

**ENVIVA PELLETS
P/N 10121
HERTFORD COUNTY**

2014



North Carolina Department of Environment and Natural Resources

Pat McCrory
Governor

John E. Skvarla, III
Secretary

June 10, 2014

Joe Harrell
Enviva Pellets Ahoskie, LLC
142 NC Route 561 East
Ahoskie, North Carolina 27910

Subject: Enviva Pellets Ahoskie, LLC
Ahoskie, Hertford County, North Carolina
Facility ID 4600107, Air Quality Permit No. 10121R02
VOC Emission Test Protocols for Tracking No. 2014-115st: Hammermill ES-DHM-1,
Tracking No. 2014-116st: Wood Dryer ES-DRYER and
Tracking No. 2014-117st: Pellet Cooler ES-CLR3
Air Control Techniques, Inc.
Proposed Test Dates: June 24 through 27, 2014

Dear Mr. Harrell:

The North Carolina Division of Air Quality (DAQ) has reviewed the protocols for the emissions testing at Enviva Pellets Ahoskie. The proposed test methods are acceptable to determine the VOC emissions as discussed below.

The emissions sources are direct heat, wood-fired dryer ES-DRYER controlled by simple cyclone CD-DC and wet electrostatic precipitator CD-WESP; four dry wood hammermills CD-DHM-1 through 4 controlled by four simple cyclones CD-DHM-C1 through C4 and two fabric filters CD-DHM-FF1 and FF2; and four pellet coolers ES-CLR1 through CLR4 controlled by CD-CLR-C1 and C2.

In order to modify the permit to allow for softwood use up to 35%, Enviva has proposed EPA Method 25A testing to quantify the VOC emissions from the dryer, hammermills, and pellet coolers while using a 35% softwood/65% hardwood feed. The proposed test methods, test dates, sampling locations and operating rates for the sampling period are tabulated below.

Tracking No./ Proposed Date	Emission Source/ Test Location	Process Rate			Proposed Methods	Pollutant
		Permitted	Normal	Proposed		
2014-115st June 26	Hammermill ES-DHM-1 Exhaust duct (prior to fabric filter)	8.6 tons/hr	6 tons/hr	6 tons/hr	EPA 1, 2, 3A, 4, 25A	VOC as propane
2014-116st June 24-25	Dryer ES-DRYER CD-WESP exhaust	43 ODT/hr	48 ODT/hr	43 ODT/hr		
2014-117st June 27	Pellet Cooler ES-CLR3 Pellet cooler stack 2	---	20 ODT/hr	20 ODT/hr		

The proposed EPA Method 1, 2, 3A, 4 and 25A testing is acceptable to determine the VOC as propane emissions at the proposed sampling locations. Approval of the methods and locations does not imply the test results will be considered representative of facility-wide VOC emissions. This issue remains outside the scope of this protocol approval.

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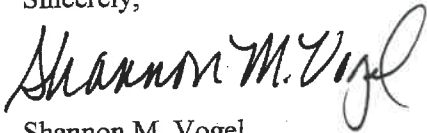
Joe Harrell
June 10, 2014
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The proposed operating rates for testing are acceptable. Please note that DAQ recommends that testing be performed at approximately 90% of maximum operating rate. The test results will only be considered representative for process rates and conditions up to approximately 110% of the tested operating rates. Additional testing may be required if Enviva intends to operate at higher process rates than tested. The final test report shall include information documenting the operation of the tested emission sources and associated equipment (for example: operating rates of pellet coolers ES-CLR1, 2, and 4).

The protocol indicated that the following process and control information will be recorded during the testing periods: the fabric filter static pressure drops and product throughput (tons/hr) for the ES-DHM-1; dryer WESP secondary voltages and currents, dryer inlet and outlet temperatures, total feed rate oven dried ton per hour (ODT/hr) and material moisture content for ES-DRYER; and cyclone pressure drops and product throughput (tons/hr) for the ES-CLR3.

Approval of the proposed methods does not exempt the tester from the minimum requirements of the testing methodologies nor does it exempt Enviva from any regulatory requirement. Any deviations from the proposed testing remain subject to approval by DAQ. If you have any questions, please contact me at (919) 707-8416 or shannon.vogel@ncdenr.gov.

Sincerely,



Shannon M. Vogel
Environmental Engineer

cc: Central Files, Hertford County
Robert Fisher, WARO
John Richards, Air Control Techniques, Inc.
IBEAM Documents - 4600107



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Sheila C. Holman
Director

John E. Skvarla, III
Secretary

Pat McCrory
Governor

March 10, 2014

Kevin Kernan
Chief Operating Officer
7200 Wisconsin Ave. Suite 1000,
Bethesda, MD 20814

Dear Mr. Kernan:

SUBJECT: Air Quality Permit No. 10121R02
Facility ID: 4600107
Enviva Pellets Ahoskie, LLC
Ahoskie, Hertford County, NC
Fee Class: Title V

In accordance with your completed Air Quality Permit Application for a permit modification received December 10, 2013, we are forwarding herewith Air Quality Permit No. 10121R02 to Enviva Pellets Ahoskie, LLC, 142 N.C. Rt 561 East, Ahoskie, North Carolina authorizing the construction and operation, of the emission source(s) and associated air pollution control device(s) specified herein. Additionally, any emissions activities determined from your Air Quality Permit Application as being insignificant per 15A North Carolina Administrative Code 2Q .0503(8) have been listed for informational purposes in "ATTACHMENT 1." Please note the requirements for the annual compliance certification are contained in General Condition P in Section 3. The current owner is responsible for submitting a compliance certification for the entire year regardless of who owned the facility during the year.

The Permittee shall amend the current Title V Air Quality Permit Application (application 4600107.12A) to include the new air emission sources listed in this permit (ID Nos. ES-FB, ES-FPH, ES-TLB, ES-PL1, ES-PL2) on or before 30 days after the issuance of this permit.

As the designated responsible official it is your responsibility to review, understand, and abide by all of the terms and conditions of the attached permit. It is also your responsibility to ensure that any person who operates any emission source and associated air pollution control device subject to any term or condition of the attached permit reviews, understands, and abides by the condition(s) of the attached permit that are applicable to that particular emission source.

If any parts, requirements, or limitations contained in this Air Quality Permit are unacceptable to you, you have the right to request a formal adjudicatory hearing within 30 days following receipt of this permit, identifying the specific issues to be contested. This hearing request must be in the form of a written petition, conforming to NCGS (North Carolina General Statutes) 150B-23, and filed with both the Office of Administrative Hearings, 6714 Mail Service Center, Raleigh, North Carolina 27699-6714 and the Division of Air Quality, Permitting Section, 1641 Mail Service Center, Raleigh, North Carolina 27699-1641. The form for requesting a formal adjudicatory hearing

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

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may be obtained upon request from the Office of Administrative Hearings. Please note that this permit will be stayed in its entirety upon receipt of the request for a hearing unless a request for a hearing is made pursuant to NCGS 150B-23, this Air Quality Permit shall be final and binding 30 days after issuance.

You may request modification of your Air Quality Permit through informal means pursuant to NCGS 150B-22. This request must be submitted in writing to the Director and must identify the specific provisions or issues for which the modification is sought. Please note that this Air Quality Permit will become final and binding regardless of a request for informal modification unless a request for a hearing is also made under NCGS 150B-23.

The construction of new air pollution emission source(s) and associated air pollution control device(s), or modifications to the emission source(s) and air pollution control device(s) described in this permit must be covered under an Air Quality Permit issued by the Division of Air Quality prior to construction unless the Permittee has fulfilled the requirements of GS 143-215-108A(b) and received written approval from the Director of the Division of Air Quality to commence construction. Failure to receive an Air Quality Permit or written approval prior to commencing construction is a violation of GS 143-215.108A and may subject the Permittee to civil or criminal penalties as described in GS 143-215.114A and 143-215.114B.

For PSD increment tracking purposes, PM10 emissions from this facility have increased by 1.0 pounds per hour.

This Air Quality Permit shall be effective from March 10, 2014 until November 30, 2015, is nontransferable to future owners and operators, and shall be subject to the conditions and limitations as specified therein. Should you have any questions concerning this permit, please contact Russell Braswell at 909-707-8731 or russell.braswell@ncdenr.gov. Should you have any questions about the requirement to file a Title V permit application as mentioned above, please contact Kevin Godwin at 919-707-8480 or kevin.godwin@ncdenr.gov.

Sincerely yours,



William D. Willets, P.E.
Acting Chief

Enclosure

- c: Robert Fisher, Supervisor, Washington Regional Office
- Connie Horne (cover letter only)
- ✓ Central Files

Insignificant Activities under 15A NCAC 2Q .0503(8)

Emission Source ID No.	Emission Source Description
IES-DWH	Dried wood handling
IES-PP	Pellet press system
IST-1 and IST-2	Two diesel storage tanks (2,500 gallon and 500 gallon capacity)
IES-CHP	Electric powered green wood chipper
IES-GWHS	Green wood handling and storage
IES-GWFB	Green wood fuel storage bin

1. Because an activity is insignificant does not mean that the activity is exempted from an applicable requirement or that the owner or operator of the source is exempted from demonstrating compliance with any applicable requirement.
2. When applicable, emissions from stationary source activities identified above shall be included in determining compliance with the permit requirements for toxic air pollutants under 15A NCAC 2D .1100 "Control of Toxic Air Pollutants" or 2Q .0711 "Emission Rates Requiring a Permit".

ATTACHMENT 2 to Permit No. 10121R02

List of changes made in the R02 permit.

Old Page(s)	New Page(s)	Condition/Item*	Description of Change(s)
Global	Global	N/A	<ul style="list-style-type: none"> • Change the application number and complete date; • Change permit revision number to R02; • Change the issuance/effective dates of the permit • Clarified equipment ID No. callouts in all stipulations. • Added new equipment to all relevant regulations
Cover letter	Cover letter	N/a	<ul style="list-style-type: none"> • Added a reminder for the amendment of the current Title V permit application.
3	3	Equipment list	<ul style="list-style-type: none"> • Clarified ID callouts • Added new sources from application • Corrected "coarse" to "dry wood" • Corrected CD-CLR-5 to 3, at Permittee's request • Changed all instances of "CHM" to DHM, at Permittee's request. • Removed "in series" from control device descriptions. These descriptors are left in the section headers.
4	4	2.1.A	<ul style="list-style-type: none"> • Updated regulation table to include 2D .0540
4	4	n/a	<ul style="list-style-type: none"> • Removed testing requirement, because it had been satisfied.
5	5	2.1.A.1	<ul style="list-style-type: none"> • Added specific maintenance requirements for CD-WESP • Added a semi-annual reporting requirement per DAQ policy. • Removed noncompliance statement because this is generally not included in "R" permits.
Varies	Varies	Each instance of 2D .0521	<ul style="list-style-type: none"> • Removed requirement to establish "normal" VE for all existing sources. This requirement remains for sources new to this permit.
6	7	2.1.B	<ul style="list-style-type: none"> • Updated regulation table to include 2D .0540
n/a	10	2.2.A.1	<ul style="list-style-type: none"> • Added specific requirement for 2D .0540

* Based on the new permit.

State of North Carolina,
Department of Environment,
and Natural Resources



Division of Air Quality

AIR QUALITY PERMIT

Permit No.	Replaces Permit No.(s)	Effective Date	Expiration Date
10121R02	10121R01	March 10, 2014	November 30, 2015

Until such time as this permit expires or is modified or revoked, the below named Permittee is permitted to construct and operate the emission source(s) and associated air pollution control device(s) specified herein, in accordance with the terms, conditions, and limitations within this permit. This permit is issued under the provisions of Article 21B of Chapter 143, General Statutes of North Carolina as amended, and Title 15A North Carolina Administrative Codes (15A NCAC), Subchapters 2D and 2Q, and other applicable Laws.

Pursuant to Title 15A NCAC, Subchapter 2Q, the Permittee shall not construct, operate, or modify any emission source(s) or air pollution control device(s) without having first submitted a complete Air Quality Permit Application to the permitting authority and received an Air Quality Permit, except as provided in this permit.

Permittee: Enviva Pellets, LLC
Facility ID: 4600107

Facility Site Location: 142 N.C. Rt 561 East
City, County, State, Zip: Ahoskie, Hertford County, North Carolina, 27910

Mailing Address: 7200 Wisconsin Avenue, Suite 1000
City, State, Zip: Bethesda, Maryland, 20814

Application Number: 4600107.12A
Complete Application Date: January 22, 2014

Primary SIC Code: 2499
**Division of Air Quality,
Regional Office Address:** Washington Regional Office
943 Washington Square Mall
Washington, North Carolina, 27889

Permit issued this the 10th of March, 2014

William D. Willets, P.E., Acting Chief, Air Permitting Section
By Authority of the Environmental Management Commission

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(Including specific requirements, testing, monitoring, recordkeeping, and reporting requirements)

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(Including specific requirements, testing, monitoring, recordkeeping, and reporting requirements)

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ATTACHMENT

List of Acronyms

SECTION 1- PERMITTED EMISSION SOURCE (S) AND ASSOCIATED AIR POLLUTION CONTROL DEVICE (S) AND APPURTENANCES

The following table contains a summary of all permitted emission sources and associated air pollution control devices and appurtenances:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-DRYER	Direct heat, wood-fired dryer (125 million Btu per hour heat input)	CD-DC CD-WESP	One simple cyclone (204 inches in diameter; ID No. CD-DC) One wet electrostatic precipitator (29,904 square feet of total collection plate area; ID No. CD-WESP)
ES-DWDS	Dried wood day silo	CD-DWDS-BV	One bin vent filter (377 square feet of filter area)
ES-DHM-1, ES-DHM-2, ES-DHM-3, ES-DHM-4	Four dry wood hammermills	CD-DHM-C1, CD-DHM-C2, CD-DHM-C3, CD-DHM-C4 CD-DHM-FF1, CD-DHM-FF2	Four simple cyclones (57 inches in diameter each; ID Nos. CD-DHM-C1 through C4) two fabric filters (6,667 square feet of filter area each; CD-DHM-FF1 and FF2)
ES-HAF	Hammermill area and Hammermill No. 5	CD-HAF-FF	One fabric filter (5,417 square feet of filter area)
ES-PMFS	Pellet feed mill silo	CD-PMFS-BV	One bin vent filter (377 square feet of filter area)
ES-CLR1, ES-CLR2, ES-CLR3, ES-CLR4	Four pellet coolers	CD-CLR-C1, CD-CLR-C2	Two multicyclones (43 inch diameter tubes each)
ES-CLR5	Pellet cooler No. 5	CD-CLR-3	One simple cyclone
ES-EG, ES-FWP (NSPS, III; GACT, ZZZZ)	One emergency use generator (350 brake horsepower; ID No. ES-EG) and one fire water pump (300 brake horsepower; ID No. ES-FWP)	N/A	N/A
ES-FB	Fines bin	CD-FB-BV	One bin vent filter (325 square feet of filter area)
ES-FPH ES-TLB	Finished product handling Truck loadout bin (with 12 bottoms)	CD-FPH-BF	One bagfilter (4,842 square feet of filter area)
ES-PL1, ES-PL2	Two pellet loadouts		

SECTION 2 - SPECIFIC LIMITATIONS AND CONDITIONS

2.1- Emission Source(s) and Control Devices(s) Specific Limitations and Conditions

The emission source(s) and associated air pollution control device(s) and appurtenances listed below are subject to the following specific terms, conditions, and limitations, including the testing, monitoring, recordkeeping, and reporting requirements as specified herein:

A.

