



STATE OF MISSISSIPPI
TATE REEVES
GOVERNOR
MISSISSIPPI DEPARTMENT OF ENVIRONMENTAL QUALITY
CHRIS WELLS, EXECUTIVE DIRECTOR

July 3, 2025

CERTIFIED MAIL #70191120000047857145

Ms. Jennifer Fulton Anderson
Oxbow Greenwood, LLC
2546 Vine Place
Boulder, CO 80304

**Re: Oxbow Greenwood, LLC
Agreed Order No. 7520 25**

Dear Ms. Anderson:

Enclosed you will find a copy of Agreed Order No. 7520 25, which has been executed by the Executive Director of the Mississippi Department of Environmental Quality, Chris Wells, on behalf of the Mississippi Commission on Environmental Quality.

The enclosed Order assesses a civil penalty. The penalty payment, when due, should be made by check payable to the Mississippi Department of Environmental Quality and returned in the enclosed, self-addressed envelope to the MDEQ Accounts Receivable at P.O. Box 2339, Jackson, MS 39225.

If you have any questions regarding your obligations under the enclosed order, please contact Geoffrey Martin at (601) 961-5024.

Sincerely,

Michelle Clark, P.E., BCEE, Chief
Environmental Compliance and Enforcement Division

Enclosure
cc: Geoffrey Martin

Agency Interest No. 2192
ENF20250001

BEFORE THE MISSISSIPPI COMMISSION
ON ENVIRONMENTAL QUALITY

MISSISSIPPI COMMISSION ON
ENVIRONMENTAL QUALITY

COMPLAINANT

VS.

ORDER NO. 7520 25

OXBOW GREENWOOD, LLC
808 12TH STREET
GREENWOOD, MISSISSIPPI 38930

RESPONDENT

AGREED ORDER

COME NOW the Mississippi Commission on Environmental Quality (Commission), acting through the staff and Executive Director of the Mississippi Department of Environmental Quality (MDEQ), Complainant, and Oxbow Greenwood, LLC, Respondent, in the above captioned cause and agree as follows:

1.

Respondent owns and operates a soybean processing and oil extraction facility in Greenwood, Mississippi (the Facility).

On April 13, 2023, Complainant and Respondent entered into Agreed Order No. 7245-23 (the Agreed Order). The Agreed Order authorized Respondent to operate all air emissions equipment contained in Air Construction Permits 1560-00050, issued on July 5, 2017, August 10, 2017 and September 17, 2020, and Title V Operating Permit 1560-0050 issued on September 24, 2015 (the "Permits"). It also authorized Respondent to operate one new surge bin and one new oil stripper at the Facility following MDEQ's approval of an updated compliance plan, as required by and in accordance with 40 CFR 63.2851.

By letter dated November 25, 2024, Respondent was contacted by Complainant and notified

of the following alleged violations which were discovered during a Compliance Evaluation Inspection at the Facility on September 26, 2024:

- A. Respondent failed to submit a semiannual monitoring report for the second half of calendar year 2023 by January 31, 2024, in violation of Condition 5.A.4 of Title V Operating Permit No. 1560-00050 which states, "Except as otherwise specified herein, the permittee shall submit reports of any required monitoring by July 31 and January 31 for the preceding six-month period..."
- B. Respondent failed to submit an annual compliance certification for calendar year 2023 by January 31, 2024, in violation of Condition 4.2 of Title V Operating Permit No. 1560-00050 which states, "Except as otherwise specified herein, the permittee shall submit to the Permit Board and to the Administrator of EPA Region IV a certification of compliance with permit terms and conditions, including emissions limitations, standards, or work practices, by January 31 for the preceding calendar year..."
- C. Respondent failed to monitor and record the pressure drop across the surge bin baghouse emission control system during operation in June 2023 in violation of Section 3.C. of Agreed Order No. 7245-23 which states, "Upon approval of the Compliance Plan, Respondent is authorized to operate one new surge bin at the Facility. As a condition of operation of the surge bin, the baghouse associated with the surge bin is required to operate at all times the surge bin operates. Respondent shall continuously monitor the pressure drop across the baghouse emission control system..."

On September 27, 2024, Respondent submitted the semiannual monitoring report for the second half of calendar year 2023 and the annual compliance certification for calendar year 2023.

2.

In lieu of a formal enforcement hearing concerning the alleged violations listed above, Complainant and Respondent agree to settle this matter as follows:

- A. Respondent agrees to pay and Complainant agrees to accept a civil penalty in the amount of \$10,000.00. Respondent shall pay this penalty to MDEQ within forty-five

(45) days after this Agreed Order has been executed by the MDEQ Executive Director or his designee. The settlement payment shall be submitted to:

Mississippi Department of Environmental Quality
Attn: Accounts Receivable
P.O. Box 2339
Jackson, MS 39225

- B. Prior to further operation of the surge bin, Respondent shall install a continuous monitoring system capable of monitoring and recording pressure drop on the baghouse associated with the surge bin at least once every fifteen (15) minutes. Respondent shall notify MDEQ prior to start-up of the unit and include documentation that the continuous monitoring system has been installed. This documentation shall be submitted to:

Mississippi Department of Environmental Quality
Attn: Manager, ECED Air I Branch
P.O. Box 2261
Jackson, MS 39225

- C. Respondent acknowledges that all requirements of Agreed Order No. 7245-23 are still in effect.

3.

Nothing in this Agreed Order shall limit the rights of MDEQ or the Commission in the event Respondent fails to comply with this Agreed Order. The Agreed Order shall be strictly construed to apply to those matters expressly resolved herein.

4.

Nothing contained in this Agreed Order shall limit the rights of MDEQ or the Commission to take enforcement or other actions against Respondent for violations not addressed herein and for future violations of environmental laws, rules, and regulations.

5.

Respondent neither admits nor denies the allegations contained herein. Respondent

understands and acknowledges that it is entitled to an evidentiary hearing before the Commission pursuant to Miss. Code Ann. § 49-17-31, and that it has made an informed waiver of that right.

ORDERED, this the 3rd day of July, 2025.

MISSISSIPPI COMMISSION ON
ENVIRONMENTAL QUALITY

BY: 

CHRIS WELLS
EXECUTIVE DIRECTOR
MISSISSIPPI DEPARTMENT
OF ENVIRONMENTAL QUALITY

AGREED, this the 27th day of June, 2025.

OXBOW GREENWOOD, LLC

BY: 

JENNIFER FULTON ANDERSON

~~SENIOR VICE PRESIDENT OF FINANCE & HUMAN RESOURCES~~

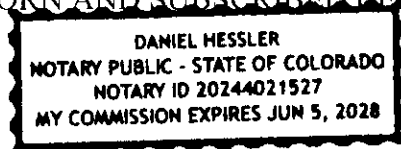
CHIEF FINANCIAL OFFICER + CHIEF OPERATING OFFICER

STATE OF COLORADO

COUNTY OF BOULDER

PERSONALLY appeared before me, the undersigned authority in and for the jurisdiction aforesaid, the within named JENNIFER FULTON ANDERSON, who first being duly sworn, did state upon her oath and acknowledge to me that she is the ~~SENIOR VICE PRESIDENT OF FINANCE & HUMAN RESOURCES~~ **CHIEF FINANCIAL OFFICER + CHIEF OPERATING OFFICER** of OXBOW GREENWOOD, LLC and is authorized to sign and enter this Agreement.

SWORN AND SUBSCRIBED BEFORE ME, this the 27 day of June, 2025.




NOTARY PUBLIC

My Commission expires: 6-5-28