtain Incinerators to Manage Debris Caused By Hurricane Helene in North Carolina, March 12, 2025. https://www.deq.nc.gov/media/47825/download?attachment
[12] EPA, 90 FR 41508, August 26, 2025. https://www.federalregister.gov/documents/2025/08/26/2025-16360/commercial-and-industrial-solid-waste-incineration-units-temporary-use-incinerators-and-air-curtain
[13] EPA, 91 FR 13225, March 19. 2026. https://www.federalregister.gov/documents/2026/03/19/2026-05395/commercial-and-industrial-solid-waste-incineration-units-temporary-use-incinerators-and-air-curtain
[14] NCDEQ, Request for No Action Assurance for the Use of Air Curtain Incinerators to Manage Debris Caused by Hurricane Helene in North Carolina, March 10, 2026. https://edocs.deq.nc.gov/AirQuality/DocView.aspx?id=636656&dbid=0&repo=AirQuality&cr=1
[15] EPA, Request for No Action Assurance for the Use of Air Curtain Incinerators to Manage Debris Caused by Hurricane Helene in North Carolina, April 22, 2026. https://edocs.deq.nc.gov/AirQuality/DocView.aspx?id=636659&dbid=0&repo=AirQuality.

and accessible by agencies and regulated entities. Though we do have some concerns and suggested revisions that are discussed further in our comments, the DAQ generally supports the EPA's proposal.

II. Comments on EPA's Proposal

This section provides the DAQ's comments on the EPA's proposed actions, including comments related to specific topics on which the EPA has solicited comment (with the identifying comment number as listed in the preamble), and comments on additional aspects of the EPA's proposed rulemaking.

A. Disaster Debris Cleanup and Management (Comments Emergency-1, Emergency-2, and Emergency-3)

As described in Section I.B of this letter, Hurricane Helene caused widespread destruction in Western North Carolina and resulted in an unprecedented magnitude of disaster debris, which increases the risk of wildfires and post-fire erosion that can degrade water quality. On December 13, 2024, North Carolina's former Governor Cooper and the Office of State Budget and Management (OSBM) released a Revised Damage and Needs Assessment on North Carolina's recovery from Hurricane Helene,[4] which estimated that the storm resulted in approximately 6.8 million tons of vegetative debris. On March 19, 2025, the National Oceanic and Atmospheric Administration's (NOAA) National Hurricane Center issued a report on Hurricane Helene, stating, "The North Carolina Forest Service estimated 822,000 acres of damaged timberland, which resulted in $214 million in damages to North Carolina forests.[16]" As the state and local governments of North Carolina were faced with the enormous task of managing this debris, the DAQ collaborated with state and federal partners to coordinate debris cleanup, including issuance of guidance on debris removal for contractors, local governments, and nonprofits. By December 13, 2024, the State had organized 108 active Temporary Debris Storage and Reduction Sites across 20 counties, and 10,445,000 cubic yards of debris had been cleared from 27 counties.

As also described in Section I.B of this letter, state and local governments made many efforts to minimize the health impacts of debris cleanup following Hurricane Helene, The NCDEQ issued extensive guidance on debris removal, collection, and burning, and offered technical assistance.[17] Landowners, contractors, and municipalities were encouraged to grind vegetative debris into wood chips when possible. The State also created the North Carolina State Mission Assigned Recovery Task (SMART) Program to assist counties in removing disaster debris after a federally declared disaster.[18] The SMART Program allows property owners in participating counties to request free debris removal services.

If burning was the only viable option, the DAQ advocated for using ACIs to remove vegetative debris and limiting the use of open burning. When operated properly, ACIs emit less smoke and harmful pollution than open burning, making these units an essential component of North

[16] NOAA, National Hurricane Center Tropical Cyclone Report, Hurricane Helene, March 19, 2025. https://www.nhc.noaa.gov/data/tcr/AL092024_Helene.pdf
[17] NCDEQ, Environmental Guidance for Helene-Impacted Areas, Accessed April 14, 2026. https://www.deq.nc.gov/news/key-issues/storm-season/hurricane-helene-response/environmental-guidance-helene-impacted-areas#DebrisRemovalCollectionBurning-17021
[18] North Carolina SMART Program, Disaster Debris Removal Assistance For Your Community, Accessed April 15, 2026. https://ncdebriscleanup.com/

Carolina's path towards recovery. The state saw an influx of numerous temporary ACIs relocating from out of state to deal with the estimated 6.8 million tons of vegetative debris. While these temporary ACIs with capacities to burn less than 35 tons per day are not currently required to obtain Title V permits, units larger than this size were still subject to this onerous requirement, presenting a hurdle in the way of efficiently processing this disaster debris. When open burning was necessary, the DAQ emphasized that it is always illegal to burn trash or any man-made materials.[17] Along with the Asheville-Buncombe Air Quality Agency, the DAQ deployed 15 temporary air quality monitors and sensors to observe air quality in the aftermath in the storm.

B. Consolidation and Alignment of ACI Provisions

The DAQ generally supports the consolidation of regulations for ACIs that only burn wood waste, clean lumber, and yard waste in a new Subpart and the alignment of requirements for these ACIs. Combining requirements for ACIs of this type into a single set of rules regardless of the amount of vegetative debris burned would make the rules clearer for all stakeholders, including the regulated community, states, local governments, and the public. The regulated community will benefit from only having one set of regulations to reference for these ACIs' requirements and not needing to cite different requirements depending on the amount burned. Additionally, ACIs that only burn wood waste, clean lumber, and yard waste are not solid waste incineration units, as described in Section I.B of this letter and defined in the Clean Air Act, and thus should not be regulated under the other numerous federal rules for solid waste incinerators. Separating requirements for ACIs of this type from those of solid waste incinerators will correct this error and reduce confusion.

The DAQ agrees with most of the proposed requirements for ACIs that only burn wood waste, clean lumber, and yard waste but has some concerns about the specific text of the proposed rules, as shown in the EPA's Redline/Strikeout (RLSO) markup of the rule language included with the docket. [19] Our specific comments are outlined below:

Definitions, Opacity Measurement, Performance Testing, Recordkeeping, and Reporting Requirements (Comments ACI-1, ACI-2, ACI-3, ACI-4, and ACI-6)

The DAQ agrees with the EPA's proposal to align the definition of an ACI in the new proposed Subpart Ca with the existing definition of an ACI in the OSWI Rules (Comment ACI-1). The DAQ also agrees with the EPA's proposal to require 6-minute averages as the basis of opacity compliance across all of the rules, as this ensures consistency across ACIs (Comment ACI-2).

Additionally, the DAQ agrees with the approach EPA has taken in aligning and clarifying the annual performance testing frequencies (Comment ACI-3), including the allowance for delaying an annual performance test of a unit not operating until the next day that the ACI operates (Comment ACI-4).

Finally, the DAQ supports aligning the recordkeeping and reporting requirements among ACIs, to require records for 5 years, with the records stored onsite for two years, and an

[19] EPA, Redline/Strikeout for amendments to Subparts across 40 CFR 60 and 62 and the addition of a new part 60 subpart for Consolidated Air Curtain Incinerators that Only Burn Wood Wastes, Yard Wastes, and Clean Lumber, Docket Document ID No. EPA-HQ-2025-0068-0013, March 20, 2026. https://www.regulations.gov/document/EPA-HQ-OAR-2025-0068-0013

option for offsite storage for the remaining 3 years that the record is required (Comment ACI-6).

Initial Notification Requirements (Comment ACI-5)

While the DAQ agrees with the EPA's proposal to require ACI operators to provide notification of startup, we recommend EPA revise the provisions to provide a more reasonable timeframe of these initial notification requirements. In the RLSO document, § 60.37a in 40 CFR Part 60 Subpart Ca specifies that the ACI operator "*(a) Prior to the date of the initial startup or by [INSERT DATE OF PUBLICATION IN THE FEDERAL REGISTER], whichever is later, submit to the Administrator a Notification that includes the three items described in paragraphs (a)(1) through (3) of this section.*" Requiring this notification on the same date as the final rule is published in the Federal Register does not provide adequate notice to regulated entities of this deadline, as the future date of publication would likely be unknown by regulated entities until the date that it appears in the Federal Register. The DAQ recommends allowing at least 60 days from the publication for entities to provide this notification.

CISWI Federal Plan Applicability

The DAQ notes that (according to the RLSO of the proposed rule language) EPA did not propose to remove the requirements for ACIs that only burn wood waste, clean lumber, and yard waste from the CISWI Federal Plan in 40 CFR Part 62 Subpart IIIa. Attachment 24 in the RLSO document does not amend or repeal any of the citations in this Subpart related to ACIs of this type, including §§ 62.14510a, 62.14530a, and 62.14740a through 62.14765a.[19] To achieve the EPA's stated goals of consolidating requirements for ACIs that burn only wood waste, clean lumber, and yard waste in 40 CFR Part 60 Subpart Ca and removing all requirements for these ACIs from other federal rules, the DAQ believes that the CISWI Federal Plan in 40 CFR Part 62 Subpart IIIa should be amended in a manner consistent with the other rules in this proposed action.

C. Proposed Temporary-Use and Disaster Recovery Provisions

In the wake of Hurricane Helene, North Carolina urgently needed ACIs to burn vegetative debris as quickly and cleanly as possible; however, only OSWI ACIs had temporary-use disaster provisions that allowed them to be used without delay. In the immediate aftermath of the storm and prior to the EPA's issuance of a NAA for North Carolina, CISWI ACIs were required to obtain a Title V permit and comply with 40 CFR Part 60 Subparts CCCC or DDDD. Consequently, fewer ACIs were able to be used to replace open burning. CISWI ACIs are larger and can burn more debris at once, making them safer and more effective for processing a large volume of debris. The DAQ recognized the potential benefits of using CISWI ACIs and asked the EPA for regulatory relief. After the EPA issued the NAA, these larger ACIs allowed more vegetative debris to be cleared and lessened the need for open burning.

The use of both OSWI and CISWI ACIs continues to play an important role in Western North Carolina's recovery from Hurricane Helene, as these units have allowed for quicker disposal of disaster debris while minimizing particle pollution and reducing the risk of wildfires. The DAQ generally supports adding temporary-use disaster provisions for CISWI units, which will relieve the need for future NAAs (upon the proposed rule becoming final). However, the DAQ

requests that §§ 60.2030 and 60.2542 in the CISWI Rules and § 62.14775a in the CISWI Federal Plan be amended to allow states to approve temporary use of a CISWI unit beyond 16 weeks.[19] The RLSO text specifically retains this authority with the EPA, but we believe that States are well equipped to handle these numerous requests when State personnel are already very involved in the many various efforts towards disaster recovery in their areas. Additionally, we request that the opacity limitations continue to apply for ACIs operating under the temporary-use disaster requirements. ACIs produce less pollution than open burning, but only if they are operated properly. Requiring ACIs used in disaster recovery to continue to meet the specified opacity limitations ensures that they are combusting waste efficiently and are not producing excessive pollution. The DAQ believes that the addition of temporary-use disaster provisions with opacity limitations for CISWI ACIs will allow states to respond more quickly and effectively to disasters while minimizing emissions. As a result, operators and state agencies will be able to focus on the most crucial and impactful pathways towards recovery.

