

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Michigan Sugar Company - Bay City	SRN : B1493
Location : 2600 S Euclid Ave	District : Saginaw Bay
	County : BAY
City : BAY CITY State: MI Zip Code : 48706	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Sharon LeBlanc
FCE Begin Date : 2/2/2015	FCE Completion Date : 10/14/2016
Comments : FCE for 2017 was unable to be completed based on incomplete submittal of operational and emissions data for select EUs prior to completion of report preparation.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
10/14/2016	Scheduled Inspection	Non Compliance	FCE scheduled inspection for the 2017 fiscal year. Supplemental information was requested on November 9, 2016, to complete the compliance evaluation for the facility. Based on the amount of time allowed for the records submittal (received December 9, 2016), the incomplete nature of the submittal, and unknown errors District Staff has determined that the a reasonable amount of time was allowed for records retrieval, and that records are not readily available. Based on general condition 5 and 17, and special conditions EUBOILER8 VI.4 and FGBOILERS VI.7 the facility is determined to be in noncompliance at the time of report preparation. Any supplemental information will be reviewed following receipt. sgl
10/13/2016	Odor Evaluation	Compliance	odor evaluation in response to odor complaints received since 10/11/2016.
10/11/2016	Odor Evaluation	Non Compliance	odor evaluation in response to odor complaints received since 10/6/2016.

Activity Date	Activity Type	Compliance Status	Comments
10/06/2016	Odor Evaluation	Compliance	Odor evaluation in response to odor complaints received for 10/6/2016. Odors detected as part of the referenced odor eval activities identified objectionable odors during the activities, but determined that they did not meet the thresholds for intensity and duration.
10/05/2016	Odor Evaluation	Compliance	lower intensity or intermittent odors noted. No rule 901 violation verified.
10/03/2016	Odor Evaluation	Compliance	odor evaluation in response to odor complaints received since the 9/26/2016 odor survey. Note that odors reported present met objectionable threshold, but did not meet duration thresholds, as were intermittent with wind changes at the time of the evaluation.
09/28/2016	Odor Evaluation	Non Compliance	odor evaluation in response to odor complaints received since 9/26/2016. Odors identified were a combination of process and either manure or sulfury-sewer odors. intensity and duration verified Rule 901 violation.
09/26/2016	Odor Evaluation	Compliance	odor survey in response to odor complaints received from 9/23/2016 thru 9/26/2016. No odors were reported that met thresholds for intensity and duration. sgl
09/26/2016	ROP Monthly	Compliance	Anamet SO2 Gas Generation report for the month of August 2016. Total for 12 month rolling is 0.45 tons.

Activity Date	Activity Type	Compliance Status	Comments
09/26/2016	ROP Semi 1 Cert	Non Compliance	<p>For the first half of 2016, the facility reported NOX CEMS downtime and failure to monitor emissions for a total of 178.4 hrs for Boiler #6 for the first quarter.</p> <p>Multiple issues with Boiler #8 and included 500.6 hours of CEMS downtime for the month of January 2016, where Nox emissions failed to be monitored on a continuous bases. In addition, in the month of March 2016, the facility reported additional CEMs failure that resulted in failed monitoring of NOX emissions for the first quarter.</p> <p>During the second quarter of 2016, the company reported that due to limited run time, the CGA for the CEMS associated with Boiler #8 did not have a cylinder gas audit as did the other two boilers located onsite. Boiler #8 was not reported to have been run until the week of the third quarter CGA.</p> <p>All of the boiler #8 deviations were reported to TPU for audit and violations if appropriate.sgl</p>
09/22/2016	Odor Evaluation	Non Compliance	Odor evaluation conducted in response to odor complaints received for 9/22/2016. sgl
09/21/2016	Odor Evaluation	Non Compliance	Odor evaluation conducted in response to odor complaints received since September 20, 2016. Rotten beat and manure odors were identified during the activity and at intensity and duration thresholds sufficient to be determined to be a rule 901 violation at the time of the evaluation.
09/19/2016	Odor Evaluation	Compliance	odor evaluation for odor complaints received between 9/15/16 to 9/19/16. Odors reported were determined to either be of a processing nature, manure or rotting beet odors were intermittent. sgl

