

**NORTH CAROLINA DIVISION OF  
AIR QUALITY**

Inspection Report  
Date: 06/09/2021

Fayetteville Regional Office  
Enviva Pellets Sampson, LLC  
NC Facility ID 8200152  
County/FIPS: Sampson/163

**Facility Data**

Enviva Pellets Sampson, LLC  
5 Connector Road, US 117  
Faison, NC 28341  
Lat: 35d 7.3300m Long: 78d 10.9950m  
SIC: 2499 / Wood Products, Nec  
NAICS: 321999 / All Other Miscellaneous Wood Product Manufacturing

**Permit Data**

Permit 10386 / R04  
Issued 10/2/2019  
Expires 9/30/2027  
Class/Status Title V  
Permit Status Active  
Current Permit Application(s) Tax Certification,  
State, State, TV-1st Time

**Contact Data**

**Program Applicability**

**Facility Contact**

**Authorized Contact**

**Technical Contact**

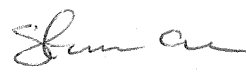
Johnathan Toler  
EHS Manager  
(910) 515-5822

Ken McBride  
Plant Manager  
(919) 820-9693

Catherine Grazioli  
Regional Environmental  
Compliance Mgr.  
(919) 441-3710

SIP / PSD  
MACT Part 63: Subpart ZZZZ  
NSPS: Subpart IIII

**Comments:**

Inspector's Signature: 

Date of Signature: 06/09/21



**Compliance Data**

Inspection Date 05/28/2021  
Inspector's Name Stephen Allen  
Operating Status Operating  
Compliance Status Violation - emissions  
Action Code FCE  
Inspection Result Compliance

**Total Actual emissions in TONS/YEAR:**

	TSP	SO2	NOX	VOC	CO	PM10	* HAP
2019	279.85	18.14	37.35	403.25	37.43	69.96	5351.06
2018	211.61	22.31	43.66	567.35	143.49	105.92	34911.40
2017	190.25	20.85	166.90	509.38	175.19	96.90	36723.63

\* Highest HAP Emitted (in pounds)

**Five Year Violation History:**

<u>Date</u>	<u>Letter Type</u>	<u>Rule Violated</u>	<u>Violation Resolution Date</u>
08/12/2020	NOV/NRE	2D .0530 Prevention of Significant Deterioration	02/23/2021
05/05/2020	NOV	2D .0530 Prevention of Significant Deterioration	Pending
06/05/2018	NOV/NRE	2D .0530 Prevention of Significant Deterioration	10/04/2019
11/03/2017	NOV/NRE	2D .0530 Prevention of Significant Deterioration	05/25/2018
02/03/2017	NOV	2D .0521 Control of Visible Emissions	02/17/2017

<b>Performed Stack Tests since last FCE:</b>			
<u>Date</u>	<u>Test Results</u>	<u>Test Method(s)</u>	<u>Source(s) Tested</u>
12/20/2020	Violation	Method 10, Method 201A, Method 202, Method 25A, Method 320, Method 5, Method OTM-26, per approved protocol	ES-CLR-5, ES-DRYER, ES-DWH, ES-GHM-1, ES-GHM-2, ES-GHM-3, ES-HM-3, ES-HM-4
12/03/2020	Pending		

**1. DIRECTIONS TO SITE:**

From FRO, head north on Green St toward Mason St (0.2 mi). Turn right onto Grove St (0.8 mi). Use the left 2 lanes to turn left onto I-95BUS N/N Eastern Blvd. Continue to follow I-95BUS N (5.9 mi). Merge onto I-95 N (2.0 mi) Take exit 58 for US-13 N toward Interstate 295 Future/US-401/Newton Grove (0.4 mi). Turn right onto US-13 N/Goldsboro Rd . (7.2 mi). Drive ~18 miles to Newton Grove. At the traffic circle in Newton Grove, take the exit for US-701 S toward Clinton. Travel for 2 miles on US-701 S, then turn right onto I-40 East, and travel for ~11 miles. Take Exit 355, and turn left at the end of the ramp. The facility is on the left, just past the I-40 overpass. Follow the signs to the admin building and enter at the far left door marked “visitor’s entrance” and sign in.

