

# Appendix B

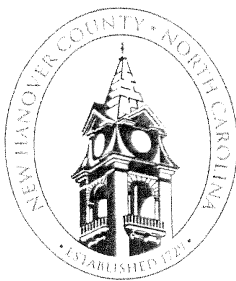
## Local Government and Public Comments Received

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NEW HANOVER COUNTY  
BOARD OF COMMISSIONERS

230 GOVERNMENT CENTER DRIVE, SUITE 175  
WILMINGTON, NC 28403  
(910) 798-7149  
(910) 798-7145 FAX  
[WWW.NHCGOV.COM](http://WWW.NHCGOV.COM)

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~~~~~  
Sheila L. Schult  
*Clerk to the Board*

April 28, 2011

Laura Boothe, Attainment Planning Branch Supervisor  
North Carolina Division of Air Quality  
Mail Service Center 1641  
Raleigh, NC 27699-1641

Re: New Hanover County Comments for Sulfur Dioxide Air Quality Nonattainment Boundary  
Recommendation

Dear Ms. Boothe,

Thank you for the opportunity to comment on the N.C. Division of Air Quality's potential boundary options for the sulfur dioxide (SO<sub>2</sub>) nonattainment designation as it applies to the violating monitor in New Hanover County. On behalf of New Hanover County, we respectfully submit the following comments.

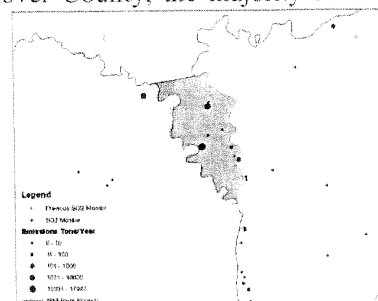
We firmly believe a boundary line should be drawn in a manner that represents the area of the County that is affected by the sulfur dioxide violation in order to adequately protect public health. We understand the health effects that result from breathing high levels of SO<sub>2</sub>, and as a county government, recognize that our primary responsibility is to protect our citizens from these impacts. To that end, the New Hanover County Board of Health recently passed an Air Quality Resolution urging state and local government officials to affirmatively endorse and implement regulatory standards that reduce air emissions that adversely impact health and the environment; reduce the proportion of populations exposed to harmful air pollutants; promote alternative modes of transportation to reduce motor vehicle emissions; and scrutinize all prospective businesses and industries that include or will result in any discharges of known or potential contaminants, pollutants and/or toxics to the environment. We also envision the economic impacts that will result from a nonattainment designation. In a time when employment rates are soaring, and many of our residents have lost their jobs and face losing their homes, we also strongly believe the importance of accurately delineating the boundary line so that it does not cause unintended economic impacts in areas of the County where the air is actually meeting the new SO<sub>2</sub> standard and public health is not being negatively impacted.

In EPA's guidance issued on March 24, 2011, EPA acknowledges that a single monitor may generally not be adequate to fully characterize ambient concentrations of SO<sub>2</sub>. EPA then goes on to state that available air quality monitoring and modeling information submitted by states will be considered, as appropriate, including data from 2011 that may become available. To assist with this, the County has contracted with an environmental firm to develop and implement a SO<sub>2</sub> ambient monitoring campaign to

gather data to provide backup information to N.C. Division of Air Quality to make a case for accurately delineating the scope of the potential nonattainment area in New Hanover County. The contractor recently started monitoring air quality concentrations at two additional locations in New Hanover County to assist with the demonstration of the geographic extent of the ambient air quality violation. Based on the statistical analysis completed, the contractor will generate S02 concentration contours for New Hanover County and recommend areas that should not be included in the nonattainment designation. In creating these contours, the contractor will also review historical ambient S02 monitoring data collected by DAQ at the monitoring location in Castle Hayne during 2005, and include this data in their analysis. The data will be available weekly as it is compiled, but the final analysis will not be completed until late June or early July of 2011. We realize that this is after your June 3, 2011 deadline to submit your recommendations for area designations to EPA, but we also understand that you will have several months thereafter to make modifications to your initial recommendation. We would hope that you would utilize the monitoring data that we will be collecting when making any preceding modifications to your initial recommendation, or to provide support for your initial recommendation.

