

Mailing Address:  
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KEITH W. TURNER  
DIRECT DIAL: (601) 965-1958  
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kturner@watkinseager.com

November 5, 2018

**Via Email and Hand Delivery**

Tim Aultman  
Environmental Compliance & Enforcement Division  
Mississippi Department of Environmental Quality  
515 East Amite Street  
Jackson, Mississippi 39201

Re: Amite BioEnergy, LLC

Dear Mr. Aultman:

I am writing this as legal counsel for Amite BioEnergy, LLC ("Amite"). Pursuant to Miss. Code Ann. § 49-17-43(7)(g), Amite is voluntarily disclosing information that indicates its facility (Air Pollution Control Permit To Construct Air Emissions Equipment, Permit No. 0080-00031) located in Gloster, Mississippi, may not be in full compliance with 11 Miss. Admin. Code Part 2 Chapter 2, Permit Regulations for the Construction and/or Operation of Air Emissions Equipment, and Chapter 5, Regulations for the Prevention of Significant Deterioration of Air Quality.

The basis for this notice is information identified during work at a sister facility which indicated different emission rates than expected. The actual conditions at the Gloster facility have not yet been determined but ongoing testing will be available in the near term. This will include Volatile Organic Compound EPA Method 25a and Fourier Transform Infrared Spectroscopy EPA Method 320 testing. Upon completion of the testing, Amite will supplement this notice and schedule a meeting with Mississippi Department of Environmental Quality ("MDEQ") staff to review the findings and determine an appropriate path forward. In the meantime, if you need additional information or have questions about this notice please call my office at the number listed above. We appreciate your assistance going forward as Amite addresses this matter and look forward to working with the MDEQ on a satisfactory resolution.

Very truly yours,

Keith W. Turner

KWT:sd

cc: Gretchen Zmitrovich (via email and hand delivery)  
Krystal Rudolph (via email and hand delivery)  
Todd Tolkinen (via email)  
Michael Bellow (via email)  
Sharon Killian (via email)

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NOV 07 2018

Mississippi Department of Environmental Quality



One Galleria Boulevard | Suite 1030 | Metairie, LA 70001 | P (504) 828-5845

trinityconsultants.com

Trinity  
Consultants

February 22, 2019

Mr. Thomas Tynes  
Enforcement Branch Manager  
Mississippi Department of Environmental Quality (MDEQ)  
515 E. Amite Street  
Jackson, MS 39201

**RE:    *Submittal of Stack Test Report***  
***Amite BioEnergy LLC; Gloster, MS***  
***AI #57796***

Dear Mr. Tynes,

On behalf of Amite BioEnergy LLC (Amite), a company owned by Drax Biomass Inc., Trinity Consultants, Inc. (Trinity) submits the attached stack test report for testing performed at Amite on November 26-30, 2018. The testing was performed by Sanders Engineering & Analytical Services, Inc.

Also included as an attachment is a summary of tables of the tested emissions from each source. The Primary Hammermills, the Secondary Hammermills, the Pellet Coolers, the Loadout Silo, and the Regenerative Thermal Oxidizer (RTO) were all tested for VOCs. Additionally, the RTO was also tested for formaldehyde.

Below is a summary of the emissions from each source.