D. Removal of Categorical Title V Permitting Provisions (Comment ACI-0)

On October 10, 2024, the North Carolina General Assembly (NCGA) passed House Bill 149, also known as the Disaster Recovery Act of 2024, in response to Hurricane Helene.[20] Section 10.5.(c) of the Act stated that owners and operators of permanent and temporary ACIs subject to 40 CFR Part 60, Subparts EEEE and FFFF were not required to obtain a General Title V Operating Permit, consistent with the EPA's commensurate action to the federal OSWI Rules earlier that year. As a result, the Title V permitting requirement for OSWI ACIs in North Carolina was lifted sooner than it would have been through the state's administrative rulemaking process alone, providing permitting relief for OSWI ACIs while the DAQ worked on amending the state's ACI rule. This change further facilitated the use of ACIs during this critical time.

The DAQ supports the EPA's proposal to remove the categorical Title V permitting requirement for CISWI and SMWC ACIs that burn only wood wastes, yard wastes, and clean lumber (Comment ACI-0). This will align the requirements for these units with those for ACIs of other sizes (i.e., OSWI and LMWC ACIs). Further, as explained in Section I of this letter and in EPA's preamble, ACIs that burn only these materials are not solid waste incineration units under the CAA, and therefore, should not be regulated as such with respect to Title V permitting.

While the EPA's preamble indicates its intent to remove categorical Title V permitting for ACIs of this type, the RLSO text for Subpart IIIa appears to continue requiring ACIs of this type to obtain a Title V permit, as Attachment 24 does not include any amendments or repeals of §§ 62.14510a, 62.14530a, and 62.14740a through 62.14765a.[19] The DAQ recommends EPA review this language closely and revise the CISWI Federal Plan text to remove requirements for ACIs burning only wood wastes, yard wastes, and clean lumber, as well as any erroneous cross references.

E. Pyrolysis Exclusion (Comment OSWI-1)

North Carolina is still recovering from the devastating impacts of Hurricane Helene. Though a significant amount of work has been done to process debris, there is still an enormous amount that needs to be removed. Removing the Title V permitting requirement for ACIs that only burn

[20] NCGA, The Disaster Recovery Act of 2024, October 10, 2024. https://www.ncleg.gov/Sessions/2023/Bills/House/PDF/H149v5.pdf

wood waste, clean lumber, and yard waste, streamlining requirements for these ACIs, and adding temporary-use disaster provisions for CISWI units will make the removal of vegetative debris easier and faster. It is imperative that North Carolina be able to take advantage of these benefits as soon as possible; however, they were proposed along with EPA's request for comment on removing the reference to "pyrolysis/combustion units" from the definition of "municipal waste combustion unit" in the OSWI Rules. While we generally agree that pyrolysis units are distinct and separate from OSWI units, the DAQ does not want the necessary changes to ACI requirements needed to aid in disaster recovery to be delayed due to comments EPA receives on this definition (Comment OSWI-1). The DAQ urges EPA to separate the changes to ACI requirements and CISWI Rules from the request for comment on the pyrolysis exclusion so North Carolina can implement these crucial and timely actions without impediment.

F. Miscellaneous Comments

As outlined in this Subsection, the DAQ has identified several aspects of the text of the proposed rules, as included in the RLSO document posted to the docket,[19] that we believe require correction or clarification.

CISWI Rules and Federal Plan (40 CFR Part 60, Subparts CCCC and DDDD, and 40 CFR Part 62, Subpart IIIa)

The EPA states at 91 FR 13543, 13555 (Mar. 20, 2026) that CISWI units temporarily used in disaster recovery must continue operating control devices installed to comply with CISWI New Source Performance Standards, a CISWI Federal plan, or a State plan implementing CISWI Emission Guidelines, unless doing so is not technically feasible due to conditions in the disaster recovery area.[21] This provision is consistent with the (now rescinded) IFR, which included the same exception. However, unlike the IFR, the proposed text of 40 CFR Part 60 Subpart Ca, as listed in the RLSO document, requires control devices to remain in operation but does not include any reference to feasibility.[19] The DAQ supports the inclusion of the exception for feasibility and recommends that the rule text be amended to align with the IFR.

OSWI Rules (40 CFR Part 60, Subparts EEEE and FFFF)

In the RLSO of the proposed rules, the text appearing at § 60.3059(b) in 40 CFR Part 60 Subpart FFFF contains a cross reference to "§§ 60.3062 through 60.3068", but the EPA is proposing to remove these sections. Additionally, § 60.2966(b), the section in 40 CFR Part 60 Subpart FFFF that corresponds to § 60.3059(b), is proposed to be removed.[19] The DAQ believes that § 60.3059(b) is no longer necessary and should also be removed.

Other Miscellaneous Rule Text

In our inspection of the RLSO document,[19] the DAQ also identified some minor errors in the proposed rule text, as outlined below:

- The RLSO markup of the proposed rules appears to contain an erroneous Subpart citation and title, where the text "PART 60—STANDARDS OF PERFORMANCE FOR LARGE MUNICIPAL WASTE COMBUSTORS" appears instead of "PART

[21] EPA, 91 FR 13543 and 13555, March 20, 2026.

60—STANDARDS OF PERFORMANCE FOR NEW STATIONARY SOURCES" for Attachment 10.

- There is an extraneous heading under Attachment 11 for Subpart BBBB that seems to have been put there in error.

- In 40 CFR Part 62 Subpart FFF, §62.14102(m) contains a typographical error, where the term "feestocks" appears instead of "feedstocks."

The DAQ requests that EPA provide an updated RLSO markup version of the rule text upon finalization of this rulemaking, to assist states and regulated entities with identifying the final changes to the rules.

III. Conclusions and Recommendations

As articulated in this comment letter, the DAQ is in favor of the EPA's proposal to remove the Title V permitting requirement for ACIs that only burn wood waste, yard waste, and clean lumber, in addition to the consolidation of regulations for ACIs of this type in 40 CFR Part 60 Subpart Ca. The DAQ also supports the addition of temporary-use disaster provisions for CISWI units, though we request that the EPA allow states to serve in the Administrator Role for approving requests for ACIs to operate under the disaster provisions longer than 16 weeks and that opacity limitations continue to apply to ACIs operating under these requirements. Additionally, the DAQ recommends that the EPA align their proposed regulatory text with stated intentions in the Federal Register, including the specified exception to the requirement to operate control devices in the temporary-use disaster provisions for CISWI units for when it is not technically feasible to continue operation and removal of provisions in the CISWI Federal Plan that apply to ACIs burning only wood wastes, yard wastes, and clean lumber. Finally, the DAQ urges the EPA to finalize the consolidation and alignment of these ACI rules as expeditiously as possible, to ensure states, local air agencies, and the regulated community can efficiently respond in the wake of future natural disasters to keep communities and residents safe.

Thank you for your attention to this matter. If you should have any questions or need additional information, please contact me at (919) 707-8497 or taylor.hartsfield@deq.nc.gov.

Sincerely,

Taylor Hartsfield

Taylor Hartsfield, Deputy Director
Division of Air Quality, NCDEQ

cc: Sushma Masemore, NCDEQ
Michael A. Abraczinskas, NCDAQ
Katherine Quinlan, NCDAQ

Asheville-Buncombe Air Quality Agency

Memo

To: Air Quality Board

From: James Raiford

CC: Ashley Featherstone, Director

Date: May 7, 2026

Re: 2025 Clean Air Compliance Awards

For the twenty-fourth year, the Asheville-Buncombe Air Quality Agency is recognizing permitted facilities that have been in compliance with all aspects of their permit as well as all other AB Air Quality Rules and Regulations over the past year. This year, there were 47 such facilities.

The following is a list of facilities that are being recognized with a Clean Air Compliance Award certificate this year:

- A Simple Cremation
- Amcor Flexibles LLC
- Anders-Rice Funeral Home
- APAC - Atlantic, Inc. - Black Mountain
- APAC - Atlantic, Inc. - Enka
- Aprotech Powertrain, LLC
- B.V. Hedrick Gravel and Sand Company - Grove Stone Quarry
- B.V. Hedrick Gravel and Sand Company - North Buncombe Quarry
- BorgWarner Turbo Systems
- Buncombe County Landfill I
- Buncombe County Landfill II
- Carolina Ready Mix & Builders Supply, LLC

- Carolina Ready Mix Enka Plant
- City of Asheville Water Resources Dept. - DeBruhl Water Treatment Plant
- City of Asheville Water Resources Dept. - North Fork Water Treatment Plant
- Cormark International, LLC
- Cremation Services of WNC - Smoky Park Highway
- Cremation Services of WNC - Tunnel Road
- Day International, Inc. dba Flint Group
- DelKote Machine Finishing, Inc.
- Dodge Mechanical Power Transmission Company
- Duke Energy Progress, LLC - Asheville Combined Cycle Plant
- Eaton Corporation - Avery Creek Facility
- Eaton Electrical
- Ecolab, Inc.
- General Electric Co. dba GE Aviation Asheville
- Glatfelter Industries Asheville, Inc.
- Harwood Home for Funerals, Inc.
- Ingles Markets Distribution Center
- Kearfott Corporation Motion Systems Division
- Low & Bonar, Inc.
- Metropolitan Sewerage District of Buncombe County
- MTTG, LLC dba Mill Tek Toll Grinders
- New Belgium Brewing Company, Inc.
- Oldcastle APG South, Inc., dba Adams
- Perfection Gear, Inc.
- Plasticard - Locktech International, LLP dba PLI
- RTX Corporation, Pratt and Whitney Division
- Riverside Stump Dump, Inc.
- Robin Media Group, Inc. (Charter Communications)
- Shakespeare Company, LLC
- Southern Concrete Materials - Biltmore Plant
- Southern Concrete Materials - Pond Road
- Tutco, Inc.
- Vulcan Construction Materials, LLC

- Western Animal Disease Diagnostic Laboratory
- XSYS North America

Asheville-Buncombe Air Quality Agency
APPLICATION REVIEW SUMMARY

SECTION A: FACILITY INFORMATION			
Company Name:	Freudenberg Performance Materials (Freudenberg)		
Site Name:	Freudenberg – Enka Facility		
Mailing Address:	1301 Sand Hill Road, Enka, NC 28728		
Site Address:	1301 Sand Hill Road, Enka, NC 28728		
General Description of Business	Non-woven and geosynthetic fiber manufacturing facility		
Facility Classification:	Title V	**SITE STATUS:**	Existing

SECTION B: APPLICATION INFORMATION			
Date Of Application:	May 24, 2024	**Application Tracking No.:**	NA
Date Complete Application Received:	January 2, 2025	**Board Meeting Date:**	May 14, 2026
Confidentiality Requested?	No	**Board Agenda Type:**	Title V Permit Renewal
Application Results:	The purpose of this review is to renew the Title V operating permit for the facility.		
Permit No. / Date Issued by Application:	11-805-26 / May 14, 2026		
Permit No. / Date Voided by Application:	11-805-19A / March 14, 2024		

