

ENVIVA PELLETS

2013

P/N 10203

NORTHAMPTON COUNTY

Zoning Consistency Determination

Facility Name Enviva Pellets Northampton, LLC

Facility Street Address Lebanon Church Road (Street Number TBD)

Facility City Gaston

Description of Process Wood pellet manufacturing facility

SIC Code/NAICS SIC - 2499 ; NAICS - 321999

Facility Contact Glenn Gray

Phone Number (804) 412-0227

Mailing Address 1309 East Cary Street, Suite 200

Mailing City, State Zip Richmond, Virginia 23219

Based on the information given above:

- I have received a copy of the air permit application (draft or final) AND...

- There are no applicable zoning and subdivision ordinances for this facility at this time
- The proposed operation IS consistent with applicable zoning and subdivision ordinances
- The proposed operation IS NOT consistent with applicable zoning and subdivision ordinances (please include a copy of the rules in the package sent to the air quality office)
- The determination is pending further information and can not be made at this time
- Other: _____

Agency NORTHAMPTON COUNTY PLANNING & ZONING DEPT.

Name of Designated Official WILLIAM E. FLYNN, JR.

Title of Designated Official DIRECTOR

Signature *William E. Flynn, Jr.*

Date DECEMBER 21, 2012

Please forward to the mailing address listed above and the air quality office at the appropriate address as checked on the back of this form.

Courtesy of the Small Business Assistance Program
toll free at 1-877-623-6748 or on the web at www.envhelp.org/sb

January 22, 2013

Received

JAN 24 2013

Air Permits Section

MEMORANDUM

TO: Kevin Godwin, Environmental Engineer II, Raleigh Central Office

FROM: *OB* Charles Buckler, Meteorologist II, Air Quality Analysis Branch

THROUGH: *WJef* William Willets, Acting AQAB Supervisor, Air Quality Analysis Branch

SUBJECT: Enviva Pellets (Fac # 6600167.11A)
Gaston, NC Northhampton County

I have reviewed the modeling analysis that was received January 3, 2013 for the proposed construction of the wood pellet manufacturing plant near Gaston, NC. The facility will potentially emit several toxics at the facility. In addition, a Nitrogen Dioxide (NO₂) 1-hour National Ambient Air Quality Standard (NAAQS) analysis was accomplished. The analysis shows compliance, on a source-by-source basis for all toxics Acceptable Ambient Levels (AALs) and the NO₂ 1-hour NAAQS.

Several emission sources were modified as part of this project but the latest version of AERMOD (12060) modeling system was used to assess only three sources (Dryer WESP Stack, Emergency Generator and the Firewater Pump). Source emission rates modeled are listed in Table 2-3 below:

✓ **Table 2-3. Modeled Emission rates**

Pollutant	Modeled Emission Rates		
	Dryer	EG	FP
	EP1 (g/s)	EP9 (g/s)	EP10 (g/s)
Acrolein	✓ 1.782E-01	✓ 2.855E-05	✓ 2.448E-05
Arsenic	✓ 3.497E-05	-	-
Benzene	✓ 5.889E-02	✓ 2.880E-04	✓ 2.469E-04
Benzo(a)pyrene	✓ 5.700E-05	✓ 5.804E-08	✓ 4.974E-08
Cadmium	✓ 6.517E-06	-	-
Chlorine	✓ 1.732E-02	-	-
Formaldehyde	✓ 1.085E+00	✓ 3.643E-04	✓ 3.122E-04
Hexachlorodibenzo-p-dioxin	✓ 3.508E-05	-	-
Hydrogen chloride	✓ 4.166E-02	-	-
Mercury, vapor	✓ 7.673E-05	-	-
Nickel metal	✓ 7.235E-04	-	-
Phenol	✓ 2.170E-01	-	-
Vinyl chloride	✓ 3.946E-04	-	-
NO _x	4.070E+00	2.900E-01	2.486E-01

Note: Conversion factor from g/s to lbs/hr = 7.936.

Terrain and land use features were assessed and were incorporated into the modeling. 1988-1992 Raleigh surface and Greensboro upper-air meteorological data was used for the analysis. Structural effects for downwash impacts were determined using the BPIP-PRIME (Building Profile Input Program-Plume Rise Model Enhancement) program to assess several structures at the facility.

To determine the location and extent of the maximum impact, receptors were placed at the property boundary, at 100-meter intervals or less, and extended outwards at 100-meter intervals to 500 meters. An additional set of receptors were placed from 500 meters to 5000 meters at 500 meter spacing. The cavity impact did not exceed simple terrain impacts. The modeling assumes emission rates and source assumptions are correct. Maximum impacts for all pollutants are listed in Table 3-1 and Table 3-2 below and show compliance for all pollutants and all standards on a source-by-source basis.

Table 3-1. TAP Modeling Results

Pollutant	Averaging Period	Max. Modeled ¹	Date/Time	Location of Maximum		AAL	% of
		Impact (µg/m ³)	of Impact (YYMMDDHH)	UTM-E (m)	UTM-N (m)	(µg/m ³)	AAL (%)
Acrolein	1-Hour	1.07E+00	92031107	266,300.0	4,042,800.0	8.00E+01	1.33%
Arsenic	Annual	1.00E-05	1992	266,300.0	4,043,000.0	2.30E-04	4.35%
Benzene	Annual	1.57E-02	1992	266,300.0	4,043,000.0	1.20E-01	13.12%
Benzo(a)pyrene	Annual	1.00E-05	1992	266,300.0	4,043,000.0	3.30E-02	0.03%
Cadmium ²	Annual	1.56E-06	1992	266,300.0	4,043,000.0	5.50E-03	0.03%
Chlorine	1-Hour	1.04E-01	92031107	266,300.0	4,042,800.0	9.00E+02	0.01%
	24-Hour	5.43E-02	92050724	265,840.5	4,042,512.0	3.75E+01	0.14%
Formaldehyde	1-Hour	6.50E+00	92031107	266,300.0	4,042,800.0	1.50E+02	4.33%
Hexachlorodibenzo-p-dioxin	Annual	1.00E-05	1992	266,300.0	4,043,000.0	7.60E-05	13.16%
Hydrogen chloride	1-Hour	2.49E-01	92031107	266,300.0	4,042,800.0	7.00E+02	0.04%
Mercury, vapor	24-Hour	2.40E-04	92050724	265,840.5	4,042,512.0	6.00E-01	0.04%
Nickel metal	24-Hour	2.27E-03	92050724	265,840.5	4,042,512.0	6.00E+00	0.04%
Phenol	1-Hour	1.30E+00	92031107	266,300.0	4,042,800.0	9.50E+02	0.14%
Vinyl chloride	Annual	9.00E-05	1992	266,300.0	4,043,000.0	3.80E-01	0.02%

Table 3-2. NAAQS Modeling Results

Pollutant	Averaging Period	UTM-E (m)	UTM-N (m)	Date/Time	Modeled Concentration ($\mu\text{g}/\text{m}^3$)	Background Concentration ¹ ($\mu\text{g}/\text{m}^3$)	Total Concentration ($\mu\text{g}/\text{m}^3$)	NAAQS ($\mu\text{g}/\text{m}^3$)	Exceeds NAAQS? (Yes/No)
NO ₂	1-Hour	266,092.9	4,042,747.0	1988-1992	95.07	35.80	130.87	188	No

¹ Background Concentration provided in email from Charles Bockler (NCDAQ) to Jon Hill (Trinity) on August 1, 2011

Cc: Lori Cherry, Toxics Branch

CD - FBH - BF

Bagfilter Evaluation - Enviva Northampton

User Input

User must supply information in blue (double outline).

Optional user information is single outlined.

Particulate Material: Wood Estimated Efficiency (%): 99.9

Actual Air Flow Rate (acfm): 35,500 Cloth Area (sq ft): 4,842

Maximum Operating Temperature (F): 250 Proposed Cloth Material: Polyethylene

Pulse Jet?: no

Uncontrolled Particulate Rate (lb/hr): Process Rate (lb/hr):

Maximum Pressure Drop (in H2O): 6 No. of compartments: 1

Gas Stream Moisture (%): 23.00 Felted?: yes

Time Between Cleanings (min): 0.17 Cleaning Time (min): ?

Particle Size Distribution

Avg. Size (um)	Size Ranges (um)	Size (um)	Cumul. Mass (% < size)
1.25	0 - 2.5	0	0.0
3.75	2.5 - 5	2.5	16.5
7.5	5 - 10	5	40.3
12.5	10 - 15	10	51.6
17.5	15 - 20	15	57.0
20	> 20	20	100.0

Information Source(s)

6600167.13B

Program Output

Filtering Velocity Analysis

Typical Filtering Velocity (fpm): 12.0 Applicant Filtering Velocity (fpm): 7.3

Typical filtering velocity not exceeded.

Fabric Durability Analysis

Chemical Resist:

	Acid	Alkali
Fabric appropriate for max. oper. temp.	Fair	Fair

Particulate Emissions Analysis

Controlled Particulate Rate (lb/hr): 0.000 Gas Stream Particulate I Uncontrolled: 0.00 Note: Correc Controlled: 0.0000 moisture cor

The estimated collection efficiency is reasonable.

Allowable Emissions per 2D .0515 (lb/hr): 0.00

Maximum Areal Dust Loading (gr/sq ft): 0.0 Dust drag (K2) parameter ((lnH2O/f): 0

Efficiency Calculations

Mass in Range (%)	Control Efficiency (%)	eta-m (%)
0.0	98.00	0.00
16.5	99.90	16.48
23.8	99.90	23.78
11.3	99.99	11.30
5.4	99.99	5.40
43.0	99.99	43.00
Overall Control Efficiency =		99.95 %
Penetration =		0.05 %

Bagfilter evaluation developed by:

William D. Willets, M.S., E.I.T.
 North Carolina Division of Environmental Management
 Air Quality Permitting
 Version 3.3; September 23, 1999

ance

Organics

Fair	
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loadings (gr/dscf)
of gas stream temperature and
content must be entered!

pm)/(lb/sq ft)

CD-HM-BFI AND 2

Bagfilter Evaluation - Enviva Northampton

User Input

User must supply information in blue (double outline).

Optional user information is single outlined.

Particulate Material: Wood Estimated Efficiency (%): 99.9

Actual Air Flow Rate (acfm): 45,000 Cloth Area (sq ft): 6,250

Maximum Operating Temperature (F): 250 Proposed Cloth Material: Polyethylene

Pulse Jet?: no

Uncontrolled Particulate Rate (lb/hr): Process Rate (lb/hr):

Maximum Pressure Drop (in H2O): 6 No. of compartments: 1

Gas Stream Moisture (%): 23.00 Felted?: yes

Time Between Cleanings (min): 0.17 Cleaning Time (min): ?

Particle Size Distribution

Avg. Size (um)	Size Ranges (um)	Size (um)	Cumul. Mass (% < size)
1.25	0 - 2.5	0	0.0
3.75	2.5 - 5	2.5	16.5
7.5	5 - 10	5	40.3
12.5	10 - 15	10	51.6
17.5	15 - 20	15	57.0
20	> 20	20	100.0

Information Source(s)

6600167.13B

Program Output

Filtering Velocity Analysis

Typical Filtering Velocity (fpm): 12.0 Applicant Filtering Velocity (fpm): 7.2

Typical filtering velocity not exceeded.

Fabric Durability Analysis

Chemical Resist:

Fabric appropriate for max. oper. temp.	Acid	Alkali
	Fair	Fair

Particulate Emissions Analysis

Controlled Particulate Rate (lb/hr): 0.000 Gas Stream Particulate I: 0.00 Note: Correc
Uncontrolled: 0.0000 moisture co
Controlled: 0.0000

The estimated collection efficiency is reasonable.

Allowable Emissions per 2D .0515 (lb/hr)

0.00

Maximum Areal Dust Loading (gr/sq ft) Dust drag (K2) parameter ((inH2O/f

0.0

0

Efficiency Calculations

Mass in Range (%)	Control Efficiency (%)	eta-m (%)
0.0	98.00	0.00
16.5	99.90	16.48
23.8	99.90	23.78
11.3	99.99	11.30
5.4	99.99	5.40
43.0	99.99	43.00
Overall Control Efficiency =		99.95 %
Penetration =		0.05 %

Bagfilter evaluation developed by:

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Air Quality Permitting
Version 3.3; September 23, 1999

ance

Organics

Fair	
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Loadings (gr/dscf)
at gas stream temperature and
moisture content must be entered!

pm)/(lb/sq ft)

CD-HM-BF3

Bagfilter Evaluation - Enviva Northampton

User Input

User must supply information in blue (double outline).

Optional user information is single outlined.

Particulate Material: Wood Estimated Efficiency (%): 99.9

Actual Air Flow Rate (acfm): 30,000 Cloth Area (sq ft): 6,250

Maximum Operating Temperature (F): 250 Proposed Cloth Material: Polyethylene

Pulse Jet?: no

Uncontrolled Particulate Rate (lb/hr): Process Rate (lb/hr):

Maximum Pressure Drop (in H2O): 6 No. of compartments: 1

Gas Stream Moisture (%): 23.00 Felted?: yes

Time Between Cleanings (min): 0.17 Cleaning Time (min): ?

Particle Size Distribution

Avg. Size (um)	Size Ranges (um)	Size (um)	Cumul. Mass (% < size)
1.25	0 - 2.5	0	0.0
3.75	2.5 - 5	2.5	16.5
7.5	5 - 10	5	40.3
12.5	10 - 15	10	51.6
17.5	15 - 20	15	57.0
20	> 20	20	100.0

Information Source(s)

6600167.13B

Program Output

Filtering Velocity Analysis

Typical Filtering Velocity (fpm): 12.0 Applicant Filtering Velocity (fpm): 4.8

Typical filtering velocity not exceeded.

Fabric Durability Analysis

Chemical Resist:

	Acid	Alkali
Fabric appropriate for max. oper. temp.	Fair	Fair

Particulate Emissions Analysis

Controlled Particulate Rate (lb/hr): 0.000 Gas Stream Particulate i
 Uncontrolled: 0.00 Note: Corre
 Controlled: 0.0000 moisture coi

The estimated collection efficiency is reasonable.

Allowable Emissions per 2D .0515 (lb/hr): 0.00

Maximum Area Dust Loading (gr/sq ft): 0.0 Dust drag (K2) parameter ((inH2O/f): 0

Efficiency Calculations

Mass in Range (%)	Control Efficiency (%)	eta-m (%)
0.0	98.00	0.00
16.5	99.90	16.48
23.8	99.90	23.78
11.3	99.99	11.30
5.4	99.99	5.40
43.0	99.99	43.00
Overall Control Efficiency =		99.95 %
Penetration =		0.05 %

Bagfilter evaluation developed by:

William D. Willets, M.S., E.I.T.

North Carolina Division of Environmental Management

Air Quality Permitting

Version 3.3; September 23, 1999

ance

Organics

Fair	
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Loadings (gr/dscf)
at gas stream temperature and
moisture content must be entered!

(lb/sq ft)

User must supply information in blue (double outline). Units must be as specified.

The user may wish to overwrite data that is solid outlined.

Calculated information appears in black.

