

Talking Points for Submitting Comments to DEQ on Enviva's Title V Permit

Comment period ends Nov. 15!

***Send your comments to Kevin Godwin at DEQ: publiccomments@ncdenr.gov
Include "Enviva Pellets Hamlet, LLC: No Expansion" in your subject line***

1. 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 a great deal of 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.
2. 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. 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 sources of pollution. 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.
3. 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 compare the impacts of communities of color nearby to the state as a whole.
4. 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." 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, DEQ needs to initiate a study to assess the cumulative impacts of that the industrial scale wood pellet industry has on North Carolina communities, forests, water, and the climate prior to making future permitting decisions.