

February 21, 2020

Received

FEB 25 2020

Air Permits Section

William D. Willets, P.E.
Chief, Permitting Section
Division of Air Quality, NC DEQ
1641 Mail Service Center
Raleigh, North Carolina 27699-1641

RE: Notice of Intent to Construct for Enviva Pellets Northampton, LLC Plant

Dear Mr. Willets:

Enviva Pellets Northampton, LLC ("Enviva") owns and operates the Enviva Pellets Northampton, LLC wood pellet manufacturing facility located in Garysburg, North Carolina at:

309 Enviva Boulevard
Garysburg, Northampton County
North Carolina 27831

The facility currently holds North Carolina DEQ Air Permit No. 10203R06, which was issued on October 30, 2019.

Enviva has submitted a permit application to alter/expand the facility that is currently under review by NCDAQ. This Notice of Intent is to request permission from NCDAQ to begin construction of infrastructure elements of the modifications presented in the application prior to permit issuance. The following describes the infrastructure elements of the modifications that are proposed to be constructed prior to permit issuance.

This proposed modification involves reducing and controlling emissions from the dry hammermills (DHM) and the dry shavings dry hammermills (DSHM). A portion of the air flow from each DHM and DSHM will be recirculated within each dry hammermill, thereby reducing the amount of air emitted to the atmosphere and the amount of make-up air required. After recirculation, emissions (containing primarily particulate, VOC, and HAPs) will be directed to baghouses followed by a quench duct (for fire safety), followed by the Dryer Furnace, the Wet Electrostatic Precipitator (WESP), and the Dryer RTO (already permitted), or the WESP and Dryer RTO, or both.

The proposed pre-permit construction involves installing piping, ductwork, and connections associated with redirecting the DHM and DSHM airflows, as well as installing the duct work for the DHM, DSHM, and the rotary drum dryer RTO. No final connections that would allow operation of the recirculation process or operation of the associated DHM and DSHM controls will be made prior to the receipt of a permit from NCDAQ.

Dry hammermills are used to reduce the size of wood chips to be dried in the rotary drum dryer using rotating steel hammers. Dry shavings hammermills reduce the size of pre-dried shavings that are brought to the facility from offsite. Properly sized and dried fiber is transferred to the pellet presses, where the fiber is compressed into wood pellets.

Air emissions from the DHMs and DSHMs include particulate, VOC, and HAPs. Currently the air emissions from these sources are routed to baghouses, then to the atmosphere. The proposed project will allow the redirection of a portion of the airflow within each DHM and DSHM followed by control of DHM and DSHM emissions by the furnace, WESP, and the dryer RTO; WESP and RTO, or both.

The air emission sources associated with the proposed modification are the DHMs, the DSHMs, the DHM, and the Dryer RTO. The Dryer RTO is an air cleaning device employed to reduce emissions from the DHMs and DSHMs.

Total emissions along with the net change in emissions associated with the proposed change are presented below:

Pollutant	Current Permit (tpy)	Option 2 (tpy)	Option 2 Change
CO	182.73	172.2	-10.53
NO _x	242.21	226.9	-15.31
PM	147.89	145.8	-2.09
PM ₁₀	227.66	115.5	-2.16
PM _{2.5}	82.66	84.1	+1.44
SO ₂	39.52	39.1	-0.42
VOC	129.68	119.5	-10.18
Total HAPs	21.71	18.1	-3.61

The proposed construction for the alteration/expansion is scheduled to begin on approximately April 1, 2020.

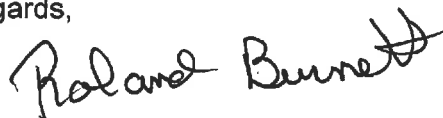
With the submittal of this Notice of Intent, Enviva acknowledges that the affected air contaminant sources, equipment, and associated air cleaning devices currently under review by NCDAQ cannot be operated in a manner that alters the emissions of any air contaminants until the modified permit is issued. Furthermore, Enviva acknowledges that any alteration or physical expansion of the physical arrangement or operation of an air contaminant source, equipment, or associated air cleaning device prior to the issuance of the permit under review by NCDAQ is undertaken at Enviva's risk and with the knowledge that Enviva may be denied a modification of the permit under G.S. 143-215.108 without regard to Enviva's financial investment or alteration or expansion of the facility. All preconstruction activities proposed are consistent with the permit application currently under review by NCDAQ and are consistent with the Zoning Consistency Determination from Northampton County dated February 6, 2020. A copy of this determination is included with this NOI.

Enclosed with this Notice of Intent is the required fee of \$200, an affidavit from the Roanoke-Chowan News Herald stating that the required Public Notice was published on February 15, 2019, and the Zoning Consistency Determination from Northampton County.

Thank you for your consideration of this request, and if there are any questions or additional information is required, please contact Kai Simonsen in Enviva's Raleigh office at 919-428-0289, or via e-mail at Kai.Simonsen@envivabiomass.com.