Activity Date	Activity Type	Compliance Status	Comments
09/14/2016	Odor Evaluation	Compliance	odor evaluation in response to odor complaints received on September 13 and 14, 2016. Odors reported were either determined to not be associated with facility or were below the intensity and duration thresholds to verify a Rule 901 Violation. sgl
09/12/2016	Odor Evaluation	Non Compliance	Odor evaluation in response to odor complaints received for period of 9/9/16 to 9/12/2016. Manure-like odors were reported present in combination with other identifiable process odors downwind of the subject site. sgl
09/08/2016	Odor Evaluation	Compliance	odor survey conducted in response to odor complaint received immediately before mobilizing for activity. Courtland Farms Subdivision.
09/06/2016	Odor Evaluation	Compliance	odor evaluation failed to identify odors from waste water treatment ponds. Odors associated with site included the smell of raw beets and process odors,
08/29/2016	Odor Evaluation	Compliance	odor evaluation in response to odor complaints received since 8/25/2016. Note that no manure-like odors were detected at the time of the survey.
08/29/2016	Odor Evaluation	Compliance	Limited odor evaluation in Stoney Creek subdivision. sgl
08/24/2016	Odor Evaluation	Compliance	odor evaluation in response to odor complaints received since 8/15/2016. Note manure like odors were noted north/downwind of the facility, but were reported to be intermittent with a flora scent.
08/18/2016	Excess Emissions (CEM)		Response by company to electronic request (8/3/2016 for resubmittal of CEMS deviation reports for EUBOILER#8. Company did not address reviewers statement that failure to conduct CGA within quarter for NOx CEMS that the instrument was in downtime for the quarter. Company indicated that since the CEMS had met all daily compliance checks that there was no downtime. f

Activity Date	Activity Type	Compliance Status	Comments
08/17/2016	ROP Monthly	Compliance	Anamet SO2 Gas Generation report for the month of July 2016. Total for 12 month rolling is 0.48 tons. The EU did not run for the month of July 2016.
08/15/2016	Odor Evaluation	Compliance	odor evaluation conducted in response to odor complaints received after 8/11/2016 (one in total).
08/11/2016	Odor Evaluation	Compliance	odor evaluation conducted in response to odor complaints received from 8/5/2016 thru 8/11/2016. Note very faint manure-like pond odor was noted, however it was not of an intensity or duration sufficient to verify a rule 901 violation.
08/10/2016	Excess Emissions (CEM)	Non Compliance	<p>Replacement pages for quarterly boiler report/ excess emissions submittal received on 8/1/2016, which was missing signatures. Note that no changes or corrections were made to the excess emissions reports...</p> <p>It should be noted that boiler #8 per TPU review (e-mail dated 8/3/2016) indicated that the boiler #8 report page should indicate that the CEMS for Boiler #8 was down for 100% of operations for 2nd quarter as the CEMS had not completed a cylinder gas audit for that quarter. Note that due to this violation (VN to be issued by TPU) that the compliance status for both the 8/1 and 8/9/2016 submittals are non-compliance.</p>

Activity Date	Activity Type	Compliance Status	Comments
08/01/2016	Excess Emissions (CEM)	Non Compliance	<p>2nd Quarter Cylinder Gas Audit, and Quarterly Boiler Reports. The referenced documents came with out signatures for the individual boiler report pages, and an original cert page was not submitted, only a photocopy. Signed and certified originals were requested on 8/1/2016.</p> <p>Quarterly report for Boiler #6 reported 59.5 hours of downtime due to monitor equipment malfunctions (chiller problems). No downtime was reported for boilers 7 or 8. No excess emissions were reported for any of the three boilers.</p> <p>The quarterly cylinder gas audit was performed on June 30, 2016, by Network Environmental Inc. and reported that the results for boilers 6 and 7 the units were reported within acceptable ranges.</p> <p>However, the NOX CEMS was reported not to be operating at the time of the Audits, and no data was available. Further review indicated that Boiler #8 was not operating for the month of June 2016. No reason was provided in the report for the boiler not to be operating at the time of the testing. Supplemental clarification was requested from the company. sgl.</p>
08/01/2016	Odor Evaluation	Compliance	Odor evaluation in response to odor complaint received on 7/29/2016. intermittent sewery smell was identified, but did not meet the odor intensity or duration thresholds at the time of the evaluation.
08/01/2016	ROP Tech Review Notes		ROP Technical Review document prepared for MI- ROP-B1493-2016.
07/26/2016	Odor Evaluation	Compliance	odor evaluation conducted in response to odor complaints received since 7/21/2016. No odors associated with the waste water ponds were noted as part of the evaluation.