Facility Name:	Enviva Northampton
Cyclone ID:	CD-CLR-1

Cyclone Parameters

Diameter of exit (De)	2.7	ft	0.82	m
Diameter (D)	4.5	ft	1.37	m
# Body Height (Lb)	6.2	ft	1.89	m
# Cone Height (Lc)	7.0	ft	2.13	m
# Inlet Height (Dia.) (H)	3.0	ft	0.91	m
# Inlet Width (W)	2.00	ft	0.61	m
Inlet Type (C[irc.] or R[ect.])	C		R	
Exit throat length (S)	3.7	ft	1.13	m
Collected solids exit diameter (Dd)	2	ft	0.61	m
# Flow Rate (ACFM)	17,100	acfm	484.2	m3/min
Gas Temperature	80	F	299.7	K
Pressure	1	atm	101.3	kPa
# Particle Density	40	lb/ft3	642	kg/m3

Molecular Wt. of gas (default is air)	28.8	lb/lb-mol	28.8	g/mol	Properties of air:	
# Gas Density (default is air)	0.0732	lb/ft3	1.17	kg/m3	Density (lb/ft3)	0.0732
# Gas Viscosity (default is air)	0.0448	lb/hr-ft	1.85E-05	kg/m-s	Viscosity (cp)	0.0185
Estimated Pressure Drop	6.5	in H2O	1621	Pa		

Particle Size Distribution

Size Ranges (µm)	Size Range (µm)	Average Diameter (µm)	Density Function (%wt)	Cumulative Mass (% < size)
0 - 1	0.00	0.5	0	0
1 - 10	1.00	5.5	10	10
10 - 25	10.00	17.5	0	10
25 - 50	25.00	37.5	40	50
50 - 100	50.00	75.0	40	90
> 100	100.00	100.0	10	100

Performance Analyses

Facility:	Enviva Northampton
Cyclone:	CD-CLR-1

Method of Lapple

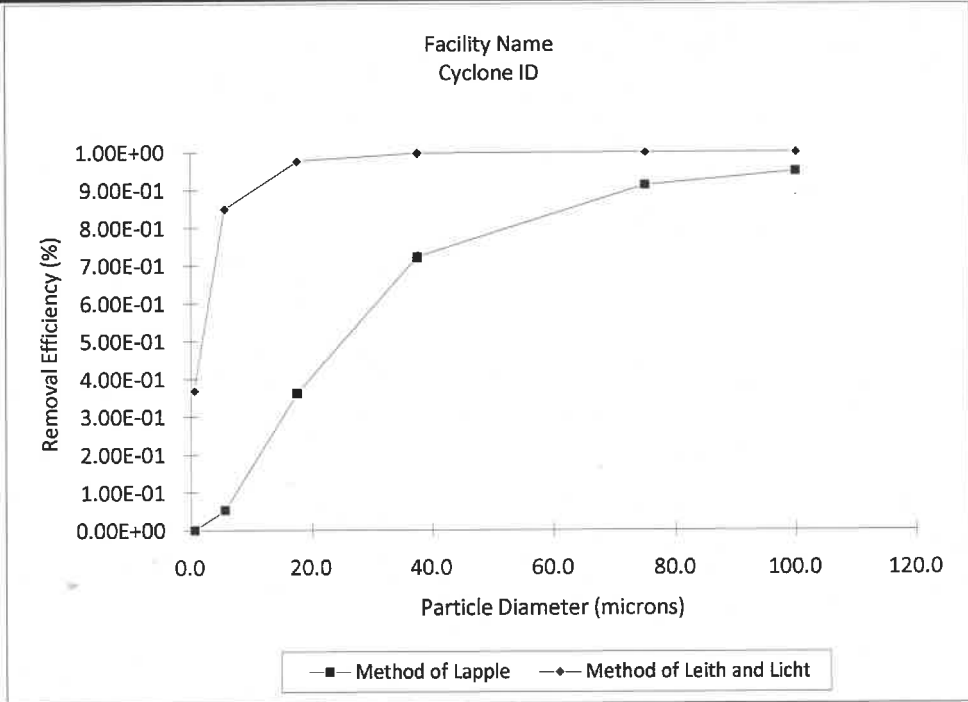
Inlet Area	7.07	ft ²	0.56	m ²	
Inlet Velocity	2419	ft/min	14.5	m/sec	40.3 fps
Effective Turns	3.2		3.2		
Particle Cut Diameter	25.2	μm	23.2	μm	

Size Ranges (μm)	Density Function (μm)	Mass in Fraction (%)	eta	etam
0 - 1	0.5	0	4.64E-04	0.000
1 - 10	5.5	10	5.31E-02	0.531
10 - 25	17.5	0	3.62E-01	0.00
25 - 50	37.5	40	7.23E-01	28.92
50 - 100	75.0	40	9.13E-01	36.50
> 100	100.0	10	9.49E-01	9.49
Overall efficiency =				75.4 %
Penetration =				24.56 %

Method of Leith-Licht

n =	0.70
l [=] natural length	2.84
This is Lc + Lb - S	2.90
Vs =	0.63
d =	0.63
Kc =	0.50
C =	13.56

Size Ranges (μm)	Avg. Size (m)	Psi	Mass in Range (%)	eta	etam (%)	New Mass in Range (%)
0 - 1	5.00E-07	0.00052	0	0.3706	0.00	0.00
1 - 10	5.50E-06	0.06254	10	0.8512	8.51	92.89
10 - 25	1.75E-05	0.63317	0	0.9770	0.00	0.00
25 - 50	3.75E-05	2.91	40	0.9973	39.89	6.76E+00
50 - 100	7.50E-05	11.63	40	0.9999	39.99	3.41E-01
> 100	1.00E-04	20.68	10	1.0000	10.00	1.64E-02
Overall efficiency =					98.40 %	
Penetration =					1.60 %	



Cyclone Design and Evaluation

Version 2.5.2

by D. R. van der Vaart and William D. Willets

User must supply information in blue (double outline). Units must be as specified.

The user may wish to overwrite data that is solid outlined.

Calculated information appears in black.

Facility Name: Enviva Northampton
Cyclone ID: CD-HN-CYC-1

Cyclone Parameters

Diameter of exit (De)	3.8	ft	1.14	m
Diameter (D)	8.0	ft	2.44	m
# Body Height (Lb)	5.0	ft	1.52	m
# Cone Height (Lc)	10.0	ft	3.05	m
# Inlet Height (Dia.) (H)	5.0	ft	1.52	m
# Inlet Width (W)	2.70	ft	0.82	m
Inlet Type (C[irc.] or R[ect.])	c		R	
Exit throat length (S)	5.4	ft	1.65	m
Collected solids exit diameter (Dd)	1.7	ft	0.52	m
# Flow Rate (ACFM)	15,000	acfm	424.8	m3/min
Gas Temperature	80	F	299.7	K
Pressure	1	atm	101.3	kPa
# Particle Density	40	lb/ft3	642	kg/m3

Molecular Wt. of gas (default is air)	28.8	lb/lb-mol	28.8	g/mol	Properties of air:	
# Gas Density (default is air)	0.0732	lb/ft3	1.17	kg/m3	Density (lb/ft3)	0.0732
# Gas Viscosity (default is air)	0.0448	lb/hr-ft	1.85E-05	kg/m-s	Viscosity (cp)	0.0185
Estimated Pressure Drop	1.2	in H2O	287	Pa		

Particle Size Distribution

Size Ranges (µm)	Size Range (µm)	Average Diameter (µm)	Density Function (%wt)	Cumulative Mass (% < size)
0 - 1	0.00	0.5	0	0
1 - 10	1.00	5.5	10	10
10 - 25	10.00	17.5	0	10
25 - 50	25.00	37.5	40	50
50 - 100	50.00	75.0	40	90
> 100	100.00	100.0	10	100

Performance Analyses

Facility:	Enviva Northampton
Cyclone:	CD-HN-CYC-1

Method of Lapple

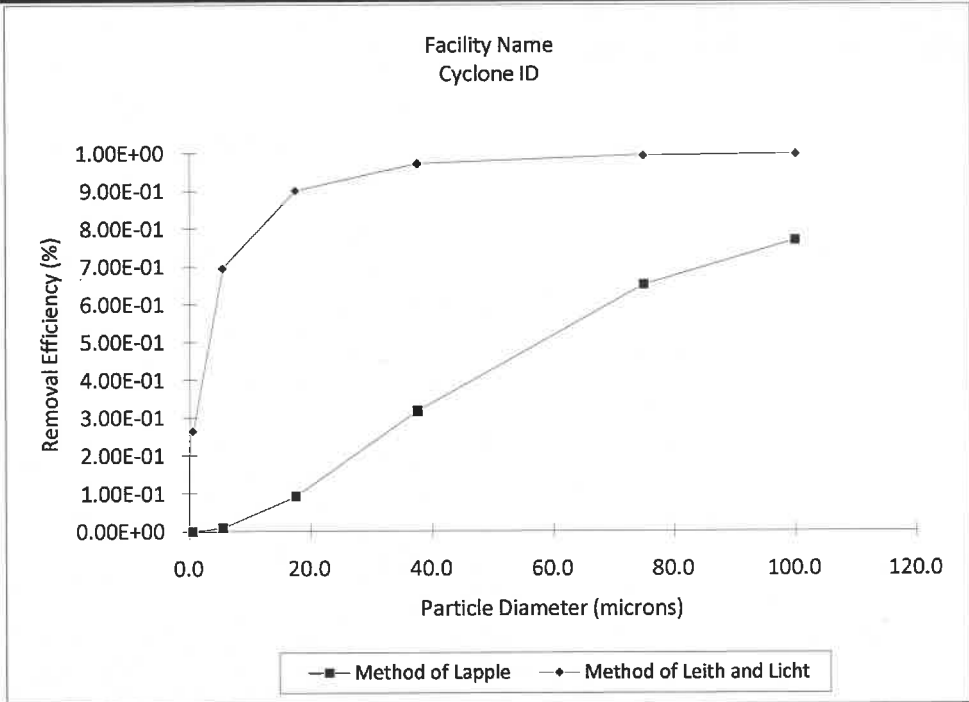
Inlet Area	19.63	ft ²	1.25	m ²	
Inlet Velocity	764	ft/min	5.6	m/sec	12.7 fps
Effective Turns	2.0		2.0		
Particle Cut Diameter	66.3	μm	54.9	μm	

Size Ranges (μm)	Density Function (μm)	Mass in Fraction (%)	eta	etam
0 - 1	0.5	0	8.28E-05	0.000
1 - 10	5.5	10	9.92E-03	0.099
10 - 25	17.5	0	9.21E-02	0.00
25 - 50	37.5	40	3.18E-01	12.71
50 - 100	75.0	40	6.51E-01	26.03
> 100	100.0	10	7.68E-01	7.68
Overall efficiency =				46.5 %
Penetration =				53.47 %

Method of Leith-Licht

n =	0.75
l [=] natural length	4.42
This is Lc + Lb - S	2.93
Vs =	3.22
d =	-0.42
Kc =	0.30
C =	11.56

Size Ranges (μm)	Avg. Size (m)	Psi	Mass in Range (%)	eta	etam (%)	New Mass in Range (%)
0 - 1	5.00E-07	0.00012	0	0.2627	0.00	0.00
1 - 10	5.50E-06	0.0142	10	0.6973	6.97	69.19
10 - 25	1.75E-05	0.14375	0	0.9009	0.00	0.00
25 - 50	3.75E-05	0.66	40	0.9718	38.87	2.58E+01
50 - 100	7.50E-05	2.64	40	0.9950	39.80	4.58E+00
> 100	1.00E-04	4.69	10	0.9981	9.98	4.46E-01
Overall efficiency =					95.63 %	
Penetration =					4.37 %	



Godwin, Kevin

From: Pittman, Dena
Sent: Wednesday, January 16, 2013 4:01 PM
To: Godwin, Kevin
Cc: Mceachern, Charles
Subject: P&O for 6600167.13B (Enviva pellets Northampton, LLC)

Kevin,

Overview/Review of Application:

The original permit application appears to have been a preliminary estimate of the equipment and layout for the site. After further analysis, the facility has submitted this application to address certain equipment changes associated with post-dryer wood processing operations, as well as, a minor revision to the facility's emissions layout. These changes resulted in a revision to the previous dispersion modeling analysis. The application appears to be complete.

I looked through the files and did not find any comments related to the permit.

Compliance Status:

Inspections – Based on the most recent inspection conducted on July 24, 2012 by Will Wike, the facility was under construction and had not started operating. I discussed the facility with Will and he had no comments to add.

Thanks.

Please note - my email address has changed to dena.pittman@ncdenr.gov

Dena Pittman, P.E.
Environmental Engineer
NCDENR Division of Air Quality
Raleigh Regional Office
3800 Barrett Drive, Raleigh, NC 27609
Phone: (919) 791-4274
Fax: (919) 571-4718
www.ncair.org

*Email correspondence to and from this address may be subject to the
North Carolina Public Records Law and may be disclosed to third parties.*

Comprehensive Application Report for 6600167.13B
Enviva Pellets Northampton, LLC - Gaston (6600167)
Northampton County

01/02/2013

<u>General Information:</u>		Permit/Latest Revision: 10203/ R00		<u>Application Dates</u>	
Permit code:	State	Received	Completeness Due	Clock Start	Calculated Issue Due
Application type:	Modification	12/19/2012	02/02/2013	12/19/2012	03/19/2013
Engineer/Rev. location:	Kevin Godwin/RCCO	<u>Fee Information</u>			
Regional Contact:	Charles McEachern	Initial amount:	Date received:	Amount Due:	Add. Amt Rcv'd:
Facility location:	Raleigh Regional Office	\$867.00	12/19/2012	0.00	Date Rcv'd:
Facility classification:	Title V	Fund type:	Deposit Slip #:	Location rec'd:	Location deposited:
Clock is ON	Application is COMPLETE	2333			
Status is :	In progress				

<u>Contact Information</u>					
<u>Type</u>	<u>Name</u>	<u>Address</u>	<u>City</u>	<u>State</u>	<u>ZIP</u>
Technical/Permit	Glenn Gray, Plant Manager	7200 Wisconsin Avenue	Bethesda, MD	MD	20814
Authorized	North Hintz, Vice President Engineering	7200 Wisconsin Avenue	Bethesda, MD	MD	20814
					<u>Telephone</u>
					(757) 274-8377
					(301) 657-5567

<u>Acceptance Criteria</u>	
<u>Received?</u>	<u>Acceptance Criteria Description</u>
Yes	Application fee
Yes	Appropriate number of apps submitted
Yes	Zoning Addressed
N/A	Source recycling/reduction form
Yes	Authorized signature
Yes	PE Seal
Yes	Application contains toxic modification(s)

<u>Completeness Criteria</u>	
<u>Received?</u>	<u>Complete Item Description</u>

Comprehensive Application Report for 6600167.13B
Enviva Pellets Northampton, LLC - Gaston (6600167)
Northampton County

01/02/2013

Application Events	<u>Start</u>	<u>Due</u>	<u>Complete</u>	<u>Comments</u>	<u>Staff</u>
<u>Event</u> TV - Acknowledgment/Complete	12/19/2012	12/29/2012	01/02/2013		kmhash

Comprehensive Application Report for 6600167.13B
Enviva Pellets Northampton, LLC - Gaston (6600167)
Northampton County

01/02/2013

Regulations Pertaining to this Permit

<u>Reference Rule</u>	<u>Regulation Description</u>
2Q	Avoidance Conditions
Part 60 - NSPS	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
2D	Particulates Miscellaneous Industrial Processes
2D	Sulfur Dioxide Emissions Combustion Sources
2D	Control of Visible Emissions
2D	New Source Performance Standards
2D	Control of Toxic Air Pollutants
2D	Maximum Achievable Control Technology
Part 63 - NESHAP/MACT	Reciprocating Internal Combustion Engines
Avoidance	Prevention of Significant Deterioration

Audit Information Pertaining to this Application

<u>Column Name</u>	<u>Date Changed</u>	<u>Old Value</u>	<u>New Value</u>	<u>Editor</u>



North Carolina Department of Environment and Natural Resources
Division of Air Quality

Beverly Eaves Perdue
Governor

Sheila C. Holman
Director

Dee Freeman
Secretary

January 2, 2013

Mr. Norb Hintz
Vice President Engineering
Enviva Pellets Northampton, LLC
7200 Wisconsin Avenue
Suite 1100
Bethesda, MD 20814

SUBJECT: Receipt of Permit Application
Modification of Permit No. 10203R00
Application No. 6600167.13B
Enviva Pellets Northampton, LLC
Facility ID: 6600167, Gaston, Northampton County

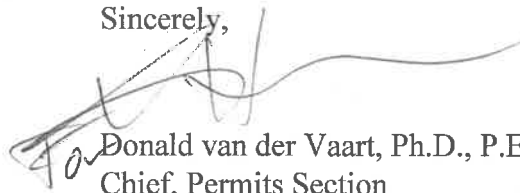
Dear Mr. Hintz:

Your air permit application (6600167.13B) for Enviva Pellets Northampton, LLC, located in Northampton County, North Carolina was received by this Division on December 19, 2012.

This application submittal **did** contain all the required elements as indicated and has been accepted for processing. Your application will be considered complete as of December 19, 2012, unless informed otherwise by this office within 60 days.

Should you have any questions concerning this matter, please contact Kevin Godwin at (919) 707-8480.