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 the best of my knowledge.

Regards,



Roland Burnett
Plant Expansion Manager

AFFIDAVIT OF PUBLICATION

This is not an invoice

Roanoke-Chowan News-Herald

Post Office Box 1325
Ahoskie, North Carolina 27910

Received

FEB 25 2020

Air Permits Section

IN ACCOUNT WITH

Enviva
4242 Six Forks Road
Raleigh, NC 27609

Date	Description	Inches	Rate
2/17/20	Notice of Construction Prior to Receipt of Air Permit Enviva Pellets Northampton, LLC	3x12	Open

Attorneys placing legal advertising are held responsible for payment. All statements payable 10 days after billing.
Additional copies of this notice will be furnished except upon payment of fee of \$20.00.

**NORTH CAROLINA
NORTHAMPTON COUNTY**

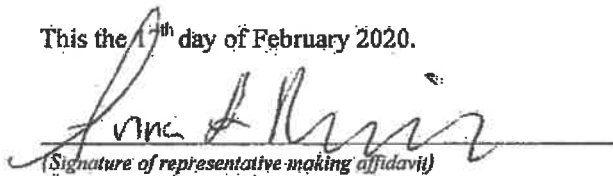
AFFIDAVIT OF PUBLICATION

Before the undersigned, a Notary Public, duly commissioned, qualified, and authorized by law to administer oaths, personally appeared the undersigned representative who being duly sworn, deposes and says that he (she) is an employee or other officer authorized to make this affidavit of Roanoke-Chowan Publications, LLC, engaged in the publication of a newspaper known as the Roanoke-Chowan News Herald, issued and entered as second class mailing in the Town Ahoskie, N.C., in said county and state; that he (she) is authorized to make this affidavit and sworn statement; and the notice or other legal advertisement, a true copy of which is attached hereto, was published in the Roanoke-Chowan News-Herald on the following date

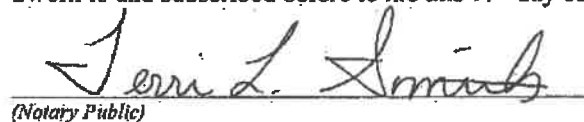
February 15, 2020

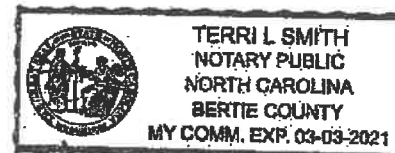
And that the said newspaper in which such notice, paper, document or legal advertisement was published was at the time of each and every such publication, a newspaper meeting all of the requirements and qualifications of Section 1-597 of the General Statutes of North Carolina and was a qualified newspaper within the meaning of Section 1-597 of the General Statutes of North Carolina.

This the 17th day of February 2020.


(Signature of representative making affidavit)

Sworn to and subscribed before to me this 17th day of February 2020.


(Notary Public)



Zoning Consistency Determination

Received

FEB 25 2020

Air Permits Section

Facility Name Enviva Pellets Northampton, LLC

Facility Street Address 309 Enviva Blvd.

Facility City Garysburg

Description of Process Wood pellet manufacturing facility

SIC/NAICS Code 2499

Facility Contact Steven P. Van Ootegham, Air Quality Engineer

Phone Number 984-368-0002

Mailing Address 4242 Six Forks Road, Suite 1050

Mailing City, State Zip Raleigh, NC 27609

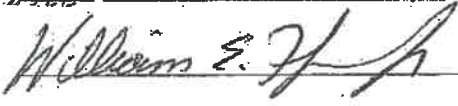
Based on the information given above:

- I have received a copy of the air permit application (draft or final) AND...
- There are no applicable zoning ordinances for this facility at this time
- The proposed operation IS consistent with applicable zoning ordinances
- The proposed operation IS NOT consistent with applicable zoning 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 CODE ENFORCEMENT

Name of Designated Official WILLIAM E. FLYNN, JR.

Title of Designated Official CODE ENFORCEMENT DIRECTOR

Signature 

Date 2-6-2020

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

Simpson, Richard

From: Michael H Carbon <mcarbon@ramboll.com>
Sent: Monday, March 09, 2020 7:16 PM
To: Simpson, Richard
Cc: Michael Greene - Enviva, LP (Michael.Greene@envivabiomass.com); Alan McConnell (AMcConnell@KilpatrickStockton.com); Stephen Stroud; Steven Van Ootegham; rolad.burnette@envivabiomass.com; Cuilla, Mark; Willets, William; Stewart, Ray; Pullen, Booker; Pjetraj, Michael; Yana Kravtsova; Kai Simonsen
Subject: [External] FW: Enviva Northampton Request
Importance: High

CAUTION: External email. Do not click links or open attachments unless you verify. Send all suspicious email as an attachment to report.spam@nc.gov

Richard
As we discussed earlier today the table below compares the current permit basis for NOR to the proposed emissions following the DHM recirculation control Option 2. Also, please find the below responses to your email questions from last week.