We regret that we cannot submit our final comments on a boundary recommendation for New Hanover County until the additional monitoring data is available, however we would like to submit our preliminary comments based on the information that is currently available. Importantly, with the comments we are providing, we have purposely chose boundaries that omit the area surrounding the Wilmington International Airport. We felt that it was prudent to omit the Airport from the recommended boundary because of the General Conformity Rule that the Airport would be subject to if located within a nonattainment area.

In its guidance, EPA acknowledges that S02 concentrations are highest relatively close to the source(s) and much lower at greater distances due to dispersion. In New Hanover County, the majority of the sources of S02 (98%) are located within the Highway 421 corridor. During the presentations on April 12, N.C. Division of Air Quality staff presented a Boundary Option G that includes the Highway 421 corridor and 98% of the sources in New Hanover County. This option was also supported by existing S02 data taken in 2005 at the Castle Hayne monitoring station which did not show a violation of the 2010 S02 standard in that area. At this time, New Hanover County wishes to provide its support for Boundary Option G for the following reasons:



- The Boundary accounts for 98% of the S02 sources in New Hanover County.
- The Boundary is supported by data retrieved at the Castle Hayne monitoring station demonstrating that air quality levels were not in violation of the new standard at that monitor.
- The Boundary does not encompass the area surrounding the Wilmington International Airport.

When defining partial county boundaries, EPA in its guidance document recommends the use of well-defined jurisdictional lines such as township borders, immovable landmarks or other permanent and readily identifiable boundaries. As a secondary comment, we are also providing the following readily identifiable boundary as a possible option for a nonattainment boundary. In New Hanover County, there are two predominate areas that are zoned for heavy industry (I-2). These two areas contain the majority

of the SO<sub>2</sub> sources in New Hanover County (99%), all existing major sources of SO<sub>2</sub>, and any land where a potential major SO<sub>2</sub> emitter could be established in the future. For your benefit, we have provided a map of the two predominate I-2 zoning districts in New Hanover County as a possible boundary option. While this boundary would include the monitor in Castle Hayne that exhibited air quality levels below the 2010 SO<sub>2</sub> standard, importantly, it also includes all major sources of SO<sub>2</sub> in New Hanover County without encumbering the area surrounding the Airport or other population centers.


Additionally, we think it is important to note that the County is taking steps to amend the zoning ordinance so that any new high-intensity industrial uses in our I-2 district, or major expansions to existing uses, are required to go through a heightened level of review. This review would require that high-intensity industrial uses go through the process of receiving a Special Use Permit before being allowed to proceed with permitting – a process that would require two public hearings, a recommendation by the County's Planning Board and an ultimate decision by the Board of County Commissioners. The Special Use Permit would only be issued by the Board of County Commissioners if the Board found the following:

- 1) That the use will not materially endanger the public health or safety if located where proposed and approved;
- 2) That the use meets all required conditions and specifications;
- 3) That the use will not substantially injure the value of adjoining or abutting property, or that use is a public necessity; and
- 4) That the location and character of the use if developed according to the plan as submitted and approved will be in harmony with the area in which it is to be located and in general conformity with the plan of development in New Hanover County.

We felt that this information was important to include with these comments as an example of a measure we are taking from a local land-use perspective to try to prevent our air quality problem from becoming worse and to assure you that we are your partner in this effort.

Thank you again for the opportunity to comment on the proposed boundary for the SO<sub>2</sub> nonattainment designation and for taking the time to thoroughly consider New Hanover County's recommendations. We look forward to talking with you soon.