- Wood-fired dryer (ID No. ES-DRYER) with simple cyclone (ID No. CD-DC) in series with one wet electrostatic precipitator (ID No. CD-WESP)
- Dried wood day silo (ID No. ES-DWDS) with bin vent filter (ID No. CD-DWDS-BV)
- Four dry wood hammermills (ID Nos. ES-DHM-1 through ES-DHM-4) with four simple cyclones (ID Nos. CD-DHM-C1 through CD-DHM-C4) in series with two fabric filters (ID Nos. CD-DHM-FF1 and CD-DHM-FF2)
- Hammermill area and Hammermill No. 5 (ID No. ES-HAF) with fabric filter (ID No. CD-HAF-FF)
- Pellet feed mill silo (ID No. ES-PMFS) with bin vent filter (ID No. CD-PMFS-BV)
- Five pellet coolers (ID Nos. ES-CLR1 through ES-CLR5) with two multicyclones (ID Nos. CD-CLR-C1 and CD-CLR-C2)
- Fines bin (ID No. ES-FB) with bin vent filter (ID No. CD-FB-BV)
- Finished product handling (ID No. ES-FPH), truck loadout bin (ID Nos. ES-TLB), and two pellet loadouts (ID Nos. ES-PL1, ES-PL2) all venting to bagfilter (ID No. CD-FPH-BF)

The following table provides a summary of limits and standards for the emission source(s) described above:

Regulated Pollutant	Limits/Standards	Applicable Regulation
Particulate matter	$E = 4.10 \times P^{0.67}$ for process weight rate < 30 tph $E = 55 \times P^{0.11} - 40$ for process weigh rate \geq 30 tph Where, E = allowable emission rate (lb/hr) P = process weight rate (tph)	15A NCAC 02D .0515
Sulfur dioxide	(ID No. ES-DRYER only) 2.3 pounds per million Btu heat input	15A NCAC 02D .0516
Visible emissions	20 percent opacity when averaged over a six minute period	15A NCAC 02D .0521
Fugitive dust	See Section 2.2.A.1	15A NCAC 2D .0540
Toxic air pollutants	See Section 2.2 A.2	15A NCAC 02D .1100 and 15A NCAC 2Q .0711

1. 15A NCAC 02D .0515: PARTICULATES FROM MISCELLANEOUS INDUSTRIAL PROCESSES

- a. Emissions of particulate matter from these sources (ID Nos. ES-DRYER, ES-DWDS, ES-DHM1 through ES-DHM4, ES-HAF, ES-PMFS, ES-CLR1 through ES-CLR5, ES-FB, ES-FPH, ES-TLB, ES-PL1, ES-PL2) shall not exceed an allowable emission rate as calculated by the following equation:

$$E = 4.10 \times P^{0.67} \text{ for process weight rate } < 30 \text{ tph}$$
$$E = 55 \times P^{0.11} - 40 \text{ for process weight rate } \geq 30 \text{ tph}$$

Where E = allowable emission rate in pounds per hour
P = process weight in tons per hour

Liquid and gaseous fuels and combustion air are not considered as part of the process weight.

Monitoring/Recordkeeping [15A NCAC 02Q .0508(f)]

- b. Particulate matter emissions from the emission sources listed above (**ID Nos. ES-DRYER, ES-WDWS, ES-DHM1 through ES-DHM4, ES-HAF, ES-PMFS, ES-CLR1 through ES-CLR5, ES-FB, ES-FPH, ES-TLB, ES-PL1, ES-PL2**) shall be controlled as described above. To assure compliance, the Permittee shall perform inspections and maintenance as recommended by the manufacturer. In addition to the manufacturer's inspection and maintenance recommendations, or if there is no manufacturer's inspection and maintenance recommendations, as a minimum, the inspection and maintenance requirement shall include the following:
 - i. a monthly visual inspection of the system ductwork and material collection units for leaks.
 - ii. an annual (for each 12 month period following the initial inspection) internal inspection of the bagfilters' structural integrity.
 - iii. an annual (for each 12 month period following the initial inspection) internal inspection of the wet electrostatic precipitator. This inspection must include (but is not limited to):
 - 1. visual checks of critical components,
 - 2. checks for any equipment that does not alarm when de-energized, to ensure it is operational,
 - 3. checks for signs of plugging in the hopper and gas distribution equipment, and
 - 4. replacement of broken equipment as required.
- c. The results of inspection and maintenance shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
 - i. the date and time of each recorded action;
 - ii. the results of each inspection;
 - iii. the results of any maintenance performed; and
 - iv. any variance from manufacturer's recommendations, if any, and corrections made.

Reporting [15A NCAC 02Q .0508(f)]

- d. The Permittee shall submit the results of any maintenance performed on the bagfilters within 30 days of a written request by the DAQ.
- e. The Permittee shall submit a summary report of monitoring and recordkeeping activities postmarked on or before January 30 of each calendar year for the preceding six-month period between July and December and July 30 of each calendar year for the preceding six-month period between January and June. All instances of deviations from the requirements of this permit must be clearly identified.

2. 15A NCAC 02D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES

- a. Emissions of sulfur dioxide from this source (**ID No. ES-DRYER**) shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard. [15A NCAC 02D .0516]

Monitoring/Recordkeeping/Reporting [15A NCAC 02Q .0508(f) and 15A NCAC 02D .2601]

- b. No monitoring, recordkeeping, or reporting is required for sulfur dioxide emissions from firing wood

for these sources.

3. 15A NCAC 02D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from these sources (**ID Nos. ES-DRYER, ES-WDWS, ES-DHM1 through ES-DHM4, ES-HAF, ES-PMFS, ES-CLR1 through ES-CLR5, ES-FB, ES-FPH, ES-TLB, ES-PL1, ES-PL2**) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 02D .0521 (d)]

Monitoring [15A NCAC 02Q .0508(f)]

- b. To assure compliance, once a month the Permittee shall observe the emission points of these sources for any visible emissions above normal. The monthly observation must be made for each month of the calendar year period to ensure compliance with this requirement. The Permittee shall establish "normal" for the fines bin, finished product handling, pellet loadout bins, and pellet loadouts (**ID Nos. ES-FB, ES-FPH, ES-TLB, ES-PL1, ES-PL2**) in the first 30 days following the startup of those sources. If visible emissions from this source are observed to be above normal, the Permittee shall either:
- i. take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
 - ii. demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2601 (Method 9) for 12 minutes is below the limit given in Section 2.1 A.4. a. above.

Recordkeeping [15A NCAC 02Q .0508(f)]

- c. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and made available to an authorized representative upon request. The log shall record the following:
- i. the date and time of each recorded action;
 - ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
 - iii. the results of any corrective actions performed.

B. Emergency Generator (ID No. ES-EG) and Fire Water Pump (ID No. ES-FWP)

The following table provides a summary of limits and/or standards for the emission source(s) described above.

Regulated Pollutant	Limits/Standards	Applicable Regulation
Sulfur dioxide	2.3 pounds per million Btu heat input	15A NCAC 2D .0516
Visible emissions	20 percent opacity	15A NCAC 2D .0521
Hazardous air pollutants (HAP)	National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE) No additional requirements per 63.6590(c)	15A NCAC 2D .1111 (40 CFR 63, Subpart ZZZZ)
NMHC and NO _x , CO, PM	0.20 g/kW for PM; 3.5 g/kW for CO; and 4 g/kW for NO _x + NMHC	15A NCAC 2D .0524 (40 CFR 60, Subpart IIII)
Fugitive dust	See Section 2.2.A.1	15A NCAC 2D .0540
Toxic air pollutants	State-enforceable only See Section 2.2 A.2.	15A NCAC 2D .1100

1. 15A NCAC 2D .0516: SULFUR DIOXIDE EMISSIONS FROM COMBUSTION SOURCES

- a. Emissions of sulfur dioxide from these sources (ID Nos. ES-EG, ES-FWP) shall not exceed 2.3 pounds per million Btu heat input. Sulfur dioxide formed by the combustion of sulfur in fuels, wastes, ores, and other substances shall be included when determining compliance with this standard. [15A NCAC 2D .0516]

Monitoring/Recordkeeping/Reporting [15A NCAC 2Q .0508(f)]

- b. No monitoring/recordkeeping/reporting is required for sulfur dioxide emissions from the firing of diesel fuel in these sources (ID Nos. ES-EG, ES-FWP).

2. 15A NCAC 2D .0521: CONTROL OF VISIBLE EMISSIONS

- a. Visible emissions from these sources (ID Nos. ES-EG, ES-FWP) shall not be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent not more than once in any hour and not more than four times in any 24-hour period. In no event shall the six-minute average exceed 87 percent opacity. [15A NCAC 2D .0521(d)]

Monitoring [15A NCAC 2Q .0508(f)]

- b. To assure compliance, once a month the Permittee shall observe the emission points of these sources (ID Nos. ES-EG, ES-FWP) for any visible emissions above normal. The monthly observation must be made for each month of the calendar year period to ensure compliance with this requirement. If visible emissions from these sources are observed to be above normal, the Permittee shall either:
- take appropriate action to correct the above-normal emissions as soon as practicable and within the monitoring period and record the action taken as provided in the recordkeeping requirements below, or
 - demonstrate that the percent opacity from the emission points of the emission source in accordance with 15A NCAC 02D .2601 (Method 9) for 12 minutes is below the limit given in Section 2.1 F.2. a. above.

Recordkeeping [15A NCAC 2Q .0508(f)]

- c. The results of the monitoring shall be maintained in a log (written or electronic format) on-site and

made available to an authorized representative upon request. The log shall record the following:

- i. the date and time of each recorded action;
- ii. the results of each observation and/or test noting those sources with emissions that were observed to be in noncompliance along with any corrective actions taken to reduce visible emissions; and
- iii. the results of any corrective actions performed.

3. 15A NCAC 2D .0524 NEW SOURCE PERFORMANCE STANDARDS [40 CFR Subpart III]

- a. The provisions of this subpart are applicable to manufacturer, owners, and operators of stationary compression ignition (CI), reciprocating internal combustion engines (RICE). The Permittee shall comply with all applicable provisions, including the requirements for emission standards, notification, testing, reporting, recordkeeping, and monitoring, contained in Environmental Management Commission Standard 15A NCAC 2D .0524 "New Source Performance Standards (NSPS)" as promulgated in 40 CFR Part 60 Subpart III, including Subpart A "General Provisions."

Emission Standards for Manufacturers:

Emergency Engines

- b. Pursuant to 40 CFR §60.4202 (a), stationary RICE engine manufacturers must certify their 2007 model year and later emergency stationary RICE. For engines greater than or equal to 50 hp, the certification emission standards for new non-road CI engines for the same model year and maximum engine power in 40 CFR 89.112 and 40 CFR 89.113 for all pollutants.

Fire Pump Engines

- c. Pursuant to 40 CFR §60.4202(d), beginning with the model years in table 3 to this subpart, stationary RICE manufacturers must certify their fire pump RICE to the emission standards in table 4 to this subpart, for all pollutants, for the same model year and NFPA nameplate power.
- d. Pursuant to 40 CFR §60.4210, RICE manufacturers must certify the engine using the certification procedures required in 40 CFR Part 89, subpart b, or 40 CFR Part 1039, subpart c as applicable.
- e. Pursuant to 40 CFR §60.4203, RICE must meet the emission standards during the useful life of the engine.

Emission Standards for Owners and Operators:

Emergency and Fire Pump Engines

- f. Pursuant to 40 CFR §60.4205, owners and operators must comply with the following emission standards:
 - 0.20 g/kW for PM
 - 3.5 g/kW for CO
 - 4 g/kW for NO_x + NMHC
- g. Pursuant to 40 CFR §60.4206, owners and operators must operate and maintain the stationary RICE according to the manufacturer's written instructions or procedures developed by the owner or operator that are approved by the engine manufacturer, over the entire life of the engine.

Fuel Requirements for Owners and Operators

- h. Pursuant to 40 CFR §60.4207, owners and operators must use fuel with a maximum sulfur content of 15 ppmw and a cetane index of at least 40.
- i. Pursuant to 40 CFR §60.4209(a), the owner or operator must install a non-resettable hour meter prior to start-up of the engines.

**4. 15A NCAC 2D .1111: MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY
(40 CFR 63 Subpart ZZZZ)**

- a. Pursuant to §63.6580, Subpart ZZZZ establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emitted from stationary reciprocating internal combustion engines (RICE) located at major and area sources of HAP emissions. This subpart also establishes requirements to demonstrate initial and continuous compliance with the emission limitations and operating limitations.
- b. Pursuant to §63.6590(c), a new stationary RICE located at an area source must meet the requirements of 40 CFR Part 60, Subpart IIII, for compression ignition engines. No further requirements apply for such engines under this part.

2.2- Multiple Emission Source(s) Specific Limitations and Conditions

A. Facility-wide sources

State-enforceable only

1. 15A NCAC 2D .0540: PARTICULATES FROM FUGITIVE DUST EMISSION SOURCES

- a. As required by 15A NCAC 2D .0540 "Particulates from Fugitive Dust Emission Sources," the Permittee shall comply with all aspects of the most recently submitted fugitive dust control plan, approved September 13, 2013 and revised January 14, 2014.

State-enforceable only

2. TOXIC AIR POLLUTANT EMISSIONS LIMITATION AND REQUIREMENT –

Pursuant to 15A NCAC 02D .1100 and in accordance with the approved application for an air toxic compliance demonstration, the following permit limit shall not be exceeded:

EMISSION SOURCE(S)	TOXIC AIR POLLUTANT(S)	EMISSION LIMIT(S)
Dryer system (ID No. ES-DRYER)	Acrolein	0.989 lb/hr
	Arsenic & compounds	2.674 lb/year
	Benzene	2864.52 lb/year
	Benzo(a)pyrene	2.9 lb/yr
	Cadmium	0.50 lb/year
	chlorine	2.37 lb/day
	Formaldehyde	6.02 lb/hr
	Hexachlorodibenzo-p-dioxin	1.752 lb/year
	Hydrogen chloride	0.24 lb/hr
	Phenol	1.204 lb/hr
Fire Water Pump (ID No. ES-FWP)	Acrolein	1.94E-04 lb/hr
	Arsenic & compounds	1.50E-03 lb/year
	Benzene	17.52 lb/year
	Benzo(a)pyrene	2.30E-04 lb/year
	Formaldehyde	2.48E-03 lb/hr
Emergency generator (ID No. ES-EG)	Acrolein	2.27E-04 lb/hr
	Arsenic & compounds	1.80E-03 lb/year
	Benzene	17.52 lb/year
	Benzo(a)pyrene	1.97E-04 lb/year
	Formaldehyde	2.893E-03 lb/hr

- a. For compliance purposes, within 30 days after each calendar year quarter the Permittee shall report acrolein, benzene, formaldehyde, and phenol emissions associated with each of the respective averaging periods to the Regional Supervisor, DAQ.

