

STATE OF NORTH CAROLINA
COUNTY OF WAKE

IN THE GENERAL COURT OF JUSTICE
SUPERIOR COURT DIVISION
24 CV 032664-910

NORTH CAROLINA
DEPARTMENT OF
ENVIRONMENTAL QUALITY,
DIVISION OF WATER
RESOURCES,

Petitioner,

v.

CITY OF ASHEBORO, CITY OF
GREENSBORO, and CITY OF
REIDSVILLE,

Respondents.

**BRIEF OF AMICUS CURIAE
IN SUPPORT OF PETITIONER**

N.C. Gen. Stat. § 150B-43

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Cape Fear River Watch and Haw River Assembly submit this brief as amicus curiae in support of the North Carolina Department of Environmental Quality, Division of Water Resources’ (“the Department”) Brief in Support of its Petition for Judicial Review filed on September 2, 2025.¹

INTEREST OF AMICUS CURIAE

Amici Cape Fear River Watch and Haw River Assembly (collectively “Riverkeeper Groups”) are 501(c)(3) nonprofit member organizations who represent North Carolinians who drink, fish, swim, and play in the Cape Fear River Basin downstream of Asheboro. Cape Fear River Watch is headquartered in Wilmington, and Haw River Assembly is headquartered in Pittsboro. Both Riverkeeper Groups have become national voices for combatting industrial chemical pollution, and both advocate at the local, state, and federal level for communities unfairly burdened by toxic chemical pollution.

STATEMENT OF THE CASE

For more than a decade, Asheboro has discharged 1,4-dioxane, a cancer-causing chemical, from its wastewater plant upstream of the drinking water supplies for nearly 900,000 North Carolinians. Because of its chemical properties, 1,4-dioxane is highly mobile and cannot be removed by conventional water treatment technologies. As a result, Asheboro’s pollution flows into downstream rivers, through public water drinking systems, and eventually into homes, schools, businesses, and churches. Because of Asheboro (and other industrial and municipal

¹ Consistent with Rule 28.1(b)(3)(c) of the North Carolina Rules of Appellate Procedure, the Southern Environmental Law Center states that the below signed counsel authored this brief on behalf of Haw River Assembly and Cape Fear River Watch. No other person or entity assisted, either directly or indirectly, with the submission of this brief.

dischargers), many communities are forced to drink water laden with levels of 1,4-dioxane far above the cancer-risk level.

The vast majority of the 1,4-dioxane in Asheboro's discharges comes from industries that pay the utility to accept their 1,4-dioxane laden waste. In particular, StarPet Inc., a plastics manufacturer, and the Great Oak Landfill send extraordinarily high levels of 1,4-dioxane to the city's wastewater plant. Asheboro is unable to treat 1,4-dioxane, so this toxic pollution flows through its facility and into the environment. The city could stop pollution from its industrial customers, but it has chosen not to. Instead, Asheboro has spent the past several years fighting 1,4-dioxane regulation. The city has asked environmental rulemakers to block 1,4-dioxane rules,² and it sued the Department over the 1,4-dioxane limits in its National Pollutant Discharge Elimination System ("NPDES") permit. (R pp 1109–16). As part of this campaign, Asheboro has repeatedly (and falsely) claimed that complying with the law will require it to install advanced treatment at the wastewater utility itself—an endeavor that would cost the city millions of dollars. (*See, e.g.*, R pp 1008–09, 1507).

But the city's cost argument is absurd. It's like refusing to go to work across town because private jets are too expensive, while ignoring the perfectly functional car sitting in your driveway. Like local commuters, Asheboro has other options. The city has the authority to require its industrial customers (including StarPet and Great Oak Landfill) to treat, limit, or even eliminate their 1,4-dioxane pollution *before* it ever reaches the city's wastewater plant. If Asheboro used this authority, it would not only cost less to treat the chemical, but the cost would be put on the industries responsible for the pollution—not the municipal utility.