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FEB 28 2019

Dept. of Environmental Quality

### Amite BioEnergy – Emissions from Stack Test

Equipment	Average Volatile Organic Compound Emissions <sup>1</sup> (tons/yr)	Average Formaldehyde Emissions (tons/yr) <sup>1</sup>
Primary Hammermill 1A (AA-004)	11.21	N/A
Primary Hammermill 1B (AA-004)	18.73	N/A
Primary Hammermill 2A (AA-004)	36.51	N/A
Primary Hammermill 2B (AA-004)	23.17	N/A
Primary Hammermill 3A (AA-004)	16.33	N/A
Primary Hammermill 3B (AA-004)	11.95	N/A
Secondary Hammermill 1 (AA-007)	31.0	N/A
Secondary Hammermill 2 (AA-007)	29.5	N/A
Secondary Hammermill 3 (AA-007)	30.9	N/A
Cooler 1AB	91.0	N/A
Cooler 1CD	77.9	N/A
Cooler 2AB	82.9	N/A
Cooler 2CD	88.2	N/A
Cooler 3AB	84.7	N/A
Cooler 3CD	74.0	N/A
Loadout Silo	7.74	N/A
RTO	79.87	2.44
<b>Total</b>	<b>795.58</b>	<b>2.44</b>
<i>(1) Emissions are the average of three 1-hour runs.</i>		

If you have any questions about the attached report, please call either me at (504) 828-5845, ext 1001, or  
                    .

Sincerely,

TRINITY CONSULTANTS

A handwritten signature in cursive script, appearing to read "Sharon Killian".

Sharon Killian  
Principal Consultant  
Manager of Consulting Services - New Orleans

Attachments

**Summary of Average Volatile Organic Compound (VOC) and Average Formaldehyde Emissions Test Results**  
**Amite BioEnergy LLC**  
**Testing Conducted: November 26-30, 2018**

Equipment	Average Volatile Organic Compound Emissions (lbs/hr)	Average Volatile Organic Compound Emissions (tons/yr)	Average Formaldehyde Emissions (lbs/hr)	Average Formaldehyde Emissions (tons/yr)
Primary Hammermill 1A (AA-004)	2.56	11.21	-	-
Primary Hammermill 1B (AA-004)	4.28	18.73	-	-
Primary Hammermill 2A (AA-004)	8.34	36.51	-	-
Primary Hammermill 2B (AA-004)	5.29	23.17	-	-
Primary Hammermill 3A (AA-004)	3.73	16.33	-	-
Primary Hammermill 3B (AA-004)	2.73	11.95	-	-
Secondary Hammermill 1 (AA-007)	7.07	31.0	-	-
Secondary Hammermill 2 (AA-007)	6.74	29.5	-	-
Secondary Hammermill 3 (AA-007)	7.06	30.9	-	-
Cooler 1AB	20.78	91.0	-	-
Cooler 1CD	17.78	77.9	-	-
Cooler 2AB	18.93	82.9	-	-
Cooler 2CD	20.14	88.2	-	-
Cooler 3AB	19.33	84.7	-	-
Cooler 3CD	16.90	74.0	-	-
Loadout Silo	1.77	7.74	-	-
RTO	18.24	79.87	0.55754	2.44
<b>Total</b>	<b>181.64</b>	<b>795.58</b>	<b>0.55754</b>	<b>2.44</b>



**Summary of Volatile Organic Compound (VOC) and Formaldehyde Emissions Test Results**  
**Amite BioEnergy LLC**  
**Testing Conducted: November 26-30, 2018**