State-enforceable only

3. TOXIC AIR POLLUTANT EMISSION RATES REQUIRING A PERMIT –

Pursuant to 15A NCAC 02Q .0711, a permit to emit toxic air pollutants is required for any facility whose actual rate of emissions from all sources are greater than any one of the following rates listed in the table below:

Pollutant (CAS Number)	Carcinogens (lb/yr)	Chronic Toxicants (lb/day)	Acute Systemic Toxicants (lb/hr)	Acute Irritants (lb/hr)
1,3 Butadiene (106-99-0)	11			
Acetaldehyde (75-07-0)				6.8
Beryllium (7440-41-7)	0.28			
Carbon tetrachloride (56-23-5)	460			
Chlorobenzene (108-90-7)		46		
Chloroform (67-66-3)	290			
Di(2-ethylhexyl)phthalate (DEHP) (117-81-7)		0.63		
Ethylene dichloride (1,2-dichloroethane) (107-06-2)	260			
Managanese & cmpds		0.63		
Mercury, vapor (7439-97-6)		0.013		
Methyl chloroform (1,1,1-trichloroethane) (71-55-6)		250		
Methyl ethyl ketone (78-93-3)		78		
Methyl isobutyl ketone (108-10-1)		52		7.6
Methylene chloride (75-09-2)	1600		0.39	
Nickel metal (7440-02-0)		0.13		
Pentachlorophenol (87-86-5)		0.063	0.0064	
Perchloroethylene (tetrachloroethylene) (127-18-4)	13000			
Polychlorinated biphenyls (1336-36-3)	5.6			
Styrene (100-42-5)			2.7	
Tetrachlorodibenzo-p-dioxin (1746-01-6)	0.00020			
Trichloroethylene (79-01-6)	4000			
Toluene (108-88-3)		98		14.4
Trichlorofluoromethane (CFC 111) (75-01-4)			140	
Vinyl chloride (75-01-4)	26			
Xylene (1330-20-7)		57		16.4

a. No monitoring, recordkeeping, or reporting is required to comply with 15A NCAC 2Q .0711.

SECTION 3 - GENERAL CONDITIONS

1. REPORTS, TEST DATA, MONITORING DATA, NOTIFICATIONS, AND REQUESTS FOR RENEWAL shall be submitted to:

Robert Fisher
Regional Air Quality Supervisor
North Carolina Division of Air Quality
Washington Regional Office
943 Washington Square Mall
Washington, NC 27889
(252) 946-6481

2. PERMIT RENEWAL REQUIREMENT - The Permittee, at least 90 days prior to the expiration date of this permit, shall request permit renewal by letter in accordance with 15A NCAC 2Q .0304(d) and (f). Pursuant to 15A NCAC 2Q .0203(i), no permit application fee is required for renewal of an existing air permit. The renewal request should be submitted to the Regional Supervisor, DAQ.
3. ANNUAL FEE PAYMENT - Pursuant to 15A NCAC 2Q .0203(a), the Permittee shall pay the annual permit fee within 30 days of being billed by the DAQ. Failure to pay the fee in a timely manner will cause the DAQ to initiate action to revoke the permit.
4. ANNUAL EMISSION INVENTORY REQUIREMENTS - The Permittee shall report by June 30 of each year the actual emissions of each air pollutant listed in 15A NCAC 02Q .0207(a) from each emission source within the facility during the previous calendar year. The report shall be in or on such form as may be established by the Director. The accuracy of the report shall be certified by the responsible official of the facility.
5. EQUIPMENT RELOCATION - A new air permit shall be obtained by the Permittee prior to establishing, building, erecting, using, or operating the emission sources or air cleaning equipment at a site or location not specified in this permit.
6. This permit is subject to revocation or modification by the DAQ upon a determination that information contained in the application or presented in the support thereof is incorrect, conditions under which this permit was granted have changed, or violations of conditions contained in this permit have occurred. The facility shall be properly operated and maintained at all times in a manner that will effect an overall reduction in air pollution. Unless otherwise specified by this permit, no emission source may be operated without the concurrent operation of its associated air cleaning device(s) and appurtenances.
7. REPORTING REQUIREMENT - Any of the following that would result in previously unpermitted, new, or increased emissions must be reported to the Regional Supervisor, DAQ:
 - a. changes in the information submitted in the application regarding facility emissions;
 - b. changes that modify equipment or processes of existing permitted facilities; or
 - c. changes in the quantity or quality of materials processed.

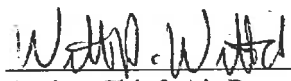
If appropriate, modifications to the permit may then be made by the DAQ to reflect any necessary changes in the permit conditions. In no case are any new or increased emissions allowed that will cause a violation of the emission limitations specified herein.

8. This permit is nontransferable by the Permittee. Future owners and operators must obtain a new air permit from the DAQ.
9. This issuance of this permit in no way absolves the Permittee of liability for any potential civil penalties which may be assessed for violations of State law which have occurred prior to the effective date of this permit.
10. This permit does not relieve the Permittee of the responsibility of complying with all applicable requirements of any Federal, State, or Local water quality or land quality control authority.
11. Reports on the operation and maintenance of the facility shall be submitted by the Permittee to the Regional Supervisor, DAQ at such intervals and in such form and detail as may be required by the DAQ. Information required in such reports may include, but is not limited to, process weight rates, firing rates, hours of operation, and preventive maintenance schedules.
12. A violation of any term or condition of this permit shall subject the Permittee to enforcement pursuant to G.S. 143-215.114A, 143-215.114B, and 143-215.114C, including assessment of civil and/or criminal penalties.
13. Pursuant to North Carolina General Statute 143-215.3(a)(2), no person shall refuse entry or access to any authorized representative of the DAQ who requests entry or access for purposes of inspection, and who presents appropriate credentials, nor shall any person obstruct, hamper, or interfere with any such representative while in the process of carrying out his official duties. Refusal of entry or access may constitute grounds for permit revocation and assessment of civil penalties.
14. The Permittee must comply with any applicable Federal, State, or Local requirements governing the handling, disposal, or incineration of hazardous, solid, or medical wastes, including the Resource Conservation and Recovery Act (RCRA) administered by the Division of Waste Management.
15. PERMIT RETENTION REQUIREMENT - The Permittee shall retain a current copy of the air permit at the site. The Permittee must make available to personnel of the DAQ, upon request, the current copy of the air permit for the site.
16. CLEAN AIR ACT SECTION 112(r) REQUIREMENTS - Pursuant to 40 CFR Part 68 "Accidental Release Prevention Requirements: Risk Management Programs Under the Clean Air Act, Section 112(r)," if the Permittee is required to develop and register a risk management plan pursuant to Section 112(r) of the Federal Clean Air Act, then the Permittee is required to register this plan in accordance with 40 CFR Part 68.
17. PREVENTION OF ACCIDENTAL RELEASES - GENERAL DUTY - Pursuant to Title I Part A Section 112(r)(1) of the Clean Air Act "Hazardous Air Pollutants - Prevention of Accidental Releases - Purpose and General Duty," although a risk management plan may not be required, if the Permittee produces, processes, handles, or stores any amount of a listed hazardous substance, the Permittee has a general duty to take such steps as are necessary to prevent the accidental release of such substance and to minimize the consequences of any release. **This condition is federally-enforceable only.**

Permit No. 10121R02
Page 14

Permit issued this the March 10, 2014.

NORTH CAROLINA ENVIRONMENTAL MANAGEMENT COMMISSION



Acting Chief, Air Permits Section
Division of Air Quality

By Authority of the Environmental Management Commission

Air Permit No. 10121R02

ATTACHMENT

List of Acronyms

AOS	Alternate Operating Scenario
BACT	Best Available Control Technology
Btu	British thermal unit
CAA	Clean Air Act
CAIR	Clean Air Interstate Rule
CEM	Continuous Emission Monitor
CFR	Code of Federal Regulations
DAQ	Division of Air Quality
DENR	Department of Environment and Natural Resources
EMC	Environmental Management Commission
EPA	Environmental Protection Agency
FR	Federal Register
GACT	Generally Available Control Technology
HAP	Hazardous Air Pollutant
MACT	Maximum Achievable Control Technology
NAA	Non-Attainment Area
NCAC	North Carolina Administrative Code
NCGS	North Carolina General Statutes
NESHAPS	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen Oxides
NSPS	New Source Performance Standard
OAH	Office of Administrative Hearings
PM	Particulate Matter
PM₁₀	Particulate Matter with Nominal Aerodynamic Diameter of 10 Micrometers or Less
POS	Primary Operating Scenario
PSD	Prevention of Significant Deterioration
RACT	Reasonably Available Control Technology
SIC	Standard Industrial Classification
SIP	State Implementation Plan
SO₂	Sulfur Dioxide
tpy	Tons Per Year
VOC	Volatile Organic Compound

**NORTH CAROLINA DIVISION OF
AIR QUALITY**

Air Permit Review

Permit Issue Date:

Region: Washington Regional Office
County: Hertford
NC Facility ID: 4600107
Inspector's Name: Robert Fisher
Date of Last Inspection: 06/11/2013
Compliance Code: 3 / Compliance - inspection

Facility Data

Applicant (Facility's Name): Enviva Pellets Ahoskie, LLC
Facility Address:
 Enviva Pellets Ahoskie, LLC
 142 N.C. Rt 561 East
 Ahoskie, NC 27910
SIC: 2499 / Wood Products, Nec
NAICS: 321999 / All Other Miscellaneous Wood Product Manufacturing
Facility Classification: Before: Title V **After:** Title V
Fee Classification: Before: Title V **After:** Title V

Permit Applicability (this application only)

SIP: 15A NCAC 2D .0540
NSPS:
NESHAP:
PSD:
PSD Avoidance:
NC Toxics:
112(r):
Other:

Contact Data

Facility Contact	Authorized Contact	Technical Contact
Tom Garrahan Plant Manager (252) 209-6032 x210 142 NC Route 561 Ahoskie, NC 27910	Kevin Kernan Chief Operating Officer 7200 Wisconsin Ave. Suite 1000, Bethesda, MD 20814	Joseph Harrell EHS Manager (252) 209-6032 142 NC Route 561 East Ahoskie, NC 27910

Application Data

Application Number: 4600107.13A
Date Received: 12/10/2013
Application Type: Modification
Application Schedule: State
Existing Permit Data
Existing Permit Number: 10121/R01
Existing Permit Issue Date: 01/03/2012
Existing Permit Expiration Date: 11/30/2015

Total Actual emissions in TONS/YEAR:

CY	SO2	NOX	VOC	CO	PM10	Total HAP	Largest HAP
2012	17.50	79.88	24.79	29.83	113.93	8.91	2.3544 [Formaldehyde]
2011	1.10	13.50	16.30	18.90	12.60	--	-- [--]

(Data taken by IBEAM from the ED module)

Review Engineer: Russell Braswell

Review Engineer's Signature:

Date:



3/10/14

Comments / Recommendations:

Issue 10121/R02
Permit Issue Date: 3/10/14
Permit Expiration Date: November 30, 2015

1. Purpose of Application:

Enviva Pellets Ahoskie, LLC (Enviva) currently holds Air Permit 10121R01, with a requirement to submit a First Time Title V application within one year of commencement of operation at the facility.¹ Starting in August of 2012, the DAQ has received complaints of fugitive dust leaving the facility's property. In response

¹ This application (46000107.12A) was received on November 13, 2012 which was within the time period allowed. The .12A application is not considered in this permit renewal.

to these complaints, Enviva submitted a fugitive dust control plan as required by 15A NCAC 2D .0540. Additionally, Enviva plans to install several new product handling processes which can be expected to reduce dust emissions.

2. Facility Description:

Enviva is a wood pellets manufacturing plant. According to Betsy Huddleston's November 27, 2012 inspection report, the facility uses 90% hardwood and 10% softwood.

3. History/Background:

- December 7, 2010 The R00 permit is issued with a requirement to submit a First Time Title V application within a year of startup.
- October 25, 2011 Enviva submitted application 4600107.11A.
- January 3, 2012 Permit R01 is issued in response to application .11A. This permit changed the configuration of several control devices and incorporated modeling.
- November 13, 2012 Enviva submitted application .12A in order to comply with the First Time Title V requirement. The .12A application is separate from this application (.13A).

4. Application Chronology:

- December 10, 2013 Enviva submitted this application (.13A). The required zoning consistency determination was not included with this application.
- January 22, 2013 The required zoning consistency determination was received.
- January 24, 2013 Responsibility for this permit application was transferred to Russell Braswell.
- February 10, 2013 An initial draft of the permit and review were distributed to DAQ staff (Mark Cuilla, Mike Pjetraj, Robert Bright, Yongcheng Chen, Betsy Huddleston), Enviva staff (Joe Harrell), and Trinity Consultants (Dale Overcash). For a summary of comments received, see Attachment 2.
- March 10, 2014 Permit issued.

5. Permit Modifications/Changes and TVEE Discussion:

According to Betsy Huddleston's November 27, 2012 inspection, the heat input rate of the dryer is incorrect, and there is a cyclone associated with hammermill #5 that is not included on the permit. These issues will be addressed in the First Time Title V permit. This application is only concerned with the new sources listed on the application and the addition of the fugitive dust control plan requirement.

Minor administrative corrections (e.g. changing "coarse" to "dry wood", removing requirements for stack testing that have been satisfied) have been made to the permit.

At the request of the Permittee, CD-CLR-5 has been renamed to -3 and each instance of "CHM" has been changed to "DHM". See Attachment 2 for details.

The list of changes to the permit can be found in Attachment 1. The following new emission sources have been added to IBEAM:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-FB	Fines bin	CD-FB-BV	One bin vent filter (325 square feet of filter area)
ES-FPH	Finished product handling	CD-FPH-BF	One bagfilter (4,842 square feet of filter area)
ES-TLB	Truck loadout bin (with 12 bottoms)		
ES-PL1, ES-PL2	Two pellet loadouts		

6. Regulatory Review:

The new sources at the facility are subject to the following regulations, in addition to the General Conditions:

- a. 15A NCAC 2D .0515 "Particulates from Miscellaneous Industrial Processes"
- b. 15A NCAC 2D .0521 "Control of Visible Emissions"
- c. 15A NCAC 2D .0540 "Particulates from Fugitive Dust Emission Sources"

It should be noted that there are other regulations that apply to other sources at the facility, but as they do not apply to these specific sources, they will not be discussed in this review.

- a. 15A NCAC 2D .0515 "Particulates from Miscellaneous Industrial Processes"

This regulation limits the amount of particulate a source can emit as a function of its maximum process rate (excluding any liquid or gaseous fuel). This limit only applies to "miscellaneous" processes (i.e. processes not covered by 2D .0503 through 2D .0514). The regulation gives the limits as:

$$\text{For } P \leq 30, E = 4.10 \times (P)^{0.67}$$

$$\text{For } P > 30, E = 55.0 \times (P)^{0.11} - 40$$

Where:

- P = Maximum process rate, in tons per hour
- E = Maximum allowable particulate emission rate, in pounds per hour (calculated to three decimal places. Liquid and gaseous fuels are not considered part of the process rate.)

Note that the sources at this facility are not considered "wood products finishing plants" and are therefore not subject to 2D .0512.

Each of the new sources will be controlled by fabric filters. Enviva states that the planned fabric filters will have a maximum outlet particulate loading rate of 0.01 gr/ft³, which will easily be low enough to ensure compliance. Fabric filters are very effective at capturing wood dust, so the proposed outlet loading rate is reasonable.