This simple, cost-effective solution matters because the administrative court used

² Letter from Elijah Williams, City of Greensboro; Michael Rhoney, City of Asheboro; & Summer Woodard, City of Reidsville, to John D. Solomon et al., N.C. Env't Mgmt. Comm'n (Mar. 8, 2024), <https://perma.cc/CG3P-ZNT7>.

Asheboro’s cost concerns to justify multiple holdings below, including that the Department needed to go through formal rulemaking before it could set limits for 1,4-dioxane in NPDES permits. (R pp 2984, 2987, 2989, 2990). Asheboro (and Greensboro and Reidsville) misled the administrative court about the financial burden wastewater plants would suffer if they were forced to comply with 1,4-dioxane limits, and the administrative court relied on that falsehood in reaching its decision. As a result, families, businesses, and communities downstream are the ones bearing the cost. Communities are now faced with an impossible choice: expend millions of dollars to treat pollution they did not create or continue drinking water laden with a cancer-causing chemical. This Court should correct the administrative court’s error and reverse the decision below.

ARGUMENT

Last year, the administrative court overstepped its authority in overturning 1,4-dioxane limits in Asheboro’s NPDES permit and holding the Department could not set such limits based on the narrative toxic substances standard codified at 15A North Carolina Administrative Code 2B.0208. (R p 2992). The administrative court’s decision directly conflicts with the federal Clean Water Act, 40 C.F.R. § 122.44(d)(1) (requiring limits based on “State narrative criteria for water quality”), and U.S. Supreme Court precedent, *PUD No. 1 of Jefferson Cnty. v. Wash. Dep’t of Ecology*, 511 U.S. 700, 715–16 (1994) (narrative water quality standards are enforceable); *City & Cnty. of San Fran., Cal. v. EPA*, 145 S. Ct. 704, 719–20 (2025) (permitting agencies have the responsibility to “[d]etermin[e] what steps a permittee must take to ensure that water quality standards are met,” including via “limitations . . . expressed in both numerical and non-numerical

(i.e., ‘narrative’) form.”). Riverkeeper Groups support the Department’s arguments regarding the errors made by the administrative court.³

Riverkeeper Groups write separately to refute the administrative court’s conclusion that implementing 1,4-dioxane limits would be “prohibitively expensive” for Asheboro. (R pp 2984, 2989, 2990). That finding underpinned several of the administrative law judge’s holdings, including that the city was substantially prejudiced and that the Department’s actions were arbitrary and capricious. *Id.* But the cost of treating 1,4-dioxane at the wastewater plant is irrelevant. Asheboro can (and should) use its existing authority under the Clean Water Act’s pretreatment program to reduce or eliminate 1,4-dioxane pollution before it reaches the wastewater plant.

I. The Clean Water Act’s pretreatment program gives Asheboro the tools it needs to comply with NPDES permit limits.

Wastewater plants like Asheboro’s are only designed to treat certain conventional pollutants (e.g., bacteria). But these utilities often receive industrial waste that contains chemicals the wastewater plant cannot remove. The Clean Water Act anticipated this problem and established the “pretreatment program” to address industrial pollution dumped into wastewater plants. *See General Pretreatment Regulations for Existing and New Sources*, 52 Fed. Reg. 1586, 1590 (Jan. 14, 1987) (codified at 40 C.F.R. pt. 403). By establishing a regulatory scheme that mandates industries to “pretreat” their waste before sending it to a wastewater plant, the Clean Water Act ensures that *industries* pay the costs of treating their pollution, not the local governments running wastewater plants (or their ratepayers). *See id.* This scheme is not only

³ Like the Department, Riverkeeper Groups believe the administrative court erred in allowing the cities of Greensboro and Reidsville to intervene in the permit challenge proceedings. Consequently, Riverkeeper Groups’ amicus brief focuses on Asheboro. That said, like Asheboro, Greensboro and Reidsville also have both the ability and the obligation to use pretreatment tools to control industrial pollution.