Sincerely,



Donald van der Vaart, Ph.D., P.E., J.D.
Chief, Permits Section

cc: Raleigh Regional Office Files



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Pat McCrory
Governor

Sheila C. Holman
Director

John E. Skvarla, III
Secretary

CERTIFIED MAIL 7000 0600 0028 7275 1885
RETURN RECEIPT REQUESTED

January 17, 2013

Mr. Norb Hintz
Vice President Engineering
Enviva Pellets
7200 Wisconsin Avenue
Suite 1100
Bethesda, Maryland 20814

SUBJECT: Construction Prior to Receipt of Air Permit
Enviva Pellets Northampton, LLC
Lebanon Church Road
Gaston, North Carolina 27866
Facility ID No. 6600167, Current Permit No. 010203R00
Tracking Number 6600167.13A

Dear Mr. Hintz:

The Division of Air Quality has considered your request deemed complete on January 2, 2013 to construct equipment prior to receipt of an air permit as allowed in N.C.G.S. 143-215.108A(b). Your request describes the following changes:

- add three (3) hammermills (ID Nos. ES-HM-5 through 7),
- add three (3) cyclones (ID Nos. CD-CYC-5 through 7), and include revised cyclone information for all seven cyclones,
- add one bagfilter (ID No. CD-HM-BF3) and include revised bagfilter information,
- remove the hammermill area as a permitted source (ID No. ES-HMA),
- add a dust system (ID No. ES-NDS) controlled by the new bagfilter (ID No. CD-HM-BF3),
- add three (3) pellet cooler cyclones (ID Nos. CD-CLR4 through 6),
- add a fines bin (ID No. ES-PFB) to be controlled by a new bin vent filter (ID No. CD-PFB-BV),
- add finished product handling (ID No. ES-FPH) that will consist of a pellet screening operation and conveying controlled by a new bagfilter (ID No. CD-FPH-BF),
- add twelve (12) pellet loadout bins to distribute finished product into trucks in one of the two new pellet mill loadouts and controlled by bagfilter (ID No. CD-FPH-BF), and

Permitting Section

1641 Mail Service Center, Raleigh, North Carolina 27699-1641
217 West Jones Street, Raleigh, North Carolina 27603
Phone: 919-707-8405 / Fax: 919-715-0717
Internet: www.ncair.org

Mr. Norb Hintz
January 17, 2013
Page 2

- add two (2) pellet mill loadouts (ID Nos. ES-PL-1 and PL-2) used to load finished product into trucks and controlled by bagfilter (ID No. CD-FPH-BF).

Based on the information submitted in your "Notice of Intent to Construct," and in accordance with N.C.G.S. 143-215.108A(c), the Division of Air Quality grants permission for the construction, alteration or expansion of the equipment listed above. You may commence construction immediately. **Please be aware that you are not allowed to operate any of the equipment prior to receipt of your revised air permit.** Also, there may be other state, federal or local regulations applicable to your construction plans. This permission to construct prior to receipt of an air permit does not supercede any applicable zoning ordinances.

If you have any questions please feel free to contact Kevin Godwin at (919) 707-8480.

Sincerely,



Donald R. van der Vaart, Ph. D., P.E., J.D.
Chief

c: Raleigh Regional Office Files
✓ Central Files
IBEAM Document Module

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7000 0600 0028 7275 1885

[Empty rectangular box]

Postage	\$
Certified Fee	
Return Receipt Fee (Endorsement Required)	
Restricted Delivery Fee (Endorsement Required)	
Total Postage & Fees	\$

Postmark
Here

Recipient's Name (Please Print Clearly) (to be completed by mailer)
Mr. Norb Hintz, Enviva Pellets
Street, Apt. No., or PO Box No.
7200 Wisconsin Ave. Suite 1100
City, State, ZIP+4
Bethesda MD 20814

See Reverse for Instructions

NOTICE OF INTENT TO CONSTRUCT REVIEW AND DETERMINATION

PERMITTEE Enviva Pellets	SITE LOCATION Gaston	COUNTY Northampton
CONTACT Glenn Gray, Plant Manager	TELEPHONE (757) 274-8377	PERMIT NO. 010203R00
REVIEWER Kevin Godwin		SIGNATURE <i>Kevin T. Godwin</i>
RECOMMENDATION Approve NOI	FEE \$200	DATE January 17, 2013

1. Background

A Notice of Intent (NOI) to construct:

- A. three (3) hammermills (ID Nos. ES-HM-5 through 7),
- B. three (3) cyclones (ID Nos. CD-CYC-5 through 7), and include revised information for all seven cyclones,
- C. one bagfilter (ID No. CD-HM-BF3) and include revised bagfilter information,
- D. remove the hammermill area as a permitted source (ID No. ES-HMA),
- E. a dust system (ID No. ES-NDS) controlled by the new bagfilter (ID No. CD-HM-BF3),
- F. three (3) pellet cooler cyclones (ID Nos. CD-CLR4 through 6),
- G. a fines bin (ID No. ES-PFB) to be controlled by a new bin vent filter (ID No. CD-PFB-BV),
- H. finished product handling (ID No. ES-FPH) that will consist of a pellet screening operation and conveying controlled by a new bagfilter (ID No. CD-FPH-BF),
- I. twelve (12) pellet loadout bins to distribute finished product into trucks in one of the two new pellet mill loadouts and controlled by bagfilter (ID No. CD-FPH-BF), and
- J. two (2) pellet mill loadouts (ID Nos. ES-PL-1 and PL-2) used to load finished product into trucks and controlled by bagfilter (ID No. CD-FPH-BF),

was received on January 2, 2013. The NOI was filed in accordance with G.S. 143-215.108A(b) and was determined to be complete on January 2, 2013.

2. Review

As required by G.S. 143-215.108A(c), the Division of Air Quality is providing this review and determination of the NOI for consistency with the requirements of G.S. 143-215.108A(b). The following elements are required to be met to approve the NOI:

Element	Yes	No
The Permittee is and has been in substantial compliance with other permits issued the Permittee.	X	
The facility will be altered or expanded so that it will be used for either the same or a similar use as the use already permitted.	X	
The alteration or expansion will not result in a disproportionate increase in the size of the facility already permitted.	X	
The alteration or expansion will result in the same or substantially similar emissions as that of the facility already permitted.	X	
The alteration or expansion will not have a significant effect on air quality.	X	
The Commission is likely to issue the permit modification.	X	
The source(s) being constructed are not ineligible.	X	
The notice of intent is complete, i.e., it contains proof of publication, the notice in the newspaper contains all the required elements, the notice of intent sent to DAQ contains all the required elements, a \$200.00 processing fee has been submitted.	X	
Is the date authorizing construction contained in the "Construction Prior to Receipt of Air Permit" letter at least 15 days after the date of publication of the public notice?	X	
The alteration or expansion will not be prohibited by other state, federal or local laws.	X	

3. Discussion of Elements

- A. As of the most recent inspection on July 24, 2012, the facility was still under construction. The facility is considered to have been in substantial compliance with other permits.
- B. The facility will continue to be used as currently permitted.
- C. The change is not expected to result in a disproportionate increase in the size of the facility already permitted.
- D. The alteration will result in similar emissions. The facility estimates facility-wide emissions after the additions as follows:

TSP (tpy)	PM-10	NO_x (tpy)	VOC (tpy)	CO (tpy)	SO₂ (tpy)	CO_{2e} (tpy)
84.25	80.42	125.80	185.94	194.02	19.05	233.62

The following table provides a summary of emissions from the new sources controlled by bagfilters and cyclones:

Emissions Unit	Source ID	Control Device ID	Flowrate	Pollutant loading	Potential PM Emissions (tpy)
Hammermills bagfilter 1	HM-1 through 3	CD-HM-BF1	45,000	0.003	5.07
Hammermills bagfilter 2	HM-4 through 6	CD-HM-BF2	45,000	0.003	5.07
Hammermills bagfilter 3	HM-7, NDS	CD-HM-BF3	30,000	0.003	3.38
Pellet mill feed silo	PMFS	CD-PMFS-BV	2,500	0.003	0.28
Pellet mill feed silo	PFB	CD-PFB-BV	3,600	0.003	0.12
Pellet coolers cyclone 1	CLR-1	CD-CLR-1	17,100	0.01	6.42
Pellet coolers cyclone 2	CLR-2	CD-CLR-2	17,100	0.01	6.42
Pellet coolers cyclone 3	CLR-3	CD-CLR-3	17,100	0.01	6.42
Pellet coolers cyclone 4	CLR-4	CD-CLR-4	17,100	0.01	6.42
Pellet coolers cyclone 5	CLR-5	CD-CLR-5	17,100	0.01	6.42
Pellet coolers cyclone 6	CLR-6	CD-CLR-6	17,100	0.01	6.42
Finished product handling	FPH, PL1 and 2, PB-1 through PB-12	CD-FPH-BF	35,500	0.003	4.0

- E. The alteration is not expected to have a significant impact on air quality. The total PM, PM-10, and PM-2.5 emissions increases are 56.43, 52.60, and 37.30 tons per year, respectively.
- F. The DAQ is likely to issue a permit revision allowing the alteration.
- G. Installing the new equipment is not ineligible for construction prior to receiving a permit.
- H. The NOI is complete.
- I. The alteration is not prohibited by other state, federal, or local laws.

4. Determination

RCO recommends approval of the NOI.

NORTH CAROLINA DIVISION OF AIR QUALITY			Raleigh Regional Office Enviva Pellets Northampton, LLC NC Facility ID 6600167 County/FIPS: Northampton/131
Inspection Report Date: 07/25/2012			
Facility Data		Compliance Data	
Enviva Pellets Northampton, LLC 874 Lebanon Church Road Gaston, NC 27866 Lat: 36d 30.0294m Long: 77d 42.9888m SIC: 2499 / Wood Products, Nec NAICS: 321999 / All Other Miscellaneous Wood Product Manufacturing		Inspection Date 07/24/2012 Inspector's Name Will Wike Operating Status Operating Compliance Code Compliance - inspection Action Code FCE On-Site Inspection Result Compliance	
Contact Data			Permit Data
Facility Contact	Authorized Contact	Technical Contact	Permit 10203 / R00 Issued 3/9/2012 Expires 2/28/2017 Classification Title V Permit Status Active
Glenn Gray Plant Manager (757) 274-8377	Norb Hintz Vice President Engineering (301) 657-5567	Glenn Gray Plant Manager (757) 274-8377	
Inspector's Signature:		Comments:	
Date of Signature:		In compliance – facility is not yet finished being built. Recommend re-inspection in one year.	

(I) DIRECTIONS TO SITE: From RRO, take I-440 Inner Beltline to US 64 East and follow to I-95 North. Follow I-95 North and take exit 176 for Hwy 46 West toward Gaston/Garysburg. Turn left onto Hwy 46 West then take a right onto Lebanon Church Road. Follow for approximately 1-2 miles and the facility will be on the left at 874 Lebanon Church Road.

(II) FACILITY DESCRIPTION: Enviva Pellets, LLC (Enviva) is proposing to construct and operate a new wood pellets manufacturing plant in the town of Gaston, NC. The proposed plant is designed to produce wood pellets with no less than 13% moisture content. Pellets will typically consist of pressed hardwoods, but could contain up to 10% softwoods on an annual basis.

The pelletizing process is described in the air permit application (with some editing) as follows:

- 1) Green wood will be delivered via trucks as whole logs or as chipped wood. Logs are chipped and debarked to specification for drying. Chipped wood is conveyed to wood storage and wood/bark is conveyed to green wood fuel dryer storage.
- 2) Wood dryer (ID No. ES-Dryer) – Green wood is conveyed to a rotary dryer system. Direct contact heat is provided to the system via a 174 million Btu/hr burner system. Moisture content is reduced to no less than 13%. Air emissions from the dryer system are controlled by a simple cyclone (ID No. CD-DC) in series with a wet electrostatic precipitator (ID No. CD-WESP).
- 3) Dried wood handling (ID No. ES-DWH) – Dried materials are transferred from the dryer via conveyors to hammermills for further size reduction prior to pelletizing.
- 4) Coarse Hammermills (ID No. ES-HM-1, 2, 3, and 4) – Dried materials are reduced to the appropriate size using four hammermills operating in parallel. Particulate emissions are controlled using four simple cyclones (ID Nos. CD-HM-CYC1 through CYC4) in series with two bagfilters (ID Nos. CD-HM-BF1 and BF2).
- 5) Hammermill Area Filter (ID No. ES-HMA) – A number of dried and sized wood transport emission sources are controlled by the Hammermill Area Filter bagfilter (ID No. CD-HMA-BF).
- 6) Pellet Mill Feed Silo (ID No. ES-PMFS) – Ground wood from the hammermills is conveyed to the in-feed screw pellet mill feed silo prior to pelletization. Emissions are controlled using a bin vent filter (ID No. CD-PMFS-BV).
- 7) Pellet Press System (ID No. ES-PP) – Dried ground wood is compacted in the presence of water using several screw presses. Exhaust from the pellet press and associated conveyors are vented to the atmosphere with negligible particulate emissions. No chemical binding agents are used for pelletization.
- 8) Pellet Coolers (ID Nos. ES-CLR) – Wood pellets are conveyed to one of six pellet coolers. Cooling air is passed through the pellets. Particulate emissions are controlled using three simple cyclones operating in parallel (ID Nos. CD-CLR-1, 2, and 3).
- 9) Finished product handling (ID No. ES-FPH) – Pelletized product is conveyed to storage and load-out operations with no emissions expected.
- 10) Emergency Generator (ID No. ES-EG), Fire water pump (ID No. ES-FWP) and associated Fuel oil storage tanks – The facility will use a 350 bhp emergency generator and a 300 bhp fire water pump. Both engines operate on diesel fuel. Fuel for the emergency generator is stored in a 2,500 gallon tank and for the fire pump in a 500 gallon tank.

(III) INSPECTION SUMMARY: On July 24, 2012, I (Will Wike) visited the facility to conduct a compliance inspection. Upon approaching the site, it was apparent that the plant was in the early stages of construction. A chain gate blocked the driveway. There was some construction equipment in the distance near the tree line. The next day, I contacted Joe Harrell, Corporate EHS Manager, in order to determine the facility's operating status. On July 26, 2012, we spoke and Mr. Harrell confirmed that construction of the facility was not expected to be completed until sometime between October and December of 2012. Mr. Harrell indicated that the plant manager will be Roland Burnett. We discussed the air permit compliance schedule Mr. Harrell prepared and sent earlier in the month. Mr. Harrell is being pro-active in making sure the plant meets all of its monitoring, recordkeeping, etc. requirements established in its air permit. Based on these findings, the facility appeared to be in compliance, by default, from an air quality standpoint on the day of the inspection.

(IV) CONCLUSIONS/RECOMMENDATIONS: At the time of the inspection, Enviva Pellets' Gaston facility appeared to be in compliance (by default) with all permitting requirements. It is recommended that the facility be re-inspected in one year.



7200 Wisconsin Ave, Suite 1100
Bethesda, MD 20814 USA

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fax (301) 657 5567

www.envivabiomass.com

December 19, 2012

Dr. Donald R. van der Vaart, P.E.
Division of Air Quality
1641 Mail Service Center
Raleigh, North Carolina 27699-1641

Received

JAN 2 2013

Air Permits Section

Re: Request for Intent to Construct
Enviva Pellets Northampton, LLC.
Garysburg, NC

Dear Dr. Van der Vaart:

Enviva Pellets Northampton, LLC (Enviva) was issued a construction and operating permit (DAQ Permit #10203R00) on March 9, 2012. Enviva is submitting this request for intent to install and operate certain equipment changes associated with post-dryer wood processing operations, as well as a minor revision to the facility's emission source layout. The following list of emission sources are impacted by the changes proposed in the permit application:

- 1) Addition of three (3) hammer mills (ES-HM-5 through 7);
- 2) Addition of three (3) hammermill cyclones (CD-CYC-5 through 7) and revised cyclone information for all seven hammermill cyclones;
- 3) Addition of one (1) hammermill Bagfilter (CD-HM-BF3) with revised bagfilter information for all the hammermill bagfilters;
- 4) Removal of the hammermill area permitted source (ES-HMA);
- 5) Addition of nuisance dust system (ES-NDS) controlled by the new hammermill bagfilter (CD-HM-BF3);
- 6) Addition of three (3) pellet cooler cyclones (CD-CLR4 through 6);
- 7) Addition of a fines bin (ES-PFB) that will be controlled by a new bin vent filter (CD-PFB-BV);

Received

JAN 2 2013

Air Permits Section



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- 8) Addition of finished product handling (ES-FPH) that will consist of pellet screening operation and conveying, which will be controlled by a new bagfilter (CD-FPH-BF);
- 9) Addition of twelve (12) pellet loadout bins that will distribute finished product into trucks in the one of the two new pellet mill loadout and will also be controlled by the new finished product handling bagfilter (CD-FPH-BF); and
- 10) Addition of the two (2) pellet mill loadouts (ES-PL-1 and PL-2) used to load finished product into trucks and will be controlled by finished product handling bagfilter (CD-FPH-BF).

Enviva has submitted the notice of intent to construct without an air permit application to the local newspaper. A copy of the affidavit from the Daily Herald is included in Attachment 2. We trust that this information satisfies the proof of publication requirement.

Enviva acknowledges that the air contaminant sources, equipment, and associated air cleaning device may not be operated in a manner that alters the emission of any air contaminant until Enviva has obtained a modified permit under G.S. 143-215.108.

Enviva acknowledges that any alteration of the physical arrangement or operation of an air contaminant source, equipment, or associated air cleaning device prior to the modification of a permit under G.S. 143-215.108 is undertaken at Enviva's own risk and that Enviva may be denied a modification of the permit under G.S. 143-215.108 without regard to Enviva's financial investment for the alteration of the facility.

