



# State of Mississippi

TATE REEVES  
Governor

MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY  
CHRIS WELLS, EXECUTIVE DIRECTOR

January 8, 2024

Submitted via email to [amber.bouska@draxbiomass.com](mailto:amber.bouska@draxbiomass.com)

Ms. Amber Bouska  
Amite BioEnergy LLC, Wood Pellet Manufacturing Facility  
1763 Georgia Pacific Number 2  
Gloster, MS 39638

Re: Notice of Violation  
Amite BioEnergy LLC, Wood Pellet  
Manufacturing Facility  
Gloster, Mississippi  
Amite County  
Air-Permit to Construct No. 0080-000031

Dear Ms. Bouska:

Attached is our inspection report that was completed as a result of a Compliance Evaluation Inspection (CEI) at Amite BioEnergy LLC, Wood Pellet Manufacturing Facility on November 9, 2023. This inspection revealed the following violations of the Air-Permit to Construct (PTC):

- 1. Air-Construction Permit No. 0080-0031, Condition 5.18 (AA-300 & AA-400):** For Emission Points AA-300 and AA-400, the permittee shall conduct a weekly inspection of each baghouse. Maintenance shall be performed as necessary to maintain proper operation of each baghouse at all times.  
The records from each inspection and any maintenance performed shall be kept in log form and made available to the MDEQ upon request or inspection...  
*The facility failed to document, maintain, and provide the required inspection log records for any period since the issuance of the modified PTC, March 9, 2021, to March 2023.*  
Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.2.B(11)
- 2. Air-Construction Permit No. 0080-0031, Condition 5.21 (AA-301):** The permittee shall monitor the effective life of the catalytic media in the regenerative catalytic oxidizer (RCO) by determining the apparent density (in grams per cubic centimeter) and percent saturation no later than sixteen (16) months after the initial startup. Thereafter, the

OFFICE OF POLLUTION CONTROL  
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permittee shall perform subsequent apparent density testing on the catalytic media in each RCO no later than 16 months after the previously completed test.

*The facility conducted a laboratory analysis of the catalytic media to determine effective life; however, the required "apparent density in grams per cubic centimeter and percent saturation" were not provided by the lab results methodology.*

Ref.: 11 Miss. Admin. Code, Pt. 2, R. 2.2.B(11)

Additionally, as a result of ongoing compliance review of your facility, the following violation is cited as a result of the stack test performed October 13, 2023:

- 3. Air-Construction Permit No. 0080-0031, Condition 5.8 (AA-301):** For Emission Points AA-201 (WESP – RTO Control System) and AA-301 (RCO Control System), unless otherwise required herein, the permittee shall conduct subsequent performance testing on the exhaust of the regenerative thermal oxidizer (RTO) and the regenerative catalytic oxidizer (RCO) to evaluate the emission of PM (filterable only), PM<sub>10</sub> (filterable + condensable), PM<sub>2.5</sub> (filterable + condensable), NO<sub>x</sub>, CO, VOCs, methanol, acetaldehyde, formaldehyde, acrolein, propionaldehyde, hydrogen chloride (HCl), and phenol no later than twenty-five (25) months after the previously completed performance test.

*The facility failed to timely conduct the subsequent performance test. The facility conducted the initial performance test referenced in condition 5.7 of the PTC July 7, 2021, requiring the subsequent performance test to be conducted no later than August 31, 2023. However, the facility conducted the subsequent performance test October 13, 2023, 43 days late.*

In regard to Violation No. 3, MDEQ is aware that the facility requested an extension to the subsequent performance test by telephone call August 1, 2023. However, the facility's planned outage for equipment installations and upgrades do not preclude the facility from complying with their obligations as described in the permit.

We request that you respond to these alleged violations no later than January 24, 2024. This response should contain: (1) actions that have been taken to correct the violations, (2) a schedule for correcting the violations, or (3) reasons why you believe the alleged violations did not exist. We will review this information before determining if further action is warranted. Failure to submit this information may result in further enforcement action.

If you have any questions concerning this matter, please contact me at (601) 961-5075.

Sincerely,

Brandon Johnson, PhD  
Air 2 Branch  
Environmental Compliance and Enforcement Division



**Mississippi Department of Environmental Quality**  
**Office of Pollution Control**  
**Air Compliance Inspection Report**

**Site Name:** Amite BioEnergy LLC, Wood Pellet Manufacturing Facility  
Air 2 Branch

**Permit Number:** Air-Construction Permit No. 0080-00031

**AFS ID:** 2800500031

**Physical Address**

Old Highway 24  
Gloster, MS 39638  
Amite County

**Mailing Address**

1500 North 19th Street  
Suite 501  
Monroe, Louisiana 71201

**Evaluation Type:** Compliance Evaluation Inspection - Title V

**Date of Evaluation:** 11/09/2023

**Inspection Participants:** Brandon Johnson, MDEQ  
Kenneth Pilgrim, MDEQ  
Jeff Crawford, Amite BioEnergy LLC  
Dan Caston, Amite BioEnergy LLC

**Purpose of Inspection**

This inspection was conducted to ensure compliance under the Air-Construction Permit No. 0080-00031 issued to Amite BioEnergy LLC, Wood Pellet Manufacturing Facility (Amite BioEnergy).

**Permit Status**

Air-Construction Permit No. 0080-00031 was issued to Amite BioEnergy on November 26, 2012, and modifications to this permit were issued on March 21, 2014, and March 9, 2021.

