

**Archived:** Friday, September 27, 2019 10:55:43 AM  
**From:** Bill Pugh ([chiromancy@hotmail.com](mailto:chiromancy@hotmail.com)) Sent You a Personal Message  
**Sent:** Thursday, September 26, 2019 6:33:33 AM  
**To:** [james.white@deq.virginia.gov](mailto:james.white@deq.virginia.gov)  
**Subject:** Registration Number 61653 - Protect our Forests and our Health  
**Importance:** Normal

---

Dear Virginia Department Of Environmental Quality,

Please be a good steward of our state.

I am writing to urge you to deny Enviva's proposed expansion. I oppose any expansion in production at the Enviva Southampton County wood pellet facility. Additionally, I call on VA DEQ to decouple Enviva's permit for expansion with their permit for air pollution controls. Enviva must be required to install air pollution controls that their competitors in other states have used for years. The public should have the ability to comment on these two separate issues independent of each other.

I am concerned with the expansion of the wood pellet industry, led by Enviva, and the industry's impact on Virginia's forests, communities, and the climate.

The urgency of the climate crisis demands that we dramatically scale up forest protection. We cannot afford the increased logging and degradation of our forests. According to the Intergovernmental Panel on Climate Change, to meet our climate goals we must dramatically scale up forest protection, conservation, and restoration. Yet Enviva is driving the destruction and degradation of tens of thousands of acres of Southern forests per year. An increasing body of scientific evidence shows that burning trees for utility-scale electricity releases more greenhouse gas emissions than fossil fuels do. If the Southampton County increase goes through, it will increase logging to 19,000 acres per year, and carbon emissions to 1,430,757 tpy - the equivalence of 303,770 additional cars on the road per year.

Enviva has been documented numerous times logging in the Roanoke River Basin, a river that has already flooded Southampton County numerous times. As our coastal communities prepare for more frequent and intense hurricanes, it is more important than ever to invest in nature to protect communities from the damage wrought by these intense storms. Natural forests and wetlands absorb floodwaters and slow them down, buffering communities from flooding and reducing costly property damage.

Furthermore, this expansion request comes amidst revelations of years-long violations of the Clean Air Act, and attempts by the industry to cover this up. A recent report by Environmental Integrity Project shows a shocking pattern of air quality violations or noncompliance at almost all wood pellet facilities, with Virginia's Enviva facility being amongst the worst. For years, Enviva has been spewing hazardous pollutants into the air, emissions that have been linked to respiratory illness, heart disease, and cancer. Enviva consistently claims the health of communities living near their facilities is too expensive to protect. Enviva recently agreed to install proper air pollution controls at the Hamlet and Sampson County plants only after being dragged through court and threatened with an enforcement action.

Time and again, Enviva has misled the public, government, and investors on their emissions and sourcing practices. The company's past actions and missteps make it all the more imperative that it is strongly scrutinized at every step of the way.

I urge you to deny this Air Quality permit, Registration Number 61653, and any other proposals made by Enviva to expand operations. Additionally, I call on VA DEQ to decouple Enviva's permit for expansion with their permit for air pollution controls. Thank you for the opportunity to comment on this permit.

Sincerely,

Bill Pugh  
1200 N Quaker Ln  
Alexandria, VA 22302  
chiromancy@hotmail.com  
(703) 671-3542

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. Please contact Lillian Miller at [core.help@sierraclub.org](mailto:core.help@sierraclub.org) or (415) 977-5500 for more information.

**Archived:** Friday, September 27, 2019 10:55:43 AM  
**From:** [Dogwood Alliance](#)  
**Sent:** Thursday, September 26, 2019 12:13:59 AM  
**To:** [James White](#)  
**Subject:** Registration Number 61653 - Protect our Forests and our Health  
**Importance:** Normal

---

Sep 25, 2019

James White

Dear Permitting Officer, White,

I am writing to urge you to deny Enviva's proposed expansion. I oppose any expansion in production at the Enviva Southampton County wood pellet facility. Additionally, I call on VA DEQ to decouple Enviva's permit for expansion with their permit for air pollution controls. Enviva must be required to install air pollution controls that their competitors in other states have used for years. The public should have the ability to comment on these two separate issues independent of each other.

I am concerned with the expansion of the wood pellet industry, led by Enviva, and the industry's impact on Virginia's forests, communities, and the climate.

The urgency of the climate crisis demands that we dramatically scale up forest protection. We cannot afford the increased logging and degradation of our forests. According to the Intergovernmental Panel on Climate Change, to meet our climate goals we must dramatically scale up forest protection, conservation, and restoration. Yet Enviva is driving the destruction and degradation of tens of thousands of acres of Southern forests per year. An increasing body of scientific evidence shows that burning trees for utility-scale electricity releases more greenhouse gas emissions than fossil fuels do. If the Southampton County increase goes through, it will increase logging to 19,000 acres per year, and carbon emissions to 1,430,757 tpy - the equivalence of 303,770 additional cars on the road per year.

Enviva has been documented numerous times logging in the Roanoke River Basin, a river that has already flooded Southampton County numerous times. As our coastal communities prepare for more frequent and intense hurricanes, it is more important than ever to invest in nature to protect communities from the damage wrought by these intense storms. Natural forests and wetlands absorb floodwaters and slow them down, buffering communities from flooding and reducing costly property damage.

Furthermore, this expansion request comes amidst revelations of years-long violations of the Clean Air Act, and attempts by the industry to cover this up. A recent report by Environmental Integrity Project shows a shocking pattern of air quality violations or

noncompliance at almost all wood pellet facilities, with Virginia's Enviva facility being amongst the worst. For years, Enviva has been spewing hazardous pollutants into the air, emissions that have been linked to respiratory illness, heart disease, and cancer. Enviva consistently claims the health of communities living near their facilities is too expensive to protect. Enviva recently agreed to install proper air pollution controls at the Hamlet and Sampson County plants only after being dragged through court and threatened with an enforcement action.

Time and again, Enviva has misled the public, government, and investors on their emissions and sourcing practices. The company's past actions and missteps make it all the more imperative that it is strongly scrutinized at every step of the way.

I urge you to deny this Air Quality permit, Registration Number 61653, and any other proposals made by Enviva to expand operations. Additionally, I call on VA DEQ to decouple Enviva's permit for expansion with their permit for air pollution controls. Thank you for the opportunity to comment on this permit.