SECTION C: REGULATORY INFORMATION	
AB Air Quality Regulations:	4.0503, 4.0515, 4.0516, 4.0521, 4.0524, 4.0530, 4.0535, 4.0958, 4.1111, 4.1806 17.0504, 17.0317, 17.0700

SECTION D: FACILITY-WIDE EMISSIONS INFORMATION

Pollutants Reviewed as a Result of this Application or AB Air Quality Action:	Actual 2023 Emissions (TONS/YR)	Potential Emissions (TONS/YR)	
		Prior to Review	New
PM-Total	13.6*	91.4	91.1
PM-10 / PM-2.5	13.6* / 13.6*	88.7 / 87.8	88.1 / 87.1
SO_2	0.055	83.6	93.3
NO_X	8.25	37.0	26.3
CO	7.81	13.9	6.6
VOC	62.0	249 (with limit)	249 (with limit)
Greenhouse Gases, CO2e	11,171.06	40,043	29,996
All Hazardous Air Pollutants (HAPs)	0.175	0.227	0.226
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).**

IN COMPLIANCE WITH EMISSION STANDARDS / RECOMMEND APPROVAL			
Prepared by:	Alex Latta /	**Date Completed:**	03/20/2026
Reviewed by:	James C. Raiford /	**Date Approved:**	03/25/2026
Director:	Ashley J. Featherstone /	**Date Approved:**	03/25/2026

SECTION A DETAILS

FACILITY INFORMATION

[Detailed discussion of any items in Section A]

On March 4, 2013, the Agency received notification that Colbond, Inc. had merged with Bonar Technical Fabrics. The legal name of the new company is Bonar, Inc. (Bonar). The permit was amended in 2013 to reflect the change. On September 26, 2016, the Agency received notification that Bonar, Inc. had changed their corporate name to Low & Bonar, Inc. (Low & Bonar). The permit was amended in 2016 to reflect the name change. Low & Bonar manufactures non-woven and geo-synthetic fabrics for various end uses in construction, flooring, and automotive markets.

In the nonwoven process line (M-1 through M-5), polyester (polyethylene terephthalate, PET) and nylon chips (Nylon 6 aka polycaprolactam, polyamide, PA6) are melted and extruded or spun to form a synthetic fiber. Bonar utilizes a two-step process: the yarn is spun and the fleece is then made from the yarn. In the fleecing operation, the fibers are bonded together in a nonwoven fashion to form a blanket. The blankets are trimmed and stored on large rolls. The finished product, called Colback, is used as a backing for carpeting and flat roofing products.

Specifically, Nylon and PET chips are crystallized and dried in dedicated heated conversion processes prior to melting and being combined in the spinning process. A heated extrusion process melts and co-extrudes nylon and PET through spinnerets to produce co-polymer fibers. Individual fibers are combined into a yarn that is collected onto spools. In this process, a VOC-containing lubricant is applied to the surface of individual yarn strands to facilitate movement of the yarn through the equipment. Further in the process, yarn is wound onto spools in the winding cabinets. Ultimately, yarn stored on spools is fed to the fleecing operation step and formed into a non-woven fabric, which is the final product.

In the geo-synthetic process line (G-1 through G-6), nylon or polypropylene chips are melted and then extruded to form a loosely bonded blanket called Enkamat. No individual fibers are spun during this process. After cooling, the blankets are stored on large rolls. The geo-synthetic products or specialty geo-fabrics are used in various erosion control systems and building products, including ridge vents for roofing.

In the application for the initial Title V permit, Bonar provided updated maximum production capacity figures for two of the geo-synthetic fabric extrusion lines (G-3 and G-5). They also requested that G-RES be classified as an insignificant activity. Emissions from G-RES are required to be calculated and reported in accordance with the PSD avoidance condition. For that reason, the source was be included in the permit so that it would be clear that emissions must be included in PSD avoidance calculations.

Three 502(b)(10) changes occurred prior to the 2019 permit renewal. In a letter dated August 3, 2016, Bonar notified the agency of their intention to implement a 502(b)(10) change at their facility (which had been previously discussed with the Agency). Bonar was planning to reroute the M-1 line, which was routed to Filter House 1 (FH-1) to Filter House 2 (FH-2). The polypropylene was being utilized on this line was causing issues with the filter media on FH-1. FH-2 is a packed bed scrubber with a chevron style demister, it was expected to be able to process this material without causing media issues. The change occurred in late 2016. The table in the permit with the source and control device information was updated while the permit was open.

In May of 2017, Low & Bonar contacted the agency regarding the addition of a geosynthetic process line, G-6. This line is the same configuration as G-3, with the same maximum rated capacity. It was determined that this line addition could be handled as a 502(b)(10) change. Low & Bonar submitted the notification letter and checklist in August of 2017. In August of 2018 during the compliance inspection, it was noted that the process was in operation running trials. It was not in full production yet at that time.

In July of 2018, after consultation with the agency, Low & Bonar submitted a 502(b)(10) notification for the replacement of the smog hogs or electrostatic mist collection system that controls emissions from process line G-5. The goal of the project was to increase the capacity of the system in order to improve the collection efficiency of the hood inside the manufacturing area to improve indoor air quality for the

employees. The new system is the same brand, manufacturer, and electrostatic precipitator technology, the only difference is the replacement unit has more airflow capacity, 13,000 CFM compared to 7,600 CFM. The checklist and an updated C2 form were included with the notification. The replacement was completed in 2018.

Additional insignificant activities were added as part of the 2019 renewal including one aerosol can recycling unit, two ink jet printers, and one diesel fired emergency generator. More details regarding those sources are included below.

Facility Process Changes Since Last Renewal:

In February of 2020, Low & Bonar submitted a 502(b)(10) notification for the replacement of two (2) dryers, DRY 1 and DRY 2, and one (1) crystallizer, CRST-2, with new units, CRST-6, CRST-7, DRY-6, and DRY-7. The current units are listed as insignificant activities and the new units will have similar heat input ratings to the units being replaced. This change occurred in March of 2020.

In June of 2021, Low & Bonar submitted a 502(b)(10) notification to change the listed burner size of ESPB-1 and ESPB-2 from 18.8 MMBtu/hr to 21.0 MMBtu/hr to reflect actual burner size of equipment.

These changes were processed during this renewal. The emissions limits for the boilers were updated as part of this renewal since they are based on the heat input.

2024 Administrative Modification:
In an email from Tom Buller on June 29, 2022, Mr. Buller notified the Agency that Freudenberg & Co. had acquired Low and Bonar in May 2020. Because of the pandemic nothing really changed about how they operated in the first year of the acquisition. In 2021 they began merging into the Freudenberg organization. In 2022 they changed the name out front of the business and begun corresponding with customers as Freudenberg Performance Materials. They continued to operate under the Low & Bonar, Inc. legal entity. It was noted that Low and Bonar had complicated financial entities and that it would take awhile to unwind those entities. The company is listed as Freudenberg Performance Materials LP on the NC Secretary of State website.

The Agency received a letter from Tom Buller dated January 9, 2024, which included the ownership change notification and an off-permit change notification. The permit changes were for the insignificant activity list; they included a correction to the heat input rating of STEEL-1 from 0.62 MMBtu/hr to 0.5 MMBtu/hr and only being fired on natural gas and not including propane as a backup fuel source. They noted that the POLY-CHIP activity vented indoors and not outdoors, as they said the permit stated. The facility wants to add an additional STEEL-2, 0.5 MMBtu gas-fired burn off oven and an additional chip handling system – POLY-CHIP-2. Additionally, the facility noted the LIN-1 burn off oven was removed from the facility. An A1 Form was attached that was signed by Donnie Phelps, the Site Executive Officer, as the responsible official, and dated 1/24/24. The Agency responded with a letter and invoice for the $100 administrative fee change on February 14, 2024. Emissions calculations for the burn-off oven were included.

The general conditions in the permit were also updated as part of this renewal.

Facility Requested changes as part of this renewal:

Freudenberg is requesting the following changes to the permit with this renewal:

1. Remove all references to the use of propane at the facility, as the propane tank has been removed from operation. This includes removing propane as a backup fuel for F-1,F-2, DRY-4,CRST-5, DRY-5, STEEL-1 and removing propane from the text of conditions 2.1.D.1.c and 2.1.D.4.c
2. Remove equipment PST, GLUE, and AEROSOL from the permit as the equipment has been removed from operation.
3. Update the following insignificant activities emission source and/or control device descriptions:
    a. POLY-CHIP: change the control device description to read "Closed-loop pneumatic system comprised of numerous dust collectors and a cyclone"
    b. R&D LAB: change emission source description to read "One Research and Development Laboratory known as the 'Quality Lab'"

c. FINISH: change emission source description to read "One finish oil storage area"
d. TRANSFER:
    i. Change emission source description to read "Pneumatic nylon chip transfer operation"
    ii. Change control device description to read "Closed-loop pneumatic system with one (1) vacuum system dust collector"
e. ENKA-CHIP: Change emission source description to read "Closed-loop pneumatic Enkamat chip handling system"
f. INKJET: change emission source description to read "Two ink jet printers utilized for printing on the geo-synthetic lines"

Additionally, Freudenberg identified inconsistencies between the emission calculations and the listed maximum process rates for the G-3 and G-6 process lines and has submitted updated emissions calculations with the renewal application to correctly reflect the maximum process rates listed in the permit. No changes to the permit are requested with the update to the emissions calculations. These changes are reflected on forms A2 and D4 of the renewal application.

Freudenberg also requested that the condition for the emergency engines 40 CFR Part 63 Subpart ZZZZ be updated since rule changes occurred since the last permit was issued.