In order to demonstrate compliance, Enviva must perform regular maintenance and monitoring of the control devices. All maintenance and monitoring activities must be recorded in a logbook and reported twice per year.

Compliance will be determined during the next inspection.

b. 15A NCAC 2D .0521 "Control of Visible Emissions"

This regulation limits visible emissions (VE) from post-1971 processes to less than 20% opacity when averaged over a six minute period. Sources are allowed one exception per hour. The hourly exception cannot exceed 87% opacity, and cannot occur more than four times per 24-hour period.

Fabric filters are historically very effective at capturing wood dust, so little VE is to be expected from these sources. Regular monitoring and recordkeeping is required to demonstrate compliance. Additionally, the facility must establish what "normal" VE is for each source within 30 days of commencement of operations.

Compliance will be determined during the next inspection.

c. 15A NCAC 2D .0540 "Particulates from Fugitive Dust Emissions"

This regulation requires that facilities not contribute to substantive dust complaints outside their property boundary.

There have been several substantive complaints against Enviva (see Section 10). As such, Enviva was required to develop a fugitive dust control plan and have the plan approved by the Director. The most recent plan was approved on September 13, 2013 and amended on January 14, 2014. Enviva must comply with all aspects of the plan, or potentially be found in noncompliance with the regulation.

Compliance will be determined based on inspections and complaint investigations (if any are required.)

7. NSPS, MACT/GACT, PSD/NSR, 112(r), RACT, CAM:

a. NSPS

None of the new sources are subject to any NSPS.

b. MACT/GACT

None of the new sources are subject to any MACT/GACT.

The permit application specifically requested a permit shield for NESHAP Subpart DDDD. This regulation specifically applies to facilities that are considered Major Source for HAP. Based on the emission summary below, it appears that Enviva does not have potential emissions such that HAP-Major is a consideration. Therefore, NESHAP Subpart DDDD does not apply to the facility.

c. PSD/NSR

Based on the facility emission summary, as calculated by Trinity Consultants, the facility does not have potential emissions such that PSD is triggered for any pollutant.

Based on the emission calculations in the application, this modification will cause an increase of up to 1.00 lb/hr of PM10 emissions. Therefore, PSD Increment Tracking will be notified.

d. 112(r)

Enviva does not store any 112(r)-subject chemicals.

e. RACT

The facility is not located in an area of ozone noncompliance. Therefore, RACT does not apply.

f. Compliance Assurance Monitoring (CAM)

CAM is only considered during permit renewal, First Time Title V, or if the modification is for a "Large" source (a source with potential emissions of a pollutant greater than 100 ton/yr *after* control).

This application does not meet any of the criteria above, so CAM will not be considered.

8. Air Toxics:

This application does not change any emission rate of Toxic Air Pollutants (TAPs). Therefore, none of the regulations pertaining to TAPs need reviewing.

It should be noted that the modeling done with the R01 application is based off of an incorrect dryer heat input rate of 125 mmBtu/hr (see Section 5 for details). The First Time Title V permit will have to examine the emission limits associated with 2D .1100 based on the correct dryer heat input rate.

9. Facility Emissions Review

Pollutant	Potential Emissions [As calculated by Trinity Consultants] (ton/yr)
CO ₂ e	129
TSP*	128.78
PM10*	128.78
PM2.5*	128.78
CO	45.94
NO _x	183.98
VOC	20.25
SO ₂	19.20
Single largest HAP**	<10
Total HAP**	15.1

* While the emission calculations submitted by Trinity Consultants indicate an increase in overall particulate emissions (due to increased air handling and product handling), a decrease in *fugitive* particulate emissions is also expected.

** Taken from the R01 review. The new sources with this application will not have an effect on HAP emission rates.

10. Compliance Status

1. Notices of Violation/Recommendation for Enforcement since the R00 permit.

May 2, 2013 . NOV issued for improperly operating emission sources and control devices.

2. Inspection status

The facility was most recently fully inspected on November 27, 2012 by Betsy Huddleston. The facility was deemed in compliance at the time of inspection.

3. Complaints

The facility has been investigated for dust complaints on

- September 17, 2012,
- November 27, 2012,
- April 11, 2013 (resulting in the NOV mentioned above),
- May 3, 2013, and
- June 11, 2013.

These complaints related to fugitive dust. In response to these complaints, Enviva submitted a dust control plan. The plan was most recently amended on January 14, 2014.

11. Other Regulatory Concerns

A PE seal was included with the application.

A zoning consistency form was submitted and indicated consistency with zoning.

12. Public Notice/EPA and Affected State(s) Review

No Public Notice is required with this permit because this permit application is being processed with the 2Q .0300 permitting procedures.

13. Recommendations

Issue 10121R02.

Attachment 1
Change list

Old Page(s)	New Page(s)	Condition/ Item*	Description of Change(s)
Global	Global	N/A	<ul style="list-style-type: none"> • Change the application number and complete date; • Change permit revision number to R02; • Change the issuance/effective dates of the permit • Clarified equipment ID No. callouts in all stipulations. • Added new equipment to all relevant regulations
3	3	Equipment list	<ul style="list-style-type: none"> • Clarified ID callouts • Added new sources from application • Corrected "coarse" to "dry wood" • Corrected CD-CLR-5 to 3, at Permittee's request • Changed all instances of "CHM" to DHM, at Permittee's request.
4	4	2.1.A	<ul style="list-style-type: none"> • Updated regulation table to include 2D .0540
4	4	n/a	<ul style="list-style-type: none"> • Removed testing requirement, because it had been satisfied.
5	5	2.1.A.1	<ul style="list-style-type: none"> • Added specific maintenance requirements for CD-WESP
Varies	Varies	Each instance of 2D .0521	<ul style="list-style-type: none"> • Removed requirement to establish "normal" VE for all existing sources. This requirement remains for sources new to this permit.
6	7	2.1.B	<ul style="list-style-type: none"> • Updated regulation table to include 2D .0540
n/a	10	2.2.A.1	<ul style="list-style-type: none"> • Added specific requirement for 2D .0540

* Based on the new permit.

Attachment 2

Comments received on initial draft

1. Betsy Huddleston, by email, February 10, 2014

- a. In the application, it appears that there is a mismatch when calculating PM emissions from the pellet coolers.

Response: The permit application includes calculations for a planned additional pellet cooler. This explains the discrepancy.

- b. Betsy stated that Enviva had initially not planned on installing twelve pellet loadout bins. Where did these extra bins come from?

Response: The permit application requested equipment IDs ES-PB1 through 12. Betsy contacted Joe Harrell and confirmed that Enviva did not plan on installing twelve bins. In an email, Harrell suggested "Truck Loadout Bin with 12 conical bottoms" as the source description.

- c. Betsy pointed out a few reference errors in the permit and in the review.

Response: These have been fixed.

- d. Betsy pointed out that the equipment being added with the permit application is not specifically listed in the review.

Response: This oversight has been fixed.

2. Joe Harrell, by email, February 14, 2014

- a. The new authorized official is Tom Garrahan

Response: After getting the contact information, I have made this update.

- b. Joe pointed out a few errors regarding the name of the facility and its parent company.

Response: Fixed.

- c. Joe requested changing the equipment IDs of the hammermills and their cyclones to match the identification the facility uses.

Response: Fixed.

- d. Joe confirmed that there will only be one pellet loadout bin installed. The loadout bin will have 12 outlets, but only be one bin.

Response: This has been corrected.

3. Mark Cuilla, by email, March 6, 2014

- a. Mark noted some typos in the permit and review.

Response: Fixed.

Attachment 2, cont.

Comments received on initial draft

- b. Mark asked why there were no standard testing conditions in the permit.

Response: I discussed this with Mark and William Willets. We decided that it was not appropriate to have the DAQ standard testing language in "R" Title V permits.

- c. Mark noted that there needs to be a maintenance reporting requirement in section 2.1.A.1.

Response: Added.



North Carolina Department of Environment and Natural Resources

Division of Air Quality

Sheila C. Holman

Director

Pat McCrory
Governor

John E. Skvarla, III
Secretary

CERTIFIED MAIL: 70101870000133232204

RETURN RECEIPT REQUESTED

December 11, 2013

Mr. Peter Najera
VP of Operations
Enviva Pellets Ahoskie, LLC
7200 Wisconsin Ave. Suite 1100
Bethesda, MD 20814

SUBJECT: Receipt of Permit Application
Modification of Permit No. 10121R01
Application No. 4600107.13A
Enviva Pellets Ahoskie, LLC
Facility ID: 4600107, Ahoskie, Hertford County

Dear Mr. Najera:

Your air permit application (4600107.13A) for Enviva Pellets Ahoskie, LLC, located in Hertford County, North Carolina was received by this Division on December 10, 2013.

Submittal of your air permit application request must include the following items:

A permit application processing fee:

Under the new permit application processing fee schedule effective January 1, 2013, your required fee is \$889.00.

The amount of fee monies (Check No.) received was \$867.00. The amount due is \$22.00.

Pending review of your application and based on the required fee amount indicated above, you may be required to pay an additional amount.

Number of Copies of Application:

The appropriate number of copies of the application was received.

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

Mr. Najera
December 11, 2013
Page 2

Local zoning and subdivision ordinances consistency determination:

Your application **did** contain the complete request for consistency determination.

Signature of An Authorized Official:

Your application **was** signed by an authorized official as defined by 15A NCAC 2Q.0304(j).

PE Seal Requirement:

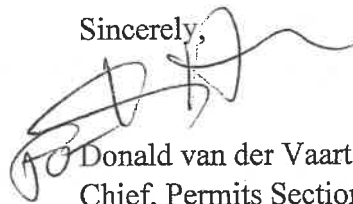
The appropriate PE Seal **was** received.

In summary, this application **did not** contain all the required elements as indicated above and has not been accepted for processing. This information must be submitted and contain the above requested information. The requested information must be submitted to our Office within thirty (30) days or the application may be terminated.

Pursuant to 15A NCAC 2Q.0507, the Permittee is required to address any requirements that becomes applicable after the date a Title V application is filed prior to release of a Title V draft permit. If necessary, please update your Title V application as soon as practical by submitting three copies of the required forms, plus one confidential copy if appropriate, to Division of Air Quality, 1641 Mail Service Center, Raleigh, North Carolina 27699-1641. Please include an A1 form with the words, "Initial Title V Application Update" typed or written across the top and a signed E5 form with a revised date.

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: Washington Regional Office Files

Comprehensive Application Report for 4600107.13A
 Enviva Pellets Ahoskie, LLC - Ahoskie (4600107)

12/11/2013

Hertford County

General Information: Permit/Latest Revision: 10121/ R01

Permit code: State

Application type: Modification

Engineer/Rev. location: Kevin Godwin/RCO

Regional Contact: Yongcheng Chen

Facility location: Washington Regional Office

Facility classification: Title V

Clock is OFF Application is INCOMPLETE.

Status is : Pending acceptance

Application Dates

Received	12/10/2013	Completeness Due	Clock Start	Calculated Issue Due
				03/10/2014

Fee Information

Initial amount:	\$867.00	Date received:	12/10/2013	Amount Due:	22.00	Add. Amt Rcv'd:		Date Rcv'd:	
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 Technical/Permit	Peter Najera, VP of Operations Joseph Harrell, EHS Manager	7200 Wisconsin Ave. Suite 1100 142 NC Route 561 East	Bethesda, MD		20814	(301) 357-5560 (252) 209-6032

Acceptance Criteria

<u>Received?</u>	<u>Acceptance Criteria Description</u>
No	Application fee
Yes	Appropriate number of apps submitted
Yes	Zoning Addressed
N/A	Source recycling/reduction form
Yes	Authorized signature
Yes	PE Seal
No	Application contains toxic modification(s)

Completeness Criteria

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

Comprehensive Application Report for 4600107.13A
 Enviva Pellets Ahoskie, LLC - Ahoskie (4600107)
 Hertford County

12/11/2013

<u>Event</u>	<u>Application Events</u>	<u>Start</u>	<u>Due</u>	<u>Complete</u>	<u>Comments</u>	<u>Staff</u>
TV - Acknowledgment/Incomplete add info request		01/01/2013	01/09/2014		Need \$22	kmhash

<u>Regulations Pertaining to this Permit</u>	
<u>Reference Rule</u>	<u>Regulation Description</u>
2D .0515	Particulates Miscellaneous Industrial Processes
2D .0516	Sulfur Dioxide Emissions Combustion Sources
2D .0521	Control of Visible Emissions

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

December 6, 2013

Mr. Charles Hammond
Planning and Zoning Director
Town of Ahoskie Planning and Zoning
201 West Main Street
Ahoskie, NC 27910

Keith

Received
JAN 22 2014
Air Permits Section

**Subject: Air Permit Application Zoning Consistency Determination Request
Enviva Pellets Ahoskie, LLC**

Dear Mr. Hammond,

This letter is a request for a determination of whether planned installation for the addition of one fines bin with bin vent filter control device for particulate matter (PM) control; and the addition of a finished product handling bagfilter (CD-FPH-BF) that will control existing emissions from a collection of transfer points, the pellet loadout bins, and truck pellet loadout operations is consistent with current local zoning requirements. A copy of the air permit application being submitted to the North Carolina Division of Air Quality (NCDAQ) is attached.

Your confirmation of zoning consistency is needed by the NCDAQ prior to issuance of the air quality construction permit. Please complete the attached form and send to the address shown on the form as soon as possible. In the interim, we would appreciate it if you would stamp this cover letter with your department's seal, sign and date next to your seal and return the sealed cover letter via FAX to my attention at (919) 462-9694. This stamp is needed to be considered administratively complete by the NC Division of Air Quality. Should you require additional information to complete your review, please do not hesitate to contact me at (919) 462-9693.

Sincerely,



Dale Overcash, PE
Principal Consultant

Attachments

REVIEWED FOR CODE
COMPLIANCE

DATE: 1-10-14

Kevin R. Truman

ZONING OFFICER

TOWN OF AHOSKIE

Zoning Consistency Determination

Received
JAN 22 2014
Air Permits Section

Facility Name Enviva Pellets Ahoskie, LLC

Facility Street Address 142 N.C. Rt. 561 East

Facility City Ahoskie, NC

Description of Process Plant will produce pelletized wood

SIC/NAICS Code 2499 (Wood Products, Not Elsewhere Classified)

Facility Contact Joe Harrell

Phone Number (252) 209-6032

Mailing Address Same as facility

Mailing City, State Zip _____

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 TOWN OF AHOSKIE

Name of Designated Official KEITH R. TRUMAN

Title of Designated Official ZONING OFFICER

Signature Keith R. Truman

Date 1-10-14

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.

Zoning Consistency Determination

Received
JAN 22 2014
Air Permits Section

Facility Name Enviva Pellets Ahoskie, LLC

Facility Street Address 142 N.C. Rt. 561 East

Facility City Ahoskie, NC

Description of Process Plant will produce pelletized wood

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Mailing City, State Zip _____

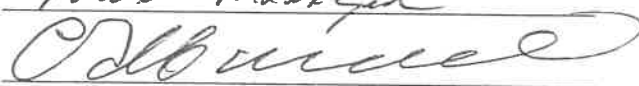
Based on the information given above:

- 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 Town of AHOSKIE

Name of Designated Official Charles R. Hammond

Title of Designated Official Town Manager

Signature 

Date 1/21/14

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.