Sincerely,

Bruce Vaben  
1550 Collins Ave  
Miami Beach, FL 33139-3111  
(555) 555-5555  
newspirit32@hotmail.com

**Archived:** Friday, September 27, 2019 10:55:43 AM  
**From:** [Dogwood Alliance](#)  
**Sent:** Thursday, September 26, 2019 1:45:25 PM  
**To:** [James White](#)  
**Subject:** Registration Number 61653 - Protect our Forests and our Health  
**Importance:** Normal

---

Sep 26, 2019

James White

Dear Permitting Officer, White,

I am writing to urge you to deny Enviva's proposed expansion. I oppose any expansion in production at the Enviva Southampton County wood pellet facility. Additionally, I call on VA DEQ to decouple Enviva's permit for expansion with their permit for air pollution controls. Enviva must be required to install air pollution controls that their competitors in other states have used for years. The public should have the ability to comment on these two separate issues independent of each other.

I am concerned with the expansion of the wood pellet industry, led by Enviva, and the industry's impact on Virginia's forests, communities, and the climate.

The urgency of the climate crisis demands that we dramatically scale up forest protection. We cannot afford the increased logging and degradation of our forests. According to the Intergovernmental Panel on Climate Change, to meet our climate goals we must dramatically scale up forest protection, conservation, and restoration. Yet Enviva is driving the destruction and degradation of tens of thousands of acres of Southern forests per year. An increasing body of scientific evidence shows that burning trees for utility-scale electricity releases more greenhouse gas emissions than fossil fuels do. If the Southampton County increase goes through, it will increase logging to 19,000 acres per year, and carbon emissions to 1,430,757 tpy - the equivalence of 303,770 additional cars on the road per year.

Enviva has been documented numerous times logging in the Roanoke River Basin, a river that has already flooded Southampton County numerous times. As our coastal communities prepare for more frequent and intense hurricanes, it is more important than ever to invest in nature to protect communities from the damage wrought by these intense storms. Natural forests and wetlands absorb floodwaters and slow them down, buffering communities from flooding and reducing costly property damage.

Furthermore, this expansion request comes amidst revelations of years-long violations of the Clean Air Act, and attempts by the industry to cover this up. A recent report by Environmental Integrity Project shows a shocking pattern of air quality violations or

noncompliance at almost all wood pellet facilities, with Virginia's Enviva facility being amongst the worst. For years, Enviva has been spewing hazardous pollutants into the air, emissions that have been linked to respiratory illness, heart disease, and cancer. Enviva consistently claims the health of communities living near their facilities is too expensive to protect. Enviva recently agreed to install proper air pollution controls at the Hamlet and Sampson County plants only after being dragged through court and threatened with an enforcement action.

Time and again, Enviva has misled the public, government, and investors on their emissions and sourcing practices. The company's past actions and missteps make it all the more imperative that it is strongly scrutinized at every step of the way.

I urge you to deny this Air Quality permit, Registration Number 61653, and any other proposals made by Enviva to expand operations. Additionally, I call on VA DEQ to decouple Enviva's permit for expansion with their permit for air pollution controls. Thank you for the opportunity to comment on this permit.

Sincerely,

Brian Habenicht  
52 Westwood Pl  
Asheville, NC 28806-4224  
(828) 301-9380  
bhabenicht@yahoo.com

**Archived:** Friday, September 27, 2019 10:55:44 AM  
**From:** [Tammy Tayman \(yarnmouse@gmail.com\)](mailto:yarnmouse@gmail.com) Sent You a Personal Message  
**Sent:** Thursday, September 26, 2019 5:10:37 PM  
**To:** [james.white@deq.virginia.gov](mailto:james.white@deq.virginia.gov)  
**Subject:** Registration Number 61653 - Protect our Forests and our Health  
**Importance:** Normal

---

Dear Virginia Department Of Environmental Quality,

We must protect this planet and all the life on it, for our future and our children's future. Thank you for doing the right thing!

I am writing to urge you to deny Enviva's proposed expansion. I oppose any expansion in production at the Enviva Southampton County wood pellet facility. Additionally, I call on VA DEQ to decouple Enviva's permit for expansion with their permit for air pollution controls. Enviva must be required to install air pollution controls that their competitors in other states have used for years. The public should have the ability to comment on these two separate issues independent of each other.

I am concerned with the expansion of the wood pellet industry, led by Enviva, and the industry's impact on Virginia's forests, communities, and the climate.

The urgency of the climate crisis demands that we dramatically scale up forest protection. We cannot afford the increased logging and degradation of our forests. According to the Intergovernmental Panel on Climate Change, to meet our climate goals we must dramatically scale up forest protection, conservation, and restoration. Yet Enviva is driving the destruction and degradation of tens of thousands of acres of Southern forests per year. An increasing body of scientific evidence shows that burning trees for utility-scale electricity releases more greenhouse gas emissions than fossil fuels do. If the Southampton County increase goes through, it will increase logging to 19,000 acres per year, and carbon emissions to 1,430,757 tpy - the equivalence of 303,770 additional cars on the road per year.

Enviva has been documented numerous times logging in the Roanoke River Basin, a river that has already flooded Southampton County numerous times. As our coastal communities prepare for more frequent and intense hurricanes, it is more important than ever to invest in nature to protect communities from the damage wrought by these intense storms. Natural forests and wetlands absorb floodwaters and slow them down, buffering communities from flooding and reducing costly property damage.

Furthermore, this expansion request comes amidst revelations of years-long violations of the Clean Air Act, and attempts by the industry to cover this up. A recent report by Environmental Integrity Project shows a shocking pattern of air quality violations or noncompliance at almost all wood pellet facilities, with Virginia's Enviva facility being amongst the worst. For years, Enviva has been spewing hazardous pollutants into the air, emissions that have been linked to respiratory illness, heart disease, and cancer. Enviva consistently claims the health of communities living near their facilities is too expensive to protect. Enviva recently agreed to install proper air pollution controls at the Hamlet and Sampson County plants only after being dragged through court and threatened with an enforcement action.

Time and again, Enviva has misled the public, government, and investors on their emissions and sourcing practices. The company's past actions and missteps make it all the more imperative that it is strongly scrutinized at every step of the way.

