



**Enviva Pellets Greenwood, LLC  
Dust Control Best Management Plan**

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**Doc. Owner: Croft Hollingsworth**

**Rev: [0]**

The purpose of this Best Management Plan (BMP) is to prevent and control dust emissions into the atmosphere by a combination of preventive maintenance, housekeeping and/or work practices in accordance with South Carolina Regulation 61-62.5, Standard 4, Section X and SC Regulation 61-62.6. Enviva manage and maintain the following practices:

- A. Dust sources and control methods for roadway, railcar, truck and mobile equipment operations;
  - Roadways paved and unpaved identified on the site map by yellow line, will be sprayed with water as required to minimize dust each day, M-F and on weekends when receiving wood. The facility will use as needed the pickup broom on 200 Enviva Way road due to high traffic.
    - ✓ Water Truck trips will be recorded in Water Truck Log daily.
    - ✓ Pickup broom trips will be recorded in Pickup Broom Truck Log as used.
  - Railcar loading of pellets fugitive dust will be controlled by extended shroud and operator presence.
  - Truck and Mobile Equipment operation will comply with posted site wide 10-mph speed limit.
  - In accordance with SC Code of Laws Sections 56-5- 4100 and 56-5-4110, these laws require that haul trucks to prevent the escape of materials loaded onto vehicles, escaped substances or cargo be cleaned from highways, and loads and covers be firmly attached. The signage shall be posted at all truck entrances and exits.
- B. If fugitive dust is observed from above locations, the facility will implement corrective action, and record the event in the shift production report. Dust sources and control methods for material handling and storage. Frequency of control should be included where appropriate;
  - Roundwood, bark, and chips receiving and handling via trucks and mobile equipment requires the facility to use water suppression on designated roadways, pickup broom on main entrance road, and a 10-mph speed limit throughout the site.
  - Process wood chips/fines/fuel bark and chips are conveyed with fully enclosed conveyors.
  - Pellets are conveyed with fully enclosed conveyors.
  - Bark/Fuel Chip piles - If fugitive dust is observed, the facility will spray water on pile and/or handling of this pile as in adding or removing bark/ fuel chips from the pile.
  - Bark from debarker - If fugitive dust is observed, the facility will spray water on pile and/or handling of this pile as in adding or removing bark from the pile.
  - Reclaim Wood Chip Pile - While adding chips to the reclaim pile, the telestacker discharge conveyor discharges to top of pile, which reduces drop point height.
  - Residue wood piles from emergency dumps will be located between pellet building and green hammermill island to provide constant observation. If fugitive dust is observed, the facility will spray water on pile and/or handling of this pile as in adding or removing chips from the pile.
  - Dryer emergency dump is enclosed by a three-sided concrete bunker to reduce wind exposure.
  - Dry Hammermill emergency dump has water spray that activates when dump is in operation
  - Pellet Cooler emergency dumps have water spray that activates when dump is in operation
  - Silos emergency dumps will be observed for fugitive dust, if fugitive dust is observed then personnel will spray discharge with water.
  - Rail Loadout aspiration cyclone and baghouse have emergency dump drop point to ground at 3' in height.
  - Equipment de-plugging fugitive dust control method will be water spray by personnel with water hose.
  - Conveyors for wood handling are fully enclosed.
  - Dryer emergency abort stack has control logic that shuts off feed to the dryer when dryer abort opens.
  - The above list will be observed throughout the shift for fugitive dust. If any fugitive dust is observed, the shift supervisor will stop the fugitive dust, implement corrective action, and record the event and corrective action on shift production report.
- C. A maintenance schedule for all dust control equipment as well as a minimum inventory of spare parts;
  - O&M procedures for point sources
  - Water Truck is a rental that's serviced as needed.



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- BMP of dust control equipment to include the following sources:
  - ✓ Dryer emergency dump is enclosed by three-sided concrete bunker to reduce wind exposure, will be repaired as needed.
  - ✓ Dry Hammermill emergency dump water spray.
  - ✓ Pellet Cooler emergency dumps water spray.
  - ✓ Rail Loadout shroud.
  - ✓ Wood chip telestacker discharge conveyor onto reclaim pile.
  - ✓ If water truck malfunctions water truck will be replaced immediately.
  - ✓ Pickup broom, if malfunctions pickup broom will be replaced immediately
  - ✓ 10 mph signs unreadable will be cleaned and/or repaired immediately
  - ✓ Truck tipper three-sided metal hopper to reduce wind exposure while dumping wood chips.
- D. The above equipment list will be observed throughout the shift for fugitive dust. If any fugitive dust is observed the facility will immediately implement corrective action. The facility shall repair and/or replace malfunctioning dust control equipment within 36 hours. These procedures shall be based on the manufacturer's recommendations when available, at a minimum;
  - O&M for Point Sources.
  - BMP for fugitive dust sources
    - ✓ Enviva will perform per shift fugitive dust observations on all fugitive dust control equipment and systems to mitigate fugitive dust. The facility will record fugitive dust observation results and corrective actions in shift production report.
- E. Training plans for the dust control methods, equipment, and systems;
  - New hire orientation dust management.
  - Annual dust management training for all plant personnel
  - Training roster to be maintained electronically and provided to SCDHEC upon request.
- F. Modifications and/or contingency plans required for changing weather conditions, failure of equipment, electrical power failure, and any other factors that may influence the effectiveness of control methods;
  - Rain observation is recorded on water truck log sheet.
  - Electrical Outage does not impact water truck usage.
  - Onsite weather station will continuously record wind speed and direction and rainfall. The weather station will assist in investigating fugitive dust events and dust complaints, if any. If necessary, update the plan due to dust events caused by weather changes. Once the plan is updated, Enviva will submit plan to SCDHEC for approval and update will be recorded in update log. After SCDHEC approval is received, facility will implement the updated plan.
- G. Neighbors have been provided a phone number to allow them to file complaints anytime of the day.
  - Phone Number +1 (301) 575-7820
  - Neighbor will contact Chris Brown, Enviva Community Relations Manager-Communications
    - ✓ Dust complaints will be recorded in the Dust Complaint Log and the Regional SC DHEC office shall be informed within 24 hours from the complaint.
  - If dust complaint is received, by the facility, the facility will investigate to determine root cause and attempt to contact the neighbor to inform them of cause and solution.
  - The facility will log dust complaint in log including wind speed and direction.
  - If fugitive dust is observed, the facility will stop fugitive dust, implement corrective action, and record the event on daily shift production report.
- H. All records (electronically or hard copy) will be maintained on site for a period of 5 years and provided to SCDHEC upon request. The records are:
  - Water Truck usage log, hardcopy

