ENVIVA PELLETS P/N 10203 NORTHAMPTON COUNTY



DONALD R. VAN DER VAART

SHEILA C. HOLMAN

## <u>CERTIFIED MAIL 7014-0510-0000-5537-8875</u> <u>RETURN RECEIPT REQUESTED</u>

November 29, 2016

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

SUBJECT:

Additional Information Request for Permit Application Submitted August 9, 2016

(Application ID No. 6600167.14B) Enviva Pellets Northampton, LLC

Garysburg, North Carolina

Dear Mr. Smith:

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

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

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

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

Please submit the requested information discussed in this letter by December 21, 2016. If you have any questions, please contact Ms. Yuki Puram at <a href="mailto:yuki.puram@ncdenr.gov">yuki.puram@ncdenr.gov</a>.

Sincerely yours,

William D. Willets, P.E., Chief, Permitting Section

Division of Air Quality, NCDEQ

## **Enclosure**

c: Raleigh Regional Office Central Files

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

Northampton County

12/19/2016

Regulations Pertaining to this Permit

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

Audit Information Pertaining to this Application

Column Name Date Changed

Old Value

New Value

Editor



DONALD R. VAN DER VAART

SHEILA C. HOLMAN

December 19, 2016

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

SUBJECT: Receipt of Permit Application

Renewal of Permit No. 10203R04 Application No. 6600167.16A Enviva Pellets Northampton, LLC

Facility ID: 6600167, Garysburg, Northampton County

Dear Mr. Smith:

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

This application submittal <u>did</u> contain all the required elements as indicated and has been accepted for processing. Your application will be considered complete as of December 19, 2016, unless informed otherwise by this office within 60 days.

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

Sincerely,

William D. Willets, P.E., Chief, Permitting Section

Division of Air Quality, NCDEQ

cc: Raleigh Regional Office Files

Northampton County

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General Information: Permit/Latest Revision: 10203/R04

Application type: Permit code: Renewal TV- State Only

Regional Contact: Engineer/Rev. location: Yukiko (Yuki ) Puram/RCO Charles McEachern

Current Class/Status: Facility location: Title V Raleigh Regional Office

Status is: In progress

Clock is ON

**Application Dates** 

Received Completeness Due Clock Start Calculated Issue Due

12/19/2016

02/02/2017

12/19/2016

03/19/2017

Initial amount: Date received: Fee Information

: Amount Due: Add. Amt Rcv'd: Date Rcv'd:

12/19/2016

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

Contact Information

Type Authorized Technical/Permit Royal Smith, Executive VP-Operations Joe Harrell, Corporate EHS Manager

7200 Wisconsin Avenue, Suite 142 NC Route 561 East

Address

Bethesda, MD 20814 Ahoskie, NC 27910 City State ZIP

(301) 657-5560 Telephone (252) 209-6032

Acceptance Criteria

N/A Received? Acceptance Criteria Description

Application fee

Received?

Complete Item Description

Completeness Criteria

N/A Yes Zoning Addressed Appropriate number of apps submitted

Authorized signature

N/A Yes

Application contains toxic modification(s)

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

Northampton County

Application Events

Event TV - Acknowledgment/Complete

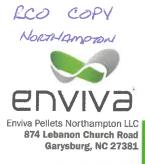
Start Due Complete 12/19/2016 12/29/2016 12/19/2016

lete Comments

Staff kmhash 7

January 22, 2016

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



+1 (252) 541 2631 fax (252) 541 2632

www.envivabiomass.com

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

Dear Mr. Butler:

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

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

Note:

VOC (.72 lbs/ODT) and CO (.23 lbs/ODT) emission factors per October 18, 2013 stack test results report
Please feel free to contact Heath Lucy at (252) 822-3988 with any questions or comments. Thank you very much for your time and attention.

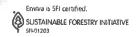
Sincerely,

Roland Burnett Plant Manager

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