

November 8, 2018

Dear Secretary Michael Regan:

We, the undersigned organizations, are concerned with the proposed expansion of Enviva's wood pellet facilities in North Carolina. Enviva is attempting a major expansion at several of their North Carolina facilities. The Richmond County (Hamlet) plant is just the beginning. The wood pellet industry has been allowed to grow unchecked in North Carolina, and we are concerned that this expansion will worsen the already dangerous impact of this industry on public health, forests, and the climate. We urge DEQ to:

1. Initiate a study to assess the cumulative impacts of the wood pellet industry, and halt expansion of the industry until such study is completed;
2. Modify the Enviva Hamlet permit to enforce reductions in production and emissions; and
3. Perform a full EJ analysis, with the results incorporated into the modified permit for the Enviva Hamlet facility.

The wood pellet industry is driving the destruction and degradation of tens of thousands of acres of North Carolina forests, which are cut down, turned into wood pellets, and shipped overseas to be burned for energy. Numerous scientific studies have confirmed that burning trees releases more greenhouse gas emissions per unit of electricity compared to coal, and is worse for the climate than burning coal particularly over the crucial decades ahead.<sup>1,2,3,4</sup>

**Now more than ever, we need standing, diverse, healthy forests to store carbon, protect us from flooding and storms, and provide us with clean air and water.** Forests draw enormous amounts of carbon out of the atmosphere and store it in trees and soil. Any expansion of the wood pellet industry will drive increases in logging and conversion of natural forests to tree plantations, which sharply conflicts with North Carolina's commitment and responsibility to act on climate change.<sup>5</sup>

In the destructive wake of Hurricane Florence, it is urgent that state policy and agency practices reflect the need to protect more forests.<sup>6,7</sup> Natural forests increase the resiliency of low-lying and flood-prone areas, whereas forest degradation, clearcut logging, and conversion to plantations

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<sup>1</sup> Booth, M. Webinar slides: Bioenergy Loopholes in the Clean Power Plan, and How to Avoid Them | Partnership for Policy Integrity. (2015). <https://bit.ly/2RU41Gs>

<sup>2</sup> Longva, Y. et al. (2017) The potential effects of land-based mitigation on the climate system and the wider environment: A synthesis of current knowledge in support of policy. <https://bit.ly/2wVLvH2>

<sup>3</sup> NRDC. (2015). Think Wood Pellets Are Green? Think Again. <https://on.nrdc.org/1Uc74qh>

<sup>4</sup> Buchholz, T. and Gunn, J. Commissioned by SELC. (2015). Carbon Emission Estimates for Drax biomass powerplants in the UK sourcing from Enviva Pellet Mills in U.S. Southeastern Hardwoods using the BEAC model. <https://bit.ly/1KBqDRA>

<sup>5</sup> North Carolina Joins 14 States in Bipartisan U.S. Climate Alliance. (2017). <https://bit.ly/2PBL0Mp>

<sup>6</sup> Sorg, Lisa. NC Policy Watch. Forests help control floods, reduce effects of climate change — unless they're ground up and burned for fuel. (26 September 2018). <https://bit.ly/2NKR7Hv>

<sup>7</sup> Boraks, David. WFAE. Post-Hurricane Floods Renew Debate Over North Carolina Wood Pellet Industry. (10 October 2018). <https://bit.ly/2RUDw3O>

significantly decrease flood protection benefits to surrounding communities.<sup>8</sup> Years of investigation, backed up by industry data, have documented that Enviva sources whole trees from the Mid-Atlantic Coastal Ecoregion, which are ecologically important, sensitive ecosystems and critical for flood control. Having driven conversions of wetland and hardwood forests to plantations, Enviva is now attempting to increase their softwood sourcing.<sup>9,10</sup>

The industrial-scale production of wood pellets creates harmful particulate matter, volatile organic compounds that create smog, and other hazardous pollutants. A shocking pattern of air quality violations have been documented in the wood pellet industry throughout the South, particularly at Enviva's North Carolina facilities.<sup>11</sup> These emissions are disproportionately harming communities of color and low-income communities, such as the communities of Dobbins Heights and Hamlet, who are already burdened by other polluting industries. According to the EPA's EJSCREEN tool, Dobbins Heights and Hamlet are in the 70-90th percentiles for traffic proximity, Superfund site proximity, ozone, PM 2.5, air toxics cancer risk, and diesel particulate matter among low-income, minority communities in the United States.<sup>12</sup>

NC DEQ should have performed a full environmental justice analysis before the draft permit was ever issued, so that the EJ analysis could be incorporated into the draft permit. Doing an analysis at this stage is too little, too late. NC DEQ must go back to the drawing board, and do a full EJ analysis before issuing a modified permit. This process must be informed by the DEQ Environmental Justice Advisory board, with leadership and input from the impacted community.