I urge you to deny this Air Quality permit, Registration Number 61653, and any other proposals made by Enviva to expand operations. Additionally, I call on VA DEQ to decouple Enviva's permit for expansion with their permit for air pollution controls. Thank you for the opportunity to comment on this permit.

Sincerely,

Tammy Tayman  
10129 Ranger Rd  
Fairfax, VA 22030  
yarnmouse@gmail.com  
(301) 371-6265

This message was sent by KnowWho, as a service provider, on behalf of an individual associated with Sierra Club. Please contact Lillian Miller at [core.help@sierraclub.org](mailto:core.help@sierraclub.org) or (415) 977-5500 for more information.

**Archived:** Friday, September 27, 2019 10:55:44 AM  
**From:** [Dogwood Alliance](#)  
**Sent:** Thursday, September 26, 2019 4:45:40 PM  
**To:** [James White](#)  
**Subject:** Registration Number 61653 - Protect our Forests and our Health  
**Importance:** Normal

---

Sep 26, 2019

James White

Dear Permitting Officer, White,

I am writing to urge you to deny Enviva's proposed expansion. I oppose any expansion in production at the Enviva Southampton County wood pellet facility. Additionally, I call on VA DEQ to decouple Enviva's permit for expansion with their permit for air pollution controls. Enviva must be required to install air pollution controls that their competitors in other states have used for years. The public should have the ability to comment on these two separate issues independent of each other.

I am concerned with the expansion of the wood pellet industry, led by Enviva, and the industry's impact on Virginia's forests, communities, and the climate.

The urgency of the climate crisis demands that we dramatically scale up forest protection. We cannot afford the increased logging and degradation of our forests. According to the Intergovernmental Panel on Climate Change, to meet our climate goals we must dramatically scale up forest protection, conservation, and restoration. Yet Enviva is driving the destruction and degradation of tens of thousands of acres of Southern forests per year. An increasing body of scientific evidence shows that burning trees for utility-scale electricity releases more greenhouse gas emissions than fossil fuels do. If the Southampton County increase goes through, it will increase logging to 19,000 acres per year, and carbon emissions to 1,430,757 tpy - the equivalence of 303,770 additional cars on the road per year.

Enviva has been documented numerous times logging in the Roanoke River Basin, a river that has already flooded Southampton County numerous times. As our coastal communities prepare for more frequent and intense hurricanes, it is more important than ever to invest in nature to protect communities from the damage wrought by these intense storms. Natural forests and wetlands absorb floodwaters and slow them down, buffering communities from flooding and reducing costly property damage.

Furthermore, this expansion request comes amidst revelations of years-long violations of the Clean Air Act, and attempts by the industry to cover this up. A recent report by Environmental Integrity Project shows a shocking pattern of air quality violations or

noncompliance at almost all wood pellet facilities, with Virginia's Enviva facility being amongst the worst. For years, Enviva has been spewing hazardous pollutants into the air, emissions that have been linked to respiratory illness, heart disease, and cancer. Enviva consistently claims the health of communities living near their facilities is too expensive to protect. Enviva recently agreed to install proper air pollution controls at the Hamlet and Sampson County plants only after being dragged through court and threatened with an enforcement action.

Time and again, Enviva has misled the public, government, and investors on their emissions and sourcing practices. The company's past actions and missteps make it all the more imperative that it is strongly scrutinized at every step of the way.

I urge you to deny this Air Quality permit, Registration Number 61653, and any other proposals made by Enviva to expand operations. Additionally, I call on VA DEQ to decouple Enviva's permit for expansion with their permit for air pollution controls. Thank you for the opportunity to comment on this permit.

Sincerely,

Helen Greer  
1170 W Wabash St Lot 32  
Tucson, AZ 85705-1465  
(520) 292-9634  
helen2wheels@gmail.com

**Archived:** Friday, September 27, 2019 10:55:45 AM  
**From:** [Dogwood Alliance](#)  
**Sent:** Thursday, September 26, 2019 4:45:40 PM  
**To:** [James White](#)  
**Subject:** Registration Number 61653 - Protect our Forests and our Health  
**Importance:** Normal

---

Sep 26, 2019

James White

Dear Permitting Officer, White,

I am writing to urge you to deny Enviva's proposed expansion. I oppose any expansion in production at the Enviva Southampton County wood pellet facility. Additionally, I call on VA DEQ to decouple Enviva's permit for expansion with their permit for air pollution controls. Enviva must be required to install air pollution controls that their competitors in other states have used for years. The public should have the ability to comment on these two separate issues independent of each other.

I am concerned with the expansion of the wood pellet industry, led by Enviva, and the industry's impact on Virginia's forests, communities, and the climate.

The urgency of the climate crisis demands that we dramatically scale up forest protection. We cannot afford the increased logging and degradation of our forests. According to the Intergovernmental Panel on Climate Change, to meet our climate goals we must dramatically scale up forest protection, conservation, and restoration. Yet Enviva is driving the destruction and degradation of tens of thousands of acres of Southern forests per year. An increasing body of scientific evidence shows that burning trees for utility-scale electricity releases more greenhouse gas emissions than fossil fuels do. If the Southampton County increase goes through, it will increase logging to 19,000 acres per year, and carbon emissions to 1,430,757 tpy - the equivalence of 303,770 additional cars on the road per year.

Enviva has been documented numerous times logging in the Roanoke River Basin, a river that has already flooded Southampton County numerous times. As our coastal communities prepare for more frequent and intense hurricanes, it is more important than ever to invest in nature to protect communities from the damage wrought by these intense storms. Natural forests and wetlands absorb floodwaters and slow them down, buffering communities from flooding and reducing costly property damage.

Furthermore, this expansion request comes amidst revelations of years-long violations of the Clean Air Act, and attempts by the industry to cover this up. A recent report by Environmental Integrity Project shows a shocking pattern of air quality violations or

noncompliance at almost all wood pellet facilities, with Virginia's Enviva facility being amongst the worst. For years, Enviva has been spewing hazardous pollutants into the air, emissions that have been linked to respiratory illness, heart disease, and cancer. Enviva consistently claims the health of communities living near their facilities is too expensive to protect. Enviva recently agreed to install proper air pollution controls at the Hamlet and Sampson County plants only after being dragged through court and threatened with an enforcement action.

