

Pellet Mill	Enforcement Action (date)	Summary of Violation	Monetary Fine (if applicable)
Alabama Pellets (Drax) - Aliceville, AL (formerly, Pinnacle Renewable Energy & Westervel Pellets)	Consent Order No. 22-051-CAP (Feb. 16, 2022)	Emission Monitoring & Recordkeeping/Reporting - Failing to conduct required daily visual emission monitoring (22 days), record results of required daily monitoring, and maintain appropriate records	\$11,000
	Notice of Deviation (Sept. 18, 2018)	Downtime of emissions control equipment	
	Consent Order No. 15-018-CAP (Dec. 3, 2014)	Excess Emissions - Exceeded 250 tpy VOC emission limit (constructed a major source without PSD permit)	\$40,000
Alabama Pellets (Drax) - Demopolis, AL (formerly, Pinnacle Renewable Energy)	Non-Compliance Form (June 30, 2022)	Monitoring - Failure to collect samples from stormwater outfall during the monitoring report	
	Warning Letter (June 4, 2020)	Best Mgmt Practices - Potential for uncontrolled discharges of sediment/pollutants into water from failing to fully implement/maintain BMPs; accumulated sediment observed downstream of facility Document Deficiency - Permit application doesn't correctly identify relevant discharge points, etc.	
CM Biomass - Crossville, AL (formerly, Mohegan Renewable Energy & Lee Energy Solutions)	Fine (July 24, 2020)	OSHA - Workplace safety or health violation	\$5,506
	Fine (Feb. 20, 2020)	OSHA - Workplace safety or health violation	\$11,470
	Notice of Violation (July 19, 2021)	Exceeding maximum softwood feedstock limit and failing to report exceedance within 10 days	
	Consent Order No. 20-027-CAP (Dec. 12, 2019)	Excess Emissions - Exceeded VOC emission rate from dry hammermill and pelletizing system / failed stack test	\$40,000
	Consent Order No. 16-023-CAP (Dec. 29, 2015)	Excess Emissions - Exceeded PM emission rate from dryer	\$60,000
	Notice of Violation (Feb. 19, 2015)	Improper Operation - Exceeded the annual limitation on hours of operation	
	Warning Letter (Nov. 3, 2014)	Fugitive Dust - Accumulated wood dust noticed during inspections, impacted neighboring properties	
	Warning Letter (Nov. 1, 2013)	Fugitive Dust - Excess PM emissions / wood dust, impacted neighboring property	
	Warning Letter (Aug. 22, 2011) Notice of Violation (July 2, 2009)	Unreported permit deviations Failure to maintain records of weekly emission monitoring Commencing construction without a permit	
Highland Pellets - Pine Bluff, AR	Consent Administrative Order LIS No. 20-189 (Nov. 30, 2020)	Improper Operation - Failure to maintain minimum bark burner temperature due to drying process being aborted Unpermitted Activity - Creation and repeated use of wood waste arbor pile and associated emission sources without permit; constructed and operated green wood chip storage inconsistent with permit; operated second heater baghouse without permit Recordkeeping / Monitoring Deficiencies - Failure to perform and record weekly equipment inspections and related monitoring activities	\$47,760
	Fine (Nov. 27, 2018)	OSHA - Workplace safety or health violation	\$16,707
	Consent Administrative Order LIS No. 18-065 (July 26, 2018)	Unpermitted Activity - Installed and operated 11 unpermitted sources, including green hammermills, heater baghouses, diesel and gasoline tanks Reporting - Failed to timely submit semi-annual monitoring report	
Enviva Pellets - Cottdale, FL	Consent Order # 22-1925 (22-1925) (Aug. 3, 2022)	Stack Test - Failed to test RTO/RCO to demonstrate compliance with PM10 and PM2.5 emission limits within the scheduled required by the permit (90 days)	\$8,000
	Consent Order # 20-0914 (May 20, 2020)	Compliance Report - Failure to timely submit compliance report	\$1,125
