

# Blue Ridge Environmental Defense League

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November 8, 2018

William D. Willets, Permitting Chief  
NC Division of Air Quality  
217 West Jones St., Suite 4000  
Raleigh, NC 27603

**RE: Draft Air Permit No. 10365R03, Facility ID 7700096, Enviva Pellets Hamlet, LLC**

Mr. Willets:

On behalf of the Blue Ridge Environmental Defense League and our chapter the Concerned Citizens of Richmond County, I write to request that the DAQ perform a Multiple Source Review in the Hamlet area before approving the Enviva Permit which today is the subject of a public hearing.

Hamlet, NC, is the location of several large sources of air pollution. The sum of the impacts on public must be ascertained by the DAQ before the agency issues any new permits.

On the following page of this letter, I have compiled information released last month from the US Environmental Protection Agency's Toxic Release Inventory. The TRI states that there are six facilities in its database which in 2017 emitted 537 thousand pounds of hazardous air pollutants, including over 50 thousand pounds of formaldehyde and 200 thousand pounds of ammonia. See chart on next page. The data for 2012 to 2017 indicate that this is a persistent level of air toxics in the Hamlet area. This level of pollutants is now the contamination baseline to which pollution from Enviva, if permitted, would be added.

Therefore, we hereby request that the Division of Air Quality complete a comprehensive assessment of air pollution in Hamlet, to include Duke Energy Progress LLC Smith Energy Complex; Trinity Manufacturing Inc.; Concrete Supply Co. LLC and others now operating plus the projected impacts of air toxics from the Enviva plant.

I plan to submit further comments.

Respectfully,



Louis A. Zeller  
Executive Director

## 2017 TRI Factsheet: City – Hamlet, NC

### Data Source: 2017 Dataset (released October 2018)

The [Toxics Release Inventory \(TRI\)](#) tracks the management of certain toxic chemicals that may pose a threat to human health and the environment. Certain industrial facilities in the U.S. must report annually how much of each chemical is recycled, combusted for energy recovery, treated for destruction, and disposed of or otherwise released on- and off-site. This information is collectively referred to as production-related waste managed.

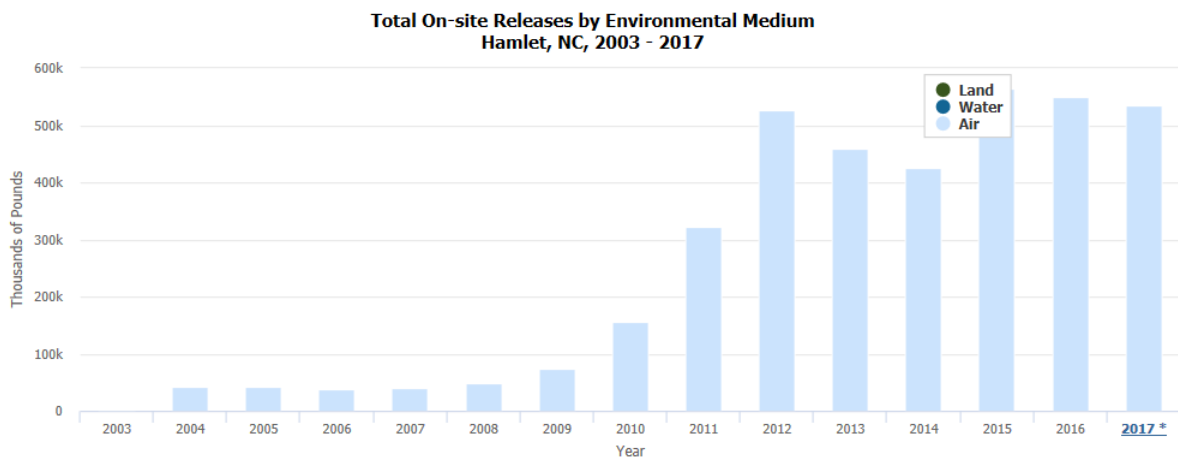
### Quick Facts for 2017

	Hamlet, NC
<b>Number of TRI Facilities:</b>	6
<b>Total Production-Related Waste Managed:</b>	834.2 thousand lbs
<b><a href="#">Total On-site and Off-site Disposal or Other Releases:</a></b>	537.5 thousand lbs
<b><a href="#">Total On-site:</a></b>	535.1 thousand lbs
• <a href="#">Air:</a>	535.1 thousand lbs
• <a href="#">Water:</a>	0 lbs
• <a href="#">Land:</a>	0 lbs
<b><a href="#">Total Off-Site:</a></b>	2.3 thousand lbs

### Chemicals Released to Air in Hamlet, NC, 2017

TOTAL 535.1 thousand pounds

AMMONIA: 39%  
FORMALDEHYDE: 10%  
Other: 50%



Attachment Data Source accessed 11/7/18:

[https://iaspub.epa.gov/triexplorer/tri\\_factsheet.factsheet?&pstate=NC&pcity=Hamlet&pyear=2017&pParent=TRI&pDataSet=TRIQ1](https://iaspub.epa.gov/triexplorer/tri_factsheet.factsheet?&pstate=NC&pcity=Hamlet&pyear=2017&pParent=TRI&pDataSet=TRIQ1)