**2. SAFETY:**

Standard FRO safety gear, including hard hat, safety glasses, safety shoes, hearing protection, and a reflective vest. The inspector should be wary of constant vehicular traffic. If it is windy, the facility can be quite dusty.

**3. FACILITY DESCRIPTION:**

Enviva Pellets Sampson, LLC is a wood pellet manufacturing plant located in Faison, Sampson County. The plant operates 24 hours per day, 7 days per week and has ~80 employees. The facility receives wood chips from lumber mills and woodworking operations and logs harvested from tracts of land within ~40 miles of the plant. Any logs large enough to be sawn into construction lumber is generally not accepted, and is sent to a local sawmill.

Chips are received at the plant and unloaded to piles in the stockyard. The chips are segregated to hardwood and softwood piles. The logs are received at the facility, stripped of bark, and chipped. The bark and some greenwood chips are used as fuel in the furnace for the rotary dryer, and the bulk of the chips are sent to the three green wood hammermills where they are further reduced in size. Hard and soft wood chips are stockpiled separately, and drawn into the dryer by screw conveyors which are computer controlled to control the pellet hardwood/softwood composition. The mix of wood chips is sent through the facility’s rotary dryer where the moisture content is reduced to ~9%. The dryer is controlled by four large cyclones in parallel, all operating in series with a wet electrostatic precipitator (WESP) and Regenerative Thermal Oxidizer (RTO) to control PM/VOC/HAP emissions.

Once dried, the wood mix is sent through a second series of dry wood hammermills for further size reduction, and is then stored in a feed silo prior to the pellet mills. The wood fibers are mixed with small amounts of corn starch and water (to help make a stronger pellet), and pressed through dies to form the pellets. The hot pellets are sent through the pellet coolers then conveyed to bins for final loadout. The pellets are bulk loaded into trucks, and transported to the Wilmington port to be shipped overseas, where they are pulverized and used as fuel (an alternative to coal) for electricity generation.

All conveyance at the facility is by screw conveyor, drag chains, or belt conveyors, all of which are enclosed. Pellets are routinely sampled at various points throughout the day for quality control, and if the pellets do not meet the end user's requirements, the dry wood is diverted away from the pellet presses, and discharged directly onto the ground in a process the facility calls a "fire dump," which has the potential to generate a lot of fugitive dust. The piles are picked up by front end loaders and fed back into the process.

#### 4. INSPECTION SUMMARY:

On Thursday 28 May 2021, I, Stephen Allen of FRO DAQ, arrived at Enviva Pellets Sampson, LLC for a compliance inspection. I met with Ms. Cathy Grazioli, Environmental Compliance Manager. Ms. Grazioli reviewed the FacFinder sheet and noted that all contact information appeared to be correct. The facility shut down for approximately 5 weeks for extensive inspection, maintenance, and equipment repair. The facility came back online on 16 April 2021.

Ms. Grazioli also gave me an update on the status of the facility's emission control upgrades. Construction of the Dryer 2-can RTO expansion and addition of two natural gas duct burners began on April 19, 2021. The Dry Hammermill modification of exhaust/recirculation is currently in the engineering and planning phase. The Pellet Cooler RTO/RCO installation is currently in the engineering and planning phase. Ms. Grazioli stated all work is scheduled to be completed by November.

We reviewed the facility's records for periodic external inspection and maintenance of the control devices and the records for periodic VE observations, as well as the records for wood throughput and emissions calculations. All of the records appeared to be up to date. Ms. Grazioli stated that the Sampson facility is moving to the same work order tracking system used by Enviva Hamlet. The only recommendation I made to Ms. Grazioli was to add DAQ issued emission control numbers to the corresponding control equipment in their database.

Ms. Grazioli then escorted me on a tour of the facility, which was operating during the inspection.