	Consent Order # 18-1106 (July 17, 2018)	Emissions Exceedance, Reporting Violation, Improper Operations - Failing to notify DEP of temp inability to comply with permit condition, failed to reduce pelletizing line processing rate when one dryer was not operational, unauthorized emissions on 8 days, failed to timely submit semi-annual monitoring report, failed to submit statement of compliance	\$10,500
	Consent Order # 17-1134 (Nov. 15, 2017)	Incomplete Application & PSD Avoidance - Application failed to include accurate identification of VOC emission levels, which would have subjected the facility to PSD review; information needed to determine BACT; and air quality impact of proposed modification	\$3,250
	Consent Order # 15-0416 (Sept. 11, 2015)	Monitoring Deficiencies - Failure to install and operate appropriate monitoring system for PM emissions, opacity, and PM control technology	\$4,500
Hazlehurst Wood Pellets (Fram) - Hazlehurst, GA	Enforcement Order EPD-AQC-7264 (Apr. 14, 2023)	Control Technology - Failing to operate WESP/RTO at all times when wood-fired burner and dryer were in operation; failing to operate controls properly (temp); failing to timely report deviations / excursion; violations of semi-annual report requirements (failing to report amount of wood dried; pellets produced)	\$51,722
	Fine (Sept. 7, 2021)	OSHA - Workplace safety or health violation	\$11,421
	Fine (Dec. 12, 2020)	OSHA - Workplace safety or health violation	\$13,653
	Fine (May 6, 2015)	OSHA - Workplace safety or health violation	\$9,500

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Archer Forest Products (Fram) - Nahunta, GA	Enforcement Order EPD-AQC-6965 (June 5, 2019)	Excess Emissions - Potential emissions exceedances for VOC, CO, single HAPs, combined HAPs Other Violations - Potential exceedance of annual drying limit; failing to conduct timely performance test	
	Fine (Apr. 13, 2022)	OSHA - Workplace safety or health violation	\$6,598
	Fine (Dec. 29, 2021)	OSHA - Workplace safety or health violation	\$7,252
Telfair Forest Products (Fram) - Lumber City, GA	Enforcement Order EPD-AQC-7159 (Mar. 2, 2022)	Performance Tests - Failure to submit performance tests, test plans, and certifications related to tests	\$5,000
	Enforcement Order EPD-AQC-6931 (Nov. 2, 2018)	Improper Operation - Exceeded limit for drying of green wood shavings; excess downtime and temperature excursions for dryers	\$6,000
	Fine (Aug. 29, 2018)	OSHA - Workplace safety or health violation	\$6,338
		Excess Emissions - Exceeded PM emissions levels	
	Enforcement Order EPD-AQC-6796 (May 12, 2017)	Other Violations - Failure to provide relevant data in performance test report; using monitoring instruments to fine tune burners before testing	\$21,938
	Fine (Apr. 14, 2016)	OSHA - Workplace safety or health violation	\$19,205
	Enforcement Order EPD-AQC-6747 (Sept. 23, 2014)	Excess visible emissions	\$14,584
	Enforcement Order EPD-AQC-6558 (Dec. 7, 2012)	Excess Emissions - Exceeded opacity emissions limits; potential excess emissions of CO & VOCs	\$3,125
Appling County Pellets (Fram) - Baxley, GA	Enforcement Order EPD-AQC-6965 (June 5, 2019)	Excess Emissions - Potential emissions exceedances for VOC, single HAP, combined HAPs, CO Other Violation - Potential exceedance of annual drying limit	
	Enforcement Order EPD-AQC-6829	Excess Emissions - Exceeded emission limits for PM and VOCs	\$5,000
	Fine (Aug. 27, 2013)	OSHA - Workplace safety or health violation	\$7,000
	Fine (Aug. 21, 2013)	OSHA - Workplace safety or health violation	\$51,000
LJR Forest Products - Swainsboro, GA	Enforcement Order EPD-AQC-7137 (Nov. 30, 2021)	Failure to submit complete and accurate permit amendment application	\$12,500