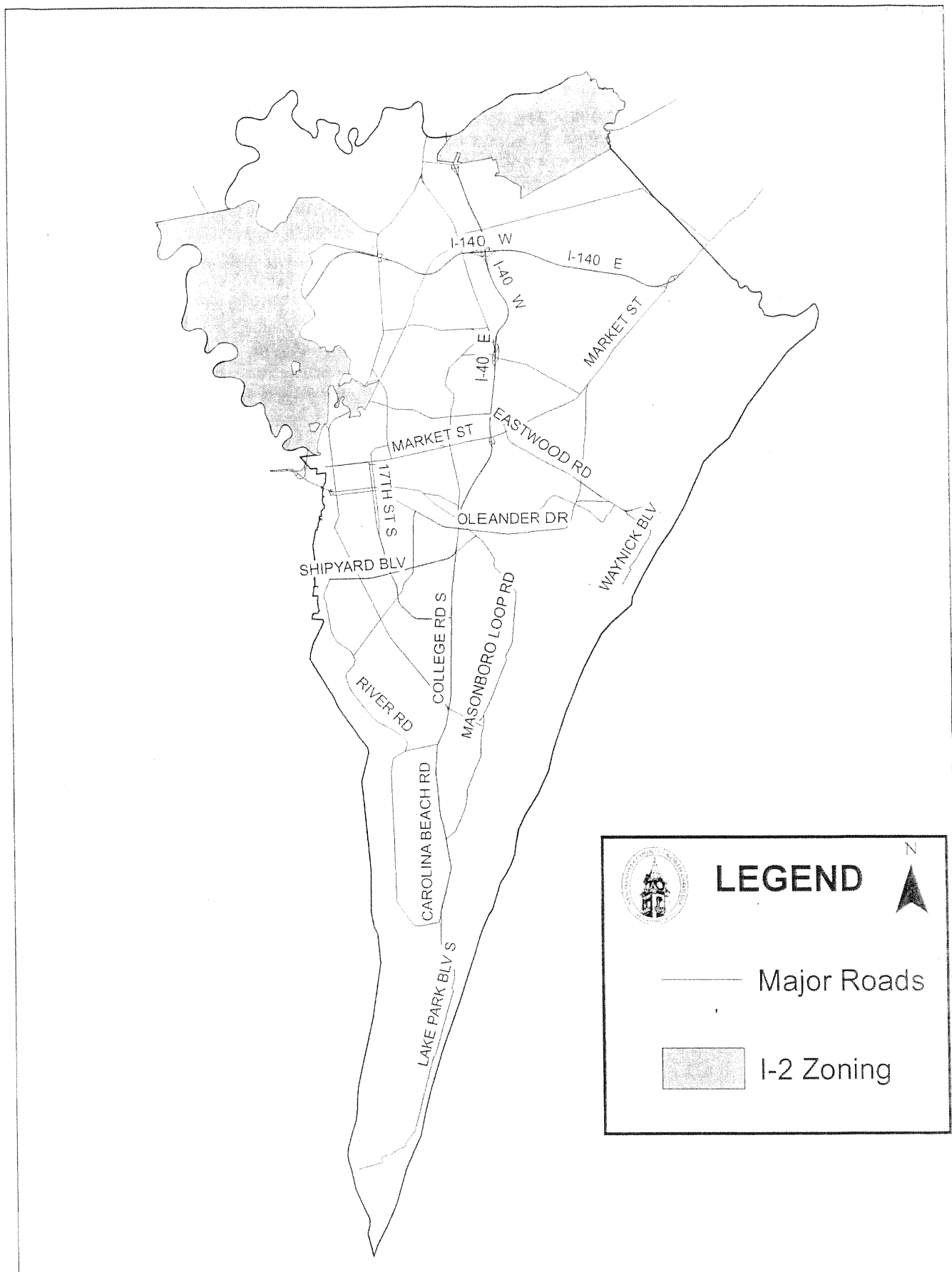
Sincerely,



Jonathan Barfield, Jr.  
Chairman

Attachment

cc: Board of Commissioners  
Bruce Shell, County Manager  
Chris Coudriet, Assistant County Manager  
Chris O'Keefe, Planning and Inspections Director  
Shawn Ralston, Long Range Planning Manager





**Boothe, Laura**

---

**From:** John, Trish, Jenna, Dain and Rebekah [TNIELSEN1@ec.rr.com]  
**Sent:** Tuesday, April 19, 2011 6:48 AM  
**To:** SVC\_DENR.DAQ.publiccomments  
**Subject:** no to new SO2 sources in New Hanover County until....

Dear Ms. Boothe:

I urge the Department of Air Quality to allow NO new major sources of SO2 in New Hanover County until the EPA has reviewed all the data and made their non-attainment designation and have approved an action plan.

We the citizens of New Hanover County and surrounding Counties are depending on the DAQ to make decisions that will be in the health and well being of our citizens.  
Of the Maps Options B would be my vote.

Thank you for your work.

You have a big responsibility to do the RIGHT thing for people and the environment, not non living, non breathing corporations.