Equipment	Test Run	Start Time (Military)	Stop Time (Military)	Stack Gas Flow Rate (standard wet ft <sup>3</sup> /minute)	Water Vapor in Stack Gas (percent)	Volatile Organic Compound Emissions (as propane, ppm- wet)	Volatile Organic Compound Emissions (lbs/hr)	Volatile Organic Compound Emissions (tons/yr)
Primary Hammermill 1A (AA-004)	RUN 1	14:20	15:20	8,809	-	42.8	2.59	11.36
	RUN 2	15:28	16:28	8,901	-	38.7	2.37	10.37
	RUN 3	16:37	17:37	8,716	-	45.3	2.72	11.90
	Average			8,809	-	42.3	2.56	11.21
Primary Hammermill 1B (AA-004)	RUN 1	14:20	15:20	9,529	-	62.0	4.06	17.79
	RUN 2	15:28	16:28	9,507	-	61.9	4.04	17.72
	RUN 3	16:37	17:37	9,416	-	73.0	4.72	20.70
	Average			9,484	-	65.6	4.28	18.73
Primary Hammermill 2A (AA-004)	RUN 1	9:35	10:35	8,929	-	140.0	8.59	37.63
	RUN 2	11:00	12:00	9,233	-	131.4	8.34	36.51
	RUN 3	12:19	13:19	9,593	-	122.6	8.08	35.39
	Average			9,252	-	131.3	8.34	36.51
Primary Hammermill 2B (AA-004)	RUN 1	9:35	10:35	6,766	-	123.0	5.72	25.06
	RUN 2	11:00	12:00	6,820	-	113.3	5.31	23.26
	RUN 3	12:19	13:19	6,758	-	104.2	4.84	21.20
	Average			6,781	-	113.5	5.29	23.17
Primary Hammermill 3A (AA-004)	RUN 1	14:13	15:13	8,455	-	64.9	3.77	16.52
	RUN 2	15:40	16:40	8,445	-	65.8	3.82	16.72
	RUN 3	17:00	18:00	8,538	-	61.3	3.60	15.76
	Average			8,479	-	64.0	3.73	16.33
Primary Hammermill 3B (AA-004)	RUN 1	14:13	15:13	8,733	-	43.5	2.61	11.43
	RUN 2	15:40	16:40	8,604	-	47.2	2.79	12.23
	RUN 3	17:00	18:00	8,636	-	46.9	2.78	12.19
	Average			8,658	-	45.9	2.73	11.95
Secondary Hammermill 1 (AA-007)	RUN 1	9:20	10:20	7,317	-	131.5	6.6	29.0
	RUN 2	10:32	11:32	7,291	-	141.6	7.1	31.1
	RUN 3	11:48	12:48	7,241	-	150.9	7.5	32.9
	Average			7,283	-	141.3	7.07	31.0
Secondary Hammermill 2 (AA-007)	RUN 1	9:20	10:20	8,824	-	115.5	7.0	30.7
	RUN 2	10:32	11:32	8,565	-	114.1	6.7	29.4
	RUN 3	11:48	12:48	8,362	-	113.1	6.5	28.5
	Average			8,584	-	114.2	6.74	29.5
Secondary Hammermill 3 (AA-007)	RUN 1	9:20	10:20	10,121	-	87.2	6.1	26.6
	RUN 2	10:32	11:32	10,076	-	109.8	7.6	33.3
	RUN 3	11:48	12:48	10,182	-	107.2	7.5	32.9
	Average			10,126	-	101.4	7.06	30.9

**Summary of Volatile Organic Compound (VOC) and Formaldehyde Emissions Test Results**  
**Amite BioEnergy LLC**  
**Testing Conducted: November 26-30, 2018**