	Enforcement Order EPD-AQC-6762 (Dec. 9, 2014)	Construction of modification without permit and failure to conduct performance testing Improper Operation - Failure to vent hammermills, pellet coolers, and aspirator to burner	\$5,000
	Fine (Dec. 9, 2013)	OSHA - Workplace safety or health violation	\$10,960
	Enforcement Order EPD-AQC-6566 (Mar. 4, 2013)	Emissions Exceedance - Exceeded legal emission limits for VOCs; constructed a PSD major source without a permit	\$100,000
Drax - Bastrop, LA (Morehouse Facility)	Settlement No. SA-AE-22-0039 (2022)	Excess Emissions - Exceeded legal emission limits for VOC and various HAPs (formaldehyde, methanol, acetaldehyde) on multiple occasions Other Permit Violations - Exceeding annual hours of operation of Fire Pump Engine; failure to use/maintain control devices in proper working order; exceeded annual pellet production rate	\$1.6 million
	Settlement No. SA-MM-19-0065 (2020)	Excess Emissions - Exceeded emission limits for SO2, VOCs, and HAPs (methanol, formaldehyde, acetaldehyde) (2016 Compliance Order) Other Violations - Failure to meet opacity monitoring requirements (2016 Compliance Order); several unpermitted emission sources (2016 Compliance Order); unregistered access to radioactive material - soil density gauge (2018 Compliance Order)	\$20,000
Drax - Urania, LA (LaSalle Facility)	Settlement No. SA-MM-22-0040 (2022)	Excess Emissions - Exceeded legal emission limits for VOC and various HAPs (formaldehyde, methanol, acetaldehyde) on multiple occasions Other Permit Violations - Exceeding annual hours of operation of Fire Pump Engine; failure to use/maintain control devices in proper working order; exceeded annual pellet production rate	\$1.6 million
	Fine (Dec. 12, 2018)	OSHA - Workplace safety or health violation	\$18,564
Drax - Gloster, MS (Amite Facility)	Notice of Violation (Mar. 14, 2023)	Excess Emissions - HAPs emissions exceeded the legal limit for individual HAPs (formaldehyde and methanol at 9 tpy) and total HAPs (25 tpy) since January 2021	
	Agreed Order No. 7082 20 (Nov. 4, 2020)	Excess Emissions - VOC emissions exceeded the legal limit (249 tpy) since 2016	\$2.5 million + \$80,000/month until new controls installed
	Agreed Order No. 6959 19 (July 1, 2019)	Improper Operation - Exceeded annual hour limit for non-emergency use of fire pump engine since August 2015 Recordkeeping - Failure to specify between emergency and non-emergency use of fire pump engine for 2 years; late submittal of semi-annual report Monitoring Deficiency - Failure to conduct visible emission evaluation; no certified monitor employed	\$110,000
	Fine (Oct. 25, 2019)	OSHA - Workplace safety or health violation	\$31,500
Enviva Pellets - Amory, MS	Agreed Order No. 7020 20 (Jan. 21, 2020)	Stormwater Permit - Failed to obtain coverage under Mississippi Baseline Stormwater General Permit	\$10,000
	Notice of Deficiency (July 12, 2017)	Recordkeeping Deficiencies - Related to watering truck and dust observation logs from May 2016 through April 2017	
	Notice of Violation (Mar. 14, 2017)	Title V - Late submission of Annual Compliance Certification	

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Enviva Pellets - Ahoskie, NC	Notice of Violation (July 21, 2016)	Improper Operation - Malfunction of emission control technology for dryer (WESP), led to operation of the dryer for extended time (31 days) without controls; failure to notify of malfunction Improper Operation - Operation of emission control technology (WESP) below minimum requirements for extended periods (23 and 46 days)	