Enviva has enclosed a check for the \$200.00 processing fee.

"I certify under penalty of law that all information and statements provided in this notice of intent to construct, including any attachments, are true, accurate, and complete to best of my knowledge and ability."



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Bethesda, MD 20814 USA

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fax (301) 657 5567

www.envivabiomass.com

If you have any questions regarding this request, please feel free to contact Mr. Glenn Gray at (757) 274-8377, or Mr. Joe Sullivan of Trinity Consultants at (919) 462-9693.

Sincerely,

Norb Hintz
Vice President Engineering
Enviva LP

Mr. Joe Harrell, Enviva
Mr. Joe Sullivan, Trinity Consultants

Enclosures:

Attachment 1- Emission Summary

Attachment 2 - NOIC in newspaper



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Bethesda, MD 20814 USA

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ATTACHMENT 1 – EMISSION SUMMARY

**TABLE 2
BAGFILTER AND CYCLONE EMISSIONS
ENVIVA PELLETS NORTHAMPTON, LLC**

Emission Unit	Emission Source ID	Filter, Vent-or-Cyclone ID	Flowrate ¹ (cfm)	Pollutant ¹ Loading ² (gr/cf)	Annual Operation (hours)	% PM that Is		Potential Emissions					
						PM ₁₀	PM _{2.5}	PM (lb/hr)	PM ₁₀ ³ (tpy)	PM ₁₀ ³ (lb/hr)	PM _{2.5} ³ (tpy)	PM _{2.5} ³ (lb/hr)	PM _{2.5} ³ (tpy)
Hammermills Bagfilter 1	ES-HM-1 through 3	CD-HM-BF1	45,000	0.003	8,760	100%	100%	1.16	5.07	1.16	5.07	1.16	5.07
Hammermills Bagfilter 2	ES-HM-4 through 6	CD-HM-BF2	45,000	0.003	8,760	100%	100%	1.16	5.07	1.16	5.07	1.16	5.07
Hammermills Bagfilter 3	ES-HM-7; ES-NDS	CD-HM-BF3	30,000	0.003	8,760	100%	100%	0.77	3.38	0.77	3.38	0.77	3.38
Pellet Mill Feed Silo Bin Vent Filter	ES-PMFS	CD-PMFS-BV	2,500	0.003	8,760	100%	100%	0.06	0.28	0.06	0.28	0.06	0.28
Pellet Mill Fines Bin Bin Vent Filter	ES-PFB	CD-PFB-BV	3,600	0.003	2,500	100%	100%	0.09	0.12	0.09	0.12	0.09	0.12
Pellet Coolers Cyclone 1	ES-CLR-1	CD-CLR-1	17,100	0.01	8,760	91%	55%	1.47	6.42	1.33	5.84	0.81	3.53
Pellet Coolers Cyclone 2	ES-CLR-2	CD-CLR-2	17,100	0.01	8,760	91%	55%	1.47	6.42	1.33	5.84	0.81	3.53
Pellet Coolers Cyclone 3	ES-CLR-3	CD-CLR-3	17,100	0.01	8,760	91%	55%	1.47	6.42	1.33	5.84	0.81	3.53
Pellet Coolers Cyclone 4	ES-CLR-4	CD-CLR-4	17,100	0.01	8,760	91%	55%	1.47	6.42	1.33	5.84	0.81	3.53
Pellet Coolers Cyclone 5	ES-CLR-5	CD-CLR-5	17,100	0.01	8,760	91%	55%	1.47	6.42	1.33	5.84	0.81	3.53
Pellet Coolers Cyclone 6	ES-CLR-6	CD-CLR-6	17,100	0.01	8,760	91%	55%	1.47	6.42	1.33	5.84	0.81	3.53
Finished Product Handling Bagfilter	ES-FPH, ES-PL1 & 2, ES-PB-1 thru 12	CD-FPH-BF	35,500	0.003	8,760	91%	0.55	0.91	4.00	0.83	3.64	0.50	2.20
TOTAL								12.95	56.43	12.08	52.60	8.58	37.30

Note:

- ¹ Filter, Vent, and Cyclone inlet flow rate (cfm) provided by design engineering firm (Mid-South Engineering Co.). The exit flowrate was conservatively assumed to be the same as the inlet flowrate.
- ² Pollutant Loading (gr/cf) provided by Aircon.
- ³ Pellet cooler cyclone speciation based on AP-42 factors for wet wood combustion (Section 1.6) controlled by a mechanical separator. Since the particle size of particulate matter from a pellet cooler is anticipated to be larger than flyash, this factor is believed to be a conservative indicator of speciation.

TABLE 3
ELECTRIC POWERED RECHIPPER (ES-RCHP-1, -2) EMISSIONS
ENVIVA PELLETS NORTHAMPTON, LLC

Annual Throughput of Each Rechipper	620,471	tons/year (dry wood) ¹
Short-term Throughput of Each Rechipper	70.83	tons/hr (dry wood) ¹
Maximum Annual Operation	8,760	hours

Pollutant	Emission Factors (lb/dry wood tons)	Emissions ⁵	
		(lb/hr)	(tpy)
THC as Carbon ²	0.0041	2.904E-01	1.27
THC as alpha-Pinene ³	0.0047	3.296E-01	1.44
PM ⁴	N/A	N/A	N/A
Methanol ²	0.0010	7.083E-02	0.31

¹ It is assumed that the wood received at the facility has a nominal water content of 50%.

The annual throughput used for the rechippers are the same as the annual throughput of the dryer; while the short-term throughput is based upon the maximum hourly throughput of the dryer.

² Emission factor obtained from available emissions factors for rechippers in AP-42 Section 10.6.3, Table 7 and Section 10.6.4, Tables 7 and 9. Emission factors for THC and Methanol are the same across all three tables.

³ The THC/VOC makeup of wood is primarily composed of terpenes (C₅H₈)_n [where n = 2, 3, or 4 typically] but to convert from carbon to the equivalent weight in THC/VOC, the assumption was that alpha-pinene (AP) would be the representative THC/VOC (molecular weight = 136.2 lb/lb-mol).

The following equation shows the conversion:

$$lb\ VOC/ODT = lb\ C/ODT * (136.2\ lb/mol\ AP / 12\ lb/mol\ C) * (1\ mol\ AP / 10\ mol\ C)$$

⁴ PM emission factor is not applicable as rechipper emissions are routed downward to the ground.

⁵ Short term emissions were based upon the annual throughput of the rechippers (dry wood) divided by the total hours of operation. Emissions are representative of the total combined emissions for both rechippers.

**ATTACHMENT 2 – PROOF OF PUBLICATION IN LOCAL NEWSPAPER (DAILY
HERALD)**

AFFIDAVIT OF PUBLICATION

being first duly sworn, deposes

STATE OF NORTH CAROLINA)
COUNTY OF HALIFAX)

and says: That (he) (she) is the Agent to the Publisher of THE DAILY HERALD newspapers printed and published five days a week in the County of Halifax, State of North Carolina, and of general circulation in the cities of Roanoke Rapids, County of Halifax, State of North Carolina and elsewhere, and thehereto attached

NOTICE OF CONSTRUCTION PRIOR TO RECEIPT OF AIR PERMIT

Notice is hereby given that Enviva Pellets Northampton, LLC. is proposing to begin construction pursuant to North Carolina General Statute 143-215.108. Construction will begin prior to the receipt of an operating air permit from the North Carolina Division of Air Quality (NCDAQ) for an equipment modification. The modification involves the following changes associated with post-dryer wood processing operations, as well as a minor revision to the facility's equipment layout: Addition of three hammer mills, associated cyclones, and bagfilters; Addition of dust handling system controlled by a new bag-filter; Addition of three pellet cooler cyclones; Addition of a fines bin that will be controlled by a new fabric filter; and Addition of finished product handling operations including pellet screening, conveying, storage, and loadout, all of which will be controlled by a new bagfilter.

Written comments regarding the proposed modification may be submitted to:

Attention: Donald R. van der Vaart Chief, Air Permits Section NC Division of Air Quality 1641 Mail Service Center Raleigh, NC 27699-1641

The NCDAQ will consider all comments received regarding the proposed construction.

The site is located at 874 Lebanon Church Road, Garysburg, NC, 27866. The permittee contact and address is Mr. Joe Harrell, 142 N.O. Route 561 East, Ahoskie, NC, 27910.

The current Air Permit No. 10203R00 was issued to Enviva on 9/2012.

Total emissions from all Enviva baghouses and cyclones are 56.43 tons of particulate matter per year.

Proposed construction for the modification is scheduled to begin within 15 days and completed by March 2013.

December 23, 2012

NOTICE OF CONSTRUCTION PRIOR TO AIR PERMIT

was printed and published correctly in the regular and entire issue of said THE DAILY HERALD for 1 issues, that the first was made on the 23rd day of DECEMBER 20 12 and the last publication thereof was made on the 23rd day of

DECEMBER 20 12 that said publication

was made on each of the following dates, to wit 12/23/12

Request of TRINITY CONSULTANTS, INC.

The Daily Herald

By Sherry Agee

Subscribed sworn to before me this 20 12 day of 23rd DECEMBER

Notary Signature [Signature]

Notary Public in and for the County of Halifax, State of North Carolina

My Commission Expires: My Commission Expires May 13, 2017

**The Roanoke Rapids
Daily Herald**

P.O. Box 520 • 916 Roanoke Avenue
Roanoke Rapids, NC 27870
(252) 537-2505 • FAX (252) 537-2314
FED ID 86-0497096

ADVERTISING INVOICE and STATEMENT

1 BILLING PERIOD		2 ADVERTISER / CLIENT NAME	
		TRINITY CONSULTANTS, INC.	
23 TOTAL AMOUNT DUE		3 UNAPPLIED AMOUNT	3 TERMS OF PAYMENT
21 CURRENT NET AMOUNT DUE	22 30 DAYS	60 DAYS	90 DAYS

8 BILLED ACCOUNT NAME AND ADDRESS		9 REMITTANCE ADDRESS		4 PAGE #	5 BILLING DATE
TRINITY CONSULTANTS, INC. 1 COPLEY PKWAY, STE RALEIGH NC 27560		The Roanoke Rapids Daily Herald P.O. Box 520 916 Roanoke Avenue Roanoke Rapids, NC 27870 (252) 537-2505 • FAX (252) 537-2314		1	12/23/12
				BILLED ACCOUNT NUMBER 5196	
				7	ADVERTISER / CLIENT NUMBER

PLEASE DETACH AND RETURN UPPER PORTION WITH YOUR REMITTANCE

10	DATE	11	NEWSPAPER REFERENCE	12	13	14	DESCRIPTION — OTHER COMMENTS/CHARGES	15	16	SAU SIZE BILLED UNITS	17	18	TIMES RUN RATE	19	GROSS AMOUNT	20	NET AMOUNT
	12/23		LE4				NOTICE OF CONSTRUCTION PRIOR TO AIR PERMIT 12/23			13.25			8.850		117.26 .00		
							NOTICE OF CONSTRUCTI SALES TAX										

Received
JAN 2 2013
Air Permits Section

PAID

STATEMENT OF ACCOUNT AGING OF PAST DUE AMOUNTS

21 CURRENT NET AMOUNT DUE	22 30 DAYS	50 DAYS	90 DAYS	UNAPPLIED AMOUNT	23 TOTAL AMOUNT DUE
					117.26

**The Roanoke Rapids
Daily Herald**

P.O. Box 520 • 916 Roanoke Avenue
Roanoke Rapids, NC 27870 • (252) 537-2505

***UNAPPLIED AMOUNTS ARE INCLUDED IN TOTAL AMOUNT DUE**

24 BILLING PERIOD	25 BILLED ACCOUNT NUMBER	26 ADVERTISER INFORMATION	27 ADVERTISER CLIENT NUMBER	28 ADVERTISER / CLIENT NAME

Comprehensive Application Report for 6600167.13A

Enviva Pellets Northampton, LLC - Gaston (6600167)

Northampton County

01/18/2013

<u>General Information:</u>	Permit/Latest Revision: 10203/ R00	<u>Application Dates</u>				
Permit code:	Construction Notice	Received	Completeness Due	Clock Start	Calculated Issue Due	
Application type:	Construction Notice	01/02/2013			01/17/2013	
Engineer/Rev. location:	Kevin Godwin/RCO	<u>Fee Information</u>				
Regional Contact:	Charles McEachern	Initial amount:	Date received:	Amount Due:	Add. Amt Rcv'd:	Date Rcv'd:
Facility location:	Raleigh Regional Office	\$200.00	01/02/2013	0.00		
Facility classification:	Title V	Fund type:	Deposit Slip #:	Location rec'd:	Location deposited:	
Clock is ON	Application is COMPLETE		2333			
Status is :	CN Approved					

<u>Contact Information</u>				
<u>Type</u>	<u>Name</u>	<u>Address</u>	<u>City State ZIP</u>	<u>Telephone</u>
Authorized Technical/Permit	Norb Hintz, Vice President Engineering Glenn Gray, Plant Manager	7200 Wisconsin Avenue 7200 Wisconsin Avenue	Bethesda, MD 20814 Bethesda, MD 20814	(301) 657-5567 (757) 274-8377

<u>Acceptance Criteria</u>	
<u>Received?</u>	<u>Acceptance Criteria Description</u>
<u>Completeness Criteria</u>	
<u>Received?</u>	<u>Complete Item Description</u>

Comprehensive Application Report for 6600167.13A
Enviva Pellets Northampton, LLC - Gaston (6600167)
Northampton County

01/18/2013

Application Events					
<u>Event</u>	<u>Start</u>	<u>Due</u>	<u>Complete</u>	<u>Comments</u>	<u>Staff</u>
CN - Acknowledgment Letter Sent	01/02/2013	01/16/2013	01/02/2013		knhash
CN - Approval Notice	01/17/2013		01/17/2013		kgodwin

<u>Outcome Information</u>	
Permit:	10203
<u>Outcome</u>	01/17/2013
Accumulated process days (includes public notice periods): 15	

Comprehensive Application Report for 6600167.13A
Enviva Pellets Northampton, LLC - Gaston (6600167)
Northampton County

01/18/2013

Regulations Pertaining to this Permit	
<u>Reference Rule</u>	<u>Regulation Description</u>

Audit Information Pertaining to this Application		
<u>Column Name</u>	<u>Date Changed</u>	<u>Old Value</u>
		<u>New Value</u>
		<u>Editor</u>

Comprehensive Application Report for 0100160.13A

01/18/2013

ITG/Burlington Industries LLC -Burlington Finishing Plant - Burlington (0100160)

Alamance County

General Information: Permit/Latest Revision: 00148/ T22

Permit code: TV-Renewal Application Dates
 Received: 01/16/2013 Completeness Due 03/17/2013 Clock Start 01/16/2013 Calculated Issue Due
 Application type: Renewal

Engineer/Rev. location: Betty Gatano/RCO Fee Information
 Regional Contact: Jalal Adouli Initial amount: Date received: Amount Due: Add. Amt Rcv'd: Date Rcv'd:
 Facility location: Winston-Salem Regional Office 01/16/2013
 Facility classification: Title V Fund type: Deposit Slip #: Location rec'd: Location deposited:
 Clock is ON Application is COMPLETE 2333
 Status is : In progress

Contact Information

<u>Type</u>	<u>Name</u>	<u>Address</u>	<u>City State ZIP</u>	<u>Telephone</u>
Technical/Permit Authorized	G. Mike Garlick, Corporate Environmental Engineer Eric Page, Plant Manager	804 Green Valley Road PO Box 691	Greensboro, NC 27408 Burlington, NC 27216	(336) 379-2941 (336) 228-2701

Acceptance Criteria

<u>Received?</u>	<u>Acceptance Criteria Description</u>
N/A	Application fee
Yes	Appropriate number of apps submitted
N/A	Zoning Addressed
N/A	Source recycling/reduction form
Yes	Authorized signature
N/A	PE Seal
N/A	Application contains toxic modification(s)

Completeness Criteria

<u>Received?</u>	<u>Complete Item Description</u>
	Complete

Comprehensive Application Report for 0100160.13A
ITG/Burlington Industries LLC -Burlington Finishing Plant - Burlington (0100160)
Alamance County

01/18/2013

Application Events					
<u>Event</u>	<u>Start</u>	<u>Due</u>	<u>Complete</u>	<u>Comments</u>	<u>Staff</u>
TV - Acknowledgment/Complete	01/16/2013	01/26/2013	01/18/2013		kmhash

Regulations Pertaining to this Permit

<u>Reference Rule</u>	<u>Regulation Description</u>
2Q	Avoidance Conditions
2D	Particulates Fuel Burning Indirect Heat Exchangers
2D	Particulates Miscellaneous Industrial Processes
2D	Sulfur Dioxide Emissions Combustion Sources
2D	Control of Visible Emissions
2D	Work Practices Sources of Volatile Organic Compounds
2D	Maximum Achievable Control Technology