Patricia Nielsen  
614 Robert E Lee Drive  
Wilmington, NC, 28412

910-793-9777

**Boothe, Laura**

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**From:** david paynter [dpaynter@yahoo.com]  
**Sent:** Friday, April 22, 2011 5:06 PM  
**To:** SVC\_DENR.DAQ.publiccomments  
**Subject:** SO2 Boundaries for Wilmington, NC

Laura Boothe  
Division of Air Quality  
Raleigh, NC

In determining the boundaries for the nonattainment area for the Wilmington MSA, I would recommend using the most extensive boundaries possible. This would ensure that public health is protected as the area grows. In reviewing the NC Division of Air Quality's various options, B provides the best protection for public health. The boundaries of this option cover all of New Hanover County and the area of Brunswick County bordering the Cape Fear River. This area contains 99.9% of the SO2 emissions in the Wilmington MSA.

David Paynter  
6242 Head Rd  
Wilmington, NC 28409

**Boothe, Laura**

---

**From:** Cig [cignotti@earthlink.net]  
**Sent:** Tuesday, April 26, 2011 3:04 PM  
**To:** SVC\_DENR.DAQ.publiccomments  
**Subject:** Sulfur Dioxide nonattainment New Hanover County

Attn: Laura Boothe,

I was surprised that there are only 5 NC counties currently being tested. While I am a strong supporter of clean air and water, I do believe it is paramount that we are being fair to everyone. To me, it is apparent that New Hanover County has an air quality issue. The issue is ensuring we improve the county's air quality in a reasonable manner and with a realistic time line. We did not get in this predicament over night and we won't clean it up over night. Any boundary chosen should not include the entire county or region and should be targeted near the polluting sources. Targeting the areas nearest the sources will lessen the "stigma" area and decrease the chances of crippling the local economy. The bottom line is NHC relies on tourism as its economic engine ... dirty air or water benefits no one. We can not sweep this problem under the rug. We must tackle it head on but also in a reasonable fashion with a realistic time line.

Sincerely,

David Cignotti  
Wrightsville Beach, NC

**Boothe, Laura**

---

**From:** Tina Evans [tina.evans@nc.eastersealsucp.com]  
**Sent:** Tuesday, April 26, 2011 4:25 PM  
**To:** SVC\_DENR.DAQ.publiccomments  
**Subject:** Stop Titan  
  
**Sensitivity:** Confidential

To whom it may concern, I have a deep concern for the concrete plant that is in motion to be built here in our town near Castle Hayne. Our children, their health as well as the air and water will be greatly effected by this plant. I urge all that are involved to think seriously about this before approving this project to go forth. Our children lives are at hand.

Tina Evans  
Adult & Children Services  
Wilm ICS Residential & DD Services Supv  
Easter Seals UCP NC & VA Inc.  
33 Darlington Ave Wilm,NC 28403  
(910) 790-5921 Ext 105  
Fax (910) 794-1036

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**Boothe, Laura**

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**From:** Kayne Darrell [kaydee@ec.rr.com]  
**Sent:** Wednesday, April 27, 2011 11:24 AM  
**To:** SVC\_DENR.DAQ.publiccomments  
**Subject:** SO2 non attainment

I find it so disturbing that New Hanover County's largest source of SO2 emission is sitting right next to the soccer complex where thousands of our children are playing soccer seven days a week. I truly hope that we can avoid causing more asthma and other respiratory diseases to our children by not adding any more pollutants to our already toxic air. Please, please, for the sake of our children, do not allow any new sources of SO2 into our area until we can correct this existing problem. Our community is looking to DENR to protect us and protect our children.

Thank you  
Kayne Darrell  
5008 Castle Lakes Rd  
Castle Hayne, NC 28429

**Boothe, Laura**

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**From:** Michele Zapple [michelezapple@yahoo.com]  
**Sent:** Wednesday, April 27, 2011 12:33 PM  
**To:** SVC\_DENR.DAQ.publiccomments

To Whom It May Concern,

Please do not allow any new sources of air pollution in Wilmington or New Hanover County. Air quality, along with water quality, is most important to our quality of life here in Wilmington. I moved my family here from Los Angeles 14 years ago, and believe me, being able to breathe, without it hurting to inhale, is important. I am not exaggerating; we used to tell our 3 children, "Just try not to take a deep breath" during air quality alerts, which had become an almost daily occurrence in our 19 years there. Our air quality is already compromised here; insist that the EPA do its job and enforce air quality before it's too late.