Division of Air Quality
Washington Regional Office
December 16, 2013

Received
DEC 19 2013
Air Permits Section

TO: Kevin Godwin, RCO Permits

FROM: Betsy Huddleston BH

SUBJECT: **Recommendations and Comments on Air Permit Application**
Enviva Pellets Ahsokie, LLC
Hertford County, Facility ID 4600107
Air Permit 10121R01, APP 4600107.13A
Fee Class: Title V

Contacts: Mr. Joe Harrell, EHS Manager, office (252) 209-6032 ext. 202, cell (252) 370-3181
Dale Overcash, Trinity Consultants, (919) 462-9693

1. Introduction:

WaRO has substantiated dust complaints at Enviva, with the most recent resulting in an approved modified dust control plan on 9/13/2013. When they were working on the revision, they came to the conclusion that a significant portion of the dust leaving the site was not actually fugitive. It is coming from the pellet cooler cyclones. The emissions are very fine. During one inspection Rob Fisher and I observed the emissions at close to 20% opacity.

This purpose of this application is to install equipment for dust control:

- Fines from the hammermill, conveyors from the hammermill to the pellet feed mill silo, and screens will be collected and sent to a compressed air receiver. The receiver exhausts to a fines bin (ES-FB) with bagfilter control. It is my understanding that by collecting fines prior to the sized wood entering the pelletizing process, they are hoping fines emissions from the pellet cooler cyclones will be dramatically reduced.
- There are four pellet truck loadout bins that feed two truck loadouts. Enviva wishes to install a bagfilter to control fines from the loadout bins as they fill trucks. The pellets will go down covered chutes, and there will be a slight negative pressure in the building from an induced draft fan. Enviva is installing this baghouse for safety purpose as well.

2. Facility Compliance Status:

The most recent full facility permit inspection was 11/27/2012. I did not observe any fugitive dust leaving the site at the time of the inspection. Enviva did have some issues with meeting their recordkeeping requirements associated with their dust management plan. WaRO periodically performed surveillance and responded to complaints throughout 2013. DAQ required a modification of the dust management plan following my observations of dust travelling off-site during a complaint investigation on 4/11/2013 (finalized 9/13/2013).

3. Regional Concerns, Comments and Recommendations:

- *WaRO has been eagerly anticipating this application, as we hope the additions will provide measurable relief to the residents located immediately north of the facility. We ask this permit modification be processed as expeditiously as possible.*
- The permit does not have a condition for 2D.0540. Considering the company has a dust management plan that was triggered by this rule, and there are several residents impacted by dust, we must add the condition to the permit with this revision. Please include

language that recognizes Enviva has an approved and active dust management plan. They've titled their plan "Fugitive Dust/Emissions Control Plan."

- Jenny Kelvington emailed me that the residents and a third party representing them may soon contest the zoning for the Enviva property. I read through our requirements for zoning determinations with respect to application processing. It doesn't appear that a contestment would necessarily slow issuance of this permit.
- WaRO would like to review the draft permit before it is issued.

(k:\hertford46\00107\permits\20131216p02.doc)

Comprehensive Application Report for 4600107.13A
 Enviva Pellets Ahoskie, LLC - Ahoskie (4600107)

03/10/2014

Hertford County

General Information: Permit/Latest Revision: 10121/R02

Permit code: State
 Application type: Modification
 Engineer/Rev. location: Russell Braswell/RCO
 Regional Contact: Yongcheng Chen
 Facility location: Washington Regional Office
 Facility classification: Title V
 Clock is ON: Application is COMPLETE
 Status is: Issued

Application Dates

Received: 12/10/2013
 Completeness Due: 01/31/2014
 Clock Start: 12/17/2013
 Calculated Issue Due: 03/25/2014

Fee Information

Initial amount: \$867.00
 Date received: 12/10/2013
 Amount Due: 22.00 \$
 Add. Amt Rcv'd: 22.00
 Date Rcv'd: 01/02/2014
 Fund type: Deposit Slip #: 2333
 Location rec'd: Location deposited:

Contact Information

Type Authorized Technical/Permit
Name Kevin Kernan, Chief Operating Officer
 Joseph Harrell, EHS Manager
Address 7200 Wisconsin Avenue, Suite 1000Bethesda, MD 20814
 142 NC Route 561 East Ahoskie, NC 27910
City State ZIP
Telephone (252) 209-6032

Acceptance Criteria

Received? No
Acceptance Criteria Description
 Application fee
 Appropriate number of apps submitted
 Zoning Addressed
 Source recycling/reduction form
 Authorized signature
 PE Seal
 Application contains toxic modification(s)

Completeness Criteria

Received? Complete
Item Description

Comprehensive Application Report for 4600107.13A
Enviva Pellets Ahsokie, LLC - Ahsokie (4600107)
Hertford County

03/10/2014

Application Events

<u>Event</u>	<u>Start</u>	<u>Due</u>	<u>Complete</u>	<u>Comments</u>	<u>Staff</u>
TV - Acknowledgment/Incomplete add info request	01/02/2013	01/09/2014	12/17/2013	Need \$22	cjhome
Regional technical review completed/mailed	12/10/2013	01/09/2014	12/16/2013		ethuddleston
Draft to coordinator/supervisor for review	02/10/2014	02/13/2014	03/06/2014	Rcvd comments from region (2/7)	facility@24) Cuilla (3/6)
Technical Add Info - for Compliance Info	02/17/2014	03/19/2014	02/24/2014	Facility asked for more time to review	chasefall
Permit issued	03/10/2014		03/10/2014		kmbhash

Comprehensive Application Report for 4600107.13A
 Enviva Pellets Ahsokie, LLC - Ahsokie (4600107)
 Hertford County

03/10/2014

Outcome Information

Class before: Title V Class after: Title V Permit/Revision: 10121/R02

2Q .0711: No 2D .1100: No Revision Issue Date: 03/10/2014

NSPS: No NESHAPS/MACT: No PSD/NSR: No Accumulated process days (includes public notice periods): 75

PSD/NSR Avoid: No Prohibitory Small: No Public notice/hearing/add info after 80 days:

PSD/NSR Status After: Minor General permit: No Manager's discretion: Appealed? No

Multi-site permit: No Multi. permits at facility: No

Quarry permit: No HAP Major (10/25 tpy): Minor

2Q .0705 Last MACT/Toxics: NO NESHAPS/GACT: NO Current Permit Information:

New Source RACT/LAER: NO Existing Source RACT: NO Issue Effective Expiration Revision #

RACT/LAER Added Fee: NO RACT Avoidance: NO 03/10/2014 03/10/2014 11/30/2015 R02

2Q .0702 (a)(18) - Toxics/Combustion Source(s) After 07/10/10: NO

Regulations Pertaining to this Permit

Reference Rule	Regulation Description
2D .0515	Particulates Miscellaneous Industrial Processes
2D .0516	Sulfur Dioxide Emissions Combustion Sources
2D .0521	Control of Visible Emissions

Audit Information Pertaining to this Application

Column Name	Date Changed	Old Value	New Value	Editor
engineer	01/31/2014	763 (Kevin Godwin)	4750 (Russell Braswell)	Kevin Godwin



1 Copley Parkway | Suite 310 | Morrisville, NC 27560 | P (919) 462-9693 | F (919) 462-9694

trinityconsultants.com

Trinity
Consultants

December 6, 2013

Mr. Donald Van der Vaart, PhD, PE, Esq.
North Carolina Division of Air Quality (NC DAQ)
217 West Jones Street
Raleigh, NC 27603

Received

DEC 10 2013

Air Quality Section

**RE: Permit Application to Add Fines Bin and Bin Vent Filter and Finished Product Handling Bagfilter -- Enviva Pellets Ahoskie, LLC
Current Permit No. 10121R01**

Dear Don,

Enviva Pellets Ahoskie, LLC (Enviva) was issued a construction and operating permit, DAQ Permit Number 10121R01 on January 3rd, 2012. Enviva is submitting this air quality permit application that addresses the addition of one fines bin with bin vent filter control device for particulate matter (PM) control; and the addition of a finished product handling bagfilter (CD-FPH-BF) that will control existing emissions from a collection of transfer points, the pellet loadout bins, and truck pellet loadout operations.

Contents of this application are as follows:

1. Three (3) copies of the permit application
2. Permit application fee of \$867
3. Required permit application forms (Attachment 1)
4. Updated emission calculations (Attachment 2)
5. Local Zoning Consistency Determination (Attachment 3)
6. General discussion of permit application (see below)

DESCRIPTION OF PROCESS CHANGES

Fines Bin (ES-FB)

Sized wood from the permitted hammermills is transported on a set of conveyors to the permitted pellet mill feed silo (ES-PMFS) prior to pelletization. Fine pellet material from the hammermill pollution control system and screening operation will then be collected in the proposed fines bin (ES-FB) which will be controlled with a compressed air receiver. The compressed air receiver receives the fines, exhaust the air, and fines are trapped by the bin vent filter. The fines are then blown off onto a rotary seal valve and transferred into the bin. Particulate emissions from the filter are calculated assuming a manufacturer guaranteed grain loading factor and the maximum nominal stack flow rate.

Received

DEC 10 2013

Air Permits Section

Finished Product Handling and Loadout Bagfilter (ES-FPH-BF)

Pelletized product is conveyed to four pellet truck loadout bins (ES-PB) that feed two pellet truck loadout operations (ES-PL). Emissions from the Pellet Loadout Bins are controlled by a bagfilter. Pellet Loadout is accomplished by gravity feed of the pellets through a covered chute that telescopes during the loadout process to maintain constant contact with product as it is loaded to prevent emissions. Although emissions to the atmosphere from conveyance from the storage bins are minimal because dried wood fines have been removed in the pellet screener, a slight negative pressure is maintained in the loadout building as a fire prevention measure to prevent any buildup of dust on surfaces within the building. The slight negative pressure is produced via an induced draft fan that exhausts to the same bagfilter that controls minor dust emissions from loading of the pellet press silo.

Particulate emissions from finished product handling and loadout are calculated assuming a manufacturer guaranteed grain loading factor and the maximum nominal stack flow rate for the bagfilter. Emission estimates for emission units included in this application are provided in Attachment 1.

EMISSIONS ESTIMATES

As indicated earlier, emissions estimates for the new fines bin and finished product handling bagfilter are provided in Attachment 1. Attachment 1 also contains revised facility-wide criteria emissions showing the revised facility-wide PM potential emissions due to these additions.

REGULATORY APPLICABILITY

The facility will remain a PSD minor source after operation of the system with facility-wide emissions remaining well below 250 tpy. The following regulations will be triggered by the Fines bin and Finished Product Handling operation, the same as for the other fabric filter controlled sources, as noted in section 2.1.A of the Ahoskie operating permit:

- 15A NCAC 2D .0515, Particulates from Miscellaneous Industrial Processes and
- 15A NCAC 2D .0521, Control of Visible Emissions.

15A NCAC 02D .0515 Particulates from Miscellaneous Industrial Processes

Particulate emissions from all emissions sources subject to permitting, including the wood pellet dryer are regulated under 15A NCAC 2D .0515. This regulation limits the particulate emissions based on process throughput using the equation $E = 4.10 \times P^{0.67}$, for process rates (P) less than 30 tons per hour (ton/hr) and $E = 55 \times P^{0.11-40}$ for process rates greater than 30 tons per hour.

All emissions from particulate matter sources will be well-controlled as a result of these fabric filter control devices.

Mr. Donald van der Vaart, PhD, PE, Esq
December 6, 2013
Page 3

15A NCAC 02D .0521 Control of Visible Emissions

Under this regulation, for sources manufactured after July 1, 1971, visible emissions cannot be more than 20 percent opacity when averaged over a six-minute period. However, six-minute averaging periods may exceed 20 percent opacity under the following conditions:

No six-minute period exceeds 87 percent opacity,
No more than one six-minute period exceeds 20 percent opacity in any hour, and
No more than four six-minute periods exceed 20 percent opacity in any 24-hour period.

This rule applies to all processes that may have a visible emission, including particulate matter emissions sources controlled by a bagfilter or bin vent filter.

APPLICATION FORMS AND LOCAL CERTIFICATION FORM

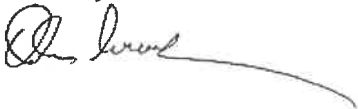
Permit application forms for the new source is provided in Attachment 2.

The local zoning certification form, provided in Attachment 3, is being submitted in conjunction with this application. Enviva will forward a copy of the proof of receipt from the local zoning department as soon as it has been received.

CLOSING

Enviva would greatly appreciate prompt processing of this application. Feel free to contact me at 919-462-9693 or Joe Harrell of Enviva at (252) 209-6032 with any questions or comments.

Sincerely,



Dale Overcash, PE
Principal Consultant

Attachments

ATTACHMENT 1

UPDATED EMISSIONS CALCULATIONS

**FACILITY-WIDE CRITERIA AND OTHER NON-HAPS EMISSIONS SUMMARY
ENVIVA PELLETS AHOSSKIE, LLC**

Source Description	Unit ID	CO (tpy)	NOx (tpy)	TSP (tpy)	PM-10 (tpy)	PM-2.5 (tpy)	SO2 (tpy)	VOC (tpy)	CO _{2e} (tpy)
Dryer System	ES-DRYER	45.00	182.91	24.48	24.48	24.48	19.20	20.25	61
Emergency Generator	ES-EG	0.50	0.58	0.03	0.03	0.03	0.00	5.59E-04	36
Fire Water Pump	ES-FWP	0.43	0.49	0.02	0.02	0.02	0.00	4.79E-04	31
Dry Wood Hammermills	ES-CHM	0.00	0.00	30.03	30.03	30.03	0.00	0.00	0
Pellet Press Silo	ES-PMFS	0.00	0.00	0.82	0.82	0.82	0.00	0.00	0
Pellet Fines Bin	ES-PFB	0.00	0.00	0.41	0.41	0.41	0.00	0.00	0
Finished Product Handling & Loadout	ES-FPH, ES-PL, ES-PB	0.00	0.00	4.00	4.00	4.00	0.00	0.00	0
Ground Wood Handling	ES-HAF	0.00	0.00	12.20	12.20	12.20	0.00	0.00	0
Pellet Coolers	ES-CLR	0.00	0.00	56.78	56.78	56.78	0.00	0.00	0
Chipper and Re-Chipper	ES-CHIP-1 and -2	0.00	0.00	0.00	0.00	0.00	0.00	2.20	0
Debarcker	ES-BARK	0.00	0.00	0.00	0.00	0.00	0.00	0.30	0
Diesel Storage Tanks	TK1 & TK2	0.00	0.00	0.00	0.00	0.00	0.00	3.79E-03	0
Total Project Emission Increases		45.94	183.98	128.78	128.78	128.78	19.20	20.25	129
PSD Significant Emission Rates		250	250	250	250	250	250	250	100,000
PSD Review Required?		No	No	No	No	No	No	No	No