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
M-1	One synthetic fiber extrusion and winding process with emissions controlled by one packed bed scrubber equipped with a chevron style demister referred to by the facility as a filter house (FH-2)	PM, PM-10, PM-2.5, VOC	FH-2 is a horizontally-oriented, packed bed wet scrubber with a chevron style demister manufactured by HEE Environmental Engineering, LLC, Model No. ECH 44-5 LB. The pressure drop range is 0.2 to 2.0 inches water column. Packing is polypropylene, total volume of packing is 4x4x5=80 cubic feet, volumetric flow rate is 7,200 cubic feet per minute, and the total liquid injection rate is 80 gallons per minute. The range of operation listed in the permit application forms indicates that the operating range is between 75 and 80 gallons per minute. For more details on the scrubber, please see the notes below from the 2012 permit review and the Title V permit application. Bonar implemented a 502(b)(10) change in 2016 to reroute the M-1 line to FH-2. It had previously been exhausted to FH-1. The maximum material throughput data for this process were revisited during the permit modification in 2012. The maximum process weight rate for M1 is 1,693 pounds per hour; this figure includes PET (polyester) and PA (nylon), which are processed together. Two different scenarios or % throughput combinations of raw materials were provided. The combination with the higher nylon or PA content is used for maximum potential emissions, since nylon results in higher PM emissions. (1,303 pounds polyester or PET + 389 pounds nylon or PA = 1,693 pounds per hour total throughput). Data provided in email correspondence from Dan March of Pisgah Environmental on

			August 20, 2012. In 2014, Bonar began making a new product that utilizes polypropylene and PET. Please see note below for more details regarding the modification that occurred in March of 2014.
M-2	One synthetic fiber extrusion and winding process with emissions controlled by one monomer mist elimination system referred to by the facility as the filter house (FH-1)	PM, PM-10, PM-2.5, VOC	FH-1 utilizes a KOCH flexifiber mist eliminator BD SRF Type II 24120, which utilizes Brownian diffusion and glass fiber filter media. The dual system was custom built and includes an Industrial Air, Inc. vacuum unit and housing with two sets of filtration units; only one operates at a time. Facility operators monitor the pressure drop across the scrubber and when the pressure drop falls below 4.75 inches of water, the exhaust is routed to the second unit and a water spray system flushes the filtration media to clean it and prepare it for reuse. The maximum material throughput data for this process was revisited during the permit modification in 2012. The maximum process weight rate for M2 is 1,058 pounds per hour; this figure includes PET (polyester) and PA (nylon), which are processed together. Two different scenarios or % throughput combinations of raw materials are provided. The combination with the higher nylon or PA content is used for maximum potential emissions, since nylon results in PM emissions and polyester does not. (815 pounds polyester or PET + 243 pounds nylon or PA = 1,058 pounds per hour total throughput). Data provided in email correspondence from Dan March of Pisgah Environmental on August 20, 2012.

M-3	One synthetic fiber extrusion and winding process with emissions controlled by one monomer mist elimination system referred to by the facility as the filter house (FH-1)	PM, PM-10, PM-2.5, VOC	Please see note regarding the control device above under M1. The maximum material throughput data for this process was revisited during the permit modification in 2012. The maximum process weight rate for M3 is 1,058 pounds per hour; this figure includes PET (polyester) and PA (nylon), which are processed together. Two different scenarios or % throughput combinations of raw materials are provided. The combination with the higher nylon or PA content is used for maximum potential emissions, since nylon results in PM emissions and polyester does not. (815 pounds polyester or PET + 243 pounds nylon or PA = 1,058 pounds per hour total throughput). Data provided in email correspondence from Dan March of Pisgah Environmental on August 20, 2012.
M-4	One synthetic fiber extrusion and winding process with emissions controlled by one monomer mist elimination system referred to by the facility as the filter house (FH-1)	PM, PM-10, PM-2.5, VOC	Please see note regarding the control device above under M1. The maximum material throughput data for this process was revisited during the permit modification in 2012. The maximum process weight rate for M4 is 1,285 pounds per hour; this figure includes PET (polyester) and PA (nylon), which are processed together. Unlike M1-M3, only one combination of materials was given (990 pounds polyester or PET + 296 pounds nylon or PA = 1,285 pounds per hour total throughput). Data provided in email correspondence from Dan March of Pisgah Environmental on August 20, 2012.

M-5	One synthetic fiber extrusion and winding process with emissions controlled by one packed bed scrubber equipped with a chevron style demister referred to by the facility as a filter house (FH-2)	PM, PM-10, PM-2.5, VOC	Solvent-based coatings are utilized in this process. Bonar estimates that similar to M1-M4, 96% of the VOCs are emitted at this stage in the process. The other 4% of VOCs are emitted in the fleecing operation that follows (F1 and F2). The maximum process weight rate for M5 is 1,270 pounds per hour; this figure includes PET (polyester) and PA (nylon), which are processed together. Several different scenarios or % throughput combinations of raw materials were provided in the permit application. The combination with the highest nylon or PA content is used for maximum potential emissions, since nylon results in PM emissions and polyester does not. (979 pounds polyester or PET + 291 pounds nylon or PA = 1,270 pounds per hour total throughput). In 2014, Bonar began making a new product that utilizes polypropylene and PET on the M1 line. During this permit review, they indicated that they may also wish to make that product on M5. Please see the note below for more details regarding the modification that occurred in March of 2014 and updated information provided during this review. FH-2 is a horizontally-oriented, packed bed wet scrubber with a chevron style demister manufactured by HEE Environmental Engineering, LLC, Model No. ECH 44-5 LB. The pressure drop range is 0.2 to 2.0 inches water column. Packing is polypropylene, total volume of packing is 4x4x5=80 cubic feet, volumetric flow rate is 7,200 cubic feet per minute, and the total liquid injection rate is 80 gallons per minute. The range of operation listed in the permit application forms indicates that the operating range is between 75 and 80 gallons per minute. For more details on the scrubber, please see the notes below from the 2012 permit review and the Title V permit application.

F-1	One Flamenco non-woven fleecing unit (Unit 1) utilizing a 6.0 MM Btu/hr air heater fired on natural gas	PM, PM-10, PM-2.5, CO, NOx, SO_2, VOC, HAPs/TAPs, GHG	The permit was modified in 2014 to allow Bonar to increase the heat input capacity of this unit from 5.6 MM BTU per hour to 6.0 million BTU per hour. The agency determined that this action required a permit modification since F-1 is a permitted piece of equipment due to the fact that in a letter from Colbond dated June 3, 2003, Colbond estimated that 96% of VOCs from the fiber finish are emitted during the spinning process, and the remaining 4% of VOCs are emitted during the fleecing process.
F-2	One Flamenco non-woven fleecing unit (Unit 2) utilizing a 10.4 MM Btu/hr air heater fired on natural gas	PM, PM-10, PM-2.5, CO, NOx, SO_2, VOC, HAPs/TAPs, GHG	Bonar did not propose any changes to F-2 in 2014. Updated information about heat input capacity was provided as part of that permit modification. The previous permit listed the heat input capacity as 6.7 MM BTU per hour.
G-1	One geo-synthetic fabric extrusion line	PM, PM-10, PM-2.5, VOC	The maximum design input rate for this machine is approximately 550 pounds per hour when utilizing nylon as the raw material, and approximately 451 pounds per hour when utilizing polypropylene.
G-2	One geo-synthetic fabric extrusion line	PM, PM-10, PM-2.5, VOC	The maximum design input rate for this machine is approximately 550 pounds per hour when utilizing nylon as the raw material, and approximately 451 pounds per hour when utilizing polypropylene.

G-3	One geo-synthetic fabric extrusion line	PM, PM-10, PM-2.5, VOC	The maximum design input rate for this machine is approximately 50 pounds per hour when utilizing nylon as the raw material, and approximately 41 pounds per hour when utilizing polypropylene. In this application for the Title V permit, Bonar has indicated that the maximum design input rate for this unit is actually 60 pounds per hour when utilizing nylon as a raw material. An updated figure for polypropylene was not provided in the application. In email correspondence dated July 3, 2014, Steve Jenkins of Bonar indicated that the maximum capacity when utilizing polypropylene is 49 pounds per hour. The maximum capacity figures were not updated when the Title V permit was issued. They will be updated as part of the current renewal.
G-4	One geo-synthetic fabric extrusion line	PM, PM-10, PM-2.5,VOC	The maximum design input rate for this machine is approximately 550 pounds per hour when utilizing nylon as the raw material, and approximately 451 pounds per hour when utilizing polypropylene.

G-5	One geo-synthetic fabric extrusion line	PM, PM-10, PM-2.5, VOC	G-5 may run continuously; the maximum design input rate was previously listed as 2,500 pounds per hour when utilizing nylon as a raw material, and 2,050 pounds per hour when utilizing polypropylene. In the application for the Title V permit, Bonar indicated that the maximum design input rate for this unit is actually 1,800 pounds per hour when utilizing nylon as a raw material. In email correspondence dated July 3rd, Steve Jenkins indicated that the maximum capacity when utilizing polypropylene is 1,476 pounds per hour. This information was updated when the Title V permit was issued. Emissions are routed to a separate exhaust stack and controlled with two electrostatic mist collectors. The manufacturer is United Air Specialists, Inc. Both are Model No. SHN-20-H-M Electrostatic Mist Collectors. The efficiency rating is 95%. The control device description was updated when the Title V permit was issued. In July of 2018, after consultation with the agency, Low & Bonar submitted a 502(b)(10) notification for the replacement of the smog hogs or electrostatic mist collection system that controls emissions from process line G-5. The goal of the project was to increase the capacity of the system in order to improve the collection efficiency of the hood inside the manufacturing area to improve indoor air quality for the employees. The new system is the same brand, manufacturer, electrostatic precipitator technology, same 95% efficiency rating (per application form), the only difference is the replacement unit has more airflow capacity, 13,000 CFM compared to 7,600 CFM, the combined capacity of the two previous units. The checklist and an updated C2 form were included with the notification. The replacement was completed in 2018. The new unit is a CLARCOR-UAS-SMOGHOG Model No. PSG34-2. Total collection plate area is listed as 3,336 ft2.

G-6	One geo-synthetic fabric extrusion line	PM, PM-10, PM-2.5, VOC	This process was added as a 502(b)(10) change in 2017 and added to the permit with the 2019 renewal. In the notification, it was stated that the capacity was the same as G-3. As such, the maximum design input rate for this machine is approximately 60 pounds per hour when utilizing nylon as the raw material, and approximately 49 pounds per hour when utilizing polypropylene.
G-RES	One geo-synthetic fabric extrusion line	PM, PM-10, PM-2.5, VOC	This machine is operated intermittently for research purposes only; maximum design input rate for this machine is approximately 30 pounds per hour when utilizing nylon as the raw material, and approximately 25 pounds per hour when utilizing polypropylene. In addition to utilizing nylon and polypropylene, other raw materials are occasionally tested on this machine for product development purposes. Emissions are exhausted to a separate stack. In a previous permit, this machine was referred to as G-5. In 2008 when Colbond added a production line, they asked that the new machine be referred to as G-5, and that this machine be renamed G-RES. In the Title V permit application, Bonar pointed out that potential emissions are less than 5 tons per year and as such, this source can be listed on the insignificant activity list. Emissions will still need to be calculated and reported in accordance with the PSD avoidance condition. For that reason, the source will be included in the permit so that it will be clear that emissions must be included in PSD avoidance calculations.
ESPB-1	One 21 MMBtu/hr Hurst Series 500 natural gas / No. 2 fuel oil boiler with Industrial Combustion Model DLG-210P Low NOx Burner	PM, PM-10, PM-2.5, CO, NOx, SO_2, VOC, HAPs/TAPs, GHGs	Primary fuel is natural gas with No. 2 fuel oil backup. The boilers burn only natural gas, except during periods of natural gas curtailment and gas supply emergencies, and for testing.
ESPB-2	One 21 MMBtu/hr Hurst Series 500 natural gas / No. 2 fuel oil boiler with Industrial Combustion Model DLG-210P Low NOx Burner	PM, PM-10, PM-2.5, CO, NOx, SO_2, VOC, HAPs/TAPs, GHGs	Primary fuel is natural gas with No. 2 fuel oil backup. The boilers burn only natural gas, except during periods of natural gas curtailment and gas supply emergencies, and for testing.