Thank you,  
Michele Zapple

**Boothe, Laura**

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**From:** Licia Lathan [licialathan@yahoo.com]  
**Sent:** Saturday, April 30, 2011 1:37 PM  
**To:** SVC\_DENR.DAQ.publiccomments  
**Subject:** improve our air quality

I live in Wilmington, actually more in Castle Hayne but technically Wilmington. I have learned of pollution problems already affecting the quality of life here such as high sulfur dioxide and mercury emissions. I am so angry that others are willing to make the pollution problems in this area even worse by adding to the chemicals being released by industries around here. Besides being opposed to the Titan Plant, I am opposed to any industry that will increase the release of chemicals that may harm health here. We need to reduce pollution here now! Not increase it! My 5 and 9 year old nephews would no doubt agree, as would my daughter who has fought respiratory problems nearly 18 years!

Sincerely,

Licia Lathan

April 29, 2011



617 Surry Street  
Wilmington, NC 28401  
(910) 762-5606  
www.cfrw.us

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Laura Boothe  
North Carolina Division of Air Quality  
Raleigh, NC 27699-1641

Dear Ms. Boothe,

This letter is in response to the sulfur dioxide nonattainment boundary decision under review by the NC Division of Air Quality (DAQ). I attended the information session held by DAQ in Wilmington to discuss the issue on April 12, 2011 and appreciate the time DAQ staff took to explain the process to the citizens of our region.

Cape Fear River Watch (CFRW) is the primary environmental advocacy organization for the protection and improvement of the Cape Fear River. Our 500+ members believe that a healthy environment is our right as residents of the Cape Fear region. As the Cape Fear Riverkeeper I speak for our members, our Board of Directors, and the Cape Fear River itself.

Due to the short notice of the proposed boundaries, CFRW is not able to recommend a specific option. However, I do urge DAQ to consider the issue based on a long term projection of our region's growth rather than short term "solutions" to the pending nonattainment designation.

As your presentation points out SO<sub>2</sub> is unhealthy to breathe for any amount of time, especially for sensitive groups, including children and the elderly. As anyone who spends time outdoors in our area will attest to wind speed and direction is much more variable than your wind rose plots indicate.

As the agency charged with working "with the state's citizens to protect and improve outdoor, or ambient, air quality in North Carolina for the health and benefit of all" I urge you to choose option A, B, or C. These options go the farthest in protecting air quality for our citizens.

Finally, I would urge that until the designation process is finalized, that DAQ not issue any additional air emission permits. Issuing air permits to new sources of SO<sub>2</sub> seems irresponsible and extremely short sighted. Why, when facing restriction for emitting too much of a pollutant, would DAQ choose to allow more of that pollutant to be emitted.

Again, thank you for your presentation to our community and for your careful consideration of this letter on behalf of our members.

Best regards,

Kemp Burdette  
Cape Fear RIVERKEEPER®

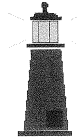
*Cape Fear River Watch is a 501 c(3) nonprofit organization. Our Tax ID #is 58-2121884. Our mission is to protect and improve the water quality of the Lower Cape Fear River Basin through education, advocacy and action.*

*Financial information about this organization and a copy of its license are available from the Charitable Solicitation Licensing Section at 1-888-830-4989. The license is not an endorsement by the State.*



BRUNSWICK COUNTY  
ECONOMIC DEVELOPMENT COMMISSION

---



Laura Boothe  
Division of Air Quality  
Mail Service Center 1641  
Raleigh, NC 27699-1641

April 19, 2011

Dear Laura,

On behalf of the Brunswick County Economic Development Commission (EDC), we want to thank DENR for giving us the opportunity to comment pertaining to the options presented as to where the nonattainment designation could occur in the Wilmington region pertaining to Sulfur Dioxide emissions.

On Thursday, April 14<sup>th</sup>, the Brunswick County EDC met and discussed the nonattainment issue. We understand the importance of ensuring county citizens of a safe environment, however, we also recognize that, as shown in your presentation, most all of the major Sulfur Dioxide emissions come from industrial plants in New Hanover County. DAK is the only industry in Brunswick County near the companies in New Hanover County that exceeds the new Sulfur Dioxide emissions levels that EPA changed last summer. ADM is approximately 25 miles away.