Comprehensive Application Report for 0100160.13A
ITG/Burlington Industries LLC -Burlington Finishing Plant - Burlington (0100160)
Alamance County

01/18/2013

Audit Information Pertaining to this Application

<u>Column Name</u>	<u>Date Changed</u>	<u>Old Value</u>	<u>New Value</u>	<u>Editor</u>
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Comprehensive Application Report for 6600167.13A
 Enviva Pellets Northampton, LLC - Gaston (6600167)
 Northampton County

01/02/2013

<u>General Information:</u>	Permit/Latest Revision: 10203/ R00	<u>Application Dates</u>	
Permit code:	Construction Notice	Received	01/02/2013
Application type:	Construction Notice	Completeness Due	Clock Start
Engineer/Rev. location:	Kevin Godwin/RCO		01/17/2013
Regional Contact:	Charles McEachern	<u>Fee Information</u>	
Facility location:	Raleigh Regional Office	Initial amount:	Date received: 01/02/2013
Facility classification:	Title V	Amount Due:	0.00
Clock is ON	Application is COMPLETE	Add. Amt Rcv'd:	
Status is :	In progress	Fund type:	2333
		Deposit Slip #:	
		Location rec'd:	Location deposited:

<u>Contact Information</u>			
Type	Name	Address	Telephone
Authorized	Norb Hintz, Vice President Engineering	7200 Wisconsin Avenue	(301) 657-5567
Technical/Permit	Glenn Gray, Plant Manager	7200 Wisconsin Avenue	(757) 274-8377

<u>Acceptance Criteria</u>	
Received?	Acceptance Criteria Description
Received?	Complete Item Description

Comprehensive Application Report for 6600167.13A
Eaviva Pellets Northampton, LLC - Gaston (6600167)
Northampton County

01/02/2013

<u>Event</u>	<u>Start</u>	<u>Due</u>	<u>Complete</u>	<u>Comments</u>	<u>Staff</u>
CN - Acknowledgment Letter Sent	01/02/2013	01/16/2013	01/02/2013		Kmhash

Comprehensive Application Report for 6600167.13A
 Enviva Pellets Northampton, LLC - Gaston (6600167)
 Northampton County

01/02/2013

Regulations Pertaining to this Permit	
<u>Reference Rule</u>	<u>Regulation Description</u>
2Q	Avoidance Conditions
Part 60 - NSPS	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
2D	Particulates Miscellaneous Industrial Processes
2D	Sulfur Dioxide Emissions Combustion Sources
2D	Control of Visible Emissions
2D	New Source Performance Standards
2D	Control of Toxic Air Pollutants
2D	Maximum Achievable Control Technology
Part 63 - NESHAP/MACT	Reciprocating Internal Combustion Engines
Avoidance	Prevention of Significant Deterioration

Audit Information Pertaining to this Application		
<u>Column Name</u>	<u>Date Changed</u>	<u>Old Value</u>
		<u>New Value</u>
		<u>Editor</u>



North Carolina Department of Environment and Natural Resources
Division of Air Quality

Beverly Eaves Perdue
Governor

Sheila C. Holman
Director

Dee Freeman
Secretary

CERTIFIED MAIL:70101870000133230934
RETURN RECEIPT REQUESTED

January 2, 2013

Mr. Norb Hintz
Vice President Engineering
Enviva Pellets Northampton, LLC
7200 Wisconsin Avenue
Suite 1100
Bethesda, MD 20814

SUBJECT: Receipt of Notice of Intent to Construct
Enviva Pellets Northampton, LLC
Facility ID: 6600167, Gaston, Northampton County
Tracking Number: 6600167.13A

Dear Mr. Hintz:

Your request (Notice of Intent to Construct - Tracking No. 6600167.13A) for Enviva Pellets Northampton, LLC, 874 Lebanon Church Road, Gaston, Northampton County, NC was received by this Division on January 2, 2013.

Pursuant to NC General Statute 143-215.108A(b) and (j), submittal of your Notice of Intent to construct must include all of the following items and the processing fee of \$200.00.

Required Items	Received	
	Yes	No
The name and location of the facility and the name and address of the permittee.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The permit number of each permit issued under G.S. 143-215.108 (by DAQ) for the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The nature of the air contaminant sources and equipment associated with the proposed modification of the permit.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
An estimate of total regulated air contaminant emissions associated with the proposed modification of the permit.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The air cleaning devices that are to be employed to address each of the air contaminant sources associated with the modification of the permit.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The schedule for alteration or expansion of the facility associated with the proposed modification of the permit.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
An acknowledgement by the permittee that the air contaminant sources, equipment, and associated air cleaning devices may not be operated in a manner that alters the emission of any air contaminant until the permittee has obtained a modified permit under G.S. 143-215.108.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Permitting Section
1641 Mail Service Center, Raleigh, North Carolina 27699-1641
217 West Jones Street, NC 27603
Phone: 919-707-8405 \ FAX: 919-715-0717 \ Internet: www.ncair.org

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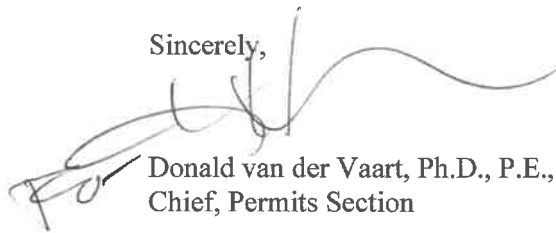
Mr. Norb Hintz
January 2, 2013
Page 2

Required Items	Received	
	Yes	No
An acknowledgement by the permittee that any alteration or expansion of the physical arrangement or operation of an air contaminant source, equipment, or associated air cleaning device prior to the modification of a permit under G.S. 143-215.108 is undertaken at the permittee's own risk and with the knowledge that the permittee may be denied a modification of the permit under G.S. 143-215.108 without regard to the permittee's financial investment or alteration or expansion of the facility.	✓	
A certification under oath that all of the information contained in the notice of intent is complete and accurate to the best of the permittee's knowledge and ability, executed by the permittee or, if the permittee is a corporation, by the appropriate officers of the corporation.	✓	
\$200.00 processing fee.	✓	

In summary, this submittal **did** contain all the required elements as indicated above **including the proof of the notice by publication** and has been accepted for processing. Your request will be considered complete as of January 2, 2013. You will be notified by this office by January 17, 2013 whether you may or may not begin physical expansion or alteration of emission sources.

Should you have any questions, please contact, Kevin Godwin at (919) 707-8480.

Sincerely,



Donald van der Vaart, Ph.D., P.E., J.D.
Chief, Permits Section

c: Raleigh Regional Office Files
Documents Module

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PS Form 3800, August 2006

See Reverse for Instructions

Comprehensive Application Report for 6600167.13A
 Enviva Pellets Northampton, LLC - Gaston (6600167)
 Northampton County

01/02/2013

<u>General Information:</u>	Permit/Latest Revision: 10203/ R00	<u>Application Dates</u>	
Permit code:	Construction Notice	Received	Completeness Due
Application type:	Construction Notice	01/02/2013	Clock Start
Engineer/Rev. location:	Kevin Godwin/RCCO		Calculated Issue Due
Regional Contact:	Charles McEachern		01/17/2013
Facility location:	Raleigh Regional Office	<u>Fee Information</u>	
Facility classification:	Title V	Initial amount:	Date received:
Clock is ON	Application is COMPLETE	\$200.00	01/02/2013
Status is :	In progress	Fund type:	Deposit Slip #:
		2333	Location rec'd:
			Location deposited:

Contact Information

<u>Type</u>	<u>Name</u>	<u>Address</u>	<u>City</u>	<u>State</u>	<u>ZIP</u>	<u>Telephone</u>
Authorized	Norb Hintz, Vice President Engineering	7200 Wisconsin Avenue	Bethesda,	MD	20814	(301) 657-5567
Technical/Permit	Glenn Gray, Plant Manager	7200 Wisconsin Avenue	Bethesda,	MD	20814	(757) 274-8377

Acceptance Criteria

Received? Acceptance Criteria Description

Completeness Criteria

Received? Complete Item Description

Comprehensive Application Report for 6600167.13A
 Enviva Pellets Northampton, LLC - Gaston (6600167)
 Northampton County

01/02/2013

Application Events					
<u>Event</u>	<u>Start</u>	<u>Due</u>	<u>Complete</u>	<u>Comments</u>	<u>Staff</u>
CN1 - Acknowledgment Letter Sent	01/02/2013	01/16/2013	01/02/2013		kmbhash

FROM AIR RECORDS MGMT
 JAN - 3 13

Comprehensive Application Report for 6600167.13A

Enviva Pellets Northampton, LLC - Gaston (6600167)

Northampton County

01/02/2013

Regulations Pertaining to this Permit

<u>Reference Rule</u>	<u>Regulation Description</u>
2Q	Avoidance Conditions
Part 60 - NSPS	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
2D	Particulates Miscellaneous Industrial Processes
2D	Sulfur Dioxide Emissions Combustion Sources
2D	Control of Visible Emissions
2D	New Source Performance Standards
2D	Control of Toxic Air Pollutants
2D	Maximum Achievable Control Technology
Part 63 - NESHAP/MACT	Reciprocating Internal Combustion Engines
Avoidance	Prevention of Significant Deterioration

REC'D AIR RECORDS MGMT
JAN - 3 13

Audit Information Pertaining to this Application

<u>Column Name</u>	<u>Date Changed</u>	<u>Old Value</u>	<u>New Value</u>	<u>Editor</u>
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North Carolina Department of Environment and Natural Resources
 Division of Air Quality

Beverly Eaves Perdue
 Governor

Sheila C. Holman
 Director

Dee Freeman
 Secretary

CERTIFIED MAIL:70101870000133230934
RETURN RECEIPT REQUESTED

January 2, 2013

Mr. Norb Hintz
 Vice President Engineering
 Enviva Pellets Northampton, LLC
 7200 Wisconsin Avenue
 Suite 1100
 Bethesda, MD 20814

SUBJECT: Receipt of Notice of Intent to Construct
 Enviva Pellets Northampton, LLC
 Facility ID: 6600167, Gaston, Northampton County
 Tracking Number: 6600167.13A

Dear Mr. Hintz:

Your request (Notice of Intent to Construct - Tracking No. 6600167.13A) for Enviva Pellets Northampton, LLC, 874 Lebanon Church Road, Gaston, Northampton County, NC was received by this Division on January 2, 2013.

Pursuant to NC General Statute 143-215.108A(b) and (j), submittal of your Notice of Intent to construct must include all of the following items and the processing fee of \$200.00.

Required Items	Received	
	Yes	No
The name and location of the facility and the name and address of the permittee.	✓	
The permit number of each permit issued under G.S. 143-215.108 (by DAQ) for the facility.	✓	
The nature of the air contaminant sources and equipment associated with the proposed modification of the permit.	✓	
An estimate of total regulated air contaminant emissions associated with the proposed modification of the permit.	✓	
The air cleaning devices that are to be employed to address each of the air contaminant sources associated with the modification of the permit.	✓	
The schedule for alteration or expansion of the facility associated with the proposed modification of the permit.	✓	
An acknowledgement by the permittee that the air contaminant sources, equipment, and associated air cleaning devices may not be operated in a manner that alters the emission of any air contaminant until the permittee has obtained a modified permit under G.S. 143-215.108.	✓	

JAN 3 13
 DIVISION OF AIR QUALITY
 NORTH CAROLINA

Permitting Section
 1641 Mail Service Center, Raleigh, North Carolina 27699-1641
 217 West Jones Street, NC 27603
 Phone: 919-707-8405 \ FAX: 919-715-0717 \ Internet: www.ncair.org

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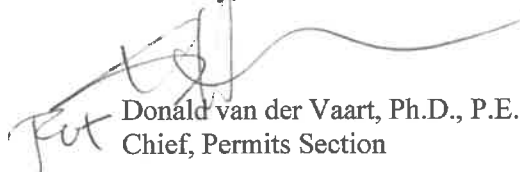
Mr. Norb Hintz
January 2, 2013
Page 2

Required Items	Received	
	Yes	No
An acknowledgement by the permittee that any alteration or expansion of the physical arrangement or operation of an air contaminant source, equipment, or associated air cleaning device prior to the modification of a permit under G.S. 143-215.108 is undertaken at the permittee's own risk and with the knowledge that the permittee may be denied a modification of the permit under G.S. 143-215.108 without regard to the permittee's financial investment or alteration or expansion of the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A certification under oath that all of the information contained in the notice of intent is complete and accurate to the best of the permittee's knowledge and ability, executed by the permittee or, if the permittee is a corporation, by the appropriate officers of the corporation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
\$200.00 processing fee.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

In summary, this submittal **did** contain all the required elements as indicated above **including the proof of the notice by publication** and has been accepted for processing. Your request will be considered complete as of January 2, 2013. You will be notified by this office by January 17, 2013 whether you may or may not begin physical expansion or alteration of emission sources.

Should you have any questions, please contact, Kevin Godwin at (919) 707-8480.

Sincerely,


Donald van der Vaart, Ph.D., P.E., J.D.
Chief, Permits Section

c: Raleigh Regional Office Files
Documents Module

Comprehensive Application Report for 6600167.13B
Enviva Pellets Northampton, LLC - Gaston (6600167)
Northampton County

01/02/2013

<u>General Information:</u>		<u>Permit/Latest Revision:</u> 10203/ R00		<u>Application Dates</u>	
Permit code:	State	Received	Completeness Due	Clock Start	Calculated Issue Due
Application type:	Modification	12/19/2012	02/02/2013	12/19/2012	03/19/2013
Engineer/Rev. location:	Kevin Godwin/RCCO	<u>Fee Information</u>			
Regional Contact:	Charles McEachern	Initial amount:	Date received:	Amount Due:	Add Amt Rcv'd:
Facility location:	Raleigh Regional Office	\$867.00	12/19/2012	0.00	Date Rcv'd:
Facility classification:	Title V	Fund type:	Deposit Slip #:	Location rec'd:	Location deposited:
Clock is ON	Application is COMPLETE	2333			
Status is :	In progress				

<u>Contact Information</u>					
<u>Type</u>	<u>Name</u>	<u>Address</u>	<u>City</u>	<u>State</u>	<u>ZIP</u>
Technical/Permit Authorized	Glenn Gray, Plant Manager North Hintz, Vice President Engineering	7200 Wisconsin Avenue 7200 Wisconsin Avenue	Bethesda, MD Bethesda, MD	MD	20814 20814
					<u>Telephone</u>
					(757) 274-8377 (301) 657-5567

<u>Acceptance Criteria</u>	
<u>Received?</u>	<u>Acceptance Criteria Description</u>
Yes	Application fee
Yes	Appropriate number of apps submitted
Yes	Zoning Addressed
N/A	Source recycling/reduction form
Yes	Authorized signature
Yes	PE Seal
Yes	Application contains toxic modification(s)

<u>Completeness Criteria</u>	
<u>Received?</u>	<u>Complete Item Description</u>

Comprehensive Application Report for 6600167.13B
Enviva Pellets Northampton, LLC - Gaston (6600167)
Northampton County

01/02/2013

Application Events	<u>Start</u>	<u>Due</u>	<u>Complete</u>	<u>Comments</u>	<u>Staff</u>
<u>Event</u> TV - Acknowledgment/Complete	12/19/2012	12/29/2012	01/02/2013		kmhash

REC'D AIR RECORDS MGMT
JAN-3 13

Comprehensive Application Report for 6600167.13B
 Enviva Pellets Northampton, LLC - Gaston (6600167)
 Northampton County

01/02/2013

RECORDED
 JAN - 3 13
 RECORDS MGMT

Regulations Pertaining to this Permit

<u>Reference Rule</u>	<u>Regulation Description</u>
2Q	Avoidance Conditions
Part 60 - NSPS	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
2D	Subpart IIII
2D	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
2D	Particulates Miscellaneous Industrial Processes
2D	Sulfur Dioxide Emissions Combustion Sources
2D	Control of Visible Emissions
2D	New Source Performance Standards
2D	Control of Toxic Air Pollutants
2D	Maximum Achievable Control Technology
Part 63 - NESHAP/MACT	Reciprocating Internal Combustion Engines
Avoidance	Subpart ZZZZ
	2D .0530
	Prevention of Significant Deterioration

Audit Information Pertaining to this Application

<u>Column Name</u>	<u>Date Changed</u>	<u>Old Value</u>	<u>New Value</u>	<u>Editor</u>



North Carolina Department of Environment and Natural Resources
Division of Air Quality

Beverly Eaves Perdue
Governor

Sheila C. Holman
Director

Dee Freeman
Secretary

January 2, 2013

Mr. Norb Hintz
Vice President Engineering
Enviva Pellets Northampton, LLC
7200 Wisconsin Avenue
Suite 1100
Bethesda, MD 20814

SUBJECT: Receipt of Permit Application
Modification of Permit No. 10203R00
Application No. 6600167.13B
Enviva Pellets Northampton, LLC
Facility ID: 6600167, Gaston, Northampton County

Dear Mr. Hintz:

Your air permit application (6600167.13B) for Enviva Pellets Northampton, LLC, located in Northampton County, North Carolina was received by this Division on December 19, 2012.