Equipment	Test Run	Start Time (Military)	Stop Time (Military)	Stack Gas Flow Rate (standard wet ft <sup>3</sup> /minute)	Water Vapor in Stack Gas (percent)	Volatile Organic Compound Emissions (as propane, ppm-wet)	Volatile Organic Compound Emissions (lbs/hr)	Volatile Organic Compound Emissions (tons/yr)
Cooler 1AB	RUN 1	7:05	8:05	21,075	-	142.8	20.7	90.6
	RUN 2	8:12	9:12	21,138	-	143.7	20.9	91.5
	RUN 3	9:21	10:21	21,048	-	143.5	20.8	90.9
	Average			21,087	-	143.4	20.78	91.0
Cooler 1CD	RUN 1	11:35	12:57	17,644	-	156.8	19.0	83.3
	RUN 2	13:06	14:06	17,683	-	137.5	16.7	73.2
	RUN 3	14:13	15:13	17,816	-	143.7	17.6	77.1
	Average			17,714	-	146.0	17.78	77.9
Cooler 2AB	RUN 1	14:26	15:26	16,171	-	169.9	18.9	82.7
	RUN 2	15:31	16:31	16,084	-	170.1	18.8	82.4
	RUN 3	16:38	17:38	16,295	-	170.6	19.1	83.7
	Average			16,183	-	170.2	18.93	82.9
Cooler 2CD	RUN 1	7:05	8:05	15,953	-	191.4	21.0	91.9
	RUN 2	8:12	9:12	15,991	-	197.3	21.7	95.0
	RUN 3	9:21	10:21	15,624	-	165.2	17.7	77.7
	Average			15,856	-	184.6	20.14	88.2
Cooler 3AB	RUN 1	10:54	11:55	17,132	-	176.3	20.8	90.9
	RUN 2	12:38	13:38	17,319	-	168.5	20.1	87.9
	RUN 3	17:57	18:57	17,452	-	143.1	17.2	75.2
	Average			17,301	-	162.6	19.33	84.7
Cooler 3CD	RUN 1	15:25	17:35	17,262	-	142.9	17.0	74.3
	RUN 2	17:40	18:40	17,177	-	140.5	16.6	72.7
	RUN 3	18:45	19:45	17,158	-	145.4	17.2	75.1
	Average			17,199	-	143.0	16.90	74.0
Loadout Silo	RUN 1	10:37	11:37	45,788	-	4.68	1.47	6.45
	RUN 2	11:41	12:41	46,377	-	5.43	1.73	7.58
	RUN 3	12:45	13:45	46,583	-	6.55	2.10	9.18
	Average			46,249	-	5.55	1.77	7.74
RTO	RUN 1	16:24	17:24	137,942	42.7	26.0	24.6	107.9
	RUN 2	17:50	18:50	137,936	42.7	20.4	19.3	84.5
	RUN 3	19:16	20:16	139,995	41.8	11.2	10.8	47.2
	Average			138,624	42.4	19.18	18.24	79.87
Equipment	Test Run	Start Time (Military)	Stop Time (Military)	Stack Gas Flow Rate (standard wet ft <sup>3</sup> /minute)	Water Vapor in Stack Gas (percent)	Formaldehyde Emissions (ppm-wet)	Formaldehyde Emissions (lbs/hr)	Formaldehyde Emissions (tons/yr)
RTO	RUN 1	16:24	17:24	137,942	42.7	1.28	0.82623	3.62
	RUN 2	17:50	18:50	138,405	42.7	0.84	0.54403	2.38
	RUN 3	19:16	20:16	140,465	41.8	0.46	0.30236	1.32
	Average			138,937	42.4	0.9	0.55754	2.44

**TABLE V. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**PRIMARY HAMMERMILL 1A**  
**Wednesday, November 28, 2018**

TEST	Start Time Military	Stop Time Military	Stack Gas Flow Rate (Standard Wet Cubic Feet per Minute)	Volatile Organic Compounds Emissions (as propane) (ppm-wet)	Volatile Organic Compounds Emissions (lbs/hour)	Volatile Organic Compounds Emissions (Tons/Year)
RUN 1	14:20	15:20	8,809	42.8	2.59	11.36
RUN 2	15:28	16:28	8,901	38.7	2.37	10.37
RUN 3	16:37	17:37	8,716	45.3	2.72	11.90
Average			8,809	42.3	2.56	11.21



**TABLE VI. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**PRIMARY HAMMERMILL 1B**  
**Wednesday, November 28, 2018**

TEST	Start Time Military	Stop Time Military	Stack Gas Flow Rate (Standard Wet Cubic Feet per Minute)	Volatile Organic Compounds Emissions (as propane) (ppm-wet)	Volatile Organic Compounds Emissions (Lbs/hour)	Volatile Organic Compounds Emissions (Tons/Year)
RUN 1	14:20	15:20	9,529	62.0	4.06	17.79
RUN 2	15:28	16:28	9,507	61.9	4.04	17.72
RUN 3	16:37	17:37	9,416	73.0	4.72	20.70
Average			9,484	65.6	4.28	18.73