Time and again, Enviva has misled the public, government, and investors on their emissions and sourcing practices. The company's past actions and missteps make it all the more imperative that it is strongly scrutinized at every step of the way.

I urge you to deny this Air Quality permit, Registration Number 61653, and any other proposals made by Enviva to expand operations. Additionally, I call on VA DEQ to decouple Enviva's permit for expansion with their permit for air pollution controls. Thank you for the opportunity to comment on this permit.

Sincerely,

lisa allarde  
128 Bernies Dr  
Kunkletown, PA 18058-7280  
(717) 992-6900  
toothlessinpa@hotmail.com

**Archived:** Friday, September 27, 2019 10:55:45 AM  
**From:** [Dogwood Alliance](#)  
**Sent:** Thursday, September 26, 2019 2:45:32 PM  
**To:** [James White](#)  
**Subject:** Registration Number 61653 - Protect our Forests and our Health  
**Importance:** Normal

---

Sep 26, 2019

James White

Dear Permitting Officer, White,

I am writing to urge you to deny Enviva's proposed expansion. I oppose any expansion in production at the Enviva Southampton County wood pellet facility. Additionally, I call on VA DEQ to decouple Enviva's permit for expansion with their permit for air pollution controls. Enviva must be required to install air pollution controls that their competitors in other states have used for years. The public should have the ability to comment on these two separate issues independent of each other.

I am concerned with the expansion of the wood pellet industry, led by Enviva, and the industry's impact on Virginia's forests, communities, and the climate.

The urgency of the climate crisis demands that we dramatically scale up forest protection. We cannot afford the increased logging and degradation of our forests. According to the Intergovernmental Panel on Climate Change, to meet our climate goals we must dramatically scale up forest protection, conservation, and restoration. Yet Enviva is driving the destruction and degradation of tens of thousands of acres of Southern forests per year. An increasing body of scientific evidence shows that burning trees for utility-scale electricity releases more greenhouse gas emissions than fossil fuels do. If the Southampton County increase goes through, it will increase logging to 19,000 acres per year, and carbon emissions to 1,430,757 tpy - the equivalence of 303,770 additional cars on the road per year.

Enviva has been documented numerous times logging in the Roanoke River Basin, a river that has already flooded Southampton County numerous times. As our coastal communities prepare for more frequent and intense hurricanes, it is more important than ever to invest in nature to protect communities from the damage wrought by these intense storms. Natural forests and wetlands absorb floodwaters and slow them down, buffering communities from flooding and reducing costly property damage.

Furthermore, this expansion request comes amidst revelations of years-long violations of the Clean Air Act, and attempts by the industry to cover this up. A recent report by Environmental Integrity Project shows a shocking pattern of air quality violations or

noncompliance at almost all wood pellet facilities, with Virginia's Enviva facility being amongst the worst. For years, Enviva has been spewing hazardous pollutants into the air, emissions that have been linked to respiratory illness, heart disease, and cancer. Enviva consistently claims the health of communities living near their facilities is too expensive to protect. Enviva recently agreed to install proper air pollution controls at the Hamlet and Sampson County plants only after being dragged through court and threatened with an enforcement action.

Time and again, Enviva has misled the public, government, and investors on their emissions and sourcing practices. The company's past actions and missteps make it all the more imperative that it is strongly scrutinized at every step of the way.

I urge you to deny this Air Quality permit, Registration Number 61653, and any other proposals made by Enviva to expand operations. Additionally, I call on VA DEQ to decouple Enviva's permit for expansion with their permit for air pollution controls. Thank you for the opportunity to comment on this permit.

Sincerely,

Marianne Tornatore  
47 Fairways Dr  
Napa, CA 94558-1254  
mat5504@yahoo.com

**Archived:** Friday, September 27, 2019 10:55:45 AM  
**From:** [Dogwood Alliance](#)  
**Sent:** Thursday, September 26, 2019 3:45:35 PM  
**To:** [James White](#)  
**Subject:** Registration Number 61653 - Protect our Forests and our Health  
**Importance:** Normal

---

Sep 26, 2019

James White

Dear Permitting Officer, White,

I am writing to urge you to deny Enviva's proposed expansion. I oppose any expansion in production at the Enviva Southampton County wood pellet facility. Additionally, I call on VA DEQ to decouple Enviva's permit for expansion with their permit for air pollution controls. Enviva must be required to install air pollution controls that their competitors in other states have used for years. The public should have the ability to comment on these two separate issues independent of each other.

I am concerned with the expansion of the wood pellet industry, led by Enviva, and the industry's impact on Virginia's forests, communities, and the climate.

The urgency of the climate crisis demands that we dramatically scale up forest protection. We cannot afford the increased logging and degradation of our forests. According to the Intergovernmental Panel on Climate Change, to meet our climate goals we must dramatically scale up forest protection, conservation, and restoration. Yet Enviva is driving the destruction and degradation of tens of thousands of acres of Southern forests per year. An increasing body of scientific evidence shows that burning trees for utility-scale electricity releases more greenhouse gas emissions than fossil fuels do. If the Southampton County increase goes through, it will increase logging to 19,000 acres per year, and carbon emissions to 1,430,757 tpy - the equivalence of 303,770 additional cars on the road per year.

Enviva has been documented numerous times logging in the Roanoke River Basin, a river that has already flooded Southampton County numerous times. As our coastal communities prepare for more frequent and intense hurricanes, it is more important than ever to invest in nature to protect communities from the damage wrought by these intense storms. Natural forests and wetlands absorb floodwaters and slow them down, buffering communities from flooding and reducing costly property damage.

Furthermore, this expansion request comes amidst revelations of years-long violations of the Clean Air Act, and attempts by the industry to cover this up. A recent report by Environmental Integrity Project shows a shocking pattern of air quality violations or

noncompliance at almost all wood pellet facilities, with Virginia's Enviva facility being amongst the worst. For years, Enviva has been spewing hazardous pollutants into the air, emissions that have been linked to respiratory illness, heart disease, and cancer. Enviva consistently claims the health of communities living near their facilities is too expensive to protect. Enviva recently agreed to install proper air pollution controls at the Hamlet and Sampson County plants only after being dragged through court and threatened with an enforcement action.

Time and again, Enviva has misled the public, government, and investors on their emissions and sourcing practices. The company's past actions and missteps make it all the more imperative that it is strongly scrutinized at every step of the way.