This application submittal did contain all the required elements as indicated and has been accepted for processing. Your application will be considered complete as of December 19, 2012, unless informed otherwise by this office within 60 days.

Should you have any questions concerning this matter, please contact Kevin Godwin at (919) 707-8480.

Sincerely,


Donald van der Vaart, Ph.D., P.E., J.D.
Chief, Permits Section

cc: Raleigh Regional Office Files



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Pat McCrory
Governor

Sheila C. Holman
Director

John E. Skvarla, III
Secretary

CERTIFIED MAIL 7000 0600 0028 7275 1885
RETURN RECEIPT REQUESTED

January 17, 2013

Mr. Norb Hintz
Vice President Engineering
Enviva Pellets
7200 Wisconsin Avenue
Suite 1100
Bethesda, Maryland 20814

SUBJECT: Construction Prior to Receipt of Air Permit
Enviva Pellets Northampton, LLC
Lebanon Church Road
Gaston, North Carolina 27866
Facility ID No. 6600167, Current Permit No. 010203R00
Tracking Number 6600167.13A

Dear Mr. Hintz:

The Division of Air Quality has considered your request deemed complete on January 2, 2013 to construct equipment prior to receipt of an air permit as allowed in N.C.G.S. 143-215.108A(b). Your request describes the following changes:

- add three (3) hammermills (ID Nos. ES-HM-5 through 7),
- add three (3) cyclones (ID Nos. CD-CYC-5 through 7), and include revised cyclone information for all seven cyclones,
- add one bagfilter (ID No. CD-HM-BF3) and include revised bagfilter information,
- remove the hammermill area as a permitted source (ID No. ES-HMA),
- add a dust system (ID No. ES-NDS) controlled by the new bagfilter (ID No. CD-HM-BF3),
- add three (3) pellet cooler cyclones (ID Nos. CD-CLR4 through 6),
- add a fines bin (ID No. ES-PFB) to be controlled by a new bin vent filter (ID No. CD-PFB-BV),
- add finished product handling (ID No. ES-FPH) that will consist of a pellet screening operation and conveying controlled by a new bagfilter (ID No. CD-FPH-BF),
- add twelve (12) pellet loadout bins to distribute finished product into trucks in one of the two new pellet mill loadouts and controlled by bagfilter (ID No. CD-FPH-BF), and

Permitting Section

1641 Mail Service Center, Raleigh, North Carolina 27699-1641
217 West Jones Street, Raleigh, North Carolina 27603
Phone: 919-707-8405 / Fax: 919-715-0717
Internet: www.ncair.org

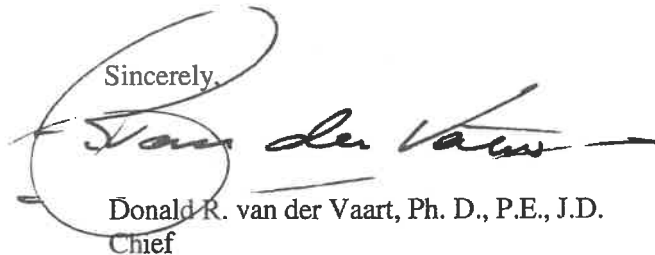
Mr. Norb Hintz
January 17, 2013
Page 2

- add two (2) pellet mill loadouts (ID Nos. ES-PL-1 and PL-2) used to load finished product into trucks and controlled by bagfilter (ID No. CD-FPH-BF).

Based on the information submitted in your "Notice of Intent to Construct," and in accordance with N.C.G.S. 143-215.108A(c), the Division of Air Quality grants permission for the construction, alteration or expansion of the equipment listed above. You may commence construction immediately. **Please be aware that you are not allowed to operate any of the equipment prior to receipt of your revised air permit.** Also, there may be other state, federal or local regulations applicable to your construction plans. This permission to construct prior to receipt of an air permit does not supercede any applicable zoning ordinances.

If you have any questions please feel free to contact Kevin Godwin at (919) 707-8480.

Sincerely,



Donald R. van der Vaart, Ph. D., P.E., J.D.
Chief

c: Raleigh Regional Office Files
✓ Central Files
IBEAM Document Module

U.S. Postal Service
CERTIFIED MAIL RECEIPT
(Domestic Mail Only; No Insurance Coverage Provided)

7000.0600 0028 7275 1885

[Empty rectangular box]

Postage	\$	Postmark Here
Certified Fee		
Return Receipt Fee (Endorsement Required)		
Restricted Delivery Fee (Endorsement Required)		
Total Postage & Fees	\$	

Recipient's Name (Please Print Clearly) (to be completed by mailer)
Mr. Mark Hintz, Enviva Pellets
Street, Apt. No., or PO Box No.
7200 Wisconsin Ave. Suite 1100
City, State, ZIP+4
Bethesda MD 20814

PS Form 3800, February 2000

See Reverse for Instructions

NOTICE OF INTENT TO CONSTRUCT REVIEW AND DETERMINATION

PERMITTEE Enviva Pellets	SITE LOCATION Gaston	COUNTY Northampton
CONTACT Glenn Gray, Plant Manager	TELEPHONE (757) 274-8377	PERMIT NO. 010203R00
REVIEWER Kevin Godwin		SIGNATURE <i>Kevin T. Godwin</i>
RECOMMENDATION Approve NOI	FEE \$200	DATE January 17, 2013

1. Background

A Notice of Intent (NOI) to construct:

- A. three (3) hammermills (ID Nos. ES-HM-5 through 7),
- B. three (3) cyclones (ID Nos. CD-CYC-5 through 7), and include revised information for all seven cyclones,
- C. one bagfilter (ID No. CD-HM-BF3) and include revised bagfilter information,
- D. remove the hammermill area as a permitted source (ID No. ES-HMA),
- E. a dust system (ID No. ES-NDS) controlled by the new bagfilter (ID No. CD-HM-BF3),
- F. three (3) pellet cooler cyclones (ID Nos. CD-CLR4 through 6),
- G. a fines bin (ID No. ES-PFB) to be controlled by a new bin vent filter (ID No. CD-PFB-BV),
- H. finished product handling (ID No. ES-FPH) that will consist of a pellet screening operation and conveying controlled by a new bagfilter (ID No. CD-FPH-BF),
- I. twelve (12) pellet loadout bins to distribute finished product into trucks in one of the two new pellet mill loadouts and controlled by bagfilter (ID No. CD-FPH-BF), and
- J. two (2) pellet mill loadouts (ID Nos. ES-PL-1 and PL-2) used to load finished product into trucks and controlled by bagfilter (ID No. CD-FPH-BF),

was received on January 2, 2013. The NOI was filed in accordance with G.S. 143-215.108A(b) and was determined to be complete on January 2, 2013.

2. Review

As required by G.S. 143-215.108A(c), the Division of Air Quality is providing this review and determination of the NOI for consistency with the requirements of G.S. 143-215.108A(b). The following elements are required to be met to approve the NOI:

Element	Yes	No
The Permittee is and has been in substantial compliance with other permits issued the Permittee.	X	
The facility will be altered or expanded so that it will be used for either the same or a similar use as the use already permitted.	X	
The alteration or expansion will not result in a disproportionate increase in the size of the facility already permitted.	X	
The alteration or expansion will result in the same or substantially similar emissions as that of the facility already permitted.	X	
The alteration or expansion will not have a significant effect on air quality.	X	
The Commission is likely to issue the permit modification.	X	
The source(s) being constructed are not ineligible.	X	
The notice of intent is complete, i.e., it contains proof of publication, the notice in the newspaper contains all the required elements, the notice of intent sent to DAQ contains all the required elements, a \$200.00 processing fee has been submitted.	X	
Is the date authorizing construction contained in the "Construction Prior to Receipt of Air Permit" letter at least 15 days after the date of publication of the public notice?	X	
The alteration or expansion will not be prohibited by other state, federal or local laws.	X	

3. Discussion of Elements

- A. As of the most recent inspection on July 24, 2012, the facility was still under construction. The facility is considered to have been in substantial compliance with other permits.
- B. The facility will continue to be used as currently permitted.
- C. The change is not expected to result in a disproportionate increase in the size of the facility already permitted.
- D. The alteration will result in similar emissions. The facility estimates facility-wide emissions after the additions as follows:

TSP (tpy)	PM-10	NO _x (tpy)	VOC (tpy)	CO (tpy)	SO ₂ (tpy)	CO ₂ e (tpy)
84.25	80.42	125.80	185.94	194.02	19.05	233.62

The following table provides a summary of emissions from the new sources controlled by bagfilters and cyclones:

Emissions Unit	Source ID	Control Device ID	Flowrate	Pollutant loading	Potential PM Emissions (tpy)
Hammermills bagfilter 1	HM-1 through 3	CD-HM-BF1	45,000	0.003	5.07
Hammermills bagfilter 2	HM-4 through 6	CD-HM-BF2	45,000	0.003	5.07
Hammermills bagfilter 3	HM-7, NDS	CD-HM-BF3	30,000	0.003	3.38
Pellet mill feed silo	PMFS	CD-PMFS-BV	2,500	0.003	0.28
Pellet mill feed silo	PFB	CD-PFB-BV	3,600	0.003	0.12
Pellet coolers cyclone 1	CLR-1	CD-CLR-1	17,100	0.01	6.42
Pellet coolers cyclone 2	CLR-2	CD-CLR-2	17,100	0.01	6.42
Pellet coolers cyclone 3	CLR-3	CD-CLR-3	17,100	0.01	6.42
Pellet coolers cyclone 4	CLR-4	CD-CLR-4	17,100	0.01	6.42
Pellet coolers cyclone 5	CLR-5	CD-CLR-5	17,100	0.01	6.42
Pellet coolers cyclone 6	CLR-6	CD-CLR-6	17,100	0.01	6.42
Finished product handling	FPH, PL1 and 2, PB-1 through PB-12	CD-FPH-BF	35,500	0.003	4.0

- E. The alteration is not expected to have a significant impact on air quality. The total PM, PM-10, and PM-2.5 emissions increases are 56.43, 52.60, and 37.30 tons per year, respectively.
- F. The DAQ is likely to issue a permit revision allowing the alteration.
- G. Installing the new equipment is not ineligible for construction prior to receiving a permit.
- H. The NOI is complete.
- I. The alteration is not prohibited by other state, federal, or local laws.

4. Determination

RCO recommends approval of the NOI.

NORTH CAROLINA DIVISION OF AIR QUALITY			Raleigh Regional Office Enviva Pellets Northampton, LLC NC Facility ID 6600167 County/FIPS: Northampton/131
Inspection Report Date: 07/25/2012			
Facility Data			Compliance Data
Enviva Pellets Northampton, LLC 874 Lebanon Church Road Gaston, NC 27866 Lat: 36d 30.0294m Long: 77d 42.9888m SIC: 2499 / Wood Products, Nec NAICS: 321999 / All Other Miscellaneous Wood Product Manufacturing			Inspection Date 07/24/2012 Inspector's Name Will Wike Operating Status Operating Compliance Code Compliance - inspection Action Code FCE On-Site Inspection Result Compliance
Contact Data			Permit Data
Facility Contact	Authorized Contact	Technical Contact	Permit 10203 / R00 Issued 3/9/2012 Expires 2/28/2017 Classification Title V Permit Status Active
Glenn Gray Plant Manager (757) 274-8377	Norb Hintz Vice President Engineering (301) 657-5567	Glenn Gray Plant Manager (757) 274-8377	
Inspector's Signature:		Comments:	
Date of Signature:		In compliance – facility is not yet finished being built. Recommend re-inspection in one year.	

(I) DIRECTIONS TO SITE: From RRO, take I-440 Inner Beltline to US 64 East and follow to I-95 North. Follow I-95 North and take exit 176 for Hwy 46 West toward Gaston/Garysburg. Turn left onto Hwy 46 West then take a right onto Lebanon Church Road. Follow for approximately 1-2 miles and the facility will be on the left at 874 Lebanon Church Road.

(II) FACILITY DESCRIPTION: Enviva Pellets, LLC (Enviva) is proposing to construct and operate a new wood pellets manufacturing plant in the town of Gaston, NC. The proposed plant is designed to produce wood pellets with no less than 13% moisture content. Pellets will typically consist of pressed hardwoods, but could contain up to 10% softwoods on an annual basis.

The pelletizing process is described in the air permit application (with some editing) as follows:

- 1) Green wood will be delivered via trucks as whole logs or as chipped wood. Logs are chipped and debarked to specification for drying. Chipped wood is conveyed to wood storage and wood/bark is conveyed to green wood fuel dryer storage.
- 2) Wood dryer (ID No. ES-Dryer) – Green wood is conveyed to a rotary dryer system. Direct contact heat is provided to the system via a 174 million Btu/hr burner system. Moisture content is reduced to no less than 13%. Air emissions from the dryer system are controlled by a simple cyclone (ID No. CD-DC) in series with a wet electrostatic precipitator (ID No. CD-WESP).
- 3) Dried wood handling (ID No. ES-DWH) – Dried materials are transferred from the dryer via conveyors to hammermills for further size reduction prior to pelletizing.
- 4) Coarse Hammermills (ID No. ES-HM-1, 2, 3, and 4) – Dried materials are reduced to the appropriate size using four hammermills operating in parallel. Particulate emissions are controlled using four simple cyclones (ID Nos. CD-HM-CYC1 through CYC4) in series with two bagfilters (ID Nos. CD-HM-BF1 and BF2).
- 5) Hammermill Area Filter (ID No. ES-HMA) – A number of dried and sized wood transport emission sources are controlled by the Hammermill Area Filter bagfilter (ID No. CD-HMA-BF).
- 6) Pellet Mill Feed Silo (ID No. ES-PMFS) – Ground wood from the hammermills is conveyed to the in-feed screw pellet mill feed silo prior to pelletization. Emissions are controlled using a bin vent filter (ID No. CD-PMFS-BV).
- 7) Pellet Press System (ID No. ES-PP) – Dried ground wood is compacted in the presence of water using several screw presses. Exhaust from the pellet press and associated conveyors are vented to the atmosphere with negligible particulate emissions. No chemical binding agents are used for pelletization.
- 8) Pellet Coolers (ID Nos. ES-CLR) – Wood pellets are conveyed to one of six pellet coolers. Cooling air is passed through the pellets. Particulate emissions are controlled using three simple cyclones operating in parallel (ID Nos. CD-CLR-1, 2, and 3).
- 9) Finished product handling (ID No. ES-FPH) – Pelletized product is conveyed to storage and load-out operations with no emissions expected.
- 10) Emergency Generator (ID No. ES-EG), Fire water pump (ID No. ES-FWP) and associated Fuel oil storage tanks – The facility will use a 350 bhp emergency generator and a 300 bhp fire water pump. Both engines operate on diesel fuel. Fuel for the emergency generator is stored in a 2,500 gallon tank and for the fire pump in a 500 gallon tank.

(III) INSPECTION SUMMARY: On July 24, 2012, I (Will Wike) visited the facility to conduct a compliance inspection. Upon approaching the site, it was apparent that the plant was in the early stages of construction. A chain gate blocked the driveway. There was some construction equipment in the distance near the tree line. The next day, I contacted Joe Harrell, Corporate EHS Manager, in order to determine the facility's operating status. On July 26, 2012, we spoke and Mr. Harrell confirmed that construction of the facility was not expected to be completed until sometime between October and December of 2012. Mr. Harrell indicated that the plant manager will be Roland Burnett. We discussed the air permit compliance schedule Mr. Harrell prepared and sent earlier in the month. Mr. Harrell is being pro-active in making sure the plant meets all of its monitoring, recordkeeping, etc. requirements established in its air permit. Based on these findings, the facility appeared to be in compliance, by default, from an air quality standpoint on the day of the inspection.

(IV) CONCLUSIONS/RECOMMENDATIONS: At the time of the inspection, Enviva Pellets' Gaston facility appeared to be in compliance (by default) with all permitting requirements. It is recommended that the facility be re-inspected in one year.