Initial miscalculations and oversights of Enviva's emissions should not be rewarded with approval to expand yet again. While Enviva claims that new pollution controls would keep them under the emissions limit even with increased production capacity, third party estimates and testing at similar Enviva plants show that Enviva would fail to remain below the major source threshold with their proposed increased production capacity. This would be a violation of the Clean Air Act. **Therefore, DEQ must reject Enviva's request to expand, and revise the draft permit to lower production levels that will ensure compliance with the Clean Air Act.**

Choosing between proper air quality controls and expansion of a harmful industry is a false choice. We urge DEQ to revise the draft permit, Air Quality Permit No. 10365R03, to require that Enviva take all procedures necessary to reduce their air pollution and reduce their production capacity.

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<sup>8</sup> Bradshaw, C. J. A., Sodhi, N. S., Peh, K. S.-H. & Brook, B. W. Global evidence that deforestation amplifies flood risk and severity in the developing world. *Glob. Chang. Biol.* 13, 2379–2395 (2007)

<sup>9</sup> Natural Resources Defense Council. European Imports of Wood Pellets for "Green Energy" Devastating US Forests. (2017). <https://bit.ly/2vpScjU>

<sup>10</sup> Montague, B. *The Ecologist*. (16 April 2018). Hardwood forests cut down to feed Drax Power plant, Channel 4 Dispatches claims. <https://bit.ly/2COksQn>

<sup>11</sup> Environmental Integrity Project. Dirty Deception: How the Wood Biomass Industry Skirts the Clean Air Act. (2018). <https://bit.ly/2COsYik>

<sup>12</sup> See EPA EJSCREEN mapper at <https://ejscreen.epa.gov/mapper/>

The latest UN IPCC Report presses governments around the world, in no uncertain terms, to take “rapid, far-reaching and unprecedented changes in all aspects of society.”<sup>13</sup> This means quickly transitioning to **truly clean, carbon-free energy** -- not false solutions like forest biomass energy -- at the same time as we dramatically scale up forest protection. In light of other applications from Enviva to expand at multiple North Carolina facilities, we call on DEQ to initiate a study to assess the cumulative impacts of that the industrial scale wood pellet industry has on North Carolina forests, the climate, and communities, prior to making future permitting decisions.

Thank you for your attention to this important matter.

CC:

Michael Abraczinskas, Division of Air Quality  
Kevin Godwin, Division of Air Quality  
William Willets, Division of Air Quality  
Governor Roy Cooper  
Jeremy Tarr, Office of the Governor

Sincerely,

Active Students for a Healthy Environment	NC Poor People's Campaign
Alliance for Energy Democracy	NC Sierra Club
Carolina Wetlands Association	NC WARN
Center for Sustainable Communities	Partnership for Policy Integrity
Clean Water for North Carolina	Piedmont Plateau Group of the Sierra Club
Coastal Carolina Riverwatch	Plastic Ocean Project
Community Roots	Rachel Carson Council
Concerned Citizens of Richmond County	Renewable Energy Transition Initiative
Crystal Coast Waterkeeper	Sol Nation
Dogwood Alliance	SouthWings
Environment North Carolina	Stand.earth
Greenpeace USA	Sustain Charlotte
Land of the Sky United Church of Christ	The Canary Coalition
MountainTrue	Toxic Free NC
NC Climate Justice Collective	Triangle Women's International League for Peace and Freedom
NC Climate Solutions Coalition	White Oak-New Riverkeeper Alliance
NC Council of Churches	Wild Nature Institute
NC Environmental Justice Network	William Bartram Sierra Club
NC Interfaith Power and Light	350 Asheville
NC League of Conservation Voters	350 Triangle

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<sup>13</sup> UN Environment. Rapid and unprecedented action required to stay within 1.5°C says UN's Intergovernmental Panel on Climate Change. Oct 8, 2018. <https://bit.ly/2Cw1CNQ>