I urge you to deny this Air Quality permit, Registration Number 61653, and any other proposals made by Enviva to expand operations. Additionally, I call on VA DEQ to decouple Enviva's permit for expansion with their permit for air pollution controls. Thank you for the opportunity to comment on this permit.

Sincerely,

Brad Yoho  
23440 Somerset Crossing PI  
Brambleton, VA 20148-8094  
(703) 430-7945  
byoho@hotmail.com

**Archived:** Friday, September 27, 2019 10:55:45 AM  
**From:** [Finley-Brook, Mary](#)  
**Sent:** Thursday, September 26, 2019 11:58:11 PM  
**To:** [James.white@deq.virginia.gov](mailto:James.white@deq.virginia.gov)  
**Subject:** Enviva  
**Importance:** Normal

PERMIT NAME: Minor New Source Review permit for a major modification to an existing major source, issued by DEQ, under the authority of the Air Pollution Control Board.

APPLICANT NAME AND REGISTRATION NUMBER: Enviva Pellets Southampton LLC; Registration Number: 61653.

FACILITY NAME AND ADDRESS: Enviva Pellets Southampton LLC; 26570 Rose Valley Road, Franklin, VA 23851.

I am highly concerned about the DEQ air permit review for the Enviva Pellets plant. This must be elevated to the Air Board for full review. There is insufficient information about the minority-majority population (60% African American <http://worldpopulationreview.com/us-cities/franklin-va-population/>) and other vulnerabilities like the high population in poverty, without health care or under the age of 18 that are not addressed in the permit application. This should have received an enhanced review and instead DEQ ran some very incomplete and inappropriate environmental justice analysis (a quick run of EJSCREEN analysis pasted below). It does clearly show that within a 5 mile radius the population is over 50% minority and nearly 40% low income. DEQ's treatment of this area in the permit and materials for public comment (with no mention of this vulnerability) is lacking basic civil rights protections and potentially allows for disproportionate harm based on race and income. This case requires a full and thorough review.



### EJSCREEN Report (Version 2018)



5 mile Ring Centered at 36.649917, -76.972143, VIRGINIA, EPA Region 3

Approximate Population: 11,619

Input Area (sq. miles): 78.53

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
<b>Environmental Indicators</b>							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$ )	8.76	8.92	41	9.97	15	9.53	33
Ozone (ppb)	41.9	43.6	16	44.3	11	42.5	43
NATA* Diesel PM ( $\mu\text{g}/\text{m}^3$ )	0.302	0.77	12	0.921	<50th	0.938	<50th
NATA* Cancer Risk (lifetime risk per million)	38	42	40	42	<50th	40	<50th
NATA* Respiratory Hazard Index	1.2	1.8	24	1.8	<50th	1.8	<50th
Traffic Proximity and Volume (daily traffic count/distance to road)	44	430	41	360	40	600	38
Lead Paint Indicator (% Pre-1960 Housing)	0.26	0.21	70	0.36	48	0.29	58
Superfund Proximity (site count/km distance)	0.025	0.1	20	0.14	18	0.12	29
RMP Proximity (facility count/km distance)	0.41	0.37	74	0.6	61	0.72	56
Hazardous Waste Proximity (facility count/km distance)	0.16	0.67	46	1.3	30	4.3	33
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.15	2.7	98	100	91	30	91
<b>Demographic Indicators</b>							
Demographic Index	46%	32%	79	30%	79	36%	70
Minority Population	54%	37%	74	32%	77	38%	70
Low Income Population	39%	27%	74	28%	74	34%	63
Linguistically Isolated Population	0%	3%	52	2%	54	4%	44
Population With Less Than High School Education	17%	11%	76	11%	80	13%	72
Population Under 5 years of age	6%	6%	52	6%	56	6%	52
Population over 64 years of age	18%	14%	74	15%	69	14%	74

\* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

I am also concerned that what DEQ has told us is the Best Available Control Technology (BACT) is not in fact the best available. I am aware that many of annual levels of criteria pollutants increase under these emissions controls scenarios. I am told that this is due to trade-offs but I expect that more could be done to lower emissions and that all available possibilities have not been explored. The evidence was insufficient.

When I heard DEQ air board staff speak in front of the Air Board Committee on Public Engagement on Sept 13 they said that they had told the company to get the public there. Enviva did! Given the attendance and how Enviva played it publicly on Twitter it seems they worked with DEQ but were not given guidelines to reach beyond paid employees who have a conflict of interest and cannot represent the larger community.



**Enviva**

@EnvivaBiomass



Enviva thanks [@VirginiaDEQ](#) for the opportunity to hear from stakeholders and renews commitment to job creation and air quality in [#Southampton](#).  
[#StrongCommunities](#)  
[ir.envivapartners.com/press-release/...](http://ir.envivapartners.com/press-release/...)



For these reasons, this high emission permit with dangerous levels of PM and criteria pollutants and GHG emissions must be reviewed by the whole Air Pollution Control Board.

Mary Finley-Brook  
Associate Professor of Geography, Environmental Studies & Global Studies  
University of Richmond  
#211 Richmond Way  
Richmond VA, 23173  
<http://geography.richmond.edu/faculty/mbrook/>

I support the mission & vision of the [Virginia Environmental Justice Collaborative](#).  
***A Clean, Healthy, Just & Equitable Environment for all.***

