

ENVIVA PELLETS

2016

P/N 10203

NORTHAMPTON COUNTY



PAT MCCRORY
Governor

DONALD R. VAN DER VAART
Secretary

SHEILA C. HOLMAN
Director

CERTIFIED MAIL 7014-0510-0000-5537-8875
RETURN RECEIPT REQUESTED

November 29, 2016

Mr. Royal Smith
Vice President of Operations
Enviva Pellets Northampton, LLC
7200 Wisconsin Avenue, Suite 1000
Bethesda, MD 20814

SUBJECT: Additional Information Request for Permit Application Submitted August 9, 2016
(Application ID No. 6600167.14B)
Enviva Pellets Northampton, LLC
Garysburg, North Carolina

Dear Mr. Smith:

In accordance with 15A NCAC 02Q .0507, Enviva Pellets Northampton, LLC (Enviva) submitted a First Time Title V permit application on April 22, 2014 and a revised application on August 9, 2016. However, the applications were incomplete and additional information is required to continue reviewing of your application. Division of Air Quality (DAQ) requests the facility to submit the information discussed below:

1. Please submit additional documents to support the control efficiencies for the cyclones CD-DC, CD-HM-CYC 1 through 8 and CD-CLR 1 through 6. Control efficiencies indicated on your application are unusually high; Cyclones CD-DC, CD-HM-CYC 1 through 8 and CD-CLR 1 through 6 are 98.5%, 98% and 90+%, respectively. However, according to EPA's AP-42, Table B.2-3, control efficiencies of single cyclones are generally from 10% to 50%. Although Cyclones CD-CLR 1 through 6 were described as high efficiency cyclones, other cyclones are described as conventional simple cyclones. Please submit additional documents to support your control efficiencies.
2. Please update Table B-1 of your application to include emissions from missing emission sources. The sources that are missing from the table are: ES-DLB, ES-DLC-1, ES-BCS-2, ES-BCS-3, ES-BSB-1 and ES-BSB-2.
3. There are inconsistent source ID numbers throughout the application. It was assumed that ES-DLH, Dry Line Hopper and ES-DLB, Dry Line Feed Bin are the same source, ES-PFB-1, Pellet Fines Bin and ES-FB are the same source. Please change the ID numbers

consistent with what is on the current permit. If you would like to update the source description or ID numbers, please submit a request in writing.

Mr. Joe Harrell of Enviva informed DAQ that Enviva is considering changing the softwood content of the product and that emissions calculations might change based on the decision. However, the original application was submitted in 2014 and a First Time Title V permit must be issued based on the current operation as soon as possible. If Enviva decides to change the operation in future, the permit must be modified accordingly.

Please submit the requested information discussed in this letter by December 21, 2016. If you have any questions, please contact Ms. Yuki Puram at yuki.puram@ncdenr.gov.

Sincerely yours,



William D. Willets, P.E., Chief, Permitting Section
Division of Air Quality, NCDEQ

Enclosure

c: Raleigh Regional Office
Central Files

Comprehensive Application Report for 6600167.16A
Enviva Pellets Northampton, LLC - Garysburg (6600167)
Northampton County

12/19/2016

Regulations Pertaining to this Permit

<u>Reference Rule</u>		<u>Regulation Description</u>
2Q	.0317	Avoidance Conditions
Part 60 - NSPS	Subpart IIII	Standards of Performance for Stationary Compression Ignition Internal Combustion Engines
2D	.0515	Particulates Miscellaneous Industrial Processes
2D	.0516	Sulfur Dioxide Emissions Combustion Sources
2D	.0521	Control of Visible Emissions
2D	.0524	New Source Performance Standards
2D	.1100	Control of Toxic Air Pollutants
2D	.1111	Maximum Achievable Control Technology
Part 63 - NESHAP/MACT	Subpart ZZZZ	Reciprocating Internal Combustion Engines
Avoidance	2D .0530	Prevention of Significant Deterioration

Audit Information Pertaining to this Application

Column Name Date Changed Old Value

New Value

Editor



PAT MCCRORY
Governor

DONALD R. VAN DER VAART
Secretary

SHEILA C. HOLMAN
Director

December 19, 2016

Mr. Royal Smith
Executive VP-Operations
Enviva Pellets Northampton, LLC
7200 Wisconsin Avenue, Suite 1000
Bethesda, MD 20814

SUBJECT: Receipt of Permit Application
Renewal of Permit No. 10203R04
Application No. 6600167.16A
Enviva Pellets Northampton, LLC
Facility ID: 6600167, Garysburg, Northampton County

Dear Mr. Smith:

Your air permit application (6600167.16A) for Enviva Pellets Northampton, LLC, located in Northampton County, North Carolina was received by this division on December 19, 2016.