**TABLE VII. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**PRIMARY HAMMERMILL 2A**  
**Wednesday, November 28, 2018**

TEST	Start Time Military	Stop Time Military	Stack Gas Flow Rate (Standard Wet Cubic Feet per Minute)	Volatile Organic Compounds Emissions (as propane) (ppm-wet)	Volatile Organic Compounds Emissions (Lbs/hour)	Volatile Organic Compounds Emissions (Tons/Year)
RUN 1	9:35	10:35	8,929	140.0	8.59	37.63
RUN 2	11:00	12:00	9,233	131.4	8.34	36.51
RUN 3	12:19	13:19	9,593	122.6	8.08	35.39
Average			9,252	131.3	8.34	36.51

**TABLE VIII. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**PRIMARY HAMMERMILL 2B**  
**Wednesday, November 28, 2018**

TEST	Start Time Military	Stop Time Military	Stack Gas Flow Rate (Standard Wet Cubic Feet per Minute)	Volatile Organic Compounds Emissions (as propane) (ppm-wet)	Volatile Organic Compounds Emissions (Lbs/hour)	Volatile Organic Compounds Emissions (Tons/Year)
RUN 1	9:35	10:35	6,766	123.0	5.72	25.06
RUN 2	11:00	12:00	6,820	113.3	5.31	23.26
RUN 3	12:19	13:19	6,758	104.2	4.84	21.20
Average			6,781	113.5	5.29	23.17

**TABLE I. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY**  
**PRIMARY HAMMERMILL 3A**  
**Monday, November 26, 2018**

TEST	Start Time Military	Stop Time Military	Stack Gas Flow Rate (Standard Wet Cubic Feet per Minute)	Volatile Organic Compounds Emissions (as propane) (ppm-wet)	Volatile Organic Compounds Emissions (Lbs/hour)	Volatile Organic Compounds Emissions (Tons/Year)
RUN 1	14:13	15:13	8,455	64.9	3.77	16.52
RUN 2	15:40	16:40	8,445	65.8	3.82	16.72
RUN 3	17:00	18:00	8,538	61.3	3.60	15.76
Average			8,479	64.0	3.73	16.33

**TABLE II. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**PRIMARY HAMMERMILL 3B**  
**Monday, November 26, 2018**

TEST	Start Time Military	Stop Time Military	Stack Gas Flow Rate (Standard Wet Cubic Feet per Minute)	Volatile Organic Compounds Emissions (as propane) (ppm-wet)	Volatile Organic Compounds Emissions (Lbs/hour)	Volatile Organic Compounds Emissions (Tons/Year)
RUN 1	14:13	15:13	8,733	43.5	2.61	11.43
RUN 2	15:40	16:40	8,604	47.2	2.79	12.23
RUN 3	17:00	18:00	8,636	46.9	2.78	12.19
Average			8,658	45.9	2.73	11.95

**TABLE XV. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**SECONDARY HAMMERMILL 1**  
**Friday, November 30, 2018**

TEST	Start Time Military	Stop Time Military	Stack Gas Flow Rate (Standard Wet Cubic Feet per Minute)	Volatile Organic Compounds Emissions (as propane) (ppm-wet)	Volatile Organic Compounds Emissions (Lbs/hour)	Volatile Organic Compounds Emissions (Tons/Year)
RUN 1	9:20	10:20	7,317	131.5	6.6	29.0
RUN 2	10:32	11:32	7,291	141.6	7.1	31.1
RUN 3	11:48	12:48	7,241	150.9	7.5	32.9
Average			7,283	141.3	7.07	31.0



**TABLE XVI. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**SECONDARY HAMMERMILL 2**  
**Friday, November 30, 2018**