We started the tour at the green wood hammermills and made our way through the production process. No visible emissions were observed from any of the emission sources during the plant inspection and Ms. Grazioli stated they haven't had any excess emission events other than an "above normal" incident that was documented in April. The required Method 9 observation was completed and repairs were noted in the maintenance records.

I observed some fugitive dust being generated from several areas of the plant where "fire dump" woodwaste was being dropped onto the ground to be picked up with a front end loader. I did not observe any of the wood dust being carried beyond the property boundary. Ms. Grazioli stated that no dust complaints or odor complaints had been received by the facility and no complaints are have been received by FRO DAQ. Ms. Grazioli stated there have been no excess emission events or malfunctions that would require reporting to DAQ.

5. PERMITTED EMISSION SOURCES:

Emission Source ID No.	Emission Source Description	Control Device ID No.	Control Device Description
ES-GHM-1, ES-GHM-2, ES-GHM-3 PSD Case-by-Case MACT	Three (3) green wood hammermills  <b>OPERATING; 0% opacity</b>	CD-WESP  CD-RTO	One wet electrostatic precipitator (29,904 square feet of collector plate area) in series with  One natural gas/propane-fired regenerative thermal oxidizer (maximum firing rate of 32 million Btu per hour)
ES-DRYER PSD Case-by-Case MACT	Wood-fired direct heat drying system (250.4 million Btu per hour heat input)  <b>OPERATING; 0% opacity</b>	CD-WESP  CD-RTO	One wet electrostatic precipitator (29,904 square feet of collector plate area) in series with  One natural gas/propane-fired regenerative thermal oxidizer (maximum firing rate of 32 million Btu per hour)
ES-FBYPASS PSD	Furnace Bypass <b>NOT OPERATING</b>	N/A	N/A
ES-DBYPASS PSD	Dryer Bypass <b>NOT OPERATING</b>	N/A	N/A
ES-DWH PSD Case-by-Case MACT	Dried wood handling operations <b>OPERATING; 0% opacity</b>	CD-DWH-BH-1 and CD-DWH-BH-2	Two (2) baghouses (377 square feet of filter area, each)
ES-HM-1 through ES-HM-8 PSD Case-by-Case MACT	Eight (8) dry hammermills <b>OPERATING; 0% opacity.</b> <b>#8 hammermill has not yet been installed.</b>	CD-HM-BH1 through CD-HM-BH8	Eight (8) baghouses (2,168 square feet of filter area each)
ES-HMC PSD	Hammermill conveying system <b>OPERATING; 0% opacity</b>	CD-HMC-BH	One baghouse (377 square feet of filter area)
ES-PMFS PSD	Pellet mill feed silo <b>OPERATING; 0% opacity</b>	CD-PMFS-BH	One baghouse (377 square feet of filter area)
ES-ADD PSD	Additive Handling and Storage <b>NOT YET INSTALLED</b>	CD-ADD_BH	One baghouse (942 square feet of filter area)
ES-HMA & ES-PCHP PSD Case-by-Case MACT	Hammermill area and pellet cooler HP fines relay system <b>OPERATING; 0% opacity</b>	CD-PCHP-BH	One baghouse (1,520 square feet of filter area)

<b>Emission Source ID No.</b>	<b>Emission Source Description</b>	<b>Control Device ID No.</b>	<b>Control Device Description</b>
ES-CLR-1 through ES-CLR-6 <b>PSD</b> <b>Case-by-Case MACT</b>	Six (6) pellet coolers and twelve (12) pellet presses (two (2) pellet presses are associated with each pellet cooler) <b>OPERATING; 0% opacity</b>	CD-CLR-1 through CD-CLR-6	Six (6) simple cyclones (54 inches in diameter) installed one each on the coolers
ES-PCLP <b>PSD</b>	Pellet cooler LP fines relay system <b>OPERATING; 0% opacity</b>	CD-PCLP-BH	One baghouse (942 square feet of filter area)
ES-PSTB <b>PSD</b>	Pellet sampling transfer bin <b>NOT YET INSTALLED</b>	CD-PSTB-BH	One baghouse (377 square feet of filter area)
ES-FPH, ES-PB-1 through ES-PB-4, ES-PL-1 and ES-PL-2 <b>PSD</b>	Finished product handling, four (4) pellet load-out bins, and two pellet mill loadouts <b>OPERATING; 0% opacity</b>	CD-FPH-BH	One baghouse (4,842 square feet of filter area)