BER-1	One Berringer electric burn-off oven with emissions controlled by a wet scrubber	PM, PM-10, PM-2.5, VOC, HAP/TAP	The oven is used for cleaning the spinnerets utilized in M1-M4. The spinnerets are disassembled and placed in the oven to melt and bake-off polymer residue. The wet scrubber is inherent to the process. More information is available in a memo to file dated January 9, 2004. The oven is considered an insignificant activity because of size or production rate as defined in AB Air Quality Code 17.0503 – "Definitions."
DRY-4	One Conair dryer (#4) with a maximum heat input capacity of 0.64 MMBtu/hr, fired on natural gas with propane backup	PM, PM-10, PM-2.5, CO, NOx, SO2, VOC, HAPs/TAPs, GHGs	This piece of equipment is an insignificant activity because of size or production rate as defined in AB Air Quality Code 17.0503 – "Definitions."
DRY-5	One Dryer (#5) with a maximum heat input capacity of 0.5 MM Btu/hr, fired on natural gas with propane backup	PM, PM-10, PM-2.5, CO, NOx, SO2, VOC, HAPs/TAPs, GHGs	The dryer, added to serve M5, is similar to the two existing units on other production lines. This piece of equipment is exempt from permitting as an insignificant activity because of size or production rate as defined in AB Air Quality Code 17.0503 – "Definitions."
DRY 6 & 7	Two Novatec dryers with maximum heat input capacities of 0.72 MM Btu/hr each, fired on natural gas with propane backup (Replaced Dryers # 1 and 2)	PM, PM-10, PM-2.5, CO, NOx, SO_2, VOC, HAPs/TAPs, GHGs	These pieces of equipment are currently exempt from permitting per AB Air Quality 17.0102(c)(2)(B)(ii). These sources are considered insignificant activities because of size or production rate as defined in AB Air Quality Code 17.0503 – "Definitions."
CRST-5	One Crystallizer (#5) with a maximum heat input capacity of 0.35 MM Btu/hr, fired on natural gas with propane backup	PM, PM-10, PM-2.5, CO, NOx, SO2, VOC, HAPs/TAPs, GHGs	The crystallizer was added to serve M5 and is similar to the two existing units on other production lines. This piece of equipment is considered an insignificant activity because of size or production rate as defined in AB Air Quality Code 17.0503 – "Definitions."
CRST-6	One Novatec crystallizer with a maximum heat input capacity of 0.54 MM Btu/hr, fired on natural gas (Crystallizer #6 Replaced Crystallizer #2)	PM, PM-10, PM-2.5, CO, NOx, SO_2, VOC, HAPs/TAPs, GHGs	This piece of equipment is currently exempt from permitting per AB Air Quality 17.0102(c)(2)(B)(ii). This source meets the definition of an insignificant activity because of size or production rate as defined in AB Air Quality Code 17.0503 – "Definitions."

CRST-7	One Novatec crystallizer with a maximum heat input capacity of 0.54 MM Btu/hr, fired on natural gas (Crystallizer #7 was added when Crystallizer #2 was replaced)	PM, PM-10, PM-2.5, CO, NOx, SO2, VOC, HAPs/TAPs, GHGs	This piece of equipment is currently exempt from permitting per AB Air Quality 17.0102(c)(2)(B)(ii). This source meets the definition of an insignificant activity because of size or production rate as defined in AB Air Quality Code 17.0503 – "Definitions."
ETC-1	One edge trim collection system with emissions controlled by one Flex-Kleen baghouse with 339 square feet of filter area	PM, PM-10, PM-2.5	The maximum material throughput for the edge trim collection system is 140 pounds of material per hour. Maximum potential emissions from this process were revisited as part of the Title V permit review. Potential uncontrolled PM emissions are now less than five tons per year. Under the Title V procedures, ETC-1 is considered an insignificant activity because of size or production rate as defined in AB Air Quality Code 17.0503 – "Definitions." Regarding the control device, the Title V permit application states that the minimum and maximum pressure drop are 4.0 and 6.0 inches water column, respectively. 2002 Model No. 84WSBS64M32.
PST	One 10,000 gallon aboveground propane storage tank	VOC	This unit has been removed and the permit will updated with the 2024 renewal.
POLY-CHIP, POLY-CHIP-2	Two polyester and nylon chip handling system with emissions controlled by numerous dust collectors and a cyclone	PM, PM-10, PM-2.5	POLY-CHIP-2 was added as part of this modification. The dust collectors are located throughout the facility, and are part of a dust collection system that collects dust moving through the pipes in the winding process. The dust is routed to a cyclone that exhausts indoors. None of the dust collectors is exhausted to the outdoor atmosphere, so they are considered an insignificant activity because of size or production rate as defined in AB Air Quality Code 17.0503 – "Definitions."
~~GLUE~~	~~One glue press~~	~~VOC~~	~~The glue press is considered an insignificant activity because of size or production rate as defined in AB Air Quality Code 17.0503 – "Definitions." This unit has been removed and will updated with the 2024 renewal.~~
LIN-1	One Lindberg electric burn-off oven.	PM, PM-10, PM-2.5	This unit has been removed and the permit will updated with the 2024 renewal.

TANKS1-2	Two 15,000 gallon No. 2 fuel oil tanks and supply systems	VOC	Fuel oil tanks are for backup for the boilers. These storage tanks are considered insignificant activities because of size or production rate as defined in AB Air Quality Code 17.0503 – "Definitions."
CHILL	Three (3) chillers with a total capacity of approximately 1,500 tons	PM, PM-10, PM-2.5	Refrigerant 134A. This equipment is an insignificant activity because of category as defined in AB Air Quality Code 17.0503 – "Definitions."
PYRO OVEN	One pyrolitic polymer cleaning oven with emissions controlled by a catalytic afterburner.	PM, PM-10, PM-2.5, CO, NOx	Manufacturer: SCHWING Fluid Technik GmbH. Model #: VacuClean 454T. This piece of equipment considered an insignificant activity because of size or production rate as defined in AB Air Quality Code 17.0503 – "Definitions."
R&D LAB	One Research and Development Laboratory known as the "Quality Lab."	VOCs	This process is considered an insignificant activity because of size or production rate as defined in AB Air Quality Code 17.0503 – "Definitions".
BOIL-3	One natural gas fired Hurst model cyclone hot water boiler with a maximum rated input of 2.5 MM Btu/hr	PM, PM-10, PM-2.5, CO, NOx, SO_2, VOC, HAPs/TAPs, GHGs	This boiler runs exclusively on natural gas; No. 2 fuel oil is not utilized as a backup fuel. This piece of equipment is considered an insignificant activity because of size or production rate as defined in AB Air Quality Code 17.0503 – "Definitions."
FINISH	Finish oil storage area	VOC	Sealed totes are stored in this area. This area is not vented to the atmosphere. The finish oil storage area is considered an insignificant activity because of size or production rate as defined in AB Air Quality Code 17.0503 – "Definitions."
TRANSFER	Pneumatic nylon chip transfer operation with emissions controlled by a closed-loop pneumatic system with one (1) vacuum system dust collector	PM, PM-10, PM-2.5	The nylon chip transfer system is a closed loop system and is considered an insignificant activity because of size or production rate as defined in AB Air Quality Code 17.0503 – "Definitions."

ENKA-CHIP	Closed-loop pneumatic Enkamat chip handling system	PM, PM-10, PM-2.5	This area is located in a room adjacent to the geo-synthetic process lines. Six storage bunkers and 2 chip handlers are utilized here to store raw material (resin chips) for the geo-synthetic process. The area is not vented outdoors. It is considered an insignificant activity because of size or production rate as defined in AB Air Quality Code 17.0503 – "Definitions." There are 2 Conair dryers and 2 Novatec dryers in this area that are used for drying nylon chips. These dryers are electric and as such, not expected to have air pollution emissions.
STEEL-1, STEEL-2	Two Steelman burn-off oven with a maximum heat input capacity of 0.5 MMBtu/hr, fired on natural gas	PM, PM-10, PM-2.5, CO, NOx, SO_2, VOC, HAPs/TAPs, GHGs	STEEL-2 was added as part of the 2024 modification. They are considered an insignificant activity because of size or production rate as defined in AB Air Quality Code 17.0503 – "Definitions."
AEROSOL	One aerosol can recycling unit	VOC, HAPs/TAPs	This unit has been removed and the permit will updated with the 2024 renewal.
GEN-1	One diesel fired emergency generator with a rated output capacity of 20 kW	PM, PM-10, PM-2.5, CO, NOx, SO_2, VOC, HAPs/TAPs, GHGs	Generac 20kW Model 2834080100. Manufactured in 2002. This source was noted by Low & Bonar in an internal audit in 2017 and brought to the agency's attention at that time. Generac engine is used for lift station pumps to pump effluent from plant to MSD in the event of a power failure. This engine is classified as an insignificant activity, but is subject to GACT standard ZZZZ. As such it is listed under permitted equipment to include the requirements for ZZZZ.

GEN-2	One diesel fired emergency generator with a rated output capacity of 200 kW	PM, PM-10, PM-2.5, CO, NOx, SO_2, VOC, HAPs/TAPs, GHGs	Olympian Generator Model D200P4. Manufactured in 2001. This source was added to the permit in 2019. This engine is located on adjacent property owned by Fletcher Partners. Low & Bonar operates and maintains the generator for the flood pumps that help control water during storm and flood conditions. The generator is included in the definition of 'facility' since it is on adjoining property under common control. This engine is classified as an insignificant activity but is subject to GACT standard ZZZZ. As such it is listed under permitted equipment to include the requirements for ZZZZ.
INKJET	Two ink jet printers utilized for printing on the geo-synthetic lines	VOC/TAP	Ink jet printers utilized to print labels for products manufactured on lines G-3 and G-5. Applicability determinations were submitted in 2017 and 2018. Worst case emissions were estimated at 0.52 tons per year and 10 pounds per year MEK for lines G-3 and G-5 respectively. The printers are considered insignificant activities because of size or production rate as defined in AB Air Quality Code 17.0503 – "Definitions."

APPLICATION NOTES

M-1 and M-5:

Prior to submitting the application for the burner tube replacement in 2014, Bonar notified the Agency of plans to produce a new product on one of their spinning machines (M-1). The new product will require the use of a different raw material, polypropylene, and a different finish material. EPA emission factors that this Agency was not previously aware of indicate that the use of polypropylene will result in additional PM and VOC emissions from the spinning process. The new finish material is water based, rather than solvent based, and as such, emissions from the finish will decrease. The modification to the M1 line resulting in a change in emissions was processed as part of that permit action. Bonar estimates that maximum material throughput is 85,000 pounds of polypropylene per month. The proportion of PET to polypropylene is estimated to be the same as that for nylon, as provided for the 2012 permit modification. Potential PM emissions from nylon are higher than those from polypropylene. As such, the PM emission limit and maximum potential hourly emission rates will be based on the product that utilizes nylon and polyester as raw materials.