TEST	Start Time Military	Stop Time Military	Stack Gas Flow Rate (Standard Wet Cubic Feet per Minute)	Volatile Organic Compounds Emissions (as propane) (ppm-wet)	Volatile Organic Compounds Emissions (Lbs/hour)	Volatile Organic Compounds Emissions (Tons/Year)
RUN 1	9:20	10:20	8,824	115.5	7.0	30.7
RUN 2	10:32	11:32	8,565	114.1	6.7	29.4
RUN 3	11:48	12:48	8,362	113.1	6.5	28.5
Average			8,584	114.2	6.74	29.5

**TABLE XVII. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**SECONDARY HAMMERMILL 3**  
**Friday, November 30, 2018**

TEST	Start Time Military	Stop Time Military	Stack Gas Flow Rate (Standard Wet Cubic Feet per Minute)	Volatile Organic Compounds Emissions (as propane) (ppm-wet)	Volatile Organic Compounds Emissions (Lbs/hour)	Volatile Organic Compounds Emissions (Tons/Year)
RUN 1	9:20	10:20	10,121	87.2	6.1	26.6
RUN 2	10:32	11:32	10,076	109.8	7.6	33.3
RUN 3	11:48	12:48	10,182	107.2	7.5	32.9
Average			10,126	101.4	7.06	30.9

**TABLE IX. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**COOLER 1AB**  
**Thursday, November 29, 2018**

TEST	Start Time Military	Stop Time Military	Stack Gas Flow Rate (Standard Wet Cubic Feet per Minute)	Volatile Organic Compounds Emissions (as propane) (ppm-wet)	Volatile Organic Compounds Emissions (Lbs/hour)	Volatile Organic Compounds Emissions (Tons/Year)
RUN 1	7:05	8:05	21,075	142.8	20.7	90.6
RUN 2	8:12	9:12	21,138	143.7	20.9	91.5
RUN 3	9:21	10:21	21,048	143.5	20.8	90.9
Average			21,087	143.4	20.78	91.0

**TABLE XII. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**COOLER 1CD**  
**Thursday, November 29, 2018**

TEST	Start Time Military	Stop Time Military	Stack Gas Flow Rate (Standard Wet Cubic Feet per Minute)	Volatile Organic Compounds Emissions (as propane) (ppm-wet)	Volatile Organic Compounds Emissions (Lbs/hour)	Volatile Organic Compounds Emissions (Tons/Year)
RUN 1	11:35	12:57	17,644	156.8	19.0	83.3
RUN 2	13:06	14:06	17,683	137.5	16.7	73.2
RUN 3	14:13	15:13	17,816	143.7	17.6	77.1
Average			17,714	146.0	17.78	77.9

**TABLE XIV. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**COOLER 2AB**  
**Thursday, November 29, 2018**

TEST	Start Time Military	Stop Time Military	Stack Gas Flow Rate (Standard Wet Cubic Feet per Minute)	Volatile Organic Compounds Emissions (as propane) (ppm-wet)	Volatile Organic Compounds Emissions (Lbs/hour)	Volatile Organic Compounds Emissions (Tons/Year)
RUN 1	14:26	15:26	16,171	169.9	18.9	82.7
RUN 2	15:31	16:31	16,084	170.1	18.8	82.4
RUN 3	16:38	17:38	16,295	170.6	19.1	83.7
Average			16,183	170.2	18.93	82.9

**TABLE X. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**COOLER 2CD**  
**Thursday, November 29, 2018**

TEST	Start Time Military	Stop Time Military	Stack Gas Flow Rate (Standard Wet Cubic Feet per Minute)	Volatile Organic Compounds Emissions (as propane) (ppm-wet)	Volatile Organic Compounds Emissions (Lbs/hour)	Volatile Organic Compounds Emissions (Tons/Year)
RUN 1	7:05	8:05	15,953	191.4	21.0	91.9
RUN 2	8:12	9:12	15,991	197.3	21.7	95.0
RUN 3	9:21	10:21	15,624	165.2	17.7	77.7
Average			15,856	184.6	20.14	88.2