Dust Control Systems PM Emissions

Emission Unit	Emission Source ID	Filter, Vent or-Cyclone ID	Flowrate ¹ (dscfm)	Pollutant Loading ² (gr/dscf)	Annual Operation (hours)	% PM that is		Potential Emissions					
						PM ₁₀	PM _{2.5}	PM (lb/hr)	PM ₁₀ (tpy)	PM _{2.5} (tpy)	PM ₁₀ (lb/hr)	PM _{2.5} (lb/hr)	PM _{2.5} (tpy)
Dried Wood Day Silo	ES-DWDS	CD-DWS-BV	2,186	0.01	8,760	100%	100%	0.19	0.82	0.19	0.82	0.19	0.82
	ES-CHM	CD-CHM-FF1	40,000	0.01	8,760	100%	100%	3.43	15.02	3.43	15.02	3.43	15.02
Dry Wood Hammermills 1 & 2	ES-CHM	CD-CHM-FF2	40,000	0.01	8,760	100%	100%	3.43	15.02	3.43	15.02	3.43	15.02
Dry Wood Hammermills 3 & 4	ES-CHM	CD-CHM-FF2	40,000	0.01	8,760	100%	100%	3.43	15.02	3.43	15.02	3.43	15.02
Hammermill Area and Hammermill 5	ES-HAF	CD-HAF-FF	32,500	0.01	8,760	100%	100%	2.79	12.20	2.79	12.20	2.79	12.20
Pellet Mill Feed Silo Bin Vent Filter	ES-PMFS	CD-PMFS-BV	2,186	0.01	8,760	100%	100%	0.19	0.82	0.19	0.82	0.19	0.82
	ES-FB	CD-FB-BV	3,600	0.003	8,760	100%	100%	0.09	0.41	0.09	0.41	0.09	0.41
Fines Bin	ES-FB	CD-FB-BV	3,600	0.003	8,760	100%	100%	0.09	0.41	0.09	0.41	0.09	0.41
	ES-FPH, ES-PL, ES-PB	CD-FPH-BF	35,500	0.003	8,760	100%	100%	0.91	4.00	0.91	4.00	0.91	4.00
Finished Product Handling	ES-FPH, ES-PL, ES-PB	CD-FPH-BF	35,500	0.003	8,760	100%	100%	0.91	4.00	0.91	4.00	0.91	4.00
Pellet Coolers Cyclone 1 & 2	ES-CLR1 & 2	CD-CLR-C1	27,500	0.022	8,760	100%	100%	5.19	22.71	5.19	22.71	5.19	22.71
Pellet Coolers Cyclone 3 & 4	ES-CLR3 & 4	CD-CLR-C2	27,500	0.022	8,760	100%	100%	5.19	22.71	5.19	22.71	5.19	22.71
Pellet Coolers Cyclone 5	ES-CLR5	CD-CLR-C3	13,750	0.022	8,760	100%	100%	2.59	11.36	2.59	11.36	2.59	11.36
Pellet Coolers Cyclone 6	ES-CLR6	CD-CLR-C4	13,750	0.022	8,760	100%	100%	2.59	11.36	2.59	11.36	2.59	11.36
TOTAL								26.58	116.42	26.58	116.42	26.58	116.42

Note:

- 1) Filter, Vent, and Cyclone inlet flow rate (cfm) provided by design engineering firm.
- 2) Unless otherwise specified, pollutant (PM) loading conservatively assumed to be 0.01 gr/dscf
- 3) It was conservatively assumed that PM₁₀ and PM_{2.5} equal PM emissions.

ATTACHMENT 2
FACILITY AND SOURCE FORMS

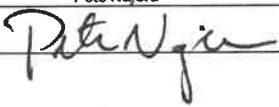
Received
 DEC 10 2013
 Air Permits Section

FORM A1
FACILITY (General Information)

REVISED 11/01/02

NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate

A1

NOTE- APPLICATION WILL NOT BE PROCESSED WITHOUT THE FOLLOWING:			
<input checked="" type="checkbox"/> Local Zoning Consistency Determination (if required)	<input checked="" type="checkbox"/> Facility Reduction & Recycling Survey Form (Form A4)	<input checked="" type="checkbox"/> Application Fee	
<input checked="" type="checkbox"/> Responsible Official/Authorized Contact Signature	<input checked="" type="checkbox"/> Appropriate Number of Copies of Application	<input checked="" type="checkbox"/> P.E. Seal (if required)	
GENERAL INFORMATION			
Legal Corporate/Owner Name: Enviva Pellets, LLC		Site Name: Enviva Pellets Ahoskie, LLC	
Site Address (911 Address) Line 1: 142 N.C. Rt 561 East		Site Address Line 2:	
City: Ahoskie	State: North Carolina	County: Hertford	
Zip Code: 27910			
CONTACT INFORMATION			
Permit/Technical Contact:		Facility/Inspection Contact:	
Name/Title: Joe Harrell		Name/Title: Joe Harrell	
Mailing Address Line 1: 142 N.C. Route 561 East		Mailing Address Line 1: 142 N.C. Route 561 East	
Mailing Address Line 2:		Mailing Address Line 2:	
City: Ahoskie	State: NC	Zip Code: 27910	City: Ahoskie State: NC Zip Code: 27910
Phone No. (area code) (252) 209-6032	Fax No. (area code)	Phone No. (area code) (252) 209-6032	Fax No. (area code)
Email Address: Joe.Harrell@envivabiomass.com		Email Address: Joe.Harrell@envivabiomass.com	
Responsible Official/Authorized Contact:		Invoice Contact:	
Name/Title: Pete Najera		Name/Title: Joe Harrell	
Mailing Address Line 1: 7200 Wisconsin Avenue		Mailing Address Line 1: 142 N.C. Route 561 East	
Mailing Address Line 2: Suite 1100		Mailing Address Line 2:	
City: Bethesda	State: MD	Zip Code: 20814	City: Ahoskie State: NC Zip Code: 27910
Phone No. (area code) (703) 380-9957	Fax No. (area code)	Phone No. (area code) (252) 209-6032	Fax No. (area code)
Email Address: Pete.Najera@envivabiomass.com		Email Address: Joe.Harrell@envivabiomass.com	
APPLICATION IS BEING MADE FOR			
<input checked="" type="checkbox"/> New Non-permitted Facility/Greenfield	<input type="checkbox"/> Modification of Facility (permitted)	<input type="checkbox"/> Renewal with Modification	
	<input type="checkbox"/> Renewal (TV Only)		
FACILITY CLASSIFICATION AFTER APPLICATION (Check Only One)			
<input type="checkbox"/> General	<input type="checkbox"/> Small	<input type="checkbox"/> Prohibitory Small	<input type="checkbox"/> Synthetic Minor <input checked="" type="checkbox"/> Title V
FACILITY (Plant Site) INFORMATION			
Describe nature of (plant site) operation(s): Facility ID No. : N/A (To be assigned)			
Wood pellet manufacturing facility			
Primary SIC/NAICS Code: 2499 (Wood Products, Not Elsewhere Classified)	Current/Previous Air Permit No 10121R01	Expiration Date: 11/30/2015	
Facility Coordinates: Latitude: 323,525.1 UTM E	Longitude: 4,015,554.4 UTM N		
Does this application contain confidential data? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
PERSON OR FIRM THAT PREPARED APPLICATION			
Person Name: Dale Overcash	Firm Name: Trinity Consultants, Inc.		
Mailing Address Line 1: One Copley Parkway	Mailing Address Line 2: Suite 310		
City: Morrisville	State: North Carolina	Zip Code: 27560	County: Wake
Phone No. 919-462-9693	Fax No. (919)-462-9694	Email Address: daleovercash@trinityconsultants.com	
SIGNATURE OF RESPONSIBLE OFFICIAL/AUTHORIZED CONTACT			
Name (typed): Pete Najera	Title: Vice President of Operations		
X Signature(Blue Ink): 	Date: 12/6/13		

Attach Additional Sheets As Necessary

FORM A4
SURVEY OF AIR EMISSIONS AND FACILITY-WIDE REDUCTION & RECYCLING ACTIVITIES

DATE: _____ Does facility have an environmental management system in place? () YES (X) NO If so, is facility ISO 14000 Certified? () YES (X) NO

Facility Name: Enviva Pellets Ahoskie, LLC Permit Number: 10121R01
 Facility ID: N/A (to be) County: Hertford Environmental Contact: Joe Harrell
 Mailing Address Line 1: 142 N.C. Rt 561 East Phone No. () (252) 209-6032 Fax No. ()
 Mailing Address Line 2: _____ Zip Code: 27910 County: Hertford
 City: Ahoskie State: North Carolina Email Address: Joe.Harrell@envivabiomass.com

AIR EMISSIONS SOURCE REDUCTIONS Any Air Emissions Source Reductions in the past year? () YES (X) NO

Source Description and ID	Air Pollutant	Enter Code for Emission Reduction Option (See Codes)	Date Reduction Option Implemented (mo/yr)	Quantity Emitted from prior annual report to DAQ (lb/yr)	Quantity Emitted from current annual report to DAQ (lb/yr)	Has reduction activity been discontinued? If so, when was it discontinued? (mo/yr)	Addition detail about source
N/A							

Comments: _____

FACILITY-WIDE REDUCTIONS & RECYCLING ACTIVITIES Any Reductions or Recycling Activities in the past year? () YES (X) NO

Source Description or Activity	Pollutant or Recycled or Reduced Material	Enter Code for Emission Reduction Option (See Codes)	Date Reduction Option Implemented (mo/yr)	Quantity Emitted from prior annual report	Quantity Emitted from current annual report	Has reduction activity been discontinued? If so, when was it discontinued? (mo/yr)	Addition detail about source
N/A							

Comments: _____

The requested information above shall be used for fulfilling the requirements of North Carolina General Statute 143-215.108(g). The permit holder shall submit to the Department a written description of current and projected plans to reduce the emissions of air pollutants by source reduction or recycling. The written description shall accompany any application for a new permit, modification of an existing permit and for each annual air quality permit fee payment. Source reduction is defined as reducing the amount of any hazardous substance, pollutant, or contaminant entering any waste stream or otherwise released into the environment (including fugitive emissions) prior to recycling, treatment, or disposal. If no activity has taken place since the previous report, simply indicate so by checking the no box in that section. Once completed, this form should be submitted along with your fee payment. Examples are listed on the first line of each section of the form for your benefit.



REVISED 1/07

Attach Additional Sheets As Necessary

Received
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FORM D
TECHNICAL ANALYSIS TO SUPPORT PERMIT APPLICATION

REVISED: 12/01/01

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D5

PROVIDE DETAILED TECHNICAL CALCULATIONS TO SUPPORT ALL EMISSION, CONTROL, AND REGULATORY DEMONSTRATIONS MADE IN THIS APPLICATION. INCLUDE A COMPREHENSIVE PROCESS FLOW DIAGRAM AS NECESSARY TO SUPPORT AND CLARIFY CALCULATIONS AND ASSUMPTIONS. ADDRESS THE FOLLOWING SPECIFIC ISSUES ON SEPARATE PAGES:

- A SPECIFIC EMISSIONS SOURCE (EMISSION INFORMATION) (FORM B) - SHOW CALCULATIONS USED, INCLUDING EMISSION FACTORS, MATERIAL BALANCES, AND/OR OTHER METHODS FROM WHICH THE POLLUTANT EMISSION RATES IN THIS APPLICATION WERE DERIVED. INCLUDE CALCULATION OF POTENTIAL BEFORE AND, WHERE APPLICABLE, AFTER CONTROLS. CLEARLY STATE ANY ASSUMPTIONS MADE AND PROVIDE ANY REFERENCES AS NEEDED TO SUPPORT MATERIAL BALANCE CALCULATIONS.**
- B SPECIFIC EMISSION SOURCE (REGULATORY INFORMATION)(FORM E2 - TITLE V ONLY) - PROVIDE AN ANALYSIS OF ANY REGULATIONS APPLICABLE TO INDIVIDUAL SOURCES AND THE FACILITY AS A WHOLE. INCLUDE A DISCUSSION OUTING METHODS (e.g. FOR TESTING AND/OR MONITORING REQUIREMENTS) FOR COMPLYING WITH APPLICABLE REGULATIONS, PARTICULARLY THOSE REGULATIONS LIMITING EMISSIONS BASED ON PROCESS RATES OR OTHER OPERATIONAL PARAMETERS. PROVIDE JUSTIFICATION FOR AVOIDANCE OF ANY FEDERAL REGULATIONS (PREVENTION OF SIGNIFICANT DETERIORATION (PSD), NEW SOURCE PERFORMANCE STANDARDS (NSPS), NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS (NESHAPS), TITLE V), INCLUDING EXEMPTIONS FROM THE FEDERAL REGULATIONS WHICH WOULD OTHERWISE BE APPLICABLE TO THIS FACILITY. SUBMIT ANY REQUIRED TO DOCUMENT COMPLIANCE WITH ANY REGULATIONS. INCLUDE EMISSION RATES CALCULATED IN ITEM "A" ABOVE.**
- C CONTROL DEVICE ANALYSIS (FORM C) - PROVIDE A TECHNICAL EVALUATION WITH SUPPORTING REFERENCES FOR ANY CONTROL EFFICIENCIES LISTED ON SECTION C FORMS, OR USED TO REDUCE EMISSION RATES IN CALCULATIONS UNDER ITEM "A" ABOVE. INCLUDE PERTINENT OPERATING PARAMETERS (e.g. OPERATING CONDITIONS, MANUFACTURING RECOMMENDATIONS, AND PARAMETERS AS APPLIED FOR IN THIS APPLICATION) CRITICAL TO ENSURING PROPER PERFORMANCE OF THE CONTROL DEVICES). INCLUDE AND LIMITATIONS OR MALFUNCTION POTENTIAL FOR THE PARTICULAR CONTROL DEVICES AS EMPLOYED AT THIS FACILITY. DETAIL PROCEDURES FOR ASSURING PROPER OPERATION OF THE CONTROL DEVICE INCLUDING MONITORING SYSTEMS AND MAINTENANCE TO BE PERFORMED.**
- D PROCESS AND OPERATIONAL COMPLIANCE ANALYSIS - (FORM E3 - TITLE V ONLY) - SHOWING HOW COMPLIANCE WILL BE ACHIEVED WHEN USING PROCESS, OPERATIONAL, OR OTHER DATA TO DEMONSTRATE COMPLIANCE. REFER TO COMPLIANCE REQUIREMENTS IN THE REGULATORY ANALYSIS IN ITEM "B" WHERE APPROPRIATE. LIST ANY CONDITIONS OR PARAMETERS THAT CAN BE MONITORED AND REPORTED TO DEMONSTRATE COMPLIANCE WITH THE APPLICABLE REGULATIONS.**

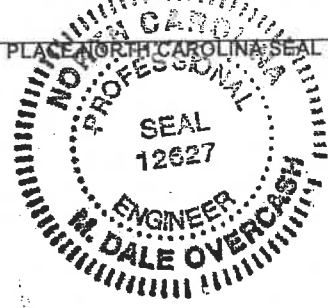
E PROFESSIONAL ENGINEERING SEAL - PURSUANT TO 15A NCAC 2Q .0112 "APPLICATION REQUIRING A PROFESSIONAL ENGINEERING SEAL," A PROFESSIONAL ENGINEER REGISTERED IN NORTH CAROLINA SHALL BE REQUIRED TO SEAL TECHNICAL PORTIONS OF THIS APPLICATION FOR NEW SOURCES AND MODIFICATIONS OF EXISTING SOURCES. (SEE INSTRUCTIONS FOR FURTHER APPLICABILITY).