As part of the review for the initial Title V permit in 2014, Steve Jenkins provided updated information regarding maximum throughput rates for the polypropylene based product on M-1. Email correspondence dated August 28, 2014 is attached to that review. Bonar estimates that maximum throughput for the M1 line for this product is 240 pounds of polypropylene and 760 pounds of PET per hour. Bonar may also wish to produce this product on the M-5 line in the future. The maximum throughput for the M-5 line for this product is estimated to be 229 pounds of polypropylene and 726 pounds of PET per hour. Potential PM emissions from nylon are higher than those from polypropylene. As such, the PM emission limit and maximum potential hourly emission rates will be based on the product that utilizes nylon and polyester as raw materials.

The production figures submitted by the facility in Appendix B.1 for the renewal in 2024 are outdated figures that were also submitted in the prior facility permit renewal application. As such, they do not match the figures used by the agency in our calculations which are more conservative.

M5 Scrubber:

The specifications from the manufacturer that were submitted in 2012 state that the scrubber is 99% efficient at removing particles greater than or equal to 5 microns in size. No data is available for efficiency for other particle sizes. No particle size data was provided for caprolactam (a component of Nylon 6) in the application. An inhalation study by the United Nations Environment Programme estimated particle size for caprolactam in the PM-2.5 range. An EPA fact sheet on packed bed scrubbers states that typical PM collection efficiencies range from 50 to 95% (http://www.epa.gov/ttn/catc/dir1/fpack.pdf). The fact sheet references another document, which states that collection efficiency for PM-2.5 and PM-10 in a packed bed scrubber is "poor," so it was determined that a value near the low end of the range may be most appropriate (http://www.epa.gov/ttn/catc/dir1/fpack.pdf; please see page 5.4-27 for the table and there is a discussion at the beginning of section 5.4). The control efficiency previously reported by Bonar for the scrubber that serves M-1-M-4 was reconsidered as part of the 2012 review. The original source test on which that figure was based has never been submitted to this agency. The summary available from the 2010 permit renewal review is not specific to particle size. The control efficiency used by this Agency has been updated to 50% as part of the 2012 review. If Bonar wishes to conduct source testing to establish more accurate control efficiencies for future emissions inventories and permit applications, they will need to submit source test protocols, notifications, and test data to this agency for review. A statement to this effect was included in the cover letter of the permit in 2012.

In the 2014 Title V application, on page 3, there is a discussion regarding the particulate matter control efficiency associated with M5 and the fact that the Agency explained in the permit cover letter to Bonar dated September 11, 2012 our rationale for using a conservative figure of 50% for FH1 and FH2. The application mentions this and states that regarding FH-2, "This is a new control device installed in 2012. The manufacturer guarantees a control efficiency of 99 percent for particulate matter less than five microns; the range of aerodynamic diameters expected of caprolactam monomers in the Colback fiber process. This control efficiency is used in the calculations presented in table 7." No manufacturer data was provided. I contacted Steve Jenkins of Bonar via email and attached previous email correspondence between me, Dan March, and HEE Environmental Engineering from 2012. In that message, HEE indicated that they have no data for control efficiencies for particles less than 5 microns in diameter. On July 3, 2014, Mr. Jenkins indicated that he did not have any further supporting documentation to suggest a control device efficiency greater than 50%. As such, we will continue to use the 50% factor unless new information is provided or a source test is conducted.

Insignificant Activities

Updated information on the heat input capacities and status of the dryers and crystallizers was provided by Steve Jenkins of Bonar as part of the Title V permit review in 2014. That information was adjusted accordingly. Please see email correspondence from Steve Jenkins in the Title V permit review for more details.

Current Renewal

In the current application for this renewal in 2024, Appendix B, outdated production figures were submitted for M-1, M-2, and G-3. G-6 was also affected since the production rate is the same as G-3. The updated more conservative figures will be used. This information will be passed on to the facility permit contact. Appendix B also listed the control efficiency of the filter house FH-2 as 99%. As discussed above, the agency will continue to use the 50% figure. These same incorrect figures were submitted in the 2019 permit renewal for this facility. The agency will plan to notify the facility and consultant that the production figures in the application (appendix B) do not match those in the permit, which were updated in 2012.

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	Entire Facility	The facility is subject to Title V permitting procedures because potential emissions are in excess of the 100-ton per year applicability threshold for VOCs. In accordance with the current permit, PPPI submitted an application to renew the Title V permit on May 24, 2024 (application was due on June 30, 2024). Since the permit application was submitted 9 months prior to permit expiration, the permit will not expire until the renewal permit has been issued or denied. All terms and conditions of the existing permit shall remain in effect until the renewal permit has been issued or denied.
17.0700 – Toxic Air Pollutant Procedures	Entire Facility	The facility was reviewed for NC Air Toxics when the permit was modified in March of 2014 to allow an increase in heat input capacity to F-1. The combustion equipment on the fleecing units is below permitting thresholds and as such, would normally not trigger a toxics review. But, since the equipment is permitted due to emissions associated with the finish oils, the increase in the heat input capacity to F-1 did result in an increase in potential emissions from natural gas combustion and did trigger a toxics review. Actual emissions from all combustion sources were below the TPERs. For the current permit renewal, no new combustion sources or sources of TAPs have been added to the facility since the last review. GEN-1, a 20 KW diesel-fired emergency engine and GEN-2, a 200 KW diesel-fired emergency engine are considered an insignificant activity under 17. 0503 and were added to the permit in 2019 so that the relevant requirements for GACT ZZZZ can be included. These sources were manufactured in 2001 and 2002 and as such, is exempt from NC Air Toxics under Chapter 17. 0702(a)(18). The toxics evaluation was not revisited as part of this renewal.
4.0524 – New Source Performance Standards	ESPB-1, ESPB-2	The facility is subject to 40 CFR Part 60, Subpart Dc – "Standards of Performance for Small Industrial-Commercial-

		Institutional Steam Generating Units." To maintain compliance with the SO_2 requirements of this regulation, the facility will monitor the sulfur content of the No. 2 fuel oil combusted in the boilers to ensure that it does not exceed 0.5% by weight. The facility is also required to maintain monthly records of the amount of fuel oil and natural gas burned in the boilers. In lieu of tracking natural gas combustion for each boiler, the facility can monitor total natural gas consumption for the facility. The facility reports the results of the monitoring to this Agency on a semi-annual basis.
4.0530 – Prevention of Significant Deterioration and 17.0317 – Avoidance Conditions	Entire Facility	When the permit was modified in 2012, the maximum potential VOC emissions increased to over 250 tons per year. In order to avoid PSD applicability, a limit of 247 tons of VOCs per year was included in the permit. Low & Bonar is required to track and report 12 month rolling average VOC emissions for M-1-M-5 (including the non-combustion portion emitted by F-1 and F-2) to ensure compliance with this limitation. Potential VOC emissions from combustion sources (permitted and unpermitted) are no more than 2 tons per year regardless of fuel type. There are no other significant VOC sources. A limit of 247 tons per year VOCs for M-1-M-5, F-1-F-2, and G-1-G6 and G-RES should be sufficient to ensure the facility's emissions remain below 250 tons per year.
4.1111 – MACT (40 CFR 63, Subpart JJJJJJ)	ESPB-1, ESPB-2	The permitted boilers are potentially subject to 40 CFR Part 63, Subpart JJJJJJ – "National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers," which was promulgated by EPA on March 21, 2011. The rule is generally applicable to solid and liquid fuel-fired boilers; however, boilers that are also gas-fired and burn liquid fuel only during periods of gas curtailment, gas supply emergencies, or for periodic testing not to exceed 48 hours during any calendar year are not subject to this subpart. Bonar submitted the initial notification in which they stated that they were not subject to the rule because the boilers burn only natural gas, except during periods of natural gas curtailment and gas supply emergencies, and for testing. If Bonar indicates that they wish to have the flexibility to burn fuel oil more often than just during periods of natural gas curtailment, the requirements would include a one-time energy assessment and biennial tune-ups. If the boilers are

		equipped with oxygen trim systems, tune-ups can be conducted every five years. When the permit was modified in 2011, relevant requirements of this subpart were added to the permit in case the facility wishes to operate the boilers on fuel oil in the future. Since that time, the requirements were amended by EPA. This condition in the permit was updated when the permit was modified in March of 2014.
4.1111 – MACT (40 CFR 63, Subpart ZZZZ)	GEN-1, GEN-2	GEN-1 and GEN-2 are subject to 40 CFR 63, Subpart ZZZZ, "National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines." Low & Bonar is classified as an area source of hazardous air pollutants. Compliance is achieved through work practice standards and maintenance activities. This condition was updated as part of this renewal since rule updates have been made since the permit was last issued.
4.0503 - Particulates from Fuel Burning Indirect Heat Exchangers	ESPB-1, ESPB-2	ESPB-1 and ESPB-2 burn natural gas with No. 2 fuel oil back-up; actual emission rates are well below the standard.
4.0515 – Particulates from Miscellaneous Industrial Processes	M-1, M-2, M-3, M-4, M-5, G-1, G-2, G-3, G-4, G-5, G-6, G-RES	M-1 has an hourly emissions limit of 3.67 pounds per hour; potential uncontrolled emissions are 4.71 pounds per hour and potential controlled emissions are 2.35 pounds per hour. M-2 and M3 each have an hourly emissions limit of 2.68 pounds per hour; potential uncontrolled emissions are 2.94 pounds per hour and potential controlled emissions are 1.47 pounds per hour. M-4 has an hourly emissions limit of 3.05 pounds per hour; potential uncontrolled emissions are 3.58 pounds per hour and potential controlled emissions are 1.79 pounds per hour. M-5 has an hourly emissions limit of 3.02 pounds per hour; potential uncontrolled emissions are 3.52 pounds per hour and potential controlled emissions are 1.76 pounds per hour. Compliance is expected as long as the control devices are operating properly. Please see the notes section below for additional details. G-1, G-2, and G-4 each have an hourly emissions limit of 1.73 pounds per hour when utilizing nylon and 1.51 pounds per hour when utilizing polypropylene; potential uncontrolled emissions are 0.050 pounds per hour with nylon and 0.311 pounds per hour with polypropylene for each machine. G-3 and G-6 have hourly emissions limits of 0.391 pounds per hour when utilizing nylon and 0.342 pounds per hour when utilizing polypropylene; potential uncontrolled emissions are 0.0054 pounds per hour with nylon and 0.034 pounds per

		hour with polypropylene. G-5 has an hourly emissions limit of 3.82 pounds per hour when utilizing nylon and 3.34 pounds per hour when utilizing polypropylene; potential uncontrolled emissions are 0.162 pounds per hour with nylon and 1.02 pounds per hour with polypropylene. G-RES has an hourly emissions limit of 0.246 pounds per hour when utilizing nylon and 0.218 pounds per hour when utilizing polypropylene; potential uncontrolled emissions are 0.0027 pounds per hour with nylon and 0.017 pounds per hour with polypropylene.
4.0516 – Sulfur Dioxide Emissions from Combustion Sources	ESPB-1, ESPB-2, F-1,F-2	This regulation limits SO_2 emissions from these sources to 2.3 lb/MMBtu. The AP-42 SO_2 emission factor for natural gas combustion for each boiler (ESPB-1, ESPB-2) is 0.001 lb/MMBtu. The boilers are subject to the SO_2 emission limit of NSPS Subpart Dc when burning No. 2 fuel oil. Thus, the facility is expected to be in compliance.
4.0521 – Control of Visible Emissions	M-1, M-2, M-3, M-4, M-5, F-1, F-2, G-1, G-2, G-3, G-4, G-5, G-6, G-RES, ESPB-1, ESPB-2	This regulation limits visible emissions from each of these emission sources to no greater than 20% opacity due to their post-1971 manufacture date. Compliance with this regulation will be determined through facility self-monitoring and Agency inspections. This regulation does not apply to emission sources subject to AB Air Quality Code 4.0524 – New Source Performance Standards if the NSPS has a visible emission standard. The boilers are subject to NSPS Subpart Dc, which does not have a visible emission (opacity) standard for boilers with a heat input capacity under 30 MMBtu/hr.
4.1806 – Control and Prohibition of Odorous Emissions	Entire Facility	This regulation requires that the facility prevent odorous emissions from causing or contributing to objectionable odors beyond their property line. Compliance with this regulation will be determined through Agency inspections.