	Notice of Violation (May 2, 2013)	Excess Emissions - Emissions control technology for dried wood silo (bin filter) circumvented due to broken door, allowed for excess particulate emissions Fugitive Dust - Deficiencies in fugitive dust plan led to observable road dust and sawdust in air leaving property	
Enviva Pellets - Sampson, NC	Civil Penalty Assessment Case No. 2020-065 (Jan. 26, 2021)	Improper Operation - Failure to meet minimum operating requirements for pollution control technologies (RTO and RCO temps) (83 violations)	\$7,377
	Special Order by Consent 2020-004 (Dec. 16, 2020)	Excess Emissions - Exceeded BACT emissions limit for PM and PM10	\$59,000
	Settlement Agreement (May 31, 2019)	Permit Application Deficiency - State concluded that Enviva's application was deficient because it failed to include available pollution control technology for hazardous air pollutants (improper case-by-case MACT analysis); additional pollution controls to be installed subject to Settlement	
	Civil Penalty Assessment Case No. 2018-002 (Mar. 5, 2018)	Excess Emissions - Exceeded BACT emission limit for CO (NOV also noted excess VOC emissions)	\$5,333
	Special Order by Consent 2018-003 (Sept. 21, 2018)	Excess Emissions - Exceeded BACT emission limit for VOCs from dryer	
	Notice of Violation (Feb. 3, 2017)	Recordkeeping Violations - Failure to maintain records of monthly visible emissions monitoring	
	Notice of Violation (Dec. 21, 2022)	Improper Operation - Failure to meet minimum operating requirements for pollution control technology (RTO temp)	
Enviva Pellets - Hamlet, NC	Civil Penalty Assessment Case No. 2020-066 (Jan. 26, 2021)	Improper Operation - Failure to meet minimum operating requirements for pollution control technologies (RTO and RCO temps) (115 violations)	\$11,197
	Fine (Dec. 30, 2021)	OSHA - Workplace safety or health violation	\$22,900
Enviva Pellets - Northampton, NC	Notice of Deficiency (Dec. 7, 2016)	Failure to submit permit renewal application	
	Notice of Deficiency (Aug. 22, 2014)	Failure to submit semiannual report	
	Notice of Violation (Nov. 21, 2022)	Excess Emissions - Exceeded formaldehyde emissions limit	
Active Energy Renewable Power - Lumberton, NC (project cancelled)	Notice of Violation (May 5, 2021)	Construction of equipment without a permit	
Enviva Pellets - Greenwood, SC	Consent Order 20-003-A (July 17, 2020)	Recordkeeping & Monitoring Deficiencies - Failure to maintain records, document corrective actions, conduct required monitoring and maintenance	
		Control Technology - Failure to limit pollution control bypass stack other than during emergency or mechanical failure Other Violations - Failure to limit opacity to required level on two occurrences	\$13,000
Jasper Pellets - Jasper, SC	Consent Order 21-001-A (Jan. 2021)	Construction of equipment without a permit and failure to report to DHEC that construction commenced	\$15,000
Woodville Pellets - Woodville, TX	Agreed Order Docket No. 2020-0449-AIR-E (Apr. 8, 2022)	Excess Emissions - Exceeded VOC emissions limits; Failed to install control technology (RTO) and operated dry hammermill and cooler system without routing emissions to pollution control for combined 18 months Other Violations - Failed to submit permit compliance certification, renewable application for Federal Operating Permit and operated prior to obtaining permit, failure to report on emissions deviations, failure to maintain valves and equipment to prevent flow from furnace bypass	\$517,068
	Fine (Feb. 7, 2022)	OSHA - Workplace safety or health violation	\$82,180
	Fine (Oct. 13, 2021)	OSHA - Workplace safety or health violation	\$12,288
	Fine (Mar. 2, 2020)	OSHA - Workplace safety or health violation	\$16,920
Enviva Pellets - Southampton, VA	Fine (Apr. 11, 2023)	OSHA - Workplace safety or health violation	\$16,020