



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

ELECTRONIC MAIL
CONFIRMATION OF EMAIL RECEIPT REQUESTED

Mr. Bryan Olier, General Manager
Jaxon Energy Processing Plant
455 Industrial Dr
Jackson, Mississippi 39209
BryanOlier@jaxon-energy.com

Re: NPDES Permit No. MSS062171, Reconnaissance Inspection Report

Dear Mr. Olier:

The U.S. Environmental Protection Agency, Region 4 conducted a Reconnaissance Inspection of the Jaxon Energy Processing Plant on August 3, 2021. The objective of the inspection was to assess the permittee's compliance with the Clean Water Act and to evaluate the general condition of the facility. The inspection results have been summarized in the enclosed Inspection Report.

The EPA appreciates your cooperation. If you have specific questions about the inspection report, please contact Tristan Odekirk at (404) 562-9295 or via e-mail at Odekirk.Tristan@epa.gov.

Sincerely,

JAIRO
CASTILLO
Jairo Castillo, P.E., Chief
Wastewater Enforcement Section
Water Enforcement Branch

Digitally signed by JAIRO
CASTILLO
Date: 2021.10.01
13:31:20 -04'00'

Enclosure

cc: Michelle Clark, MRCClark@mdeq.gov
MDEQ

**United States Environmental Protection Agency****Region 4****CV-MSS062171-8-3-2021****Reconnaissance Inspection Report****SECTION A: National Data System Coding**

NPDES No.	MO/DAY/YR	Inspection-Type	Inspector	Facility-Type
MSS062171	8/3/2021	ROS (Reconnaissance without Sampling)	Tristan Odekirk/Richard Elliott	Privately-owned sewage treatment system

SECTION B: Facility Data

Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) Jaxon Energy Processing Plant 455 Industrial Dr. Jackson, Mississippi 39209	Entry Date/Time 8/3/2021 11:20 AM Exit Date/Time 8/3/2021 12:50 PM	Permit Effective Date 7/14/2015 Permit Expiration Date 9/30/2019
Names of On-site Representative(s)/Title(s)/Phone and Fax Number(s) Bryan Olier/General Manager/ (769) 572-2322 Craig Ellison/Environmental Health and Safety and Quality and assurance Manager/ (601) 994-3443 Corey Funk/Assistant Plant Manager/ (601) 218-5581	Other Facility Data	
Name, Address of Responsible Official/Title/Phone and Fax Number Bryan Olier/General Manager/ (769) 572-2322	Contacted ☒ Yes ☐ No	

SECTION C: Areas Evaluated During Inspection (Check only those areas evaluated)

☒	Permit	☐	Flow Measurement	☐	Operation & Maintenance	☐	CSO/SSO (Sewer Overflow)
☒	Records/Reports	☐	Self-Monitoring Program	☐	Sludge Handling/Disposal	☐	Pollution Prevention
☒	Facility Site Review	☐	Compliance Schedules	☐	Pretreatment	☐	Multimedia
☒	Effluent/Receiving Waters	☐	Laboratory	☐	Storm Water	☐	Other:

SECTION D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)

See Section D.

Name(s) and Signature(s) of Inspector(s) : Tristan Odekirk Digitally signed by Odekirk, Tristan Date: 2021.10.04 11:54:06 -04'00'	Agency/Division/Phone and Fax Number EPA/ECAD/ (404) 562-9295	Date 10/1/2021
Signature of Management QA Reviewer: Jairo Castillo Digitally signed by JAIRO CASTILLO Date: 2021.10.01 13:31:49 -04'00'	Agency/Division/Phone and Fax Number EPA/ECAD/(404) 562-9257	Date 10/1/2021



United States Environmental Protection Agency
Region 4
CV-MSS062171-8-3-2021
Reconnaissance Inspection Report
(Continued)

Section D: Summary of Findings / Comments

On August 3, 2021, the EPA conducted a Reconnaissance Inspection (RI) at the Jaxon Energy Processing Plant located at 455 Industrial Dr, Jackson, MS. EPA met with the following Jaxon Energy representatives: Bryan Olier, Corey Funk, and Craig Ellison. EPA inspectors reviewed the facility's monitoring records and discussed the facility's self-monitoring program. The following is a summary of RI findings and observations.

I. Records/Reports

A review of the EPA's Enforcement and Compliance History Online (ECHO) system showed that the facility is in significant noncompliance for 7 of the past 12 quarters for Discharge Monitoring Report (DMR) non-submittal. According to the facility's National Pollutant Discharge Elimination System (NPDES) permit the facility is required to submit DMRs every quarter including no-discharge reports when the facility is not discharging effluent to waters of the US. The requirement to submit no-discharge reports was discussed with facility personnel, who agreed to back submit no-discharge DMRs. The facility personnel acknowledged that the facility would submit future no-discharge DMRs.

