

May 6, 2015

Chairman Britt Lovin
WNC Regional Air Quality Board
49 Mount Carmel Road
Asheville, NC 28806

Dear Chairman Lovin:

On behalf of the Buncombe County Commissioners, I am writing to express concern about the draft Title V air permit recently issued by the Western North Carolina Regional Air Quality Agency (WNCRAQA) for Duke Energy's Asheville Steam Electric Plant. Specifically, we are concerned that the suggested permit limit for sulfur dioxide (SO₂) is insufficient to protect county residents from harmful air pollution, and we ask that you strengthen that limit to ensure our residents can breathe healthy air.

As you know, even short-term exposure to SO₂ is linked with an array of adverse respiratory effects, including bronchoconstriction and increased asthma symptoms. Elevated concentrations of SO₂ in the air leads to more emergency room visits and hospital admissions, particularly for children, the elderly, and people with asthma.

According to a recent report that uses a model approved by the Environmental Protection Agency (EPA) for tracking SO₂ pollution, emissions from the Asheville plant have been causing violations of the ambient air quality standard for SO₂ established by EPA. Indeed, the report states that the pollution in residential and recreational areas is at concentrations up to 3.5 times higher than levels EPA has determined to be safe. These exceedances have occurred approximately one out of every three to four days since 2010.

We are concerned that the newly released draft air permit maintains the same SO₂ emissions limit that the plant has had for years. This limit is nearly 80 times higher than the limit necessary to attain EPA's public health-based SO₂ standard, and we believe it is insufficient to protect our community from the impacts of air pollution.

The final Title V permit should contain limits that allow ambient air in the Asheville area to meet EPA's standard. We understand that limit to be no more than 61.7 lb/hr of SO₂ for each coal-burning unit, or a plant-wide average of 0.029 lb/MMBtu. We also understand that these levels are achievable if the plant's air pollution controls are run at full efficiency, as they were when they were first installed, or if the plant stops using high sulfur content coal.

Part of our job as elected officials is to ensure the safety of our community. There seems to be a clear path to addressing this problem and ensuring healthy air for our residents, and the first step on that path is for plant's air permit to contain appropriate SO₂ limits.

Sincerely,

David Gantt, Chairman