**Facility Description**

Amite BioEnergy operates a wood pellet manufacturing facility. The manufacturing process consists of processing whole wood logs, wood chips, clean mill, and forest residuals into wood pellets. The facility began production in August 2015, working 4 shifts with approximately 65 employees. Emission points include chip dryer with wood furnace controlled by wet electrostatic precipitator (WESP), regenerative thermal oxidizer (RTO), primary hammermill feed silo with bin vent, primary hammermill pneumatic system vents, secondary hammermill silos with bin vents, secondary hammermill pneumatic systems, pellet cooler pneumatic systems, pellet storage silos, screened materials return system, pellet truck loadout system, emergency fire pump engine, and emergency diesel generator.

## **Inspection Summary**

Upon arriving on site, we met with Jeff Crawford – Regional Production Manager and Dan Caston – Operations Manager and informed them that we were there to conduct a compliance evaluation inspection (CEI) for their Air-Construction Permit No. 0080-00031 (PTC). We began the inspection with the records review. The PTC was available for review. Mr. Crawford and Mr. Caston produced the following records to demonstrate compliance with the permit:

- Facility Dust Management Plan
- RTO & RCO Stack Tests
  - The most recent stack test was conducted October 13, 2023
  - The most recent stack test was due to be conducted August 31, 2023 per PTC Condition 5.8
- RTO & RCO weekly method 22 emissions (since March 2021)
  - No emissions observed, no method 9 required.
  - Included VEE certifications
- Bypass Stack Startup/Shutdown Periods on 12-month rolling basis
- Bypass Stack Idle Mode Periods
- Wood Chip Rotary Dryer ODT monthly and 12-month rolling (2023 only)
- Pellet baghouse maintenance logs
  - The facility only provided the logs from March 2023 to present
  - Mr. Crawford indicated that maintenance was conducted routinely however, logs were not maintained prior to March 2023
- Pellet baghouse pressure drop records
  - Continuously monitored but not physically observed
- Wood Pellet Production monthly and 12-month rolling (since 2021)
  - Tracked by algorithm using source shavings and tons produced
- RCO Stack Test
  - Prior test conducted 08/2022 (within 16 months at time of inspection)
  - Results included predicted life of catalyst media
  - Results did not include required quantitative media density as described in permit
- Emergency Engines monthly operations (since 2021)

After the records review, we began with the facility tour. During the tour, the following operations and air equipment was observed:

- Photo 1 – Storage Silo w/ Bin Vent
- Photo 2 – Pellet Storage Silo and Pellet Truck Loadout System
- Photo 3 – Log Debarker
- Photo 4 – Log Chipper
- Photo 5 – Green & Dry Wood Transfer/Handling Ops
- Photo 6 – Green Wood Storage Pile
- Photo 7 – Wet Electrostatic Precipitator and Regenerative Thermal Oxidizer
- Photo 8 – Wood Chip Dryer and Bypass Stack

- Photo 9 – Wood-fired Furnace
- Photo 10 – Cyclone
- Photo 11 – Hammermill Feed Silo w/ Bin Vent
- Photo 12 – 3 Hammermill Pneumatic Systems w/ Baghouse
- Photo 13 – Dry Fiber Silos w/ Bin Vent
- Photo 14 – Wood Chip Dryer and Bypass Stack
- Photo 15 – 402 HP Emergency Generator Engine
- Photo 16 – Emergency Generator Panel
- Photo 17 – Pellet Mill/Cooler Pneumatic Systems
- Photo 18 – Secondary Hammermills
- Photo 19 – Regenerative Catalytic Oxidizer and Burner
- Photo 20 – Dry Shavings Truck Dump
- Photo 21 – 250 HP Emergency Pump Engine
- Photo 22 – Emergency Pump Engine Hours

No issues were noted during the facility walkthrough.

A follow-up request was made on November 27, 2023 for additional records not available during the inspection to be submitted by December 1, 2023. The facility requested additional time after this date had passed and submitted the following on December 4, 2023:

- Whole Facility HAP emissions on a 12-month rolling basis (March 2021 – June 2023)
- Facility PM, NO<sub>x</sub>, CO and VOC emissions on a 12-month rolling basis (March 2021 – June 2023)
- Wood Chip and Pellet production Records as 12-month rolling totals of oven dried tons (March 2021 – December 2022)
- Pellet baghouse maintenance logs from (since March 2021)

### **Conclusions**

As a result of this Air-Compliance Evaluation Inspection, the following violations were observed:

1. **Air-Construction Permit No. 0080-0031, Condition 5.18 (AA-300 & AA-400):**  
 For Emission Points AA-300 and AA-400, the permittee shall conduct a weekly inspection of each baghouse. Maintenance shall be performed as necessary to maintain proper operation of each baghouse at all times.  
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Furthermore, the permit requires physical observation of the pressure drop across the baghouse for pellet operations. We recommend that additional records be maintained to demonstrate this activity.

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Photos / Other Attachments**

1) Storage Silo w/ Bin Vent



4) Log Chipper



2) Pellet Storage Silo and Pellet Truck Loadout System



5) Green & Dry Wood Transfer/Handling Ops



3) Log Debarker



6) Green Wood Storage Pile



7) Wet Electrostatic Precipitator and Regenerative Thermal Oxidizer



10) Cyclone



8) Wood Chip Dryer and Bypass Stack



11) Hammermill Feed Silo w/ Bin Vent



9) Wood-fired Furnace



12) 3 Hammermill Pneumatic Systems w/ Baghouse





13) Dry Fiber Silo 1 (left) and Silo 2 (right) w/ Bin Vent



16) Emergency Generator Panel



14) Wood Chip Dryer and Bypass Stack



17) Pellet Mill/Cooler Pneumatic Systems



15) 402 HP Emergency Generator Engine



18) Secondary Hammermills



19) Regenerative Catalytic Oxidizer and Burner



22) Emergency Pump Engine Hours



20) Dry Shavings Truck Dump



21) 250 HP Emergency Pump Engine