**6. APPLICABLE AIR QUALITY REGULATIONS:**

**A. 15A NCAC 02D .0515 – PARTICULATES FROM MISC. INDUSTRIAL SOURCES** – All sources are subject. Particulate emissions shall not exceed allowable emission rates as calculated by the equations listed in the permit. Facility required to operate control devices and keep records of production such that throughput in tons per hour can be determined. Facility must conduct periodic Inspection & Maintenance (I&M) per the manufacturer’s recommendations. I&M includes, at a minimum, monthly external inspections of baghouses and cyclones, and annual (12-month) internal inspections of baghouses. Inspections of the WESP and RTO must be made per the manufacturer’s recommendations. Minimum secondary voltage and minimum current must be determined for the WESP during stack testing, and maintained at the level determined during the latest stack testing. Monthly visual inspections of the RTO system ductwork and material collection units must be conducted, and an annual (for each 12-month period) internal inspection must be conducted. The facility must demonstrate compliance with emission limits via source testing and submittal of test report for the dryer system, green wood hammermills, dry hammermills, and pellet presses and pellet coolers within 90 days after permit issuance (issued 2 October 2019 – testing required no later than 30 December 2020) unless an alternated date is approved in advance by DAQ. Recordkeeping is required. A semi-annual summary report is required.

**APPEARED IN COMPLIANCE:** Minimum voltage and current values have been established to be those as recommended by the manufacturer (40kV and 330 mA), and are monitored constantly in the control room. These values are logged during each 12-hour shift by operators, and plant management receives a daily report which includes these records along with production rates during that shift. During the inspection, the voltage ranged from 59 to 62 KV in the four WESP compartments and the current ranged from 1048 to 1245 ma. Temperatures in the RTO combustion chambers were 1650°F and 1651°F. Initial stack testing was conducted 16-19 December 2019. The test report was submitted to DAQ on 30 January 2020. The review report was completed on 11 March 2020 and indicated compliance with the applicable emission standards. The most recent stack test was conducted on 3 December 2020. The test report was submitted to DAQ on 29 January 2021 and is under review with SSCB. The latest semi-annual summary report was received at FRO on 29 January 2021 and appeared complete.

Records of inspections for the facility's control devices were available. The last inspections of the control devices were as follows:

Control Device ID No.	Date of Last External Inspection	Date of Last Annual Internal Inspection	Date of Last VE Observation
CD-WESP	05/20/21	03/23/21 semi- annual	05/20/21
CD-RTO	05/20/21	03/23/21 semi- annual 08/28/20 media replaced	05/20/21
CD-DWH-BH-1	05/20/21	04/09/21	05/20/21
CD-DWH-BH-2	05/20/21	04/09/21	05/20/21
CD-HM-BH1	05/20/21	04/09/21	05/20/21
CD-HM-BH2	05/20/21	04/10/21	05/20/21
CD-HM-BH3	05/20/21	04/10/21	05/20/21
CD-HM-BH4	05/20/21	04/11/21	05/20/21
CD-HM-BH5	05/20/21	04/11/21	05/20/21
CD-HM-BH6	05/20/21	04/11/21	05/20/21
CD-HM-BH7	05/20/21	04/11/21	05/20/21
CD-HM-BH8	Not yet installed	Not yet installed	Not yet installed
CD-HMC-BH	Not yet installed	Not yet installed	Not yet installed
CD-PMFS-BH	05/20/21	04/12/21	05/20/21
CD-ADD-BH	Not yet installed	Not yet installed	Not yet installed
CD-PCHP-BH	05/20/21	04/12/21	05/20/21
CD-CLR-1	05/20/21	Not applicable	05/20/21
CD-CLR-2	05/20/21	Not applicable	05/20/21
CD-CLR-3	05/20/21	Not applicable	05/20/21
CD-CLR-4	05/20/21	Not applicable	05/20/21
CD-CLR-5	05/20/21	Not applicable	05/20/21
CD-CLR-6	05/20/21	Not applicable	05/20/21
CD-PCLP-BH	05/20/21	04/12/21	05/20/21
CD-PSTB-BH	Not yet installed	Not yet installed	Not yet installed
CD-FPH-BH	05/20/21	04/12/21	05/20/21