equitable, but also the most cost-effective solution for everyone involved. It is far more difficult and expensive to remove chemicals at a wastewater utility that handles millions (or even tens of millions) of gallons of wastewater a day from many different sources than at a single industrial source with less flow and a more concentrated waste stream.⁴

The pretreatment process is simple. First, wastewater plants must ask about the waste that their industries are sending to them. 40 C.F.R. § 403.8(f)(2). Wastewater plants must make industries disclose enough information about their discharges so that the utility can evaluate pollution controls. *See id.* § 403.8(f)(2)(ii); EPA, *Industrial User Permitting Guidance Manual* 4-2 to 4-3 (2012), <https://perma.cc/LW53-TUHQ>. This makes sense—not only because the industries themselves are in the best position to know what pollutants are in their own wastewater, but also because wastewater plants should know what chemicals they might be receiving from their industrial customers, including chemicals that the utility cannot remove.

Second, after wastewater plants gather information about their industries' waste, the Clean Water Act requires utilities to regulate their industrial customers so that their waste does not (1) disrupt the wastewater plant's operation or sludge disposal, or (2) cause the wastewater plant to violate its NPDES permit. 40 C.F.R. §§ 403.8(a), 403.5(a)(1), 403.3(k), (p). Federal regulations spell out a variety of legal tools wastewater plants can use to do so. For instance, wastewater plants can issue a permit or order that sets pollution limits on industrial discharges. *Id.* § 403.8(f)(1)(iii). They can “[r]equire . . . the installation of technology” to reduce or eliminate the pollution before it reaches the wastewater plant. *Id.* § 403.8(f)(1)(iv). Utilities can deny or condition a permit, if necessary to comply with federal law. *Id.* § 403.8(f)(1)(i). And when pollution “present[s] an imminent endangerment to the health or welfare of persons,” the

⁴ See N.C. Collaboratory, *Treatment Technologies & Implementation Costs to Comply with Proposed 1,4-Dioxane Discharge Limits* 93–94, 108–10 (2024), <https://perma.cc/WPL6-U5N4>.

wastewater plant must “immediately and effectively . . . halt or prevent any discharge of [those] pollutants to the [wastewater plant].” *Id.* § 403.8(f)(1)(vi)(B).

In addition to federal requirements, cities like Asheboro have even more specific pretreatment rules in local sewer use ordinances. These local rules spell out additional types of prohibited industrial discharges and they give the wastewater plant expanded authority to control industrial pollution being sent to the utility.

While federal and local rules give wastewater plants some discretion in which tools they select to address pollution from their industrial customers, the utility cannot refuse to act. 40 C.F.R. § 403.8(f) (stating that a wastewater plant “shall at all times be fully and effectively exercis[ing] and implement[ing]” its pretreatment authority).

The pretreatment program works—even for less conventional pollutants that may be more difficult to treat. Burlington, North Carolina’s wastewater plant, for instance, has effectively used its pretreatment program to significantly reduce its industrial pollution. The city once received waste from multiple industrial sources of per- and polyfluoroalkyl substances (“PFAS”). PFAS, like 1,4-dioxane, are harmful chemicals that do not break down in water and are not removed by conventional wastewater or drinking water treatment. Because Burlington’s wastewater plant was not designed to remove PFAS, the city’s industries caused the utility to release the toxic chemicals at levels hundreds of thousands of times higher than what is protective of human health.⁵ After Haw River Assembly threatened to sue the city for violations of the Clean Water Act (including the city’s failure to use its pretreatment authority), Burlington

⁵ Compare City of Burlington, *East Burlington Wastewater Treatment Plant Effluent* (2025), <https://perma.cc/48Y7-Q52R>, with U.S. Env’t Prot. Agency, *Technical Fact Sheet: Draft National Recommended Human Health Ambient Water Quality Criteria for PFOA, PFOS, and PFBS* (2024), <https://perma.cc/TJP7-JT6W> (comparing Burlington’s effluent, which measured 238 parts per trillion (“ppt”) PFOA on November 15, 2019, to EPA’s draft water quality criteria to protect human health from exposure via drinking water and fish consumption for PFOA, 0.0009 ppt).