In reviewing the seven alternatives DENR suggested, the EDC feels Option B and especially Option C would have a major adverse impact on the future economy of Brunswick County.

Option B includes the major growth corridor of Brunswick County from Leland to Southport which could affect future growth. As stated, this includes a swath of land over 25 miles long with the only industry being ADM at the end of the proposed boundary. Within that 25 mile corridor is some of the most concentrated residential growth in the county but no industries.

Option C includes most all of Brunswick County's industrial parks including the Leland Industrial Park, the International logistics Park of NC and the Mid Atlantic Logistics Center as well as major industrial sites in Northwest and Navassa. This area is the future of the Wilmington region where over 2,000 people are unemployed.

P.O. BOX 158 BOLIVIA, NC 28422 PH: (910) 253-4429 FAX: (910) 253-5326 EMAIL: bcedc@brunseo.net

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April 19, 2011

Brunswick County's Unified Development Ordinance (UDO) protects the county from allowing any polluting industries from locating in the county through zoning restrictions and requiring Use Permits for any heavy industries looking to locate here. The Use Permits requires a public hearing and close scrutiny by local and state authorities.

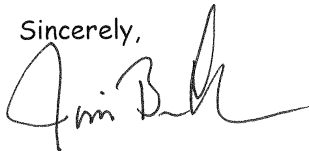
Option C includes two minority towns (Navassa and Northwest) that are in desperate need of job opportunities and have recently received federal and state grants to address their concerns.

As you know, if Option C is designated as nonattainment, it would greatly hinder our attempt to recruit new industry and hamper our existing industries to expand. With the high unemployment rate of over 11% in Brunswick County and thousands of people out of work in the region, it would be devastating to our local economy. The Commission hopes that with the protective requirements of the County's UDO and the fact that there is only one industry in Option C that exceeds Sulfur Dioxide levels, Option C will be dropped as an alternative.

At our meeting on April 14th, the Brunswick County EDC unanimously approved that Option G be recommended by DENR to the EPA as the nonattainment designated area for the Wilmington region for Sulfur Dioxide. Option G addresses the companies that have a major impact on the local environment. It also ensures the citizens of Brunswick County that the emissions issue will be addressed and that we can market our industrial parks and sites competitively.

Thank you again Laura for allowing the public to comment on your nonattainment area options, one of which will be recommended to the EPA. We sincerely hope that careful consideration is given as to how the nonattainment area affects Brunswick County. Feel free to contact me if you have any questions.

Sincerely,



Jim Bradshaw  
Executive Director  
Brunswick County Economic Development Commission

P.O. BOX 158 BOLIVIA, NC 28422 PH: (910) 253-4429 FAX: (910) 253-5326 EMAIL: bcedc@brunswickco.net

## BRUNSWICK COUNTY ADMINISTRATION

BRUNSWICK COUNTY GOVERNMENT CENTER  
DAVID R. SANDIFER COUNTY ADMINISTRATION BUILDING  
30 GOVERNMENT CENTER DRIVE, N.E.  
BOLIVIA, NORTH CAROLINA 28422

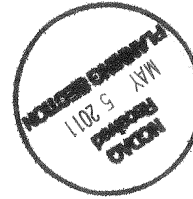
MAILING ADDRESS:

POST OFFICE BOX 249  
BOLIVIA, NORTH CAROLINA 28422

TELEPHONE  
(910) 253-2000  
(800) 442-7033

FAX  
(910) 253-2022

May 2, 2011



Ms. Laura Boothe  
N.C. Division of Air Quality  
Mail Service Center 1641  
Raleigh, North Carolina 27699-1641

RE: Sulfur Dioxide Nonattainment Area Designation

Dear Ms. Boothe:

I would like to thank you for attending a recent Board of Commissioners meeting to explain the Sulfur Dioxide Standard and Nonattainment Designation Process. Subsequent to that meeting, the Board has had the opportunity to evaluate the seven boundary options that are currently under consideration by your agency.

This is a very important matter regarding the public health and economy of our area. After a thorough evaluation of the options, on April 18, 2011 the Brunswick Board of Commissioners voted unanimously to recommend and support Option G.

