



NORTH CAROLINA
Environmental Quality

ROY COOPER
Governor

ELIZABETH S. BISER
Secretary

January 27, 2023

Members of the Board,

Thank you for sharing your concerns about the wood pellet industry in North Carolina. Our DEQ mission is to provide science-based environmental stewardship for the health and prosperity of all North Carolinians, and you serve a vital role in uplifting the concerns of community members and providing advice to my office.

In response to your letter on November 22, 2022, our agency took several actions. Noting your correct assessment of the 2022 rule changes, the Division of Air Quality revised their timeline for permit action. Then, our Department and Division teams took additional time to review the concerns raised during the special meeting and in your letter.

The Division of Air Quality (DAQ) is committed to ensuring that facilities in North Carolina meet all state and federal air quality rules and regulations through regular inspections, technical assistance, education, engagement, and outreach. DAQ's involvement with a facility continues long after a permit is issued. Trained DAQ regional office staff perform unannounced inspections of each Title V facility at least once a year — more frequently than required by the EPA. Staff perform a full compliance evaluation by visually inspecting permitted equipment and control devices and reviewing every record and report required by the permit. In addition to inspections, the Federal Clean Air Act and Federal air regulations place monitoring, recordkeeping, and reporting requirements on facilities. Facilities are obligated under Federal rules to perform tests and self-monitor. DAQ relies on data from monitoring, reporting, and testing as established by the federal rules and the permit to demonstrate compliance. The Division also fully investigates complaints, which is why we encourage residents to call our regional offices if they have a concern with a facility.

DAQ also operates a network of air quality monitoring sites to determine attainment with the National Ambient Air Quality Standards set by EPA, including the monitoring site in Northampton County. Your letter noted some concerns about the monitoring station in Northampton County and the siting of monitoring stations overall. Monitoring in Northampton County started in response to public comments received from residents during a public hearing in Northampton County in 2017. The site is equipped as a background special-purpose monitoring station for fine particles (PM_{2.5}) and nitrogen dioxide (NO₂).

At the time of construction, there was a delay of several months due to the power company's installation of underground powerlines to the monitoring shelter as requested by the site owner, Northampton County School System. Once power was established by the utility company, data



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collection began and has continued without any significant interruption since commencement of operation.

In the 2022-2023 [Annual Monitoring Network Plan](#) DAQ analyzed the current locations of Air Quality monitors across North Carolina and how many of those monitors are within one mile of potentially underserved communities. Out of the 114 total monitors, 59% (67 out of 114) of them are located within one mile of potentially underserved communities.

In the last few years, DAQ permit actions at each of the Enviva wood pellet facilities have required the addition of pollution control devices and significantly reduced overall emissions at the plants. The draft permit for Enviva Ahoskie includes the installation of control equipment, more stringent emission limits, and updated dust control requirements. These changes are expected to lower emissions overall and reduce the environmental impact to the surrounding community as compared to the current operations.

The draft permit includes updated fugitive dust plan requirements for the Enviva Ahoskie site. DAQ has also opened investigations into dust concerns at the other Enviva plants in response to the complaints provided after the special meeting. We encourage residents around the plants to contact DEQ regional offices at the time of a concern, so complaints can be investigated in real-time.

The draft permit for Ahoskie requires modifications to add controls for Volatile Organic Compounds (VOCs) and reduce the VOC emissions profile for the facility despite the increased production and softwood percentage. DAQ will require initial performance stack testing within 180 days and annual testing or periodic performance testing for increases of softwood percentage or production rate at certain thresholds. Additionally, the permit will require the operation of continuous temperature monitors on the VOC controls, written malfunction plan requirements, monthly recordkeeping, and semi-annual reporting. Those conditions will provide DAQ with the information needed to hold Enviva accountable to their permit conditions and ensure compliance with VOC limits.

In response to your recommendations that fall outside of the current permit action, our team is taking several additional actions. DAQ does not currently have the resources to install a new regulatory air monitoring site. However, DEQ is exploring alternate sources for monitoring resources to better address the concerns of the community.

DAQ staff communicated with the Town of Ahoskie about the existing noise ordinance, which is available [here](#). Noise complaints are handled by the Town of Ahoskie Police Department who indicated they were not aware of any noise complaints related to the plant's operations. As the noise ordinance is enforced on the local level, DEQ will refer any future complaints to the Town of Ahoskie as appropriate.

Our team also met with Enviva representatives to convey concerns from the board and the community and discuss the recommendations that fall outside of DAQ's current permit action. During that meeting, our team pointed to ways that the company could voluntarily address the concerns of the neighbors near their facilities, including submitting a permit request to add



fugitive dust plans at their remaining facilities, examining their best practices for trucks entering and exiting the site, adjusting the equipment used at night to alleviate noise concerns and conducting additional community engagement.

From the company's response (attached):

We believe our efforts represent the best of community relations and go above-and-beyond what most manufacturers do; however, as the Board's letter outlines there is always opportunity for improvement. In that light, Enviva will undertake the following actions:

- *Engage with local Ahoskie officials to schedule a meeting with representatives of the Meherrin Tribe so that we 1) Lay the foundation for a productive relationship, 2) Understand the Tribe's concerns, 3) Provide a briefing on our operations, and 4) Identify action items important to the community to partner on.*
- *Review Enviva Ahoskie's fugitive dust plan and determine if any enhancements or adjustments are appropriate in light of the facilities operations, weather patterns, permit compliance, community input, and the Board's letter.*
- *Host a listening session with leaders and representatives in Richmond, Sampson, and Northampton County so that Enviva can receive direct feedback on its operations, continue to build a trusting relationship, and demystify Enviva operations.*
- *Work with Ahoskie representatives to identify a local nonprofit organization that could, in partnership with Enviva, review Enviva operations pre-expansion and then post-expansion and provide feedback on the plant as it completes its transition.*

In addition to the above listed items, Enviva will also be convening a meeting of leadership to better review some of the issues outlined in the Board's letter to DEQ.

Enviva also indicated that residents with concerns can contact the company directly at community@envivabiomass.com. The email inbox is monitored by Jason Eberstein, Vice President of Government Relations. The Senior Manager for Community Relations covering the North Carolina plants is Chris Brown and his email is Christopher.Brown@envivabiomass.com.

Thank you for your time and attention on this issue and for your leadership as we work together to ensure meaningful involvement for all the residents of our state.

Sincerely,



Elizabeth S. Biser
Secretary, Department of Environmental Quality