**B. 15A NCAC 02D .0516 – SULFUR DIOXIDE EMISSIONS FROM COMBUSTION**

**SOURCES** – SO<sub>2</sub> emissions from the dryer (ID No. ES-DRYER) shall not exceed 2.3 lb/mmBtu heat input. No monitoring, recordkeeping, or reporting is required.

**APPEARED IN COMPLIANCE:** The dryer is only capable of firing wood, and the RTO is only capable of firing natural gas or propane. The AP-42 emission factor for SO<sub>2</sub> emissions from wood combustion is 0.025 lb/mmBtu, from natural gas combustion is 0.0006 lb/mmBtu, and from propane combustion is 0.001 lb/mmBtu. Therefore, as long as these are the only fuels used, compliance is expected.

- C. 15A NCAC 02D .0521 – CONTROL OF VISIBLE EMISSIONS** – All sources are subject. Visible emissions shall not exceed 20% opacity, except for an exceedance up to 87% is allowed once per hour up to four times a day. “Normal” must be established within 30 days of startup, and emission point observed monthly. Corrective actions must be taken and recorded for abnormal conditions, or visible emissions shown to be within the limit via a 12-minute Method 9 observation. The facility is required to perform a monthly observation of the emission points and document the observations. Records are required. A semi-annual summary report is required.

**APPEARED IN COMPLIANCE:** The facility has established “normal” for most of the emission sources as “no dust”. The “normal” for the pellet cooler cyclone discharge stacks is “None to light dust”. The “normal” for the WESP/RTO stack is listed as a “white plume which dissipates within ~30 feet of stack”.

The visible emissions observations from the control device stacks are conducted during the monthly external inspections and documented on the same forms. See the inspection dates listed in section 6.A above. The only “above normal” incident occurred on 26 April 2021 and a 12-minute observation was made. On 9 June 2021 I emailed Ms. Grazioli to confirm the person conducting the Method 9 observation was certified. The log documented that bags were replaced in the baghouse where the above normal visible emissions were observed. During the inspection I did not observe any visible emissions from any of the emission points.

The latest semi-annual summary report was received in FRO on 29 January 2021 and appeared complete.

- D. 15A NCAC 02D .112 – 112(g) CASE BY CASE MAXIMUM ACHIEVABLE CONTROL TECHNOLOGY** – The dryer (ES-DRYER) is the subject source. The dryer must be of a low-HAP emitting design. Facility must conduct initial testing within 90 days of permit R04 issuance (no later than 30 December 2019) to establish emission factors for Acetaldehyde, Acrolein, Formaldehyde, Methanol, Phenol, and Propionaldehyde. No monitoring, recordkeeping, or reporting is required.

**APPEARED IN COMPLIANCE:** The permit review indicates that the dryer design is acceptable to be considered as a low-HAP emitting design. Initial stack testing was conducted 16-19 December 2019. The test report was submitted to DAQ on 30 January 2020. The review report was completed on 11 March 2020 and indicated compliance with the applicable emission standards. The most recent stack test was conducted on 3 December 2020. The test report was submitted to DAQ on 29 January 2021 and is currently under review with the Stationary Source Compliance Branch.