image001.png

---



## EJSCREEN Report (Version 2018)



5 mile Ring Centered at 36.649917,-76.972143, VIRGINIA, EPA Region 3

Approximate Population: 11,619

Input Area (sq. miles): 78.53

Selected Variables	Value	State Avg.	%ile in State	EPA Region Avg.	%ile in EPA Region	USA Avg.	%ile in USA
<b>Environmental Indicators</b>							
Particulate Matter (PM 2.5 in $\mu\text{g}/\text{m}^3$ )	8.76	8.92	41	9.97	15	9.53	33
Ozone (ppb)	41.9	43.6	16	44.3	11	42.5	43
NATA* Diesel PM ( $\mu\text{g}/\text{m}^3$ )	0.302	0.77	12	0.921	<50th	0.938	<50th
NATA* Cancer Risk (lifetime risk per million)	38	42	40	42	<50th	40	<50th
NATA* Respiratory Hazard Index	1.2	1.8	24	1.8	<50th	1.8	<50th
Traffic Proximity and Volume (daily traffic count/distance to road)	44	430	41	360	40	600	38
Lead Paint Indicator (% Pre-1960 Housing)	0.26	0.21	70	0.36	48	0.29	58
Superfund Proximity (site count/km distance)	0.025	0.1	20	0.14	18	0.12	29
RMP Proximity (facility count/km distance)	0.41	0.37	74	0.6	61	0.72	56
Hazardous Waste Proximity (facility count/km distance)	0.16	0.67	46	1.3	30	4.3	33
Wastewater Discharge Indicator (toxicity-weighted concentration/m distance)	0.15	2.7	98	100	91	30	91
<b>Demographic Indicators</b>							
Demographic Index	46%	32%	79	30%	79	36%	70
Minority Population	54%	37%	74	32%	77	38%	70
Low Income Population	39%	27%	74	28%	74	34%	63
Linguistically Isolated Population	0%	3%	52	2%	54	4%	44
Population With Less Than High School Education	17%	11%	76	11%	80	13%	72
Population Under 5 years of age	6%	6%	52	6%	56	6%	52
Population over 64 years of age	18%	14%	74	15%	69	14%	74

\* The National-Scale Air Toxics Assessment (NATA) is EPA's ongoing, comprehensive evaluation of air toxics in the United States. EPA developed the NATA to prioritize air toxics, emission sources, and locations of interest for further study. It is important to remember that NATA provides broad estimates of health risks over geographic areas of the country, not definitive risks to specific individuals or locations. More information on the NATA analysis can be found at: <https://www.epa.gov/national-air-toxics-assessment>.

image002.png

---



**Enviva**

@EnvivaBiomass



Enviva thanks [@VirginiaDEQ](#) for the opportunity to hear from stakeholders and renews commitment to job creation and air quality in [#Southampton](#).

[#StrongCommunities](#)

[ir.envivapartners.com/press-release/...](http://ir.envivapartners.com/press-release/...)



LEADING IN SUSTAINABLE WOOD BIOMASS

**Archived:** Friday, September 27, 2019 10:56:11 AM  
**From:** Emily Zucchini  
**Sent:** Thursday, September 26, 2019 10:22:25 PM  
**To:** james.white@deq.virginia.gov  
**Cc:** ralph.northam@governor.virginia.gov  
**Subject:** Enviva Pellets Southampton, Registration Number 61653  
**Importance:** Normal  
**Attachments:**  
[Registration Number 61653 - Protect our Forests and our Health.pdf](#);

---

James White  
VA Department of Environmental Quality  
Tidewater Regional Office  
5636 Southern Blvd.  
Virginia Beach, VA 23462

CC: Governor Ralph Northam

Re: Enviva Pellets Southampton, Registration Number 61653

Dear Mr. White:

We, the undersigned organizations, are concerned with the proposed expansion of Enviva's wood pellet facility in Southampton County, Virginia. We are writing to object to the draft permit for Enviva Pellets Southampton, LLC (i.e. Enviva), Registration Number 61653. Over the past decade, Enviva has expanded rapidly in the US South. Enviva has been the subject of controversy for their poor track record of air quality violations, environmentally degrading sourcing practices, and negative impact on the climate.

Enviva's proposed expansion will mean more pollution to the local community, more clearcuts, more carbon in the atmosphere, more dangerous logging trucks on the road, less habitat for wildlife, and less protection from natural disasters.

Governor Northam's Executive Order No. 43, just announced on September 17th, emphasizes that "the Commonwealth must continue to prioritize the transition to cleaner sources of energy, like wind, solar, and energy efficiency through an equitable approach to benefit all Virginians." As the state moves to pursue these clean energy goals, enabling the expansion of Enviva will take Virginia backward and not forward on climate, and harm our forests, communities and climate based on flawed policies overseas.

**We urge VA DEQ to deny Enviva's permit for expansion.** Additionally, we call on VA DEQ to decouple Enviva's permit for expansion with their permit for air pollution controls. Enviva must be required to install air pollution controls. The public should have the ability to comment on these two separate issues independent of each other.

### **Global Climate Change**

According to the Intergovernmental Panel on Climate Change, to meet our climate goals we must dramatically scale up forest protection, conservation and restoration. Yet the wood pellet industry is driving the destruction and degradation of tens of thousands of acres of forests across the Southern United States, which are cut down, turned into wood pellets, and shipped overseas to be burned for electricity.

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. If the Southampton County increase goes through, it will increase carbon emissions by 245,091 tons per year - the equivalence of 95,328 additional cars on the road per year. This would bring the total carbon emissions for the Southampton County facility to 1,430,757 tons per year.

### **Forests and Resiliency**

Enviva is driving the destruction and degradation of nearly 19,000 acres of Virginia forests per year. Enviva's proposed expansion would increase logging by nearly 6,000 acres per year. 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.

Enviva's proposed expansion would increase pressure on sensitive and already overburdened ecosystems. While Enviva points to data to that US forests are flourishing, this data does not show the loss of natural forests, the loss of old growth forests, or the loss of carbon resulting from conversion of natural forests to pine plantations. Since 1953, the US has lost more than 35 million acres of natural forest and gained more than 40 million acres of pine plantation instead. Having driven conversions of wetland and hardwood forests to plantations, Enviva is now attempting to increase their softwood sourcing.

Now more than ever, we must preserve and restore existing forests without add increased harvesting pressure from the wood pellet industry, enhancing the nation's natural carbon sinks.

### **Air quality**

The industrial-scale production of wood pellets endangers public health and local quality of life by creating harmful particulate matter, volatile organic compounds (VOCs) that create smog, and other hazardous air pollutants (HAPs). A shocking pattern of air quality violations and noncompliance with the Clean Air Act have been documented in the wood pellet industry throughout the South, with Enviva's facilities being some of the worst offenders. Wood pellet facilities' emissions of harmful pollutants have been the subject of lawsuits in North Carolina and Texas:

Since Enviva Southampton began production in 2012, Enviva has been emitting excessive amounts of hazardous air pollutants - emissions that have been linked to respiratory illness, heart disease, and cancer. Even with the new pollution controls proposed by Enviva in this permit, an increase in production will increase pollution at this facility. These emissions disproportionately harm communities of color and low-income communities, who are already burdened by other polluting industries. Despite the fact that Southampton County is 35% African-American, and the city where Enviva is located, Franklin, is 59% African American, VA DEQ failed to do an environmental justice analysis before considering this permit.