I, M. Dale Overcash, attest that this application for Enviva Pellets Ahsokie, LLC has been reviewed by me and is accurate, complete and consistent with the information supplied in the engineering plans, calculations, and all other supporting documentation to the best of my knowledge. I further attest that to the best of my knowledge the proposed design has been prepared in accordance with the applicable regulations. Although certain portions of this submittal package may have been developed by other professionals, inclusion of these materials under my seal signifies that I have reviewed this material and have judged it to be consistent with the proposed design. Note: In accordance with NC General Statutes 143-215.6A and 143-215.6B, any person who knowingly makes any false statement, representation, or certification in any application shall be guilty of a Class 2 misdemeanor which may include a fine not to exceed \$10,000 as well as civil penalties up to \$25,000 per violation.

(PLEASE USE BLUE INK TO COMPLETE THE FOLLOWING)

NAME: M. Dale Overcash
 DATE: 12/9/2013
 COMPANY: Trinity Consultants
One Copley Parkway, Suite 310
 ADDRESS: Morrisville, NC 27560
 TELEPHONE: 919-492-9693
 SIGNATURE: [Signature]
 PAGES CERTIFIED: Entire Application

PLACE NORTH CAROLINA SEAL HERE



(IDENTIFY ABOVE EACH PERMIT FORM AND ATTACHMENT THAT IS BEING CERTIFIED BY THIS SEAL)

Attach Additional Sheets As Necessary

FORM E3 EMISSION SOURCE COMPLIANCE METHOD

REVISED 12/01/01

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E3

Emission Source ID NO. See attached table following Form E3 for a summary of regulatory requirements and associated compliance requirements	Regulated Pollutant _____ Applicable Regulation _____
Alternative Operating Scenario (AOS) NO: _____	

ATTACH A SEPARATE PAGE TO EXPAND ON ANY OF THE BELOW COMMENTS

MONITORING REQUIREMENTS

Is Compliance Assurance Monitoring (CAM) 40 CFR Part 64 Applicable? Yes No
 If yes, is CAM Plan Attached (if applicable, CAM plan must be attached)? Yes No

Describe Monitoring Device Type: _____
 Describe Monitoring Location: _____
 Other Monitoring Methods (Describe In Detail): _____

Describe the frequency and duration of monitoring and how the data will be recorded (i.e., every 15 minutes, 1 minute instantaneous readings taken to produce an hourly average):

RECORDKEEPING REQUIREMENTS

Data (Parameter) being recording: _____
 Frequency of recordkeeping (How often is data recorded?): _____

REPORTING REQUIREMENTS

Generally describe what is being reported: _____

Frequency: MONTHLY QUARTERL EVERY 6 MONTHS
 OTHER (DESCRIBE): _____

TESTING

Specify proposed reference test method: _____
 Specify reference test method rule and citation: _____
 Specify testing frequency: _____
NOTE - Proposed test method subject to approval and possible change during the test protocol process

Attach Additional Sheets As Necessary

**Summary of Title V Applicable Regulations and Compliance Demonstration Procedures
Enviva Pellets Ahsoskie, LLC**

Emission Source Description and ID No.	Pollutant	Regulation	Monitoring Method/Frequency/Duration	Recordkeeping	Reporting
Wood-fired dryer system (ID No. ES-DRYER), dried wood day silo (ID No. DWDS), four coarse hammermills (ID Nos. ES-CHM-1, 2, 3, and 4), Hammermill area and Hammermill No.5 (ID No. ES-HAF), pellet mill feed silo (ID No. ES-PMFS), and five pellet coolers (ID Nos. ES-CLR 1, 2, 3, 4, and 5), Pellet Fines Bin (ES-PFB), and Finished Product Handling (ES-FPH)	PM	15A NCAC 2D .0515	Inspections and maintenance, including monthly inspection of ductwork and annual internal inspection of bagfilter integrity	Written or electronic log of date and time of each inspection, results of inspection and maintenance, and variance from manufacturer's recommendation	Semi-annual progress report and annual compliance certification
Wood-fired dryer system (ID No. ES-DRYER), dried wood day silo (ID No. DWDS), four coarse hammermills (ID Nos. ES-CHM-1, 2, 3, and 4), Hammermill area and Hammermill No.5 (ID No. ES-HAF), pellet mill feed silo (ID No. ES-PMFS), and five pellet coolers (ID Nos. ES-CLR 1, 2, 3, 4, and 5) Pellet Fines Bin (ES-PFB), and Finished Product Handling (ES-FPH)	Opacity	15A NCAC 2D. 0521	Monthly visible observation for "normal." If above normal, correct action or Method 9 observation required	Written or electronic log of date/time/result of each observation, results of each non-compliant observation and actions taken to correct, and results of the corrective action	Semi-annual progress report and annual compliance certification

FORM E4 EMISSION SOURCE COMPLIANCE SCHEDULE

Revised 12/01/01

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E4

COMPLIANCE STATUS WITH RESPECT TO ALL APPLICABLE REQUIREMENTS

Will each emission source at your facility be in compliance with all applicable requirements at the time of permit issuance and continue to comply with these requirements?

Yes No

If **NO**, complete **A** through **F** below for each requirement for which compliance is not achieved.

Will your facility be in compliance with all applicable requirements taking effect during the term of the permit and meet such requirements on a timely basis?

Yes No

If **NO**, complete **A** through **F** below for each requirement for which compliance is not achieved.

If this application is for a modification of existing emissions source(s), is each emission source currently in compliance with all applicable requirements?

Yes No

If **NO**, complete **A** through **F** below for each requirement for which compliance is not achieved.

A. Emission Source Description (Include ID NO.) _____

B. Identify applicable requirement for which compliance is not achieved:

C. Narrative description of how compliance will be achieved with this applicable requirements:

D. Detailed Schedule of Compliance:

<u>Step(s)</u>	<u>Date Expected</u>

E. Frequency for submittal of progress reports (6 month minimum): _____

F. Starting date of submittal of progress reports: _____

Attach Additional Sheets As Necessary

FORM E5

TITLE V COMPLIANCE CERTIFICATION (Required)

Revised 01/01/07

NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate

E5

In accordance with the provisions of Title 15A NCAC 2Q .0520 and .0515(b)(4) the responsible company official of:

SITE NAME: Enviva Pellets Ahoskie, LLC

SITE ADDRESS: 142 N.C. Route 561 East

CITY, NC : Ahoskie, NC

COUNTY: Hertford

PERMIT NUMBER : 10121R01

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CERTIFIES THAT(Check the appropriate statement(s):

- The facility is in compliance with all applicable requirements
- In accordance with the provisions of Title 15A NCAC 2Q .0515(b)(4) the responsible company official certifies that the proposed minor modification meets the criteria for using the procedures set out in 2Q .0515 and requests that these procedures be used to process the permit application
- The facility is not currently in compliance with all applicable requirements
If this box is checked, you must also complete form E4 "Emission Source Compliance Schedule"

The undersigned certifies under the penalty of law, that all information and statements provided in the application, based on information and belief formed after reasonable inquiry, are true, accurate, and complete.

Pete Najera
Signature of responsible company official (REQUIRED, USE BLUE INK)

Date: 12/6/13

Pete Najera, Vice President of Operations
Name, Title of responsible company official (Type or print)

Attach Additional Sheets As Necessary

FORM B

SPECIFIC EMISSIONS SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 12/01/01	NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate	B
EMISSION SOURCE DESCRIPTION: Finished Product Handling/ Pellet Loadout Bins / Pellet Loadout		EMISSION SOURCE ID NO: ES-FPH, ES-PB1 thru 12, ES-PL1 and 2
OPERATING SCENARIO <u>1</u> OF <u>1</u>		CONTROL DEVICE ID NO(S): CD-FPH-BF
		EMISSION POINT (STACK) ID NO(S): EP-13

DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM):
 ES- FPH: Collection of transfer points, pellet screening operations, and pellet conveying.
 ES-PB: Pellet loadout bins are used to store pellets for shipping. Pellets are then loaded from the bins directly into trucks in either of the two pellet loadout areas.
 ES-PL: Final product is loaded into trucks in either of the two (2) pellet loadouts. The trucks are filled directly from the pellet loadout bins.

TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-B9 ON THE FOLLOWING PAGES):

Coal, wood, oil, gas, other burner (Form B1)
 Woodworking (Form B4)
 Manufact. of chemicals/coatings/inks (Form B7)
 Int. combustion engine/generator (Form B2)
 Coating/finishing/printing (Form B5)
 Incineration (Form B8)
 Liquid storage tanks (Form B3)
 Storage silos/bins (Form B6)
 Other (Form B9)

START CONSTRUCTION DATE: TBD OPERATION DATE: 3/1/2014 DATE MANUFACTURED: TBD
 MANUFACTURER / MODEL NO.: TBD EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR
 IS THIS SOURCE SUBJECT TO? NSPS (SUBPART?): _____ NESHAP (SUBPART?): _____ MACT (SUBPART?): _____
 PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25% MAR-MAY 25% JUN-AUG 25% SEP-NOV 25%
 EXPECTED ANNUAL HOURS OF OPERATION 8,760 VISIBLE STACK EMISSIONS UNDER NORMAL OPERATION: <20 % OPACITY

CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE						
AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL (AFTER CONTROLS / LIMITS)		POTENTIAL EMISSIONS (BEFORE CONTROLS / LIMITS) (AFTER CONTROLS / LIMITS)		
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr
PARTICULATE MATTER (PM)		See Emission Calculations in Attachment				
PARTICULATE MATTER <10 MICRONS (PM ₁₀)						
PARTICULATE MATTER <2.5 MICRONS (PM _{2.5})						
SULFUR DIOXIDE (SO ₂)						
NITROGEN OXIDES (NO _x)						
CARBON MONOXIDE (CO)						
VOLATILE ORGANIC COMPOUNDS (VOC)						
LEAD						
OTHER						

HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE						
HAZARDOUS AIR POLLUTANT AND CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL (AFTER CONTROLS / LIMITS)		POTENTIAL EMISSIONS (BEFORE CONTROLS / LIMITS) (AFTER CONTROLS / LIMITS)		
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr
N/A						

TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE			
INDICATE EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS			
TOXIC AIR POLLUTANT AND CAS NO.	EF SOURCE	lb/hr	lb/day
N/A			

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE
 Attach Additional Sheets As Necessary

FORM B6 EMISSION SOURCE (STORAGE SILO/BINS)

REVISED 12/01/01

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B6

EMISSION SOURCE DESCRIPTION: Pellet Loadout Bins		EMISSION SOURCE ID NO: ES-PB	
OPERATING SCENARIO: 1 OF 1		CONTROL DEVICE ID NO(S): CD-FPH-BF	
EMISSION POINT(STACK) ID NO(S): EP-13			
DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM): <p style="text-align: center;">Pellet loadout bins are used to store pellets for shipping. Pellets are then loaded from the bins directly into trucks in either of the two pellet loadout areas.</p>			
MATERIAL STORED: Pellet Product		DENSITY OF MATERIAL (LB/FT ³): 40	
CAPACITY		TONS:	
DIMENSIONS (FEET)	CUBIC FEET:	LENGTH:	WIDTH: HEIGHT:
HEIGHT:	DIAMETER: 12 (OR)	MAXIMUM DESIGN CAPACITY: 48 tph	
ANNUAL PRODUCT THROUGHPUT (TONS)		ACTUAL:	
PNEUMATICALLY FILLED		MECHANICALLY FILLED	
<input type="checkbox"/> BLOWER <input type="checkbox"/> COMPRESSOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> SCREW CONVEYOR <input checked="" type="checkbox"/> BELT CONVEYOR <input type="checkbox"/> BUCKET ELEVATOR <input type="checkbox"/> OTHER:	MOTOR HP:	<input type="checkbox"/> RAILCAR <input type="checkbox"/> TRUCK <input type="checkbox"/> STORAGE PILE <input checked="" type="checkbox"/> OTHER: Conveyor
NO. FILL TUBES:			
MAXIMUM ACFM: 750 each			
MATERIAL IS FILLED TO:			
BY WHAT METHOD IS MATERIAL UNLOADED FROM SILO?			
MAXIMUM DESIGN FILLING RATE OF MATERIAL (TONS/HR):			
MAXIMUM DESIGN UNLOADING RATE OF MATERIAL (TONS/HR):			
COMMENTS:			

Attach Additional Sheets As Necessary

FORM B9 EMISSION SOURCE (OTHER)

REVISED: 12/01/01

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B9

EMISSION SOURCE DESCRIPTION: Pellet Loadout	EMISSION SOURCE ID NO: ES-PL
OPERATING SCENARIO: 1 OF 1	CONTROL DEVICE ID NO(S): CD-FPH-BF
	EMISSION POINT (STACK) ID NO(S): EP-13

DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM):
 Final product is loaded into trucks in either of the two (2) pellet loadouts. The trucks are filled directly from the pellet loadout bins.

MATERIALS ENTERING PROCESS - CONTINUOUS PROCESS		MAX. DESIGN CAPACITY (CFM)	REQUESTED CAPACITY LIMITATION (UNIT/HR)
TYPE	UNITS		
Dried Wood	CFM	35,500	

MATERIALS ENTERING PROCESS - BATCH OPERATION		MAX. DESIGN CAPACITY (UNIT/BATCH)	REQUESTED CAPACITY LIMITATION (UNIT/BATCH)
TYPE	UNITS		

MAXIMUM DESIGN (BATCHES / HOUR):		(BATCHES/YR):	
REQUESTED LIMITATION (BATCHES / HOUR):			
FUEL USED: N/A	TOTAL MAXIMUM FIRING RATE (MILLION BTU/HR):	N/A	
MAX. CAPACITY HOURLY FUEL USE: N/A	REQUESTED CAPACITY ANNUAL FUEL USE:	N/A	

COMMENTS:

Attach Additional Sheets as Necessary

FORM C1 CONTROL DEVICE (FABRIC FILTER)