Facility records were reviewed in an opening conference with facility personnel. Copies of the facility's NPDES permits and DMRs were available on site. The facility originally had two NPDES permits for operation, one pretreatment permit and one stormwater permit.

Pretreatment permit

A correspondence between the Mississippi Department of Environmental Quality (MDEQ) and the facility showed that MDEQ is no longer requiring the facility to have a pretreatment permit. A letter obtained from MDEQ reasons that as the facility has a low enough effluent, and the receiving Wastewater Treatment Plant (WWTP) has a large enough capacity that no pretreatment permit is required by the facility. Current facility personnel were unaware of this correspondence and no signed copy of the letter was found on site. The EPA recommends that facility personnel obtain a signed copy of this letter or else reevaluate the necessity of a pretreatment permit.

Stormwater permit

The facility currently operates with a stormwater permit to discharge into two outfalls. The most recent permit expired in 2019 and a new permit was in public comment period at the time of inspection. According to the EPA's Integrated Compliance Information System (ICIS) the facility has had previous violations of oil and grease in 3rd quarter 2019 and 2nd quarter 2021.

Recommendation

The EPA recommends that the facility submit no-discharge DMRs when the facility is not actively discharging water for every reporting period, as required in the facility's NPDES permit.

II. Facility Site Review

Jaxon Energy Processing Plant produces biodiesel from corn oil. The facility is located on a 6-acre lot. Most of the facility area is asphalt with a one-acre metal roof building for office and warehouse space. Stormwater is collected in two drainage systems. In each system water passes through an oil and grease separator before discharging into surrounding waters. In system 1 (Photos 1 and 2) water is discharged through outfall 001 into a receiving ditch that also collects runoff from other surrounding facilities (Photos 3 and 4). In system 2 (Photo 5) water is discharged through outfall 002 into Town Creek (Photos 6-9).

The Jaxon Energy Processing Plant has not been operational since January 16, 2021 when a system failure caused a fire in the facility.

III. Flow Measurement

Flow measurement is not required in the permit.

IV. Self-Monitoring Program

Water samples are collected by the facility engineer and sent to Waypoint Analytical. Chain of custody forms and water quality sampling results were available on site. Facility personnel raised concern regarding the location of sampling sites regarding actual outfall locations. Sampling locations were located far downstream from actual discharge sites (Photos 6-9). The compliance sample locations have the potential to receive effluent from nearby facilities. The potential for mixing/combination of discharges from other properties, renders the chosen sample locations unrepresentative of the permittee's discharge. In addition, the surrounding sites are registered Brownfield locations. Therefore, it is likely that discharges from the surrounding sites will negatively affect the permittee's effluent quality. Currently, the facility's permit is in review/public notice by MDEQ.

The EPA recommends that the facility contact MDEQ as soon as possible to modify the sampling locations for outfalls 001 and 002. The NPDES program requires that the discharge from a permittee be representative of the facility's effluent. Given that the facility's permit has been finalized, the recommended changes should be addressed in the current permit cycle.

V. Effluent/Receiving waters

As stated previously, receiving waters are shared with multiple other facilities and Brownfields. During the inspection, facility personnel raised concern of an incident which occurred on January 5, 2021 in which a vacuum truck from the City of Jackson was cleaned out into the sampling point of the Jaxon Energy Processing Plant. This incident was documented by Jaxon personnel and a complaint was made to MDEQ.

Given the gravity of the accusation and that the alleged perpetrator is a defendant in an active EPA enforcement action, the EPA will follow up with MDEQ to know the investigation findings of this complaint. EPA will determine if further action is warranted.

PHOTOGRAPHIC LOG



Photo 1 Inside of oil and grease separator 1.



Photo 2 Influent pipe for oil and grease separator 1



Photo 3 Sampling site for outfall 1. Area receives effluent from neighboring facilities.



Photo 4 Actual location of discharge for outfall 001



Photo 5 Oil and grease separator 2



Photo 6 Actual location of discharge for outfall 002. Effluent pipe is located behind brush and discharges directly into Town creek (Downstream of other facilities and Brownfields)



Photo 7 Water storage after oil and grease separator and before outfall.



Photo 8 Chainlink fence showing distance from actual discharge point to sampling point. Distances between fence posts are estimated at 10 feet. For 22 segments this shows that the sampling point is located 220ft downstream of discharge point.



Photo 9 Sampling point for outfall 002. This point also receives effluent from neighboring facilities and Brownfield sites.

End of Report