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fax (301) 657 5567

www.envivabiomass.com

December 19, 2012

Dr. Donald R. van der Vaart, P.E.
Division of Air Quality
1641 Mail Service Center
Raleigh, North Carolina 27699-1641

Received

JAN 2 2013

Air Permits Section

Re: Request for Intent to Construct
Enviva Pellets Northampton, LLC.
Garysburg, NC

Dear Dr. Van der Vaart:

Enviva Pellets Northampton, LLC (Enviva) was issued a construction and operating permit (DAQ Permit #10203R00) on March 9, 2012. Enviva is submitting this request for intent to install and operate certain equipment changes associated with post-dryer wood processing operations, as well as a minor revision to the facility's emission source layout. The following list of emission sources are impacted by the changes proposed in the permit application:

- 1) Addition of three (3) hammer mills (ES-HM-5 through 7);
- 2) Addition of three (3) hammermill cyclones (CD-CYC-5 through 7) and revised cyclone information for all seven hammermill cyclones;
- 3) Addition of one (1) hammermill Bagfilter (CD-HM-BF3) with revised bagfilter information for all the hammermill bagfilters;
- 4) Removal of the hammermill area permitted source (ES-HMA);
- 5) Addition of nuisance dust system (ES-NDS) controlled by the new hammermill bagfilter (CD-HM-BF3);
- 6) Addition of three (3) pellet cooler cyclones (CD-CLR4 through 6);
- 7) Addition of a fines bin (ES-PFB) that will be controlled by a new bin vent filter (CD-PFB-BV);

Received

JAN 2 2013

Air Permits Section



enviva

7200 Wisconsin Ave, Suite 1100
Bethesda, MD 20814 USA

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- 8) Addition of finished product handling (ES-FPH) that will consist of pellet screening operation and conveying, which will be controlled by a new bagfilter (CD-FPH-BF);
- 9) Addition of twelve (12) pellet loadout bins that will distribute finished product into trucks in the one of the two new pellet mill loadout and will also be controlled by the new finished product handling bagfilter (CD-FPH-BF); and
- 10) Addition of the two (2) pellet mill loadouts (ES-PL-1 and PL-2) used to load finished product into trucks and will be controlled by finished product handling bagfilter (CD-FPH-BF).

Enviva has submitted the notice of intent to construct without an air permit application to the local newspaper. A copy of the affidavit from the Daily Herald is included in Attachment 2. We trust that this information satisfies the proof of publication requirement.

Enviva acknowledges that the air contaminant sources, equipment, and associated air cleaning device may not be operated in a manner that alters the emission of any air contaminant until Enviva has obtained a modified permit under G.S. 143-215.108.

Enviva acknowledges that any alteration of the physical arrangement or operation of an air contaminant source, equipment, or associated air cleaning device prior to the modification of a permit under G.S. 143-215.108 is undertaken at Enviva's own risk and that Enviva may be denied a modification of the permit under G.S. 143-215.108 without regard to Enviva's financial investment for the alteration of the facility.

Enviva has enclosed a check for the \$200.00 processing fee.

"I certify under penalty of law that all information and statements provided in this notice of intent to construct, including any attachments, are true, accurate, and complete to best of my knowledge and ability."



7200 Wisconsin Ave, Suite 1100
Bethesda, MD 20814 USA

+1 (301) 657 5560
fax (301) 657 5567

www.envivabiomass.com

If you have any questions regarding this request, please feel free to contact Mr. Glenn Gray at (757) 274-8377, or Mr. Joe Sullivan of Trinity Consultants at (919) 462-9693.

Sincerely,

Norb Hintz
Vice President Engineering
Enviva LP

Mr. Joe Harrell, Enviva
Mr. Joe Sullivan, Trinity Consultants

Enclosures:
Attachment 1- Emission Summary
Attachment 2 - NOIC in newspaper



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Bethesda, MD 20814 USA

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fax (301) 657 5567

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ATTACHMENT 1 – EMISSION SUMMARY

**TABLE 2
BAGFILTER AND CYCLONE EMISSIONS
ENVIVA PELLETS NORTHAMPTON, LLC**

Emission Unit	Emission Source ID	Filter, Vent -or- Cyclone ID	Flowrate ¹ (cfm)	Pollutant Loading ² (gr/cf)	Annual Operation (hours)	% PM that is		Potential Emissions					
						PM ₁₀	PM _{2.5}	PM (lb/hr)	PM ₁₀ ³ (tpy)	PM _{2.5} ³ (tpy)	PM _{2.5} ³ (lb/hr)	PM _{2.5} ³ (tpy)	
Hammermills Bagfilter 1	ES-HM-1 through 3	CD-HM-BF1	45,000	0.003	8,760	100%	100%	1.16	5.07	1.16	5.07	1.16	5.07
Hammermills Bagfilter 2	ES-HM-4 through 6	CD-HM-BF2	45,000	0.003	8,760	100%	100%	1.16	5.07	1.16	5.07	1.16	5.07
Hammermills Bagfilter 3	ES-HM-7, ES-NDS	CD-HM-BF3	30,000	0.003	8,760	100%	100%	0.77	3.38	0.77	3.38	0.77	3.38
Pellet Mill Feed Silo Bin Vent Filter	ES-PMFS	CD-PMFS-BV	2,500	0.003	8,760	100%	100%	0.06	0.28	0.06	0.28	0.06	0.28
Pellet Mill Fines Bin Bin Vent Filter	ES-PFB	CD-PFB-BV	3,600	0.003	2,500	100%	100%	0.09	0.12	0.09	0.12	0.09	0.12
Pellet Coolers Cyclone 1	ES-CLR-1	CD-CLR-1	17,100	0.01	8,760	91%	55%	1.47	6.42	1.33	5.84	0.81	3.53
Pellet Coolers Cyclone 2	ES-CLR-2	CD-CLR-2	17,100	0.01	8,760	91%	55%	1.47	6.42	1.33	5.84	0.81	3.53
Pellet Coolers Cyclone 3	ES-CLR-3	CD-CLR-3	17,100	0.01	8,760	91%	55%	1.47	6.42	1.33	5.84	0.81	3.53
Pellet Coolers Cyclone 4	ES-CLR-4	CD-CLR-4	17,100	0.01	8,760	91%	55%	1.47	6.42	1.33	5.84	0.81	3.53
Pellet Coolers Cyclone 5	ES-CLR-5	CD-CLR-5	17,100	0.01	8,760	91%	55%	1.47	6.42	1.33	5.84	0.81	3.53
Pellet Coolers Cyclone 6	ES-CLR-6	CD-CLR-6	17,100	0.01	8,760	91%	55%	1.47	6.42	1.33	5.84	0.81	3.53
Finished Product Handling Bagfilter	ES-FPH, ES-PL1 & 2, ES-PB-1 thru 12	CD-FPH-BF	35,500	0.003	8,760	91%	0.55	0.91	4.00	0.83	3.64	0.50	2.20
TOTAL								12.95	56.43	12.08	52.60	8.58	37.10

Note:

- Filter, Vent, and Cyclone inlet flow rate (cfm) provided by design engineering firm (Mid-South Engineering Co.). The exit flowrate was conservatively assumed to be the same as the inlet flowrate.
- Pollutant Loading (gr/cf) provided by Aircon.
- Pellet cooler cyclone speciation based on AP-42 factors for wet wood combustion (Section 1.6) controlled by a mechanical separator. Since the particle size of particulate matter from a pellet cooler is anticipated to be larger than flyash, this factor is believed to be a conservative indicator of speciation.

TABLE 3
ELECTRIC POWERED RECHIPPER (ES-RCHP-1, -2) EMISSIONS
ENVIVA PELLETS NORTHAMPTON, LLC

Annual Throughput of Each Rechipper	620,471	tons/year (dry wood) ¹
Short-term Throughput of Each Rechipper	70.83	tons/hr (dry wood) ¹
Maximum Annual Operation	8,760	hours

Pollutant	Emission Factors (lb/dry wood tons)	Emissions ⁵	
		(lb/hr)	(tpy)
THC as Carbon ²	0.0041	2.904E-01	1.27
THC as alpha-Pinene ³	0.0047	3.296E-01	1.44
PM ⁴	N/A	N/A	N/A
Methanol ²	0.0010	7.083E-02	0.31

¹ It is assumed that the wood received at the facility has a nominal water content of 50%.

The annual throughput used for the rechippers are the same as the annual throughput of the dryer; while the short-term throughput is based upon the maximum hourly throughput of the dryer.

² Emission factor obtained from available emissions factors for rechippers in AP-42 Section 10.6.3, Table 7 and Section 10.6.4, Tables 7 and 9. Emission factors for THC and Methanol are the same across all three tables.

³ The THC/VOC makeup of wood is primarily composed of terpenes (C₅H₈)_n [where n = 2, 3, or 4 typically] but to convert from carbon to the equivalent weight in THC/VOC, the assumption was that alpha-pinene (AP) would be the representative THC/VOC (molecular weight = 136.2 lb/lb-mol).
The following equation shows the conversion:

$$lb\ VOC/ODT = lb\ C/ODT * (136.2\ lb/mol\ AP / 12\ lb/mol\ C) * (1\ mol\ AP / 10\ mol\ C)$$

⁴ PM emission factor is not applicable as rechipper emissions are routed downward to the ground.

⁵ Short term emissions were based upon the annual throughput of the rechippers (dry wood) divided by the total hours of operation. Emissions are representative of the total combined emissions for both rechippers.

**ATTACHMENT 2 – PROOF OF PUBLICATION IN LOCAL NEWSPAPER (DAILY
HERALD)**

**The Roanoke Rapids
Daily Herald**

P.O. Box 520 • 916 Roanoke Avenue
Roanoke Rapids, NC 27870
(252) 537-2505 • FAX (252) 537-2314
FED ID 86-0497096

ADVERTISING INVOICE and STATEMENT

1	BILLING PERIOD	2	ADVERTISER / CLIENT NAME	
			TRINITY CONSULTANTS, INC.	
23	TOTAL AMOUNT DUE	*UNAPPLIED AMOUNT	3	TERMS OF PAYMENT

21	CURRENT NET AMOUNT DUE	22	30 DAYS	60 DAYS	90 DAYS
----	------------------------	----	---------	---------	---------

BILLED ACCOUNT NAME AND ADDRESS		REMITTANCE ADDRESS		4	PAGE #	5	BILLING DATE
TRINITY CONSULTANTS, INC.		The Roanoke Rapids Daily Herald		1			12/23/12
1 COPLEY PKWAY, STE RALEIGH NC 27560		P.O. Box 520 916 Roanoke Avenue Roanoke Rapids, NC 27870 (252) 537-2505 • FAX (252) 537-2314		6		BILLED ACCOUNT NUMBER 5196	
				7		ADVERTISER / CLIENT NUMBER	

PLEASE DETACH AND RETURN UPPER PORTION WITH YOUR REMITTANCE

10	DATE	11	NEWSPAPER REFERENCE	12	13	14	DESCRIPTION — OTHER COMMENTS/CHARGES	15	16	SAU SIZE BILLED UNITS	17	18	TIMES RUN RATE	19	GROSS AMOUNT	20	NET AMOUNT
	12/23		LE4				NOTICE OF CONSTRUCTION PRIOR TO AIR PERMIT 12/23			13.25			8.850		117.26		.00
							NOTICE OF CONSTRUCTION SALES TAX										

Received
JAN 2 2013
Air Permits Section

PAID

STATEMENT OF ACCOUNT AGING OF PAST DUE AMOUNTS

21	CURRENT NET AMOUNT DUE	22	30 DAYS	60 DAYS	90 DAYS	*UNAPPLIED AMOUNT	23	TOTAL AMOUNT DUE
								117.26

**The Roanoke Rapids
Daily Herald**

P.O. Box 520 • 916 Roanoke Avenue
Roanoke Rapids, NC 27870 • (252) 537-2505

*UNAPPLIED AMOUNTS ARE INCLUDED IN TOTAL AMOUNT DUE

24	BILLING PERIOD	25	BILLED ACCOUNT NUMBER	26	ADVERTISER INFORMATION	27	ADVERTISER / CLIENT NUMBER	28	ADVERTISER / CLIENT NAME
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Comprehensive Application Report for 6600167.13A
 Enviva Pellets Northampton, LLC - Gaston (6600167)
 Northampton County

01/18/2013

General Information: Permit/Latest Revision: 10203/R00
 Permit code: Construction Notice
 Application type: Construction Notice
 Engineer/Rev. location: Kevin Godwin/RCO
 Regional Contact: Charles McEachern
 Facility location: Raleigh Regional Office
 Facility classification: Title V
 Clock is ON: Application is COMPLETE
 Status is: CN Approved

Application Dates
 Received: 01/02/2013
 Completeness Due: Clock Start
 Calculated Issue Due: 01/17/2013

Fee Information
 Initial amount: \$200.00
 Date received: 01/02/2013
 Amount Due: 0.00
 Add. Amt Rev'd: Date Rev'd:
 Fund type: Deposit Slip #: Location rec'd: Location deposited:
 2333

Contact Information

<u>Type</u>	<u>Name</u>	<u>Address</u>	<u>City State ZIP</u>	<u>Telephone</u>
Authorized Technical/Permit	Norb Hintz, Vice President Engineering Glenn Gray, Plant Manager	7200 Wisconsin Avenue 7200 Wisconsin Avenue	Bethesda, MD 20814 Bethesda, MD 20814	(301) 657-5567 (757) 274-8377

Acceptance Criteria

Received? Acceptance Criteria Description

Completeness Criteria

Received? Complete Item Description

Comprehensive Application Report for 6600167.13A
Enviva Pellets Northampton, LLC - Gaston (6600167)
Northampton County

01/18/2013

Application Events

<u>Event</u>	<u>Start</u>	<u>Due</u>	<u>Complete</u>	<u>Comments</u>	<u>Staff</u>
CN - Acknowledgment Letter Sent	01/02/2013	01/16/2013	01/02/2013		kmhash
CN - Approval Notice	01/17/2013		01/17/2013		kgodwin

Outcome Information

Permit: 10203
 Outcome
 01/17/2013
 Accumulated process days (includes public notice periods): 15

Comprehensive Application Report for 6600167.13A
Enviva Pellets Northampton, LLC - Gaston (6600167)
Northampton County

01/18/2013

Regulations Pertaining to this Permit	
<u>Reference Rule</u>	<u>Regulation Description</u>

Audit Information Pertaining to this Application		
<u>Column Name</u>	<u>Date Changed</u>	<u>Old Value</u>
		<u>New Value</u>
		<u>Editor</u>

Comprehensive Application Report for 0100160.13A

ITG/Burlington Industries LLC -Burlington Finishing Plant - Burlington (0100160)

Alamance County

01/18/2013

General Information: Permit/Latest Revision: 00148/ T22

Permit code: TV-Renewal

Application type: Renewal

Engineer/Rev. location: Betty Gatano/RCO

Regional Contact: Jalal Adouli

Facility location: Winston-Salem Regional Office

Facility classification: Title V

Clock is ON Application is COMPLETE

Status is : In progress

Application Dates

Received 01/16/2013 Completeness Due 03/17/2013 Clock Start 01/16/2013 Calculated Issue Due

Fee Information

Initial amount: Date received: 01/16/2013 Amount Due: Add. Amt Rcv'd: Date Rcv'd:

Fund type: 2333 Deposit Slip #: Location rec'd: Location deposited:

Contact Information

Type

Technical/Permit Authorized

Name

G. Mike Garrick, Corporate Environmental Engineer
Eric Page, Plant Manager

Address

804 Green Valley Road
PO Box 691

City State ZIP

Greensboro, NC 27408
Burlington, NC 27216

Telephone

(336) 379-2941
(336) 228-2701

Acceptance Criteria

Received?	Acceptance Criteria Description
N/A	Application fee
Yes	Appropriate number of apps submitted
N/A	Zoning Addressed
N/A	Source recycling/reduction form
Yes	Authorized signature
N/A	PE Seal
N/A	Application contains toxic modification(s)

Completeness Criteria

Received? Complete Item Description

Comprehensive Application Report for 0100160.13A
ITG/Burlington Industries LLC -Burlington Finishing Plant - Burlington (0100160)
Alamance County

01/18/2013

Application Events					
<u>Event</u>	<u>Start</u>	<u>Due</u>	<u>Complete</u>	<u>Comments</u>	<u>Staff</u>
TV - Acknowledgment/Complete	01/16/2013	01/26/2013	01/18/2013		kmhash

Regulations Pertaining to this Permit

<u>Reference Rule</u>	<u>Regulation Description</u>
2Q	Avoidance Conditions
2D	Particulates Fuel Burning Indirect Heat Exchangers
2D	Particulates Miscellaneous Industrial Processes
2D	Sulfur Dioxide Emissions Combustion Sources
2D	Control of Visible Emissions
2D	Work Practices Sources of Volatile Organic Compounds
2D	Maximum Achievable Control Technology

Comprehensive Application Report for 0100160.13A
ITG/Burlington Industries LLC -Burlington Finishing Plant - Burlington (0100160)
Alamance County