Initial miscalculations and oversights of Enviva's emissions should not be rewarded with approval to expand yet again. We urge VA DEQ to reject Enviva's application to expand production at its Southampton facility because of its harm to local air quality, forests, community resiliency and the climate. Thank you for the opportunity to comment on this permit.

CC:  
Governor Ralph Northam

Sincerely,

### **Virginia Organizations:**

Blackwater/Nottoway Riverkeeper  
Center for Common Ground  
Center for Sustainable Communities  
Chesapeake Climate Action Network  
Environment Virginia  
People Demanding Action  
Rachel Carson Council  
Southwings  
The Clinch Coalition  
Virginia Organizing  
Virginia Poor People's Campaign  
Young People's Guild

### **North Carolina Organizations within Sourcing Area:**

Chowan Edenton Environmental Group  
Dogwood Alliance  
Spruill Farm Conservation Project  
The Alliance for Cape Fear Trees

--



EMILY ZUCCHINO  
Director of Community Engagement  
DOGWOOD ALLIANCE  
828.251.2525 ext. 17  
[www.dogwoodalliance.org](http://www.dogwoodalliance.org)

**OUR FORESTS. OUR STRENGTH.**

Registration Number 61653 - Protect our Forests and our Health.pdf

---

James White  
VA Department of Environmental Quality  
Tidewater Regional Office  
5636 Southern Blvd.  
Virginia Beach, VA 23462

Re: Enviva Pellets Southampton, Registration Number 61653

Dear Mr. White:

We, the undersigned organizations, are concerned with the proposed expansion of Enviva's wood pellet facility in Southampton County, Virginia. We are writing to object to the draft permit for Enviva Pellets Southampton, LLC (i.e. Enviva), Registration Number 61653. Over the past decade, Enviva has expanded rapidly in the US South. Enviva has been the subject of controversy for their poor track record of air quality violations, environmentally degrading sourcing practices, and negative impact on the climate.<sup>1</sup>

Enviva's proposed expansion will mean more pollution to the local community, more clearcuts, more carbon in the atmosphere, more dangerous logging trucks on the road, less habitat for wildlife, and less protection from natural disasters.

Governor Northam's Executive Order No. 43, just announced on September 17th, emphasizes that "the Commonwealth must continue to prioritize the transition to cleaner sources of energy, like wind, solar, and energy efficiency through an equitable approach to benefit all Virginians."<sup>2</sup> As the state moves to pursue these clean energy goals, enabling the expansion of Enviva will take Virginia backward and not forward on climate, and harm our forests, communities and climate based on flawed policies overseas.

**We urge VA DEQ to deny Enviva's permit for expansion.** Additionally, we call on VA DEQ to decouple Enviva's permit for expansion with their permit for air pollution controls. Enviva must be required to install air pollution controls. The public should have the ability to comment on these two separate issues independent of each other.

## Global Climate Change

---

<sup>1</sup> "Enviva Southampton testing already completed? - The ...." 2 Aug. 2019, <https://www.thetidewaternews.com/2019/08/02/enviva-southampton-testing-already-completed/>. Accessed 17 Sep. 2019.

<sup>2</sup> "EXPANDING ACCESS TO CLEAN ENERGY AND GROWING ...." <https://www.governor.virginia.gov/media/governorvirginiagov/executive-actions/EO-43-Expanding-Access-to-Clean-Energy-and-Growing-the-Clean-Energy-Jobs-of-the-Future.pdf>. Accessed 17 Sep. 2019.

According to the Intergovernmental Panel on Climate Change, to meet our climate goals we must dramatically scale up forest protection, conservation and restoration. Yet the wood pellet industry is driving the destruction and degradation of tens of thousands of acres of forests across the Southern United States, which are cut down, turned into wood pellets, and shipped overseas to be burned for electricity.

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>3,4,5,6</sup> If the Southampton County increase goes through, it will increase carbon emissions by 245,091 tons per year - the equivalence of 95,328 additional cars on the road per year. This would bring the total carbon emissions for the Southampton County facility to 1,430,757 tons per year.

### **Forests and Resiliency**

Enviva is driving the destruction and degradation of nearly 19,000 acres of Virginia forests per year. Enviva's proposed expansion would increase logging by nearly 6,000 acres per year.<sup>7</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.<sup>8</sup>

Enviva's proposed expansion would increase pressure on sensitive and already overburdened ecosystems. While Enviva points to data to that US forests are flourishing, this data does not show the loss of natural forests, the loss of old growth forests, or the loss of carbon resulting from conversion of natural forests to pine plantations.<sup>9</sup> Since 1953, the US has lost more than 35 million acres of natural forest and gained more than 40 million acres of pine

---

<sup>3</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>4</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>5</sup> NRDC. (2015). Think Wood Pellets Are Green? Think Again. <https://on.nrdc.org/1Uc74qh>

<sup>6</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>7</sup> "Acres of Pellets - Dogwood Alliance."

<https://www.dogwoodalliance.org/wp-content/uploads/2017/08/Acres-of-Pellets-Fact-Sheet.pdf>. Accessed 17 Sep. 2019.

<sup>8</sup> "Release: New Investigation Shows Continued Forest ...." 18 Jun. 2019,

<https://www.dogwoodalliance.org/2019/06/release-new-investigation-shows-continued-forest-destruction-f-or-wood-pellets/>. Accessed 17 Sep. 2019.

<sup>9</sup> "Industry Impacts on US Forests - Dogwood Alliance."

<https://www.dogwoodalliance.org/wp-content/uploads/2018/08/Industry-Impacts-on-US-Forests.pdf>. Accessed 17 Sep. 2019.

plantation instead.<sup>10</sup> Having driven conversions of wetland and hardwood forests to plantations, Enviva is now attempting to increase their softwood sourcing.<sup>11,12</sup>

Now more than ever, we must preserve and restore existing forests without add increased harvesting pressure from the wood pellet industry, enhancing the nation's natural carbon sinks.