Emissions Scenario	CO	NOx	TSP	PM-10	PM-2.5	SO2	Total VOC	CO _{2e}	Total HAP
	(tpy)	(tpy)	(tpy)	(tpy)	(tpy)	(tpy)	(tpy)	(tpy)	(tpy)
Current R06 Permit Facility PTE Emissions (including fugitives)	177.1	239.2	202.1	131.4	78.3	39.1	137.3	396,047	18.9
Proposed Facility PTE Emissions Option 2 (including fugitives)	173.8	227.5	182.1	111.3	77.2	39.1	129.2	388,908	18.3
Change in PTE Emissions	-3.3	-11.8	-19.9	-20.1	-1.2	0.0	-8.2	-7,139	-0.6

Thanks
Michael

From: Simpson, Richard <richard.simpson@ncdenr.gov>
Sent: Thursday, March 5, 2020 12:03 PM
To: Yana Kravtsova <yana.kravtsova@envivabiomass.com>; Kai Simonsen <Kai.simonsen@envivabiomass.com>; royal.smith@envivabiomass.com; Michael H Carbon <mcarbon@ramboll.com>
Cc: Pjetraj, Michael <michael.pjetraj@ncdenr.gov>; Willets, William <william.willets@ncdenr.gov>; Pullen, Booker <booker.pullen@ncdenr.gov>; Cuilla, Mark <mark.cuilla@ncdenr.gov>; Stewart, Ray <ray.stewart@ncdenr.gov>
Subject: Enviva Northampton Request

Yana,

Per our 3/4/2020 meeting yesterday, there were several items I discussed that were needed for Enviva Northampton. You requested for me to send you the items noted below.

1. On February 25, 2020, our office received a Notice of Intent to Construct for a modification that was sent February 6, 2020. Both documents were related to the Option 2 recirculation project from the dry shavings hammermill and the dry hammermills. Even though the annual emissions mostly showed a net reduction, there were differences in the Option 2 emissions estimates from the Intent to Construct versus the modification application. The Option 2 estimates should be the same. Per DAQ Intent to Construct Guidelines, Part II, Item 3, **"If the permittee does not supply the missing information within time needed to complete the review within 15 days, the notice of intent is incomplete, and DAQ shall disapprove the request."** The 15 days date is March 11, 2020. I must have the correct information within a reasonable amount of time to comply with our regulation and your request. Please see the attached spreadsheet noting the emission differences.

The emissions that are included in the table for the current permit (R06) do not reflect the final PTE emission rates that were submitted to NC DEQ. The values in your table include emissions from the dryer bypass stack and full capacity furnace bypass. As you may recall we requested on a few occasions during draft permit review that these numbers be updated in the permit review document to reflect the final PTE. The numbers presented in the NOI submittal for Option 2 were in error and were based on an earlier draft of the modification application and did not reflect the final proposed changes. You will also note that the numbers for TSP/PM10/P2.5 in the above table do not match the 02/05/20 modification application submittal Control Option 2 emission rates. The difference is that the WESP control efficiency was not accounted for in the 02/05/20 modification application. The revised modification application discussed below addressing the removal of control Option 1 will include the updated TSP/PM10/PM2.5 numbers reflecting control efficiency of the WESP.

2. Your initial Title V application was received on January 22, 2020. There were also emission differences between the R06 permit review, the Title V application, and the modification (see attached spreadsheet). Most of the differences are due to the requested modification. **An updated initial Title V application shall be submitted within 30 days of this email.** In one complete document, the update must include all of the facility's emission sources along with the most recent modification request.

See above note regarding differences in R06 permit numbers. Note the Title V application did not reflect the proposed changes in the 02/05/20 modification application since at the time of submittal these changes had not been approved. An updated Title V application will be submitted within 30 days reflecting the proposed 02/05/20 submittal.

3. Per our meeting yesterday, I brought up the need to have parametric monitoring for the quench system since the quench system is inherent for the regenerative catalytic oxidizer to operate properly (protection from fire). The same quench system will be utilized at the Hamlet plant. Please provide a minimum and/or maximum gallon/minute or gallon/hour rate to ensure proper operation of the RCO. The rate(s) are needed to proceed with the modification applications for both the Northampton and Hamlet facilities.

The requested monitoring ranges will be submitted along with the revised modification application replacing the 02/05/20 submittal removing DHM control Option 1 and incorporating WESP control efficiency on DHM particulate matter emissions.

Plant Expansion Manager, Roland Burnett, signed the Intent to Construct request and I do not have his email. Please forward this email to him. I may have additional questions at a later time and will be glad to assist with any of your questions.

Thanks,

Richard



Richard Simpson
Environmental Engineer, Division of Air Quality
North Carolina Department of Environmental Quality
1641 Mail Service Center 919.707.8476 (Office)
Raleigh, NC 27699-1641
Richard.Simpson@ncdenr.gov

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