agreed to clamp down on the PFAS coming from its industrial customers.⁶ As a result, the city was able to significantly reduce the amount of PFAS reaching its wastewater plant, and the levels in the wastewater plant's discharges decreased by more than 99 percent.⁷

Burlington has also used its pretreatment authority to address 1,4-dioxane from an industrial customer. In the summer of 2023 and again in January 2024, Burlington's wastewater plant released high levels of 1,4-dioxane.⁸ Because of the city's prior experience using its pretreatment authority to control PFAS, it knew what to do when it discovered 1,4-dioxane in its system. The city was able to quickly identify the industrial source and immediately ordered the industry to pause its production.⁹ Burlington later allowed the industry to resume production, but it updated the industry's permit to address its toxic pollution, requiring the industry to create a plan to capture and destroy 1,4-dioxane onsite.¹⁰

Municipalities across the country have also demonstrated the effectiveness of the pretreatment program. Wastewater plants in Michigan, for example, have reduced levels of perfluorooctane sulfonic acid ("PFOS"), a particularly harmful type of PFAS, in their discharge by 99 percent, just by using their pretreatment authority.¹¹ In 2017, the state of Michigan discovered extensive PFOS contamination downstream of one of its wastewater treatment plants¹² and decided it would be easier and more fair for the industries creating or using this

⁶ Memorandum of Agreement from Haw River Assembly & City of Burlington (Aug. 1, 2023), <https://perma.cc/6K3Q-6UJ3>.

⁷ See City of Burlington, *East Burlington Wastewater Treatment Plant Effluent* (2025) (comparing Burlington's effluent total PFAS sampling results from 2019 to those in 2024).

⁸ See City of Burlington, *Media Release: City of Burlington Detects Elevated 1,4-Dioxane Levels in Wastewater Effluent as Part of Daily Sampling Protocol* (2024), <https://perma.cc/X2YN-MLNF>.

⁹ *Id.*

¹⁰ Keith T. Barber, *Burlington Designated to Receive \$500,000 From the State for PFAS and 1,4-Dioxane Remediation*, *The Times News* (June 17, 2024), https://www.thetimesnews.com/news/local/burlington-designated-to-receive-500-000-from-the-state-for-pfas-and-1-4-dioxane/article_3ae91a03-917b-55ea-a8a9-38127a6d3d79.html.

¹¹ Mich. Dep't of Env't, Great Lakes, & Energy, *Michigan Industrial Pretreatment Program (IPP) PFAS Initiative* 27 (2025), <https://perma.cc/K2X8-Y47S>.

¹² Dorin Bogdan, AECOM, *Evaluation of PFAS in Influent, Effluent, and Residuals of Wastewater Treatment Plants (WWTPs) in Michigan* 5 (2021), <https://perma.cc/ABG8-WGQD>.

chemical (rather than the wastewater plant) to pay for the cleanup. The state first instructed several wastewater plants to sample their industries and identify which were responsible for the PFAS pollution.¹³ Michigan then directed wastewater plants to require their industries to reduce their toxic chemical pollution—through treatment, product substitution, minimization, or other methods.¹⁴ The initiative was “highly effective,” and most wastewater plants nearly eliminated the PFOS in their discharge.¹⁵