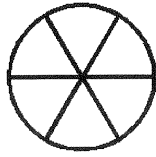
Thank you for the opportunity to provide input for your consideration on the issue.

Sincerely,

Marty K. Lawing  
County Manager



People Working



For People

**TOWN OF NAVASSA**

334 Main Street  
Navassa, NC 28451  
Phone: (910) 371-2432  
Fax: (910) 371-0041  
[www.townofnavassa.org](http://www.townofnavassa.org)

**Town Council**

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Michael Ballard, **Mayor Pro Tem**  
Jerry Merrick  
Craig Suggs  
Milton Burns  
Tony Burgess

Claudia Bray, **Town Administrator**  
Charlena Alston, **Town Clerk**

April 29, 2011

Laura Boothe  
Division of Air Quality  
Mail Service Center 1641  
Raleigh, NC 27699-1641



Dear Laura,

On behalf of the Town of Navassa, we want to thank NCDENR for giving us the opportunity to comment pertaining to the options presented as to where the nonattainment designation could occur in the Wilmington region pertaining to Sulfur Dioxide emissions.

On Thursday, April 21<sup>st</sup>, the Navassa Town Council met and discussed the nonattainment issue. The town understands the importance of ensuring town residents of clean air and a healthy environment, but we also understand that our citizens desperately need jobs and economic development opportunities. The town feels that several of the options being considered for the Sulfur Dioxide nonattainment area would have significant adverse consequences on future development within the town. Based on the data that we have seen, the only major contributor to Sulfur Dioxide emissions in Brunswick County is the DAK Americas plant, with the vast majority of emissions originating from activities generated in New Hanover County.

In reviewing the seven alternatives NCDENR suggested, the Navassa Town Council has unanimously voted at their regularly scheduled meeting on Thursday, April 21<sup>st</sup>, to recommend that Option G be recommended by NCDENR to the EPA as the nonattainment designated area for the Wilmington region for Sulfur Dioxide. Option G addresses the companies that have a major impact on the local environment. It also ensures the citizens of Navassa that the emissions issue will be addressed and that we can market our industrially zoned land competitively.

Thank you again Laura for allowing the public to comment on the nonattainment area options. If you have any questions, please contact Travis Barnes, Town Planner at (910) 371-2432.

Best Regards,

Travis Barnes, MPA, LEED AP  
Town Planner  
334 Main Street  
Navassa, NC 28451  
[tbarnes@townofnavassa.org](mailto:tbarnes@townofnavassa.org)

04/13/2011

Ms. Laura Boothe  
Division of Air Quality  
1641 Mail Service Center  
Raleigh, NC 27699-1641

Subject: New Hanover County SO<sub>2</sub> non-attainment

Dear Ms. Boothe,

I wanted to thank you for taking time from your busy schedule to address the pending SO<sub>2</sub> non-attainment boundary designation in New Hanover County. I appreciate the manner in which information was shared and the attempt to remain focused on the subject at hand during the 4/12/11 p.m. meeting.

As you can tell by the questions raised our issue is much bigger than the SO<sub>2</sub> topic of concern and therefore greatly limits "public comments", especially from industry. We being tax paying, law abiding, life-long citizens of New Hanover County are somewhat hamstrung due to our reluctance to speak in an open forum. Although our industries operate well within permitted limits, follow all applicable laws and are good community citizens some will not let facts get in the way of a misguided cause. Therefore I have the following comments:

1. EPA's reluctance to exclude emergency generation equipment greatly increases a site's potential emissions, regardless of restrictions on hours of operation.
2. Although the monitor located on the 421 corridor was tested and verified on occasion, we believe the readings to be skewed. The proximity to Wastec Incinerator and its co-mingled trash burning operation or the many pto-driven highly accelerated diesel truck engines, or the long-term idling vehicles on site do not represent the totality of New Hanover County. Granted the monitor may have shown a violation at that point, but we believe that to be worse case scenario.

With these comments in mind I would like to suggest a boundary as least intrusive as possible. Options F and G appear to capture the majority of SO<sub>2</sub> sources emissions while posing the least burdensome restrictions on industrial expansion or future growth.

Thanks for your time and consideration,

A Concerned Citizen of New Hanover County