

# Air/Citizen Suite Enforcement: Sierra Club Notice of Intent to Sue University of North Carolina



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The Sierra Club and Center for Biological Diversity (collectively “Sierra Club”) sent a September 17th Notice of Intent to Sue (“Notice”) to the University of North Carolina (“UNC”) for alleged violations of the Clean Air Act.

The Notice addresses alleged violations by UNC at Chapel Hill, North Carolina’s two coal/natural gas/No. 2 fuel oil/wood fired circulating fluidized combustion boilers.

UNC is allegedly in violation of certain emission standards or limitations that are specified in the Notice. The standards or limitations are found in the UNC Clean Air Act Title V Permit.

The alleged exceedances involve operation at approximately 332 mm/Btu/hr on a specific date (referencing Boiler No. 6). An additional exceedance (referencing Boiler No. 7) identifies operation at approximately 342 mm Btu/hr on a specified date. Additional exceedances are alleged to have occurred.

Alleged violations are also stated to include:

- Violations of Readiness Testing Limitation
- Violations of Air Cleaner Inspection Requirements
- Violations of Continuous Emissions Opacity Monitoring Requirements
- Violations of Monthly Particulate Matter Inspections Requirements
- Violations of Reporting Requirements to DAQ and the United States Environmental Protection Agency
- Violations of Coal Ash Visible Emissions Inspections Requirements
- Violations of Coal Ash Silo Bagfilter Inspections Requirements
- Violations of Carbon Monoxide Emission Requirements
- Violations of Daily Calibration Drift Assessment Requirements

A copy of the Notice can be downloaded [here](#).