REVISED 12/01/01

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C1

CONTROL DEVICE ID NO: CD-FBH-BF		CONTROLS EMISSIONS FROM WHICH EMISSION SOURCE ID NO(S): ES-FPH, ES-PB, ES-PL	
EMISSION POINT (STACK) ID NO(S): EP-13		POSITION IN SERIES OF CONTROLS NO. 1 OF 1 UNITS	
MANUFACTURER: Aircon		MODEL NO: 13.5 RAW 268-10	
DATE MANUFACTURED: TBD		PROPOSED OPERATION DATE: 3/1/2014	
OPERATING SCENARIO: 1 OF 1		PROPOSED START CONSTRUCTION DATE: TBD	
		P.E. SEAL REQUIRED (PER 2Q .0112)? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
DESCRIBE CONTROL SYSTEM: This bagfilter will be utilized to control particulate form the finished product handling pellet conveyers and screens as well as the pellet load out operation consisting of loading finished product from the bins into the trucks.			
POLLUTANT(S) COLLECTED:			
	<u>PM</u>	<u>PM-10</u>	<u>PM-2.5</u>
BEFORE CONTROL EMISSION RATE (LB/HR):	See calculations in Appendix B		
CAPTURE EFFICIENCY:	-99.9 %	-99.9 %	-99.9 %
CONTROL DEVICE EFFICIENCY:	%	%	%
CORRESPONDING OVERALL EFFICIENCY:	%	%	%
EFFICIENCY DETERMINATION CODE:			
TOTAL EMISSION RATE (LB/HR):	See calculations in Appendix B		
PRESSURE DROP (IN. H ₂ O): MIN: MAX: 6"	GAUGE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	WARNING ALARM? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO	
BULK PARTICLE DENSITY (LB/FT ³): 1.43E-06	INLET TEMPERATURE (°F): 120		
POLLUTANT LOADING RATE: 0.01 LB/HR	<input checked="" type="checkbox"/> GR/FT ³	OUTLET TEMPERATURE (°F): 100	
INLET AIR FLOW RATE (ACFM): 35,500	FILTER MAX OPERATING TEMP. (°F): N/A		
NO. OF COMPARTMENTS: 1	NO. OF BAGS PER COMPARTMENT:	LENGTH OF BAG (IN.): 144	
DIAMETER OF BAG (IN.): 5.75	DRAFT: <input type="checkbox"/> INDUCED/NEG. <input checked="" type="checkbox"/> FORCED/POS	FILTER SURFACE AREA (FT ²): 4,842	
AIR TO CLOTH RATIO: 7.30	FILTER MATERIAL: Polyester or equivalent <input type="checkbox"/> WOVEN <input checked="" type="checkbox"/> FELTED		
DESCRIBE CLEANING PROCEDURES:		PARTICLE SIZE DISTRIBUTION	
<input checked="" type="checkbox"/> AIR PULSE	<input type="checkbox"/> SONIC	SIZE (MICRONS)	WEIGHT % OF TOTAL
<input checked="" type="checkbox"/> REVERSE FLOW	<input type="checkbox"/> SIMPLE BAG COLLAPSE		CUMULATIVE %
<input type="checkbox"/> MECHANICAL/SHAKER	<input type="checkbox"/> RING BAG COLLAPSE	0-1	Unknown
<input type="checkbox"/> OTHER		1-10	
DESCRIBE INCOMING AIR STREAM: The air stream will contain wood dust particles.		10-25	
		25-50	
		50-100	
		>100	
		TOTAL = 100	
METHOD FOR DETERMINING WHEN TO CLEAN: <input checked="" type="checkbox"/> AUTOMATIC <input type="checkbox"/> TIMED <input type="checkbox"/> MANUAL			
METHOD FOR DETERMINING WHEN TO REPLACE THE BAGS: <input type="checkbox"/> ALARM <input checked="" type="checkbox"/> INTERNAL INSPECTION <input type="checkbox"/> VISIBLE EMISSION <input type="checkbox"/> OTHER			
SPECIAL CONDITIONS: None <input type="checkbox"/> MOISTURE BLINDING <input type="checkbox"/> CHEMICAL RESISTIVITY <input type="checkbox"/> OTHER			
EXPLAIN: DESCRIBE MAINTENANCE PROCEDURES: Per manufacturer recommendations			

ON A SEPARATE PAGE, ATTACH A DIAGRAM SHOWING THE RELATIONSHIP OF THE CONTROL DEVICE TO ITS EMISSION SOURCE(S):

Attach Additional Sheets As Necessary

¹Final equipment selection has not yet occurred but will be similar in design to specifications shown.

FORM B

SPECIFIC EMISSIONS SOURCE INFORMATION (REQUIRED FOR ALL SOURCES)

REVISED 12/01/01

NCDENR/Division of Air Quality - Application for Air Permit to Construct/Operate

B

EMISSION SOURCE DESCRIPTION: Pellet Fines Bin		EMISSION SOURCE ID NO: ES-PFB					
OPERATING SCENARIO: 1 OF 1		CONTROL DEVICE ID NO(S): CD-PFB-BV					
DESCRIBE IN DETAIL THE EMISSION SOURCE PROCESS (ATTACH FLOW DIAGRAM): Fine pellet material from hammermill pollution control system and screening operation is collected in the pellet fines bin which is controlled by a bin vent filter.		EMISSION POINT (STACK) ID NO(S): EP-12					
TYPE OF EMISSION SOURCE (CHECK AND COMPLETE APPROPRIATE FORM B1-B9 ON THE FOLLOWING PAGES): <input type="checkbox"/> Coal, wood, oil, gas, other burner (Form B1) <input type="checkbox"/> Woodworking (Form B4) <input type="checkbox"/> Manufact. of chemicals/coatings/inks (Form B7) <input type="checkbox"/> Int. combustion engine/generator (Form B2) <input type="checkbox"/> Coating/finishing/printing (Form B5) <input type="checkbox"/> Incineration (Form B8) <input type="checkbox"/> Liquid storage tanks (Form B3) <input checked="" type="checkbox"/> Storage silos/bins (Form B6) <input type="checkbox"/> Other (Form B9)							
START CONSTRUCTION DATE: TBD	OPERATION DATE: 3/1/2014	DATE MANUFACTURED: TBD					
MANUFACTURER / MODEL NO.: TBD	EXPECTED OP. SCHEDULE: 24 HR/DAY 7 DAY/WK 52 WK/YR						
IS THIS SOURCE SUBJECT TO? NSPS (SUBPART?): NESHAP (SUBPART?): MACT (SUBPART?):							
PERCENTAGE ANNUAL THROUGHPUT (%): DEC-FEB 25% MAR-MAY 25% JUN-AUG 25% SEP-NOV 25%							
EXPECTED ANNUAL HOURS OF OPERATION 8,760 VISIBLE STACK EMISSIONS UNDER NORMAL OPERATION: <20 % OPACITY							
CRITERIA AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE							
AIR POLLUTANT EMITTED	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL (AFTER CONTROLS / LIMITS)		POTENTIAL EMISSIONS (BEFORE CONTROLS / LIMITS)		POTENTIAL EMISSIONS (AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
PARTICULATE MATTER (PM)	See Emission Calculations in Attachment						
PARTICULATE MATTER <10 MICRONS (PM ₁₀)							
PARTICULATE MATTER <2.5 MICRONS (PM _{2.5})							
SULFUR DIOXIDE (SO ₂)							
NITROGEN OXIDES (NO _x)							
CARBON MONOXIDE (CO)							
VOLATILE ORGANIC COMPOUNDS (VOC)							
LEAD							
OTHER							
HAZARDOUS AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE							
HAZARDOUS AIR POLLUTANT AND CAS NO.	SOURCE OF EMISSION FACTOR	EXPECTED ACTUAL (AFTER CONTROLS / LIMITS)		POTENTIAL EMISSIONS (BEFORE CONTROLS / LIMITS)		POTENTIAL EMISSIONS (AFTER CONTROLS / LIMITS)	
		lb/hr	tons/yr	lb/hr	tons/yr	lb/hr	tons/yr
N/A							
TOXIC AIR POLLUTANT EMISSIONS INFORMATION FOR THIS SOURCE							
INDICATE EXPECTED ACTUAL EMISSIONS AFTER CONTROLS / LIMITATIONS							
TOXIC AIR POLLUTANT AND CAS NO.	EF SOURCE	lb/hr	lb/day	lb/yr			
N/A							

Attachments: (1) emissions calculations and supporting documentation; (2) indicate all requested state and federal enforceable permit limits (e.g. hours of operation, emission rates) and describe how these are monitored and with what frequency; and (3) describe any monitoring devices, gauges, or test ports for this source.

COMPLETE THIS FORM AND COMPLETE AND ATTACH APPROPRIATE B1 THROUGH B9 FORM FOR EACH SOURCE
Attach Additional Sheets As Necessary

FORM B6 EMISSION SOURCE (STORAGE SILO/BINS)

REVISED 12/01/01

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B6

EMISSION SOURCE DESCRIPTION: Pellet Fines Bin		EMISSION SOURCE ID NO: ES-PFB	
		CONTROL DEVICE ID NO(S): CD-PFB-BV	
OPERATING SCENARIO: 1 OF 1		EMISSION POINT(STACK) ID NO(S): EP-12	
DESCRIBE IN DETAIL THE PROCESS (ATTACH FLOW DIAGRAM):			
<p>Fine pellet material from hammermill pollution control system and screening operation is collected in the pellet fines bin which is controlled by a bin vent filter.</p>			
MATERIAL STORED: Fine pellet material		DENSITY OF MATERIAL (LB/FT ³): 40	
CAPACITY	CUBIC FEET: 2200	TONS:	
DIMENSIONS (FEET)		DIAMETER: 12 (OR)	LENGTH: WIDTH: HEIGHT:
ANNUAL PRODUCT THROUGHPUT (TONS)		ACTUAL:	MAXIMUM DESIGN CAPACITY:
PNEUMATICALLY FILLED		MECHANICALLY FILLED	
<input type="checkbox"/> BLOWER <input type="checkbox"/> COMPRESSOR <input type="checkbox"/> OTHER:	<input type="checkbox"/> SCREW CONVEYOR <input type="checkbox"/> BELT CONVEYOR <input type="checkbox"/> BUCKET ELEVATOR <input type="checkbox"/> OTHER:	MOTOR HP:	<input type="checkbox"/> RAILCAR <input type="checkbox"/> TRUCK <input type="checkbox"/> STORAGE PILE <input type="checkbox"/> OTHER: Conveyor
NO. FILL TUBES:			
MAXIMUM ACFM:			
MATERIAL IS FILLED TO:			
BY WHAT METHOD IS MATERIAL UNLOADED FROM SILO?			
MAXIMUM DESIGN FILLING RATE OF MATERIAL (TONS/HR):			
MAXIMUM DESIGN UNLOADING RATE OF MATERIAL (TONS/HR):			
COMMENTS:			

Attach Additional Sheets As Necessary

FORM C1 CONTROL DEVICE (FABRIC FILTER)

REVISED 12/01/01

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C1

CONTROL DEVICE ID NO: CD-FB-BC		CONTROLS EMISSIONS FROM WHICH EMISSION SOURCE ID NO(S): ES-FB	
EMISSION POINT (STACK) ID NO(S): TBD		POSITION IN SERIES OF CONTROLS NO. 1 OF 1 UNITS	
MANUFACTURER: Aircon	MODEL NO: 36-6		
DATE MANUFACTURED: TBD	PROPOSED OPERATION DATE: 3/1/2014		
OPERATING SCENARIO: 1 OF 1		PROPOSED START CONSTRUCTION DATE: TBD	
		P.E. SEAL REQUIRED (PER 2Q .0112)? <input checked="" type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

DESCRIBE CONTROL SYSTEM:
A bin vent filter collects dust from when wood enters or exits the silo and displaces air.

POLLUTANT(S) COLLECTED:	PM	PM ₁₀	PM _{2.5}	
BEFORE CONTROL EMISSION RATE (LB/HR):	See calculations in Appendix B			
CAPTURE EFFICIENCY:	~99 %	~99 %	~99 %	%
CONTROL DEVICE EFFICIENCY:	%	%	%	%
CORRESPONDING OVERALL EFFICIENCY:	%	%	%	%
EFFICIENCY DETERMINATION CODE:				
TOTAL EMISSION RATE (LB/HR):	See calculations in Appendix B			

PRESSURE DROP (IN. H ₂ O): MIN: TBD MAX: TBD	GAUGE? <input checked="" type="checkbox"/> YES <input checked="" type="checkbox"/> NO	WARNING ALARM? <input checked="" type="checkbox"/> YES <input checked="" type="checkbox"/> NO
BULK PARTICLE DENSITY (LB/FT ³): 3.14E-06	INLET TEMPERATURE (°F): Ambient	
POLLUTANT LOADING RATE: 0.022 LB/HR <input checked="" type="checkbox"/> GR/FT	OUTLET TEMPERATURE (°F): Ambient	
INLET AIR FLOW RATE (ACFM): 3,600	FILTER MAX OPERATING TEMP. (°F): N/A	

NO. OF COMPARTMENTS: TBD	NO. OF BAGS PER COMPARTMENT: TBD	LENGTH OF BAG (IN.): TBD
DIAMETER OF BAG (IN.):	DRAFT: <input checked="" type="checkbox"/> INDUCED/NEG. <input checked="" type="checkbox"/> FORCED/POS.	FILTER SURFACE AREA (FT ²): 325
AIR TO CLOTH RATIO: 11.08	FILTER MATERIAL:	<input checked="" type="checkbox"/> WOVEN <input checked="" type="checkbox"/> FELTED

DESCRIBE CLEANING PROCEDURES: <input checked="" type="checkbox"/> AIR PULSE <input checked="" type="checkbox"/> SONIC <input checked="" type="checkbox"/> REVERSE FLOW <input checked="" type="checkbox"/> SIMPLE BAG COLLAPSE <input checked="" type="checkbox"/> MECHANICAL/SHAKER <input checked="" type="checkbox"/> RING BAG COLLAPSE <input checked="" type="checkbox"/> OTHER	PARTICLE SIZE DISTRIBUTION		
	SIZE (MICRONS)	WEIGHT % OF TOTAL	CUMULATIVE %
	0-1		
	1-10		
	10-25		
	25-50		
	50-100		
	>100		
	TOTAL = 100		

METHOD FOR DETERMINING WHEN TO CLEAN:
 AUTOMATIC TIMED MANUAL

METHOD FOR DETERMINING WHEN TO REPLACE THE BAGS:
 ALARM INTERNAL INSPECTION VISIBLE EMISSION OTHER

SPECIAL CONDITIONS:
 MOISTURE BLINDING CHEMICAL RESISTIVITY OTHER

EXPLAIN:
 DESCRIBE MAINTENANCE PROCEDURES:
Per manufacturer recommendations or common industry practices.

ON A SEPARATE PAGE, ATTACH A DIAGRAM SHOWING THE RELATIONSHIP OF THE CONTROL DEVICE TO ITS EMISSION SOURCE(S);
Attach Additional Sheets As Necessary

ATTACHMENT 3

LOCAL ZONING DETERMINATION REQUEST

Zoning Consistency Determination

Facility Name Enviva Pellets Ahoskie, LLC

Facility Street Address 142 N.C. Rt. 561 East

Facility City Ahoskie, NC

Description of Process Plant will produce pelletized wood

SIC/NAICS Code 2499 (Wood Products, Not Elsewhere Classified)

Facility Contact Joe Harrell

Phone Number (252) 209-6032

Mailing Address Same as facility

Mailing City, State Zip _____

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 _____

Name of Designated Official _____

Title of Designated Official _____

Signature _____

Date _____

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.

December 6, 2013

Mr. Charles Hammond
Planning and Zoning Director
Town of Ahoskie Planning and Zoning
201 West Main Street
Ahoskie, NC 27910

**Subject: Air Permit Application Zoning Consistency Determination Request
Enviva Pellets Ahoskie, LLC**

Dear Mr. Hammond,

This letter is a request for a determination of whether planned installation for the addition of one fines bin with bin vent filter control device for particulate matter (PM) control; and the addition of a finished product handling bagfilter (CD-FPH-BF) that will control existing emissions from a collection of transfer points, the pellet loadout bins, and truck pellet loadout operations is consistent with current local zoning requirements. A copy of the air permit application being submitted to the North Carolina Division of Air Quality (NCDAQ) is attached.

Your confirmation of zoning consistency is needed by the NCDAQ prior to issuance of the air quality construction permit. Please complete the attached form and send to the address shown on the form as soon as possible. In the interim, we would appreciate it if you would stamp this cover letter with your department's seal, sign and date next to your seal and return the sealed cover letter via FAX to my attention at (919) 462-9694. This stamp is needed to be considered administratively complete by the NC Division of Air Quality. Should you require additional information to complete your review, please do not hesitate to contact me at (919) 462-9693.

Sincerely,



Dale Overcash, PE
Principal Consultant

Attachments