**TABLE XI. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**COOLER 3AB**  
**Thursday, November 29, 2018**

TEST	Start Time Military	Stop Time Military	Stack Gas Flow Rate (Standard Wet Cubic Feet per Minute)	Volatile Organic Compounds Emissions (as propane) (ppm-wet)	Volatile Organic Compounds Emissions (Lbs/hour)	Volatile Organic Compounds Emissions (Tons/Year)
RUN 1	10:54	11:55	17,132	176.3	20.8	90.9
RUN 2	12:38	13:38	17,319	168.5	20.1	87.9
RUN 3	17:57	18:57	17,452	143.1	17.2	75.2
Average			17,301	162.6	19.33	84.7

**TABLE XIII. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**COOLER 3CD**  
**Thursday, November 29, 2018**

TEST	Start Time Military	Stop Time Military	Stack Gas Flow Rate (Standard Wet Cubic Feet per Minute)	Volatile Organic Compounds Emissions (as propane) (ppm-wet)	Volatile Organic Compounds Emissions (Lbs/hour)	Volatile Organic Compounds Emissions (Tons/Year)
RUN 1	15:25	17:35	17,262	142.9	17.0	74.3
RUN 2	17:40	18:40	17,177	140.5	16.6	72.7
RUN 3	18:45	19:45	17,158	145.4	17.2	75.1
Average			17,199	143.0	16.90	74.0

**TABLE III. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**LOADOUT SILO**  
**Tuesday, November 27, 2018**

TEST	Start Time Military	Stop Time Military	Stack Gas Flow Rate (Standard Wet Cubic Feet per Minute)	Volatile Organic Compounds Emissions (as propane) (ppm-wet)	Volatile Organic Compounds Emissions (Lbs/hour)	Volatile Organic Compounds Emissions (Tons/Year)
RUN 1	10:37	11:37	45,788	4.68	1.47	6.45
RUN 2	11:41	12:41	46,377	5.43	1.73	7.58
RUN 3	12:45	13:45	46,583	6.55	2.10	9.18
Average			46,249	5.55	1.77	7.74

**TABLE IV. SUMMARY OF EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**RTO - VOC EMISSIONS**  
**Monday, November 26, 2018**

TEST	Start Time Military	Stop Time Military	Stack Gas Flow Rate (Standard Wet Cubic Feet per Minute)	Water Vapor in Stack Gas (Percent)	Volatile Organic Compounds Emissions (as propane) (ppm-wet)	Volatile Organic Compounds Emissions (Lbs/hour)	Volatile Organic Compounds Emissions (Tons/Year)
RUN 1	16:24	17:24	137,942	42.7	26.0	24.6	107.9
RUN 2	17:50	18:50	137,936	42.7	20.4	19.3	84.5
RUN 3	19:16	20:16	139,995	41.8	11.2	10.8	47.2
Average			138,624	42.4	19.18	18.24	79.87

**TABLE XVIII. FORMALDEHYDE EMISSIONS TEST RESULTS**  
**AMITE BIOENERGY LLC**  
**RTO - FORMALDEHYDE EMISSIONS**  
**Monday, November 26, 2018**

TEST	Start Time Military	Stop Time Military	Stack Gas Flow Rate (Standard Wet Cubic Feet per Minute)	Water Vapor in Stack Gas (Percent)	Formaldehyde Emissions (ppm-wet)	Formaldehyde Emissions (Lbs/hour)	Formaldehyde Emissions (Tons/Year)
RUN 1	16:24	17:24	137,942	42.7	1.28	0.82623	3.62
RUN 2	17:50	18:50	138,405	42.7	0.84	0.54403	2.38
RUN 3	19:16	20:16	140,465	41.8	0.46	0.30236	1.32
Average			138,937	42.4	0.9	0.55754	2.44