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, 2016, unless informed otherwise by this office within 60 days.

Should you have any questions concerning this matter, please contact Yukiko (Yuki) Puram at 919-707-8470.

Sincerely,

William D. Willets, P.E., Chief, Permitting Section
Division of Air Quality, NCDEQ

cc: Raleigh Regional Office Files

Comprehensive Application Report for 6600167.16A
 Enviva Pellets Northampton, LLC - Garysburg (6600167)
 Northampton County

12/19/2016

<u>General Information:</u>		Permit/Latest Revision: 10203/ R04		<u>Application Dates</u>	
Permit code:	TV - State Only	Received	Completeness Due	Clock Start	Calculated Issue Due
Application type:	Renewal	12/19/2016	02/02/2017	12/19/2016	03/19/2017
Engineer/Rev. location:	Yukiko (Yuki) Puram/RCO	<u>Fee Information</u>			
Regional Contact:	Charles McEachern	Initial amount:	Date received:	Amount Due:	Add. Amt Rcv'd:
Facility location:	Raleigh Regional Office	12/19/2016	12/19/2016		Date Rcv'd:
Current Class/Status:	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	Joe Harrell, Corporate EHS Manager	142 NC Route 561 East	Ahoskie, NC	27910	
Authorized	Royal Smith, Executive VP-Operations	7200 Wisconsin Avenue, Suite	Bethesda, MD	20814	
					<u>Telephone</u>
					(252) 209-6032
					(301) 657-5560

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

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

91 22 330

Comprehensive Application Report for 6600167.16A
Enviva Pellets Northampton, LLC - Garysburg (6600167)
Northampton County

12/19/2016

<u>Event</u>	<u>Start</u>	<u>Due</u>	<u>Complete</u>	<u>Comments</u>	<u>Staff</u>
TV - Acknowledgment/Complete	12/19/2016	12/29/2016	12/19/2016		kmhash



enviva

Enviva Pellets Northampton LLC
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Garysburg, NC 27381

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www.envivabiomass.com

January 22, 2016

Patrick Butler
Regional Air Quality Supervisor
NCDAQ-Raleigh Regional Office
3800 Barrett Drive
Raleigh, NC 27609

Subject: Enviva Pellets Northampton, LLC Semi-Annual Summary Permit No. 10203R04

Dear Mr. Butler:

For the reporting period of July 1, 2015 to December 31, 2015, the table below reflects the semi-annual reporting requirements per permit condition Section 2-B.6.

Total Product Processed			VOC	CO	Dryer MC AVG	
Month-YR	SW BDT	HW BDT	BDT Total	Tons	Tons	≥ 13%
August 14	5520.00	44752.00	50272.00	18	6	19.71
September 14	4723.00	43999.00	48722.00	18	5	19.10
October 14	4531.00	45104.00	49635.00	18	5	18.90
November 14	4158.00	44232.00	48390.00	17	5	18.42
December 14	1017.00	43417.00	44434.00	16	5	18.36
January 15	2399.00	37796.00	40195.00	14	4	18.88
February 15	4457.00	37383.00	41840.00	15	5	19.07
March-15	3604.00	41595.00	45199.00	16	5	19.42
Apr-15	1735.00	47029.00	48764.00	18	6	19.54
May-15	3154.00	40432.00	43586.00	16	5	20.10
June-15	3201.00	41044.00	44245.00	16	5	20.60
July 15	4905.00	40956.00	45861.00	17	5	20.50
August 15	5362.00	43042.00	48404.00	17	6	20.51
September 15	5056.00	43981.00	49037.00	18	6	19.33
October 15	3827.00	36367.00	40195.00	14	5	18.58
November 15	4846.00	40803.00	45649.00	16	5	17.80
December 15	4251.00	44557.00	48809.00	18	6	17.80
Total	66746.00	716489.00	783237.00	195	62	19.34

Note:

VOC (.72 lbs/ODT) and CO (.23 lbs/ODT) emission factors per October 18, 2013 stack test results report

Please feel free to contact Heath Lucy at (252) 822-3988 with any questions or comments. Thank you very much for your time and attention.

Sincerely,

Roland Burnett
Plant Manager

FEB -3 16

STANDARD RECORDS MGMT



[Faint, illegible handwritten text or signature]