REGULATORY NOTES

4.0515 – Particulates from Miscellaneous Industrial Processes. The particulate matter limits were calculated according to the appropriate equation in 4.0515 of the AB Air Quality code. Input parameters were as follows:

- M-1 through M-5, G-1 through G-5: Please see process weight rates listed above in Section B Details. Limits and worst-case emissions were calculated for the two different raw materials that are utilized on the G lines. Please see the attached spreadsheet for more details on limits and potential emissions for the G lines.

Inspection and maintenance requirements are included in the permit to address the control devices that reduce particulate matter emissions from M-1-M-5. Potential uncontrolled emissions from M-1-M-5 are higher than the particulate matter limit for those sources. Potential uncontrolled emissions for G-1 through G-6 are less than the emissions limits for those sources. Inspection and maintenance

requirements for the control devices serving M-1 through M-5 are included in the permit. Inspection and maintenance requirements for the control device that serves G-5 will not be included in the permit since maximum potential uncontrolled emissions are less than permitted limits.

4.0503 – Particulates from Fuel Burning Indirect Heat Exchangers. The allowable emission limit for each boiler was calculated according to the following equation:

Allowable PM Emission Limit = $(1.090) \times (42.0)^{-0.2594}$ = 0.413 lb/MMBtu heat input,

where 42.0 is the total maximum heat input capacity of both permitted boilers (2 x 21.0 MMBtu/hr).

4.0524 – New Source Performance Standards. GEN-1 and GEN-2 are not subject to NSPS Subpart IIII since they were manufactured prior to 2006.

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?**
M-1, M-2, M-3, M-4, M-5	2, 3	NA	NA	Yes
F-1 and F-2	2, 3	NA	NA	Yes
G-1, G-2, G-3, G-4, G-5, G-6, G-RES	1	NA	NA	Yes
ESPB-1, ESPB-2, Unpermitted Dryers and Crystallizers	3	NA	NA	Yes
ETC-1	2	NA	NA	Yes

EMISSION NOTES

Potential emissions are based on back up fuels, which are No. 2 fuel oil for the 2 permitted boilers. The small natural gas boiler that was added in 2008 is included in the potential emissions calculations. Maximum potential VOC emissions are based on maximum material throughput submitted by Bonar in the revised permit application they submitted in July of 2012 and updates for G-3 and G-5 that were submitted in the Title V application and an application that was submitted to modify the burners on the fleecing unit in 2014. 2013 emissions and potential emissions associated with the M and G lines were revised during the March 2014 permit modification and the permit review for the Title V permit to incorporate additional emission factors for PM and VOCs from melt spinning of polyester (PET), nylon 6, and polypropylene from EPA's AP-42, Fifth Edition, Compilation of Air Pollution Emission Factors, Volume 1, Chapter 6.9, Synthetic Fibers. This Agency was not previously aware of these factors. The use of these additional factors resulted in a slight increase in actual and potential PM and VOC emissions from the main product line.

Polypropylene is a polyolefin. AP-42 factors were used to calculate emissions from M-1 and M-5 when using that raw material. With the addition of the PM and VOC factors from AP-42 and then accounting for the very low VOC content of the spin finish for the product that will utilize polypropylene, it was determined that VOC and PM emissions would be significantly less compared to the product that utilizes nylon and the higher VOC content spin finish. The finish oil that is utilized when M-1 utilizes polypropylene has a volatile content of 0.05% as 2-(2-butoxyethoxy)ethanol (CAS # 112-34-5), which is a glycol ether. Glycol ethers are considered a HAP, but not a TAP.

Material usage data from 2024 that were submitted by Bonar in the annual emissions inventory were utilized to calculate 2024 emissions. The production figures submitted by the facility in Appendix B.1 for the renewal in 2024 are outdated figures that were also submitted in the prior facility permit renewal application. The Agency is using the more conservative production figures from 2012 to calculate potential emissions. Also, potential emissions were updated to remove propane as a back-up fuel and to change the boiler heat input rating.

SECTION E

SUPPORTING DOCUMENTATION

(Provide brief description of any attachments)

1. Permit application
2. Copy of 502(b)(10) notification for replacement of DRY 1, DRY-2, and CRST-2 with DRY-6, DRY-7, CRST-6, and CRST-7
3. Draft permit
4. Permit cover letter
5. Emission calculations
6. Draft Public Notice

Asheville-Buncombe
Air Quality Agency

Memo

To: Air Quality Board

From: James Raiford

CC: Ashley Featherstone

Date: May 7, 2026

Re: Freudenberg Performance Materials - Comments on Draft Title V Permit

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A notice announcing the opportunity for public comment on the draft Title V Permit for Freudenberg Performance Materials was published in the Asheville-Citizen Times on March 29, 2026 and placed on the agency website. No comments were received during the 30-day public comment period, which ended on April 28, 2026.

A copy of the public notice was emailed to affected state and tribal agencies, including NC DAQ, SC DHEC, GA DNR, TN DEC, and the Eastern Band of the Cherokee Nation. No comments were received from these entities.

The draft Title V Permit and components of the application review package were sent to EPA Region 4 for review on March 29, 2026. The Agency has not received any comments from EPA and their 45-day review ended will end on May 13, 2026. If comments are received from EPA, we will amend this memo, incorporate those comments into the permit as necessary and share those comments with the Board during the May 14, 2026 Board Meeting.

Asheville-Buncombe Air Quality Agency
APPLICATION REVIEW SUMMARY

SECTION A: FACILITY INFORMATION			
Company Name:	Taylor Frizsell dba Bee Tree Disposal		
Site Name:	Bee Tree Disposal		
Mailing Address:	850 Warren Wilson Road, Swannanoa, NC 28778		
Site Address:	850 Warren Wilson Road, Swannanoa, NC 28778		
General Description of Business:	Organic Waste Incinerator		
Facility Classification:	Title V	**Site Status:**	New

SECTION B: APPLICATION INFORMATION			
Date Of Application:	April 23, 2026	**Application Tracking No.:**	N/A
Date Complete Application Received:	April 23, 2026	**Board Meeting Date:**	May 14, 2026
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:	11-929-26 / May 14, 2026		
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	--	25.70
PM-10/PM-2.5	--	10.19
SO_2	--	1.91
NO_X	--	20.40
CO	--	47.91
VOC	--	20.25
Greenhouse Gases (GHG), $CO2_e$	--	60,595.37
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/	**Date Completed:**	05/07/2026
Reviewed By:	Ashley J. Featherstone/	**Date Reviewed:**	05/07/2026
Director:	Ashley J. Featherstone/	**Date Approved:**	05/07/2026

SECTION A DETAILS

FACILITY INFORMATION

[Detailed discussion of any items in Section A]

Taylor Frizsell dba Bee Tree Disposal has applied for a general Title V permit to operate a trench-style air curtain incinerator at the address listed above. The air curtain incinerator will handle only wood waste/clean lumber/yard waste from storm debris clean up and from customers bringing brush and material to the site. No municipal solid waste, treated/painted wood, or prohibited materials are to be accepted.

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	Air Curtain Destructor CP 2000T or McPherson M30 Air Destructor	PM, PM-10, PM-2.5, CO, SO2, NOx, VOC, CO2e	Maximum charge rate of 10 tons per hour. Powered by a small diesel fired engine. The site will first operate with the CP 2000T, which was listed on the first application as having a maximum charge rate of 10 tons per hour. They may switch to using the M30, which has the same maximum rating. Since this is a trench style air curtain there should be no discernable difference between running either piece of equipment at the site.

APPLICATION NOTES

The original application was received on April 2, 2026 and the current application is dated April 23, 2026. The facility emailed Buncombe County Planning Department on April 21, 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.

The facility is in the process of registering the name "Bee Tree Disposal". In order to have a responsible party, the permit will be listed with the applicant's name and "doing business as (DBA)" the proposed business name. The facility will apply for an administrative amendment when they have finalized their business registration with the State of North Carolina.

The site location was reviewed as part of the modeling demonstration, and the location of the trench burner is not within 300 feet of any occupied dwellings on adjoining property.

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	AC1	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 and documented via memorandum on May 7, 2026. This modeling shows compliance with the total solid particulate state standard, and the PM10 and PM2.5 National Ambient Air Quality Standards. This facility is limited to operating for only 10 hours a day per Chapter 4.1904(c)(4), and emissions were modeled with that restriction. 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	9.78	25.78	35	74%
	Annual	6.1	1.17	7.27	9	81%
PM10	24-hour	12.4	13.96	26.36	150	18%
TSP	24-hour	--	24.76	24.76	150	17%
	Annual	--	1.49	1.49	75	2%

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

Asheville-Buncombe Air Quality Agency

Asheville-Buncombe Air Quality Agency
Advisory Committee Meeting Notes

The Advisory Committee for the Asheville-Buncombe Air Quality Agency met on April 30, 2026 at 3:30pm in meeting room A131 at 35 Woodfin Street. Some members also joined via Microsoft Teams.

The meeting started at 3:33pm.