Asheboro can (and must) use the same regulatory tools that Burlington and wastewater treatment plants in Michigan used. The city already uses its pretreatment authority to control some pollutants like lead and cyanide. Asheboro can use the same authority to set 1,4-dioxane limits and/or conditions in StarPet’s and Great Oak Landfill’s industrial user permits so that Asheboro itself would be able to meet any 1,4-dioxane limits in its own NPDES permit. *See* 40 C.F.R. § 403.8(f)(1)(iii); Asheboro, N.C., Code of Ordinances §§ 52.05, 52.07–.09, 52.21.¹⁶ In addition, Asheboro can require its industries to install technology to reduce or eliminate 1,4-dioxane. 40 C.F.R. § 403.8(f)(1)(iv); Asheboro, N.C., Code of Ordinances § 52.11(A). And finally, Asheboro can refuse to accept 1,4-dioxane laden wastewater if the city determines it would be necessary to comply with its own permit conditions. 40 C.F.R. § 403.8(f)(1); Asheboro, N.C., Code of Ordinances § 52.21(H)(2). If Asheboro took these steps, it would practically eliminate the 1,4-dioxane sent to the wastewater plant—thereby also eliminating the need for it to install any “prohibitively expensive” treatment technology.

¹³ *Id.*

¹⁴ *Id.*

¹⁵ Mich. Dep’t of Env’t, Great Lakes, & Energy, *Michigan Industrial Pretreatment Program (IPP) PFAS Initiative* 27 (2025).

¹⁶ The limits for each industry could be based on how much flow the industry sends to the wastewater plant—simple formulas would allow Asheboro to allocate how much each industry could send while still ensuring the city complies with its permit limits.

II. Asheboro knows it can use its pretreatment authority to control 1,4-dioxane, rather than installing treatment technology at the wastewater plant.

When the Department issued Asheboro a draft copy of its NPDES permit, the city recognized that it would need to reduce 1,4-dioxane from its industries to comply with the permit's terms.¹⁷ The city asked the Department for a five-year compliance schedule so that its industries could “investigate and install treatment units to reduce 1,4 dioxane discharges *in order to meet the final compliance limits.*” (R p A-115) (emphasis added). The Department obliged, and it granted Asheboro a five-year compliance schedule that listed several pretreatment tools the city would use to meet its limits. (R p A-16). The Department also offered Asheboro phased permit limits that started higher and gradually decreased towards the final limit—a limit that would be protective of human health downstream. (R p A-10). The permit's compliance schedule and phased limits therefore intentionally gave the city time to work with its industries. Ultimately, the Department found that complying with the final limits would be “technologically achievable with pretreatment action.” (R p A-159).

In short, neither Asheboro nor the Department anticipated the city would need to install advanced treatment at the utility in order to comply with its permit. Of course, the city could choose to do so if it wanted, but Asheboro has long known that properly regulating its industrial customers would allow the city to comply with its own permit limits and the law *without* having to install “prohibitively expensive” treatment.

¹⁷ See, e.g., E-mail from Sarah Laughlin, City of Asheboro, to Kyle Mertens, Waste Mgmt. (July 6, 2021, 09:38 AM), <https://perma.cc/BA2B-EK8W>; E-mail from Sarah Laughlin, City of Asheboro, to Mark Pederson, StarPet Inc. (Mar. 30, 2022, 4:22 PM), <https://perma.cc/RN9E-W6QS> (informing StarPet and Great Oak Landfill that, in anticipation of Asheboro receiving a NPDES permit with 1,4-dioxane limits, that the industries likewise will receive 1,4-dioxane limits on their discharges to Asheboro's wastewater plant).

III. The city's failure to control 1,4-dioxane has shifted costs to communities downstream.

By refusing to control its 1,4-dioxane discharges, Asheboro has allowed toxic chemical pollution to contaminate downstream communities. The Cape Fear River Basin is contaminated with some of the highest levels of 1,4-dioxane in the country,¹⁸ and Asheboro (and Greensboro and Reidsville) are leading sources of this toxic chemical pollution. (R pp 350, A-47, C-70, C-273). Asheboro dumps 1,4-dioxane into a tributary of the Deep River, which flows into the drinking water supplies for numerous communities, including Sanford, Goldston, Lee County, parts of Chatham County, Fayetteville, Dunn, Harnett County, Brunswick County, New Hanover County, Bladen County, Pender County, and Wilmington.

