

May 4, 2021

Submitted Via Email

Division of Air Quality
N.C. Dept. of Environmental Quality
1641 Mail Service Center
Raleigh, North Carolina 27699-1641
DAQ.publiccomments@ncdenr.gov

Re: UNC.15B; Comments of the Town of Carrboro on the Title V permit renewal and modification application for the University of North Carolina at Chapel Hill

Dear Sir/Madam:

Thank you for the opportunity to comment on UNC-Chapel Hill's Title V permit renewal and modification. I write this letter on behalf of the Carrboro Town Council.

The Town of Carrboro has a significant interest in this issue, as UNC's coal burning power plant lies on the border between Chapel Hill and Carrboro and disproportionately negatively impacts the air quality for residents of Carrboro's historically Black community and Environmental Justice and Equity (EJE) neighborhoods of Tin Top, Pine Knolls, Northside, and visitors to our central business district as much as it impacts those in Chapel Hill.

The Town of Carrboro has adopted climate justice goals for doing our part to mitigate the climate emergency that we are in. Climate scientists describe a quickly closing window of time to phase out all greenhouse gas emissions globally. With every day of inaction we increase the probability of triggering irreversible tipping points that threaten the existence of many species including our own.

While we recognize the complexity of transitioning away from coal, and other financial and energy commitments that UNC has made toward this effort, our Council is still very troubled by the fact that UNC is seeking to renew this permit. In 2010, former Chancellor Holden Thorpe committed to closing the plant and abandoning the use of coal by 2020. Now, in 2021, UNC has a newly revised plan that papers over the previous commitment with an undefined timeline for phasing out coal. We find it is disturbing that any coal fired power plants are still being permitted by NCDAQ.

Aside from this, however, there are two main areas of concern that the Town of Carrboro has with the draft permit that the N.C. Division of Air Quality (DAQ) has proposed for UNC's air-polluting facilities:

A. Heat Input Limit

DAQ's proposal to remove from the permit the limit on how much coal UNC may burn per hour (or "heat input limit") is very troubling. From a commonsense perspective, allowing UNC to burn unlimited amounts of coal within a one-hour period releases uncontrolled amounts of air pollution into our community. The recent revelation from the ongoing Clean Air Act litigation against UNC that the university has violated its heat input limit 269 times since May of 2019 demonstrates the real and present danger to the public health in our community. Federal Judge Catherine C. Eagles' October 2020 ruling that the heat input limit in UNC's current air permit is an enforceable limit further reinforces the significance of this provision in DAQ's pollution control program for UNC.

With this recent history in mind, it is disconcerting to see DAQ proposing to absolve UNC of its responsibility to control its air pollution through this most basic of pollution-control measures. We call upon DAQ to reinstate the heat input limit in UNC's new Title V permit, and to make it an explicitly enforceable permit limit.

B. Sulfur Dioxide and Nitrogen Dioxide Emission Limits

A related problem is that DAQ's draft permit contains no limit on the total amount of deadly sulfur dioxide and nitrogen dioxide pollution that UNC may emit. Exposure to these pollutants may result in asthma attacks, a variety of respiratory illness, heart attacks, and even premature death. This problem with DAQ's proposal is related to our prior point; DAQ cannot enforce a limit on the total amount of sulfur dioxide and nitrogen dioxide pollution UNC can emit without also imposing a heat input limit on the university. We call upon DAQ to impose limits on the total amount of sulfur dioxide and nitrogen dioxide UNC may emit through its new Title V permit.

Please study the seriousness of these points as you consider renewal of this permit.

Sincerely,

Lydia E. Lavelle
Mayor, Town of Carrboro