

Received
MAR 14 2014
Air Permits Section

March 14, 2014

direct dial 919 420 1798
direct fax 919 510 6103
amcconnell@kilpatricktownsend.com

BY HAND DELIVERY

William D. Willets, P.E.
Acting Chief, Permitting Section
NC DENR, Division of Air Quality
217 West Jones Street
Raleigh, North Carolina 27603

RE: Request for Pine Trial, Enviva Pellets, Ahoskie, LP. AQ Permit #10121R01

Dear Mr. Willets:

Thank you for meeting with me and Joe Harrell of Enviva Pellets, Ahoskie, LP ("Enviva") on March 4, 2014 regarding Enviva's request to increase the percentage of softwood used as a raw material at the Ahoskie facility on a trial basis.

As we discussed, the maximum production throughput of the Ahoskie facility is 384,000 oven-dried tons ("ODT") of wood per year. Based on 2013 compliance test data submitted to DAQ for the Ahoskie facility, total annual VOC emissions for the facility are estimated to be approximately 42.5 tons per year ("tpy"). These data indicate that actual emissions from the facility are considerably lower than estimates based on the emission factors used in the permit application, specifically the factor of 1.051 lb/ODT contained in Section 2.1 A.1 of the facility's permit. The emission factors used in the permit application reflect the facility's practice of using less than 10% softwood as raw material for pellet production.

Enviva seeks to utilize more softwood as a raw material for the production of pellets, but has no actual emissions data from the Ahoskie facility when making pellets from a higher percentage of softwood in the raw material mix. In order to generate those data, Enviva requests that DAQ approve a trial during which Enviva may process up to 50,000 ODT of raw material comprised of up to 75% softwood content, over a 12 month period. As we discussed on March 4th, based on engineering test data from Enviva and other wood pellet facilities, the proposed trial is estimated to increase VOC emissions by approximately 76 tpy over the duration of the trial. This expected increase in VOC emissions during the trial would trigger no new regulatory requirements.

As I have discussed with Michael Pjetraj, the estimated emission increase resulting from the trial is based largely upon engineering data. To address DAQ's concern about the potential for actual

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emissions during the trial being higher than these estimates, Enviva will initiate engineering testing early in the trial to ensure that no new regulatory requirements will be triggered. During the course of the trial, Enviva will perform engineering testing using non-reference methods for VOCs, methanol and formaldehyde at a range of raw material softwood content. Prior to the use of emissions data generated from the trial in future permitting decisions by Enviva, reference method testing, including submission of a protocol and notice to DAQ, will be performed.

Thank you for your consideration of this request, and I look forward to your response at your earliest convenience.

Sincerely,



Alan H. McConnell
Counsel to Enviva Pellets, Ahoskie, LP

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cc: Michael Pjetraj, NC DAQ
Joe Harrell, Enviva Pellets, Ahoskie, LP

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COURIER REQUEST
(THIS FORM MUST ACCOMPANY ALL HAND DELIVERIES)

DATE/TIME: 3/14/14 -- 10:20 A.M.

REQUESTOR: Alan McConnell
CLIENT/MATTER #: 94657-880006

PHONE #: 919-420-1758 (Donna)
FLOOR: 14th

- | | |
|--|--|
| <input checked="" type="checkbox"/> Delivery | <input type="checkbox"/> Wait for Receipt, Signature, etc. |
| <input type="checkbox"/> Pick Up | <input type="checkbox"/> Deliver to Secondary Destination
(Address Below) |
| <input type="checkbox"/> Courthouse Filing | |

DATE/TIME OF RUN

Date of Courier Run: 3/14/14

- 8:30 10:30 1:30 3:30 Special

PRIMARY DESTINATION

Company Name: Division of Air Quality
Address: 217 W. Jones Street

ATTENTION: 1 - Willets; 2 - Pjetraj
Phone Number: (919) 707-8726

Complete by
Date/Time: 3/14 -- noon

SECONDARY DESTINATION
(if applicable)

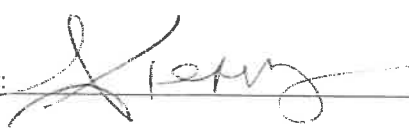
Company Name:
Address:

ATTENTION:
Phone Number:

Complete by
Date/Time:

SPECIAL INSTRUCTIONS:

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PLEASE PRINT TWO COPIES OF THIS FORM AND ATTACH THEM TO THE HAND DELIVERY PACKAGE.

If you have any questions, or to arrange for a courier run, please contact Mary Robbins (in-house courier) at ext. 471660 or cell (919) 412-7268. If Mary is unavailable to handle a run, please contact Office Services at ext. 471923 to arrange for a run to be handled by Legal Wheels or Black Dog Agency. For direct contact with Legal Wheels, call (919) 836-2210.

Kilpatrick Townsend Main Phone Number: (919) 420-1700



**KILPATRICK
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