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- Pickup Broom usage log, hardcopy
  - Shift Production Report, electronically
  - Complaint Log, electronically
  - Plan Update Log, electronically
  - Training roster, electronically
  - SCDHEC update approval letters, hardcopy
- I. Dust control best management plan will be updated if SCDHEC and/or Enviva determines additional control measures are needed or current dust control measures need modification. All updated plans before implementation will be submitted to SCHDEC for approval. Enviva will submit updated plan to SCDHEC Director of the Air Permitting Division for Department approval. Once Enviva receives SCDHEC approval of plan, facility will immediately implement approved plan.

**ATTACHMENTS:**

1. Site map for water truck, stockpile, and storage pile locations
2. Water Truck log
3. Pickup Broom log
4. Shift Production Report
5. Dust Complaint log
6. Semi-annual review/update of the BMP for Dust Control

Site Map



Yellow line represents water truck path



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Month/yr

Water Truck Usage Log

Enviva Greenwood  
200 Enviva Way

During daylight receiving hours the Water Truck is to be ran continuously on unpaved roads and through woodyard . The Start and End Time shall be logged. Rain events should be documented

Date	Start Time	Stop time	Start Time	Stop time	Start Time	Stop time	Start Time	Stop time	Rain?	Initials	Comments

Date	Start Time	Stop time	Start Time	Stop time	Start Time	Stop time	Start Time	Stop time	Rain?	Initials	Comments

Date	Start Time	Stop time	Start Time	Stop time	Start Time	Stop time	Start Time	Stop time	Rain?	Initials	Comments

Date	Start Time	Stop time	Start Time	Stop time	Start Time	Stop time	Start Time	Stop time	Rain?	Initials	Comments

Date	Start Time	Stop time	Start Time	Stop time	Start Time	Stop time	Start Time	Stop time	Rain?	Initials	Comments

Exceptions to running the water truck are rain events or roads being muddy. Exceptions must be documented on the Log.





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**GREENWOOD SHIFT PRODUCTION REPORT**

Date:		Safety Briefing			
Days/Nights:	Days		Operations	Maintenance	Total
Shift:			First Aid	0	0
Shift Supervisor		Near Miss	0	0	0
Dryer CRO		PJRAs	0	0	0
PM CRO		Observations	0	0	0
Lead PM APO		FLAMEX ALARMS	1	0	1
APO 1		FLAMEX Faults/Test Fail	0	0	0
APO 2		Safety Issues During Shift / Concerns / Things to Watch			
APO 3					
Quality Tech					
Load Out					
Fuel Operator					

Current Status							Out of Service	Adjusted	Notes
Truck Tipper		Furnace	GHM 1	DHM 1	PM 1.1				
Chipper		Dryer	GHM 2	DHM 2	PM 1.2				
Reclaimer		WESP	GHM 3	DHM 3	PM 1.3				
Stoker		RTO	GHM 4	DHM 4	PM 1.4				
				DHM 5	PM 1.5				
					PM 1.6				
					PM 1.7				
					PM 1.8				
					PM 1.9				
					PM 2.1				
					PM 2.2				
					PM 2.3				
					PM 2.4				
					PM 2.5				
					PM 2.6				

EHS Items	Red Items Enter Corrective Actions taken
No Dryer abort emissions	
No Fugitive Dust via Roads	
No Fugitive Dust via All Dumps	
No Fugitive Dust via Piles/Handling	
PM Fire Hoses in place	
DHM Fire Hoses in place	

Manual DP Readings (DHM 1-10") (bin vents 1-4") (fine) and loadout 1-6" Log time recorded				
DHM #1 Cylo (S3) Time:	DHM #2 Cylo (S3)	DHM #3 Cylo (S3)	DHM #4 Cylo (S3)	DHM #5 Cylo (S3)
3	3	3	4	4
Fines E510 Cylo (S10)	Pellet silo bin vent (S4)	loadout Cylo binvent (S7)	Loadout Baghouse (S8)	Dry chip silo bin vent (S2) Time
3	3	0.25	4	10
Issue:	Actions Taken:		Work Order Created:	Results:

PROCESS QUALITY		
	Actual	Target
Pellet Moisture	4.9%	4.5% - 6.5%
Pellet Fines	0.95%	< 0.75%
Rail Temps	15	< 30 C
Durability	98.5%	98.3% - 98.8%

DRYERS			
	Actual	Target	
Avg Moisture	10.44%	10-12%	
Standard Dev	0.79%	< 1%	

DAILY PRODUCTION		
Total Tons	Actual	Target
		775

Rail Car Load Out		
Rail Cars	Loaded on shift	Empty on hand
	10	23

Alarm Dashboard			
Alarms	Containment	Root Cause	Action Taken