Member Present (In-Person):
Ned Guttman
Jim Neely
Keith Bamberger
Caitliln Cook

Members Present (Virtual)
Jay Haney

Staff Present (In-Person)
Ashley Featherstone, Director
Hannah Rhodes, Air Quality Coordinator
Steven Ensley, Air Quality Monitoring Coordinator

Staff Present (Virtual)
James Raiford, Permitting Program Manager

Others Present: *None*

1. Review and Approval of Agenda
    a. A copy of the draft April 2025 minutes and draft agenda was emailed to members
    b. Ashley Featherstone suggested adding Air Quality Awareness Week and UNCA updates to the agenda.
    c. Ned Guttman made the motion to amend the agenda
    d. Caitlin Cook seconded the motion.
    e. Passed 5-0
2. Review and Approve April 2025 Minutes
    a. Ashley Featherstone reviewed what was on the minutes of the last meeting.
    b. Ned Guttman made the motion to approve the minutes.
    c. Jim Neely seconded the motion.
    d. All present – yes
    e. The motion passed 5-0
3. Review and Discuss Clean Air Excellence Awards Nominations
    a. Ashley Featherstone said that we received no applications this year. Ned Guttman asked why there weren't any.
    b. Steven Ensley said that the person who worked on the Eaton application last year took a new job, so that is why we wouldn't have received an application from them.
    c. Ashley Featherstone said that we did not have the time to promote it very much this year, but would like to promote it more in future years.

d. Ashley Featherstone said that Land of Sky nominated the Footprint Project last year, but they did not nominate anyone this year.
e. Steven Ensley suggested mentioning the awards when staff go out on facility inspections.
f. Keith Bamberber suggested asking Brad Rouse to promote it on his climate environment radio show. He runs Energy Savers Network.

4. Air Quality Awareness Week
    a. Keith Bamberger said that the EPA did not announce that they were officially doing Air Quality Awareness Week until this past week. He said they did not change any of the daily themes from last year.
    b. Ashley Featherstone asked if there was a website from the EPA like last year with resources to share. Keith Bamberger was not quite sure, but it was determined that we can use the same graphics and resources from last year.
    c. Ashley Feathersone said that she is doing an interview with WLOS next week on wildfires and other air quality-related issues. It is nice that it pairs up with Air Quality Awareness Week. She is going to be interviewed at the South Asheville Library where a Purple Air monitor is located, and she plans to talk about those.
    d. Keith Bamberger mentioned that she can talk about how the current Burn Ban actually positively impacts Air Quality.
    e. Ned Guttman asked if our monitors were showing any affects to this area from the Georgia wildfires.
    f. Steven Ensley said that he had not seen any major indicators that they were impacting us. Ashley Featherstone thought that it was a little hazy last week and that the wildfires may have been the reason why.
    g. Keith Bamberger said that the American Lung Association did their annual air quality Report and they named Asheville as the 1st cleanest city in the country for a short term Particulate Matter (24 hour PM2.5). This was particularly notable because years ago Asheville was ranked in the 25 worst cities for air quality by the ALA.
    h. Ashely Featherstone said that she wanted to highlight the air sensor network on the Fire and Smoke Map (on Air Now) as well as wildfire prevention tips on the WLOS interview.
    i. Jay Haney had a question about the burn ban and if it was still in place. Ashley Featherstone said that yes, it is still in place. Jay Haney asked if Jackson County also had a burn ban in place. Ashley Featherstone confirmed that the entire state is under a burn ban.
    j. Ashely Featherstone said that the number one cause of wildfires is careless debris burning, which she can share on WLOS.
    k. Keith Bamberger said he heard the state will keep the burn ban in place until we get a significant amount of rain.
    l. Ashley Feathersone said that the Agency's Ford Lightning does have a bumper sticker saying it is an electric vehicle.

5. Recognition for participants of WNC Post Helene Monitoring Project
    a. NC DAQ and AB Air Quality Certificates (state has prepared and will be printing and framing)

i. Steven Ensley said that the state is putting together this certificate to give to their partners from the Purple Air monitor project. They were kind enough to put our name on this certificate, too, so that we can share it with our hosts.
ii. Steve Ensley hopes to have the certificates in-hand soon.

b. How best to give these out – have a reception at July board meeting and present at Board meeting similar to Clean Air Excellence Awards (Have done something similar in the past). Other ideas?
i. Ashely Featherstone said she was trying to think of the best way to give out these certificates. We have done something like this with fire stations in the past for a different project and invited them to the Clean Air Excellence Award Ceremony.
ii. Keith Bamberger said that there were several Buncombe County schools that participated in another event (students that placed at the regional level at the AQIQ event), and we could also honor those students that participated in that. We could give them their regional awards, or invite the students that participated. This could add to our event/awards ceremony.
iii. Ashley Featherstone said that we anticipate doing this reception in July.
iv. Steven Ensley said that we currently have seven Purple Air monitors set up in the county. We had an eighth that was at a Brewery, but we took it down to do some maintenance on it and decided not to put it back up at the Brewery. This means we have a spare monitor we could put somewhere else if we would like, or we can keep it as a spare for when other monitors go down.
v. Keith Bamberger said that Carl Sandburg in Henderson County would like a Purple Air monitor, although he knows that is out of our county.
vi. Steven Ensley said that there is one Purple Air monitor in Marion that they were having issues finding a place with free access internet for, so that could be one they could move to Carl Sandburg.
vii. Steve Ensley offered to help Catlin Cook's UNCA students set up a Purple Air if they need assistance.

6. UNCA Updates
a. Caitlin Cook said UNCA got the older ozone monitoring equipment from the Agency in the Fall, and they have a student, Ben, that has been working on it. He is trying to put it together and see what they would need to get it up and running again. Steve Ensley said that we have 3 Compressors that we had when we had the old system with the old Zero Air. We are not currently using them. Ashley Featherstone said that we could fill out the same form as the other equipment and loan it along with the others. We wouldn't have to go through the board voting on it again since we already did that and they have given permission to loan the equipment for this project.
b. Caitlin Cook said that Ben is working with people in another department on a light pollution project, and he is hoping to take a monitor to the Blue Ridge Parkway at the same time as them to take air quality data in additionan to clear sky data.
c. Caitlin Cook said that there could be a class of hers soon that could go on a field trip to see one of the Agency's monitoring sites.
7. Agency Updates

a. Agency Governing Structure – Potential Changes to Governing Board/Interlocal Agreement
    i. Ashley Featherstone talked about the timeline for changing the Agency's governing structure. We have been looking to transition the Agency to become a county department rather than an Interlocal Agreement Agency. The reason is financial, as in recent years our funding has not been sufficient, and we have been losing staff over the years.
    ii. Ashley Featherstone further explained that the County has offered to take us on as a county department. Right now our employees are County employees, and we act in many ways like we are a county department, but we are not able to be financially supported by the County. This has been a challenge because we keep getting cost of living and other expense increases each year, but no additional funding to match it.
    iii. The County has notified the City that they wish to withdraw from the Interlocal Agreement. The main thing that has to happen is the County has to reform our board. We are changing our governing structure. Right now we are governed by our Air Quality Board, whereas the Board of Commissioners will be the new governing board. The current board will be reformed to be an advisory board. One of the key duties this advisory board will have is to review appeals of permits and other items. We will present our budget to the advisory board, and they can offer recommendations, but the Board of Commissioners will be the final approvers.
    iv. We have reached out to the State, and we have to be recertified by the NC EMC since we are changing our governing structure.
    v. We are in the process of updating our rules, which is something we were doing anyway, but we are going to get that done before the transition happens. Air Quality has been included in the County's budget. This is not a done deal until the budget gets approved.
    vi. June 2nd is when the Board of Commissioners would approve the budget, and that is when we expect we would need a resolution to reform the Air Quality Board into an advisory board. We will be amending Chapter 1, taking out the Interlocal Agreement and putting in that we are under the Board of Commissioners.
    vii. Ashley Featherstone said she is hoping that with time, this program could potentially add a position and start to thrive instead of just survive.
    viii. Jim Haney asked if this timeline document was sent out to the Advisory Committee members. Ashley Featherstone said that she has sent to the Air Quality Board members just recently, but she has plans to send it out the advisory committee as well.
    ix. Agency staff are meeting with the EMC on May 5th. We are going to ask them what they need from us and what timeline they would like to see.
    x. Ashley Featherstone will attend the May EMC AQC meeting in Raleigh. They also meet on July 8th and 9th. Our certification will be up for discussion at that July meeting. But, Ashley Featherstone is going to be giving an overview of local air

quality programs at the May meeting to prep them with information prior to the July meeting.

xi. Ashley Featherstone said that, due to this timeline, we will have to extend the Interlocal Agreement with the City beyond July 1st. Legal is looking into that, but we are hoping we can do it with a memo. If the NC EMC decides to recertify us at the meeting on July 9th, we would be recertified officially at the end of July. We do not know if we would be a part of the County officially at the beginning or towards the end of July when the Board of Commissioners can adopt the air quality code. That is something we need clarity on.

xii. Ned Guttman asked if we would be able to do inspections or not during this transition time. Staff will need to continue to gather more information from the State on the process.

xiii. Ashely Featherstone said that the nice thing is we have Forsyth and Mecklenburg's local program code that we can reference and base our new administrative codes on, since they are set up this way.

xiv. Jim Haney asked how Mecklenburg and Forsyth County got recertified. Ashely Featherstone said that they were recertified in the 1970s and 1980s and have not been reformed since then. We were the last ones to reform in 2000.

xv. Ashley Featherstone said that, as a part of this process, we need to ask the state to take over permitting for county owned facilities to the State. For example, the County's landfill has a Title V permit, and we're concerned about that being a conflict of interest, so DAQ has agreed to take that facility back. There are two other small facilities that have similar circumstances.

xvi. Ashley Featherstone said that one of the reasons this is happening is because the President has recommended twice to eliminate our EPA grants. Going under the County is part of contingency planning for that, so that we can continue to have a program here for our residents.

xvii. The County is very supportive of the local air program, and likes the things we offer such as additional local air quality requirements and permitting of more sources.

1. We had lots of dust complaints last week, which is a local rule we have that is applies to construction sites. The state amended their rules at one point and they no longer apply to those sites.

b. Rule Updates

i. Ashley Featherstone said that we are updating our rules as a part of our transition. We will be going to public notice soon for that. We are essentially adopting the State's updated rules, and for the rules we had that are slightly different than the State's, we are keeping those the same.

c. Ned Guttman said, given the upcoming governing structure changes, this Advisory Committee will cease to exist in its current form.

i. Ashley Featherstone said that the Air Quality Board will be reformed as an advisory board. She said that when they reform the board, the County likes to advertise member openings for 30 days. One way they could do it is to appoint

the current board members to serve on the new board for a certain period of time, and then they would ask the current members to reapply at that time.

ii. Ashley Featherstone is hoping that the members on this Advisory Committee will also apply for that new advisory board when the time comes.

iii. Jim Haney asked if the current governing board and advisory board would essentially be combined into one, and Ashley Featherstone and Hannah Rhodes confirmed this (but everyone would need to apply).

iv. Ashely Featherstone said that one other thing that is changing is that the Air Quality Board currently approves our industrial source permits. The Director would likely do this in the future. It is possible we could share information with the advisory board about permits and request some input or report on public comments where applicable.

v. Jim Haney asked how the new board might address new rules in place that manage the number of people on boards in the State. Ashely Featherstone was not aware of the State rules Jim was referring to.

d. Committee members said they would take a field trip to the 35 Woodfin Air Quality Lab after the meeting adjourned.

8. Adjournment
   a. Ned Guttman made the motion to adjourn the meeting.
   b. Caitlin Cook seconded the motion.
   c. All present – yes
   d. The motion passed 5-0
   e. The meeting was adjourned at 4:52pm