Unlike wastewater plants, drinking water utilities have little control over the amount of 1,4-dioxane that flows into their system. Once a drinking water supply is polluted with 1,4-dioxane, a drinking water utility's only option is to pass the costs of removing it (or the health risks of not removing it) on to its customers—the families, communities, and businesses that rely on drinking water utilities for clean, safe water. These costs could be enormous. For example, the Cape Fear Public Utility Authority, the drinking water supplier for Wilmington and New Hanover County, determined that to remove 1,4-dioxane from its drinking water, the utility could have to pay more than \$23 million to install treatment alone.¹⁹ Operating costs would tack on another \$1.58 million each year.²⁰ By contrast, it would only cost industrial customers like

¹⁸ See N.C. Dep't of Env't Quality, *1,4-Dioxane Monitoring in the Cape Fear River Basin of North Carolina* 2 (2017), <https://perma.cc/U6UG-4GDQ> (stating that the Cape Fear River Basin “exhibits some of the highest measured concentrations of 1,4-dioxane in finished drinking water in NC and the U.S.”).

¹⁹ Letter from Kenneth Waldroup, Cape Fear Pub. Util. Auth., to J.D. Solomon, N.C. Env't Mgmt. Comm'n & Richard Rogers, N.C. Dep't Env't Quality, Div. of Water Res. (Nov. 7, 2024), <https://perma.cc/S2FJ-R67T>.

²⁰ *Id.*

Asheboro's a fraction to remove 1,4-dioxane.²¹ It is thus far more cost-effective for industrial sources to treat for the chemical than for downstream drinking water utilities to do so.

It is also far more fair. As downstream drinking water utilities noted in the administrative court below, Asheboro, Greensboro, and Reidsville

wish to make 1,4-dioxane someone else's problem. . . . [they] would prefer to force everyone else to be responsible for removing their customers' 1,4-dioxane from downstream drinking water, rather than remove it themselves before discharge or prevent it from getting into their sewer systems – and the Cape Fear River – in the first place. The problem is that there are real people who live downstream. . . .

(R p 2601). Riverkeeper Groups' members drink water supplied by downstream utilities. They have already suffered from harm to their health, and they should not have to foot the bill for pollution released by Asheboro's industries, too—pollution that Asheboro can control simply by using its regulatory authority. Communities, including Riverkeeper Groups' members, have already had to reconfigure their and their families' lives because of this pollution. They have installed costly water treatment in their homes; they avoid swimming in rivers they love; they refrain from eating fish; they worry about bathing their children; and they are uneasy when they eat food or grab a drink at a local restaurant. The public should not bear this burden. Asheboro should put the burden of treatment on its industrial customers who are responsible for this pollution.

CONCLUSION

The Clean Water Act's pretreatment program gives Asheboro the authority to regulate the 1,4-dioxane pollution coming from its industries. The administrative court ignored this key tenet of federal law and wrongly assumed that any 1,4-dioxane limits issued to Asheboro (or any other city) would require the wastewater plant to install "prohibitively expensive" treatment

²¹ N.C. Collaboratory, *Treatment Technologies & Implementation Costs to Comply with Proposed 1,4-Dioxane Discharge Limits* 108–10 (2024).

technology. The administrative law judge relied on this falsehood to justify stripping the Department's ability to use a critical permitting tool—a tool that can be used to protect communities from toxic chemical pollution throughout North Carolina. Riverkeeper Groups respectfully request that the administrative decision be reversed.

Respectfully submitted this the 2nd day of September, 2025.

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CERTIFICATE OF SERVICE

I hereby certify that on September 2, 2025, I have electronically filed this **BRIEF OF AMICUS CURIAE IN SUPPORT OF PETITIONER** with the Wake County Clerk of Superior Court and served it electronically upon the following:

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This the 2nd day of September 2025.

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