01/18/2013

Audit Information Pertaining to this Application

<u>Column Name</u>	<u>Date Changed</u>	<u>Old Value</u>	<u>New Value</u>	<u>Editor</u>
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Comprehensive Application Report for 6600167.13A
 Enviva Pellets Northampton, LLC - Gaston (6600167)
 Northampton County

01/02/2013

General Information: Permit/Latest Revision: 10203/ R00

Permit code: Construction Notice

Application type: Construction Notice

Engineer/Rev. location: Kevin Godwin/RCO

Regional Contact: Charles McEachern

Facility location: Raleigh Regional Office

Facility classification: Title V

Clock is ON Application is COMPLETE

Status is : In progress

Application Dates

Received 01/02/2013 Completeness Due 01/02/2013 Clock Start Calculated Issue Due 01/17/2013

Fee Information

Initial amount: Date received: Amount Due: Add. Amt Rcv'd: Date Rcv'd:

\$200.00 01/02/2013 0.00

Fund type: Deposit Slip #: Location rec'd: Location deposited:

2333

Contact Information

<u>Type</u>	<u>Name</u>	<u>Address</u>	<u>City State ZIP</u>	<u>Telephone</u>
Authorized Technical/Permit	Norb Hintz, Vice President Engineering Glenn Gray, Plant Manager	7200 Wisconsin Avenue 7200 Wisconsin Avenue	Bethesda, MD 20814 Bethesda, MD 20814	(301) 657-5567 (757) 274-8377

Acceptance Criteria

<u>Received?</u>	<u>Acceptance Criteria Description</u>

<u>Completeness Criteria</u>	
<u>Received?</u> <u>Complete Item Description</u>	

Comprehensive Application Report for 6600167.13A
Enviva Pellets Northampton, LLC - Gaston (6600167)
Northampton County

01/02/2013

<u>Event</u>	<u>Start</u>	<u>Due</u>	<u>Complete</u>	<u>Comments</u>	<u>Staff</u>
CN - Acknowledgment Letter Sent	01/02/2013	01/16/2013	01/02/2013		kmhash

Comprehensive Application Report for 6600167.13A
 Enviva Pellets Northampton, LLC - Gaston (6600167)

01/02/2013

Northampton County

Regulations Pertaining to this Permit

<u>Reference Rule</u>	<u>Regulation Description</u>
2Q	Avoidance Conditions
Part 60 - NSPS	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
2D	Particulates Miscellaneous Industrial Processes
2D	Sulfur Dioxide Emissions Combustion Sources
2D	Control of Visible Emissions
2D	New Source Performance Standards
2D	Control of Toxic Air Pollutants
2D	Maximum Achievable Control Technology
Part 63 - NESHAP/MACT	Reciprocating Internal Combustion Engines
Avoidance	Prevention of Significant Deterioration

Audit Information Pertaining to this Application

<u>Column Name</u>	<u>Date Changed</u>	<u>Old Value</u>	<u>New Value</u>	<u>Editor</u>



North Carolina Department of Environment and Natural Resources
Division of Air Quality

Beverly Eaves Perdue
Governor

Sheila C. Holman
Director

Dee Freeman
Secretary

CERTIFIED MAIL:70101870000133230934
RETURN RECEIPT REQUESTED

January 2, 2013

Mr. Norb Hintz
Vice President Engineering
Enviva Pellets Northampton, LLC
7200 Wisconsin Avenue
Suite 1100
Bethesda, MD 20814

SUBJECT: Receipt of Notice of Intent to Construct
Enviva Pellets Northampton, LLC
Facility ID: 6600167, Gaston, Northampton County
Tracking Number: 6600167.13A

Dear Mr. Hintz:

Your request (Notice of Intent to Construct - Tracking No. 6600167.13A) for Enviva Pellets Northampton, LLC, 874 Lebanon Church Road, Gaston, Northampton County, NC was received by this Division on January 2, 2013.

Pursuant to NC General Statute 143-215.108A(b) and (j), submittal of your Notice of Intent to construct must include all of the following items and the processing fee of \$200.00.

Required Items	Received	
	Yes	No
The name and location of the facility and the name and address of the permittee.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The permit number of each permit issued under G.S. 143-215.108 (by DAQ) for the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The nature of the air contaminant sources and equipment associated with the proposed modification of the permit.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
An estimate of total regulated air contaminant emissions associated with the proposed modification of the permit.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The air cleaning devices that are to be employed to address each of the air contaminant sources associated with the modification of the permit.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
The schedule for alteration or expansion of the facility associated with the proposed modification of the permit.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
An acknowledgement by the permittee that the air contaminant sources, equipment, and associated air cleaning devices may not be operated in a manner that alters the emission of any air contaminant until the permittee has obtained a modified permit under G.S. 143-215.108.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Permitting Section
1641 Mail Service Center, Raleigh, North Carolina 27699-1641
217 West Jones Street, NC 27603
Phone: 919-707-8405 \ FAX: 919-715-0717 \ Internet: www.ncair.org

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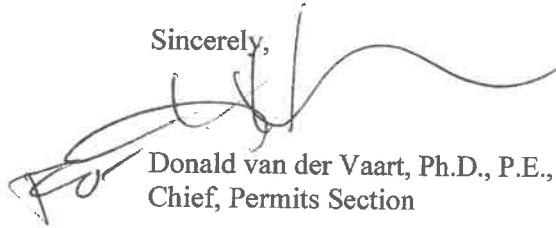
One
North Carolina
Naturally

Required Items	Received	
	Yes	No
An acknowledgement by the permittee that any alteration or expansion of the physical arrangement or operation of an air contaminant source, equipment, or associated air cleaning device prior to the modification of a permit under G.S. 143-215.108 is undertaken at the permittee's own risk and with the knowledge that the permittee may be denied a modification of the permit under G.S. 143-215.108 without regard to the permittee's financial investment or alteration or expansion of the facility.	✓	
A certification under oath that all of the information contained in the notice of intent is complete and accurate to the best of the permittee's knowledge and ability, executed by the permittee or, if the permittee is a corporation, by the appropriate officers of the corporation.	✓	
\$200.00 processing fee.	✓	

In summary, this submittal **did** contain all the required elements as indicated above **including the proof of the notice by publication** and has been accepted for processing. Your request will be considered complete as of January 2, 2013. You will be notified by this office by January 17, 2013 whether you may or may not begin physical expansion or alteration of emission sources.

Should you have any questions, please contact, Kevin Godwin at (919) 707-8480.

Sincerely,



Donald van der Vaart, Ph.D., P.E., J.D.
Chief, Permits Section

c: Raleigh Regional Office Files
Documents Module

7010 1870 0001 3323 0934

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or PO Box No.

City, State, ZIP+4

PS Form 3800, August 2005

See Reverse for Instructions

Comprehensive Application Report for 6600167.13A
 Enviva Pellets Northampton, LLC - Gaston (6600167)
 Northampton County

01/02/2013

<u>General Information:</u>	Permit/Latest Revision: 10203/ R00	<u>Application Dates</u>	
Permit code:	Construction Notice	Received	Completeness Due
Application type:	Construction Notice	01/02/2013	Clock Start
Engineer/Rev. location:	Kevin Godwin/RCCO		Calculated Issue Due
Regional Contact:	Charles McEachern		01/17/2013
Facility location:	Raleigh Regional Office	Initial amount:	Date received:
Facility classification:	Title V	\$200.00	01/02/2013
Clock is ON	Application is COMPLETE	Fund type:	Deposit Slip #:
Status is :	In progress	2333	

Contact Information

<u>Type</u>	<u>Name</u>	<u>Address</u>	<u>City State ZIP</u>	<u>Telephone</u>
Authorized	Norb Hintz, Vice President Engineering	7200 Wisconsin Avenue	Bethesda, MD 20814	(301) 657-5567
Technical/Permit	Glenn Gray, Plant Manager	7200 Wisconsin Avenue	Bethesda, MD 20814	(757) 274-8377

Acceptance Criteria

<u>Received?</u>	<u>Acceptance Criteria Description</u>
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Completeness Criteria

<u>Received?</u>	<u>Complete Item Description</u>
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Comprehensive Application Report for 6600167.13A
Enviva Pellets Northampton, LLC - Gaston (6600167)
Northampton County

01/02/2013

Application Events	<u>Start</u>	<u>Due</u>	<u>Complete</u>	<u>Comments</u>	<u>Staff</u>
<u>Event</u> CN - Acknowledgment Letter Sent	01/02/2013	01/16/2013	01/02/2013		kmhash

REC'D AIR RECORDS NGHT
 JAN - 3 13

Comprehensive Application Report for 6600167.13A
 Enviva Pellets Northampton, LLC - Gaston (6600167)
 Northampton County

01/02/2013

REC'D AIR RECORDS MGMT
 JAN - 3 13

Regulations Pertaining to this Permit

<u>Reference Rule</u>	<u>Regulation Description</u>
2Q	Avoidance Conditions
Part 60 - NSPS	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
2D	Particulates Miscellaneous Industrial Processes
2D	Sulfur Dioxide Emissions Combustion Sources
2D	Control of Visible Emissions
2D	New Source Performance Standards
2D	Control of Toxic Air Pollutants
Part 63 - NESHAP/MACT	Maximum Achievable Control Technology
Avoidance	Reciprocating Internal Combustion Engines
	Prevention of Significant Deterioration

Audit Information Pertaining to this Application

Column Name Date Changed Old Value New Value Editor



North Carolina Department of Environment and Natural Resources
Division of Air Quality

Beverly Eaves Perdue
Governor

Sheila C. Holman
Director

Dee Freeman
Secretary

CERTIFIED MAIL:70101870000133230934
RETURN RECEIPT REQUESTED

January 2, 2013

Mr. Norb Hintz
Vice President Engineering
Enviva Pellets Northampton, LLC
7200 Wisconsin Avenue
Suite 1100
Bethesda, MD 20814

SUBJECT: Receipt of Notice of Intent to Construct
Enviva Pellets Northampton, LLC
Facility ID: 6600167, Gaston, Northampton County
Tracking Number: 6600167.13A

Dear Mr. Hintz:

Your request (Notice of Intent to Construct - Tracking No. 6600167.13A) for Enviva Pellets Northampton, LLC, 874 Lebanon Church Road, Gaston, Northampton County, NC was received by this Division on January 2, 2013.

Pursuant to NC General Statute 143-215.108A(b) and (j), submittal of your Notice of Intent to construct must include all of the following items and the processing fee of \$200.00.

Required Items	Received	
	Yes	No
The name and location of the facility and the name and address of the permittee.	✓	
The permit number of each permit issued under G.S. 143-215.108 (by DAQ) for the facility.	✓	
The nature of the air contaminant sources and equipment associated with the proposed modification of the permit.	✓	
An estimate of total regulated air contaminant emissions associated with the proposed modification of the permit.	✓	
The air cleaning devices that are to be employed to address each of the air contaminant sources associated with the modification of the permit.	✓	
The schedule for alteration or expansion of the facility associated with the proposed modification of the permit.	✓	
An acknowledgement by the permittee that the air contaminant sources, equipment, and associated air cleaning devices may not be operated in a manner that alters the emission of any air contaminant until the permittee has obtained a modified permit under G.S. 143-215.108.	✓	

81 E-100
JAN 3 12
PERMITS SECTION

Permitting Section
1641 Mail Service Center, Raleigh, North Carolina 27699-1641
217 West Jones Street, NC 27603
Phone: 919-707-8405 \ FAX: 919-715-0717 \ Internet: www.ncair.org

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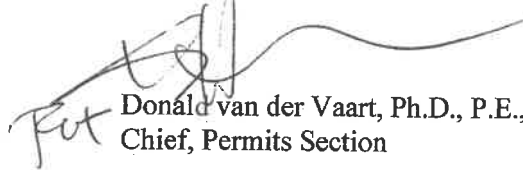
One
North Carolina
Naturally

Required Items	Received	
	Yes	No
An acknowledgement by the permittee that any alteration or expansion of the physical arrangement or operation of an air contaminant source, equipment, or associated air cleaning device prior to the modification of a permit under G.S. 143-215.108 is undertaken at the permittee's own risk and with the knowledge that the permittee may be denied a modification of the permit under G.S. 143-215.108 without regard to the permittee's financial investment or alteration or expansion of the facility.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
A certification under oath that all of the information contained in the notice of intent is complete and accurate to the best of the permittee's knowledge and ability, executed by the permittee or, if the permittee is a corporation, by the appropriate officers of the corporation.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
\$200.00 processing fee.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

In summary, this submittal **did** contain all the required elements as indicated above **including the proof of the notice by publication** and has been accepted for processing. Your request will be considered complete as of January 2, 2013. You will be notified by this office by January 17, 2013 whether you may or may not begin physical expansion or alteration of emission sources.

Should you have any questions, please contact, Kevin Godwin at (919) 707-8480.

Sincerely,


Donald van der Vaart, Ph.D., P.E., J.D.
Chief, Permits Section

c: Raleigh Regional Office Files
Documents Module

Comprehensive Application Report for 6600167.13B
 Enviva Pellets Northampton, LLC - Gaston (6600167)
 Northampton County

01/02/2013

<u>General Information:</u>		Permit/Latest Revision: 10203/ R00		
Permit code:	State			
Application type:	Modification			
Engineer/Rev. location:	Kevin Godwin/RCO			
Regional Contact:	Charles McEachern			
Facility location:	Raleigh Regional Office			
Facility classification:	Title V			
Clock is ON	Application is COMPLETE			
Status is :	In progress			

<u>Contact Information</u>			
<u>Type</u>	<u>Name</u>	<u>Address</u>	<u>City State ZIP</u>
Technical/Permit	Glenn Gray, Plant Manager	7200 Wisconsin Avenue	Bethesda, MD 20814
Authorized	Norb Hintz, Vice President Engineering	7200 Wisconsin Avenue	Bethesda, MD 20814
			<u>Telephone</u>
			(757) 274-8377
			(301) 657-5567

<u>Acceptance Criteria</u>	
<u>Received?</u>	<u>Acceptance Criteria Description</u>
Yes	Application fee
Yes	Appropriate number of apps submitted
Yes	Zoning Addressed
N/A	Source recycling/reduction form
Yes	Authorized signature
Yes	PE Seal
Yes	Application contains toxic modification(s)

<u>Completeness Criteria</u>	
<u>Received?</u>	<u>Complete Item Description</u>

Comprehensive Application Report for 6600167.13B
 Enviva Pellets Northampton, LLC - Gaston (6600167)
 Northampton County

01/02/2013

Application Events	<u>Start</u>	<u>Due</u>	<u>Complete</u>	<u>Comments</u>	<u>Staff</u>
<u>Event</u> TV - Acknowledgment/Complete	12/19/2012	12/29/2012	01/02/2013		kmhash

REC'D AIR RECORDS MGMT
 JAN - 3 13

Comprehensive Application Report for 6600167.13B
 Enviva Pellets Northampton, LLC - Gaston (6600167)
 Northampton County

01/02/2013

REC'D AIR RECORDS UNIT
 JAN - 3 13

Regulations Pertaining to this Permit

<u>Reference Rule</u>	<u>Regulation Description</u>
2Q	Avoidance Conditions
Part 60 - NSPS	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
2D	Particulates Miscellaneous Industrial Processes
2D	Sulfur Dioxide Emissions Combustion Sources
2D	Control of Visible Emissions
2D	New Source Performance Standards
2D	Control of Toxic Air Pollutants
Part 63 - NESHAP/MACT	Maximum Achievable Control Technology
Avoidance	Reciprocating Internal Combustion Engines
	Prevention of Significant Deterioration

Audit Information Pertaining to this Application

<u>Column Name</u>	<u>Date Changed</u>	<u>Old Value</u>	<u>New Value</u>	<u>Editor</u>



North Carolina Department of Environment and Natural Resources
Division of Air Quality

Beverly Eaves Perdue
Governor

Sheila C. Holman
Director

Dee Freeman
Secretary

January 2, 2013

Mr. Norb Hintz
Vice President Engineering
Enviva Pellets Northampton, LLC
7200 Wisconsin Avenue
Suite 1100
Bethesda, MD 20814

SUBJECT: Receipt of Permit Application
Modification of Permit No. 10203R00
Application No. 6600167.13B
Enviva Pellets Northampton, LLC
Facility ID: 6600167, Gaston, Northampton County

Dear Mr. Hintz:

Your air permit application (6600167.13B) for Enviva Pellets Northampton, LLC, located in Northampton County, North Carolina was received by this Division on December 19, 2012.

This application submittal did contain all the required elements as indicated and has been accepted for processing. Your application will be considered complete as of December 19, 2012, unless informed otherwise by this office within 60 days.

Should you have any questions concerning this matter, please contact Kevin Godwin at (919) 707-8480.

Sincerely,



Donald van der Vaart, Ph.D., P.E., J.D.
Chief, Permits Section

cc: Raleigh Regional Office Files