### **Air quality**

The industrial-scale production of wood pellets endangers public health and local quality of life by creating harmful particulate matter, volatile organic compounds (VOCs) that create smog, and other hazardous air pollutants (HAPs). A shocking pattern of air quality violations and noncompliance with the Clean Air Act have been documented in the wood pellet industry throughout the South, with Enviva's facilities being some of the worst offenders.<sup>13</sup> Wood pellet facilities' emissions of harmful pollutants have been the subject of lawsuits in North Carolina and Texas.<sup>14,15</sup>

Since Enviva Southampton began production in 2012, Enviva has been emitting excessive amounts of hazardous air pollutants - emissions that have been linked to respiratory illness, heart disease, and cancer. Even with the new pollution controls proposed by Enviva in this permit, an increase in production will increase pollution at this facility. These emissions disproportionately harm communities of color and low-income communities, who are already burdened by other polluting industries.<sup>16</sup> Despite the fact that Southampton County is 35% African-American, and the city where Enviva is located, Franklin, is 59% African American, VA DEQ failed to do an environmental justice analysis before considering this permit.

Initial miscalculations and oversights of Enviva's emissions should not be rewarded with approval to expand yet again. We urge VA DEQ to reject Enviva's application to expand

---

<sup>10</sup> "Industry Impacts on US Forests - Dogwood Alliance." <https://www.dogwoodalliance.org/wp-content/uploads/2018/08/Industry-Impacts-on-US-Forests.pdf>. Accessed 17 Sep. 2019.

<sup>11</sup> Natural Resources Defense Council. European Imports of Wood Pellets for "Green Energy" Devastating US Forests. (2017). <https://bit.ly/2vpScjU>

<sup>12</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>13</sup> Environmental Integrity Project. Dirty Deception: How the Wood Biomass Industry Skirts the Clean Air Act. (2018). <https://bit.ly/2COsYik>

<sup>14</sup> Southern Environmental Law Center. (February 13, 2019). Clean Air Carolina challenges air permit for Enviva Hamlet expansion in Richmond County. <http://bit.ly/2US1yRP>

<sup>15</sup> Lone Star Chapter of the Sierra Club. (June 7, 2018). Wood pellet company polluting East Texas at 10x the permitted rate. <http://bit.ly/2VmErhV>

<sup>16</sup> Stefan Koester and Sam Davis. Siting of wood pellet facilities in environmental justice communities in the Southeastern United States. Environmental Justice. Apr 2018. <http://doi.org/10.1089/env.2017.0025>

production at its Southampton facility because of its harm to local air quality, forests, community resiliency and the climate. Thank you for the opportunity to comment on this permit.

CC:

Governor Ralph Northam

Sincerely,

**Virginia Organizations:**

Blackwater/Nottoway Riverkeeper  
Center for Common Ground  
Center for Sustainable Communities  
Chesapeake Climate Action Network  
Environment Virginia  
People Demanding Action  
Rachel Carson Council  
Southwings  
The Clinch Coalition  
Virginia Organizing  
Virginia Poor People's Campaign  
Young People's Guild

**North Carolina Organizations within Sourcing Area:**

Chowan Edenton Environmental Group  
Dogwood Alliance  
Spruill Farm Conservation Project  
The Alliance for Cape Fear Trees

**Archived:** Friday, September 27, 2019 10:56:11 AM  
**From:** [Dogwood Alliance](#)  
**Sent:** Thursday, September 26, 2019 10:16:15 PM  
**To:** [James White](#)  
**Subject:** Registration Number 61653 - Protect our Forests and our Health  
**Importance:** Normal

---

Sep 26, 2019

James White

Dear Permitting Officer, White,

I am writing to urge you to deny Enviva's proposed expansion. I oppose any expansion in production at the Enviva Southampton County wood pellet facility. Additionally, I call on VA DEQ to decouple Enviva's permit for expansion with their permit for air pollution controls. Enviva must be required to install air pollution controls that their competitors in other states have used for years. The public should have the ability to comment on these two separate issues independent of each other.

I am concerned with the expansion of the wood pellet industry, led by Enviva, and the industry's impact on Virginia's forests, communities, and the climate.

The urgency of the climate crisis demands that we dramatically scale up forest protection. We cannot afford the increased logging and degradation of our forests. According to the Intergovernmental Panel on Climate Change, to meet our climate goals we must dramatically scale up forest protection, conservation, and restoration. Yet Enviva is driving the destruction and degradation of tens of thousands of acres of Southern forests per year. An increasing body of scientific evidence shows that burning trees for utility-scale electricity releases more greenhouse gas emissions than fossil fuels do. If the Southampton County increase goes through, it will increase logging to 19,000 acres per year, and carbon emissions to 1,430,757 tpy - the equivalence of 303,770 additional cars on the road per year.

Enviva has been documented numerous times logging in the Roanoke River Basin, a river that has already flooded Southampton County numerous times. As our coastal communities prepare for more frequent and intense hurricanes, it is more important than ever to invest in nature to protect communities from the damage wrought by these intense storms. Natural forests and wetlands absorb floodwaters and slow them down, buffering communities from flooding and reducing costly property damage.

Furthermore, this expansion request comes amidst revelations of years-long violations of the Clean Air Act, and attempts by the industry to cover this up. A recent report by Environmental Integrity Project shows a shocking pattern of air quality violations or

noncompliance at almost all wood pellet facilities, with Virginia's Enviva facility being amongst the worst. For years, Enviva has been spewing hazardous pollutants into the air, emissions that have been linked to respiratory illness, immune disorders, heart disease, and cancer. Enviva consistently claims the health of communities living near their facilities is too expensive to protect. Enviva recently agreed to install proper air pollution controls at the Hamlet and Sampson County plants only after being dragged through court and threatened with an enforcement action.

Time and again, Enviva has misled the public, government, and investors on their emissions and sourcing practices. The company's past actions and missteps make it all the more imperative that it is strongly scrutinized at every step of the way.

I urge you to deny this Air Quality permit, Registration Number 61653, and any other proposals made by Enviva to expand operations. Additionally, I call on VA DEQ to decouple Enviva's permit for expansion with their permit for air pollution controls. Thank you for the opportunity to comment on this permit.

Sincerely,

Kiawna Brinson-Clayton  
141 Towne Square Dr  
Newport News, VA 23607-1507  
(757) 769-5801  
Brinson.kiawna@gmail.com