- E. 15A NCAC 02D .0530 – PREVENTION OF SIGNIFICANT DETERIORATION** – Emission limits for PM, PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>x</sub>, CO, VOCs, and GHG for various operations on site. The facility must conduct initial testing and submit the test report for the dryer, one pellet cooler and one greenwood hammermill, and the dry wood handling operation to show compliance within 90 days after issuance of permit R04 (test no later than 30 December 2019) unless an alternate date is approved by DAQ, and conduct annual testing of the dryer for VOC, PM, PM<sub>10</sub>, PM<sub>2.5</sub>, and NO<sub>x</sub>, and conduct annual testing of one pellet cooler cyclone and one dry hammermill for VOC, PM, PM<sub>10</sub>, PM<sub>2.5</sub>. Additional testing is required when either the softwood percentage increased by more than 10% from the percentage run during the last stack test, or the production throughput increases by more than 10% from the throughput run during the last stack test. The facility is required to re-route the exhaust from the green wood hammermills to the ESP/RTO within 12 months after issuance of permit R04. Production throughput is limited to no more than 537,625 ODT per consecutive 12-month period until after the Softwood Expansion Project (SWEP) is completed. The limitation increases to 657,000 ODT after completion of the SWEP. Throughput of the dry wood hammermills is limited to no more than 558,450 ODT per consecutive 12-month period. Furnace Bypass operation is limited to less than 50 hours per year for startups and to less than 500 hours per year in “idle mode”, defined as a maximum heat input of 5 million Btu/hr. Monthly calculations of NO<sub>x</sub>, filterable PM, CO, VOC, and GHG emissions are required. The facility is required to perform periodic inspection and maintenance on the WESP and RTO, maintain the temperatures in the RTO at or above the average temperatures established in the stack testing, and maintain the minimum secondary voltage and minimum current in the WEST that were established in the stack testing. Records are required. A semi-annual summary report is required.

**APPEARED IN COMPLIANCE:** Initial stack testing was conducted 16-19 December 2019. The test report was submitted to DAQ on 30 January 2020. The review report was completed on 11 March 2020 and indicated compliance with the applicable emission standards. The most recent stack test was conducted on 3 December 2020. The test report was submitted to DAQ on 29 January 2021 and is under review with SSCB. The latest semi-annual summary report was received at FRO on 29 January 2021 and appeared complete. Maximum 12-month production throughput during 2020 was 455,906.3 ODT in January, with the highest average softwood percentage of 70.8% in November. The highest 12-month throughput of the dry hammermill system during 2020 was 214,276 ODT. Monthly calculations of emissions are available on the facility’s computer system. Inspections and maintenance are being conducted as required. See the table in section 6.A of this report for details on dates. The latest semi-annual summary report was received at FRO on 29 January 2021 and appeared complete.

- F. 15A NCAC 02D .0535 – EXCESS EMISSIONS REPORTING AND MALFUNCTION** – The Permittee is required to report instances of excess emissions that last more than 4 hours caused by malfunction, a breakdown of process or control equipment, or any other abnormal condition.

**APPEARED IN COMPLIANCE:** Ms. Grazioli stated that no instances of excess emissions have occurred, so no reporting has been required.



- G. 15A NCAC 02D .0540 – PARTICULATES FROM FUGITIVE DUST EMISSION SOURCES** – The Permittee shall not allow fugitive dust to cause/contribute to substantial complaints or cause excessive VE past the property boundary.

**APPEARED IN COMPLIANCE:** Ms. Grazioli stated that the facility has not received any dust complaints. FRO has not received any dust complaints related to this facility. I did not observe any evidence of fugitive dust or excess visible emissions beyond the property boundaries during the inspection.

- H. 15A NCAC 02D .1806 – CONTROL AND PROHIBITION OF ODOROUS EMISSIONS** – The Permittee shall not cause or contribute to objectionable odors beyond the facility's boundary.

**APPEARED IN COMPLIANCE:** Ms. Grazioli stated that no odor complaints had been received by the facility, and no odor complaints have been received at FRO regarding this facility.

- I. 15A NCAC 02Q .0207 – ANNUAL EMISSIONS REPORTING** – Requires the facility to submit an annual emissions inventory by June 30 for the previous calendar year.

