



September 7, 2017

The Honorable Roy A. Cooper III
North Carolina Office of the Governor
20301 Mail Service Center
Raleigh, NC 27699-0301

Dear Governor Cooper,

The undersigned public health and medical professionals strongly urge you to protect the health of Richmond County residents by revoking [Air Quality Permit No. 10365R02](#) from the wood pellet facility that is proposed to be built in Hamlet, North Carolina by Enviva Pellets Hamlet, LLC (Enviva).

Wood pellet facilities emit air pollutants directly and indirectly that are harmful to human health. These facilities directly emit air pollutants during pellet production and consumption of energy, and indirectly through increased vehicular exhaust due to the heavy-duty traffic needed to service the facility.

One of these air pollutants, fine particulate matter (PM_{2.5}), can cause numerous health issues, most notably adverse respiratory and cardiovascular health effects. In 2010, the American Heart Association deemed particulate matter a modifiable factor in heart disease and key contributor to premature deaths (Brook et al. 2010). In 2016, the American Lung Association stated it does not support biomass combustion for energy generation because of the adverse health effects from air pollutants emitted during production (American Lung Association, 2016).

According to Robert Wood Johnson Foundation program, in 2016 Richmond County ranked in the bottom 10 percent of North Carolina counties for health outcomes (University of Wisconsin, 2016). The proposed Enviva facility in Hamlet will exacerbate these already alarming health issues for the community.

In 2015, the North Carolina Department of Environmental Quality (DEQ) issued an air quality permit (No. 10365R02) to Enviva which violates air quality regulations in the following ways: (1) The only control technology that the permit lists for the control of emissions due to the use of biomass fuel is the use of biomass fuel. It is nonsensical for the only control technology for a major pollution source to be the source of the pollution itself. (2) DEQ expressly declined to consider alternative, lower-emission fuel sources in its determination of the Best Available Control Technology (BACT) for greenhouse gases. (3) The BACT analysis for particulate matter is inadequate and the permitted emission rate does not reflect the lowest rate realistically achievable with the technology selected. (4) The BACT analysis for volatile

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organic compounds (VOCs) is inadequate and the approach selected does not include technology commonly used in the pellet manufacturing industry to reduce VOC emissions.

Richmond County residents currently face air pollutants caused by Duke Energy, Piedmont Natural Gas, Perdue Chicken Plant, the CSX rail line and coal ash. The additional air pollutants emitted by this proposed Enviva wood pellet in Richmond County will cause an added and unnecessary burden of disease on residents.

The undersigned public health and medical professionals request you protect public health by revoking this flawed Air Quality Permit (No. 10365R02) issued by DEQ.

CC: Secretary Michael Regan at the NC Department of Environmental Quality, Director Michael Abraczinkas at the NC Division of Air Quality

Sincerely,

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