



State of Mississippi

TATE REEVES
GOVERNOR

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY

CHRIS WELLS, EXECUTIVE DIRECTOR

October 13, 2023

Mr. Wayne Kooy, Director of Environment

wayne.kooy@drax.com

Amite BioEnergy, LLC

1763 Georgia Pacific Road No. 2

Gloster, MS 39638

OFFICIAL CORRESPONDENCE SENT VIA E-MAIL

Re: Air Toxics Impact Analysis and Additional Info. Required
Amite BioEnergy, LLC –
Wood Pellet Manufacturing Facility
Air Ref. No. 0080-00031
Amite County

Dear Ms. Bouska:

On March 28, 2022, the Environmental Permits Division (EPD) received an application from the referenced facility requesting a modification of the Permit to Construct Air Emissions Equipment issued March 9, 2021. This application also served as a revision to the Title V Operating Permit (TVOP) application received on April 5, 2017. Upon review, it was discovered that the facility's potential hazardous air pollutant (HAP) emissions exceeded the applicable major source thresholds: 10 tons per year (tpy) for an individual HAP and 25 tpy for all HAPs combined. Accordingly, due to its operations and classification as a HAP major source, the facility became subject to 40 CFR Part 63, Subpart B [Requirements for Control Technology Determinations for Major Sources in Accordance With Clean Air Act Sections 112(g) and 112(j)].

In accordance with Subpart B, the facility was required to submit a "Case-By-Case Maximum Achievable Control Technology (MACT) Determination" to demonstrate compliance with certain requirements. However, as no such determination was included in the mentioned application, the facility's consultant was notified of this deficiency on April 19, 2022. Subsequently, an initial Case-By-Case MACT Determination was received by Mississippi Department of Environmental Quality (MDEQ) on July 26, 2022. Following MDEQ's review and response to the facility, a revised Case-By-Case MACT Determination was received on November 11, 2022.

In order to proceed with processing the above-referenced permitting actions, the MDEQ is requiring the facility to conduct an impact analysis on air toxics emitted from its overall operations to demonstrate the facility's emission of "air toxics" (methanol, formaldehyde, acetaldehyde, etc.) are at such rates to not adversely affect human health in accordance with Mississippi Administrative Code, Title 11, Part 2, Chapter 2, Rule 2.5.A.(3)(a) – (b). As part of this impact analysis, the facility must submit a protocol that details all methodologies and data sets to be utilized in completing the analysis no later than November 13, 2023. Additionally, the facility must submit the results of the completed analysis no later than December 12, 2023.

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OFFICE OF POLLUTION CONTROL

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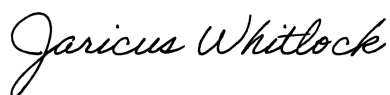
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Lastly, the MDEQ has determined that the facility must address the following items and submit the corresponding documentation no later than December 12, 2023 in order for a complete evaluation of the aforementioned permit application and the revised Case-By-Case MACT Determination:

- A “Start-Up, Shutdown, and Malfunction Plan” (SSMP) developed and completed in accordance with 40 CFR 63.6(e)(3)(i); Subpart A that address all applicable sources.
- A completed Section B.5 (Stack Parameters and Exit Conditions) of MDEQ’s consolidated air application.
- As Subpart B requires that a complete “Case-By-Case MACT Determination” addresses all sources of HAP emissions that are not subject to a separate “National Emissions Standard for Hazardous Air Pollutants (NESHAP), the facility must complete an amendment to the revised Case-By-Case MACT Determination to include an analysis of the “Primary Hammermill Feed Silo” (Emission Point AA-302).
- As it has come to the MDEQ’s attention that the facility has implemented improvements to the existing regenerative thermal oxidizer (RTO) and regenerative catalytic oxidizer (RCO), the facility must complete an evaluation that assesses the potential pollutant destruction capability of each device.
- There appears to be a discrepancy in the Compliance Assurance Monitoring (CAM) Plan provided for the RTO and RCO in which annual inspections are conducted on key components of each device (found in the Monitoring Approach” section) but reviews are logged monthly (found in the “QA/QC Practices and Criteria” section). As such, the facility must amend each CAM Plan to denote a consistent frequency for both sections.

If you have any questions or concerns, please do not hesitate to contact me [(601) 961-5303; jwhitlock@mdeq.ms.gov] or Krystal Rudolph [(601) 961-5096; krudolph@mdeq.ms.gov].

Sincerely,



Jaricus Whitlock, P.E.
Chief, Air Division

Electronic cc: Brennen Beard, Safety Manager, Amite BioEnergy, LLC
Jeff Crawford, Plant Manager, Drax Biomass, Inc.
Annie McIlwain, PPM Consultants, Inc.
Krystal Rudolph, Environmental Permits Division (EPD) Chief, MDEQ
Michelle Clark, Environmental Compliance & Enforcement Division (ECED) Chief, MDEQ
Kenny Pilgrim, Air 2 Compliance Branch Manager, MDEQ
Geoffrey Martin, Enforcement Branch Manager, MDEQ
Tyler Hardy, Air Program Manager – ECED, MDEQ
Ivelina Pilgrim, Air Program Manager – EPD, MDEQ
Laura James, Air Program Development Branch Manager

Jaricus Whitlock

From: Jaricus Whitlock
Sent: Friday, October 13, 2023 2:36 PM
To: wayne.kooy@drax.com
Cc: brennen.beard@drax.com; Jeff.Crawford@drax.com; Mcilwain, Annie; Krystal Rudolph; Ivelina Pilgrim; Michelle Clark; Geoffrey Martin; Tyler Hardy; Laura James; Kenny Pilgrim
Subject: Requirement for Additional Information (Amite BioEnergy)
Attachments: Requirement for Air Toxics Modeling and Additional Information Letter.pdf

Mr. Kooy,

Attached please find for your review a copy of the letter that formally requires Amite BioEnergy, LLC – Wood Pellet Manufacturing Facility (Air Ref. No. 0080-00031) to complete and submit additional information (including an impact analysis for air toxics) in relation to the application received March 28, 2022 and the revised Case-By-Case MACT Determination received November 11, 2022.

I ask that you please confirm receipt of the letter with a reply. If you have any questions or concerns, please do not hesitate to contact either me or Ms. Krystal Rudolph [601-961-5096; krudolph@mdeq.ms.gov].

Best Regards,

Jaricus Whitlock, P.E.
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