**APPEARED IN COMPLIANCE:** The latest emission inventory was submitted to DAQ on 8 June 2021 for calendar year 2020.

- J. 15A NCAC 02Q .0504 – OPTION FOR OBTAINING CONSTRUCTION AND OPERATION PERMIT** – The facility is required to submit a Title V air permit application to amend the existing Title V first-time application 8200152.17B on or before 12 months after commencing operation of any of the new air emission sources or control devices listed in permit R04.

**APPEARED IN COMPLIANCE:** The facility submitted their first time Title V permit application on 2 October 2020.

7. **INSIGNIFICANT ACTIVITIES:**

<b>Emission Source ID No.</b>	<b>Emission Source Description</b>
IES-GWH <b>PSD</b>	Green wood handling and sizing operations
IES-BARKHOG <b>PSD</b>	Bark Hog
IES-TK-1 <b>PSD</b>	Diesel fuel storage tank (up to 2,500 gallons capacity)
IES-TK-2 <b>PSD</b>	Diesel fuel storage tank (up to 1,000 gallons capacity)
IES-TK-3 <b>PSD</b>	Diesel fuel storage tank (up to 2,500 gallons capacity)
IES-GWSP-1 through IES-GWSP-4 <b>PSD</b>	Green wood storage piles
IES-BFSP-1 and IES-BFSP-2 <b>PSD</b>	Two (2) bark fuel storage piles
IES-DEBARK-1 <b>PSD</b>	De-barker
IES-CHIP-1 <b>PSD</b>	Log chipping
IES-DRYSHAVE <b>PSD</b>	Dry shaving material handling
IES-BFB <b>PSD</b>	Bark fuel fin
IES-PAVEDROADS <b>PSD</b>	Paved roads
IES-EG <b>NSPS Subpart IIII MACT Subpart ZZZZ NOT OPERATING</b>	689 HP diesel-fired emergency generator
IES-FWP <b>NSPS Subpart IIII MACT Subpart ZZZZ NOT OPERATING</b>	131 HP diesel-fired fire water pump

8. **NSPS SUBPART IIII – STATIONARY COMPRESSION IGNITION INTERNAL COMBUSTION ENGINES** – Applies to the emergency generator engine and the fire pump engine (ID Nos. IES-EG and IES-FWP). The facility is required to purchase engines certified to meet the emission requirements in Subpart IIII. The facility is permitted to operate the emergency engines up to 100 hours per year for periodic testing and maintenance, to include up to 50 hours of operation for non-emergency use.

**APPEARED IN COMPLIANCE:** During the inspection, Ms. Grazioli indicated that the emergency generator is only run for testing, generally about 20 minutes weekly. Gregory Poole handles the annual maintenance on the generator and fire pump with the last annual inspection conducted on 1 March 21. The last monthly inspection was conducted on 16 April 2021. The facility keeps a spreadsheet with run times and total run time for the engines, and records of inspection and maintenance on the engines. The facility has the Certificate of Conformity for both engines on file.

**9. GENERAL CONDITION 15: CLEAN AIR ACT SECTION 112(r) REQUIREMENTS:**

This facility does not store any 112(r) subject materials in excess of threshold quantities. Therefore, the facility is not required to maintain a written Risk Management Plan (RMP).

**10. NON-COMPLIANCE HISTORY SINCE 2010:**

02/03/17 NOV issued for recordkeeping deficiencies

11/03/17 NOV/NRE issued for exceedance of CO BACT emission limit

06/05/18 NOV/NRE issued for exceedance of VOC BACT emission limit. This resulted in the company entering into an SOC to operate in continuing violation during the construction of new emission controls. The company installed a new RTO on the dryer discharge, testing was conducted to show compliance, and the SOC was completed on 14 October 2019.

**11. CONCLUSION AND RECOMMENDATIONS:**

Enviva Pellets Sampson, LLC appeared to be **IN COMPLIANCE** with their air quality permit at the time of the inspection on 05/28/21.

**PINK SHEET ADDITIONS:** None

/sca