Activity Date	Activity Type	Compliance Status	Comments
07/26/2016	ROP Monthly	Compliance	Anamet SO2 Gas Generation report for the month of June 2016. Total for 12 month rolling is 0.48 tons.
07/20/2016	Odor Evaluation	Compliance	odor evaluation in response to odor complaints received on July 19, 2016
07/18/2016	Odor Evaluation	Compliance	odors were identified, but were not of the intensity and duration thresholds to verify a Rule 901 violation.
07/11/2016	Odor Evaluation	Compliance	odor evaluation in response to odor complaints received from 7/8 thru 7/11/2016. sgl
07/05/2016	Odor Evaluation	Non Compliance	odor evaluation for odor complaints received between 7/1 and 7/5/2016. Note that odors of intensity or duration to verify a Rule 901 violation were not identified during activity.
06/30/2016	Odor Evaluation	Compliance	Odor survey in very early Am to evaluate early morning - calm odor issues. odors detected were very limited, and two of the three were of an undeterminable source. The third was a sewery odor, and varied from just detectable to distinct and definite intensity. Not a Rule 901 violation.
06/28/2016	Odor Evaluation	Compliance	odor evaluation in response to odor complaints received for 6/22 - 6/25. Note that manure-like odor was noted, but varied in intensity during the duration of the observations. sgl
06/23/2016	Complaint Investigation		Grab sample from downwind of MSC aeration ponds
06/21/2016	Odor Evaluation	Compliance	
06/21/2016	ROP Monthly	Compliance	Anamet SO2 Gas Generation report for the month of March 2016. Total for 12 month rolling is 0.51 tons.
06/14/2016	Odor Evaluation	Compliance	Odor evaluation in response to odor complaints received from June 10-14, 2016. Various odors were noted as part of the odor evaluation, sources suspected include the molasses desug process, ponds and odor neutralization system. Unpleasant odors did not meet the threshold for intensity and duration.

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05/27/2016	Odor Evaluation	Compliance	Odor evaluation in response to sporadic complaints received the month of May, the most recent being on 5/28/2016.
05/26/2016	ROP Monthly	Compliance	Anamet SO2 Gas Generation report for the month of April 2016. Total for 12 month rolling is 0.60 tons.
05/12/2016	MAERS	Compliance	MAERs certification form received 3/14/2016

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05/11/2016	Excess Emissions (CEM)	Non Compliance	<p>2016 First Quarterly summary boiler reports -</p> <p>A review of the document indicated that all three NG fired boilers were operating for the quarter, with off line hours ranging from 2.9 to 6.7 hrs. the greatest off line time being that of EUBOILER8. No excess emissions were reported by the facility for the three boilers for the first quarter.</p> <p>CEM System downtime for the three boilers was as follows: Boiler #6 CEMS downtime of 118.9 hours (5.5% of operating time) due to chiller related problems of moisture, plugging and sample flow to the CEMS; Boiler #7 no downtime reported; and Boiler #8 reported downtime of 624.7 hours (28.69% of operating time) due to a continuation of zirconium cell failure (500.6 hrs) a roof leak that shorted out the CEM display (100.1 hrs) and failed calibrations (24 hours).</p> <p>It should be noted that boiler #8 reported approximately 14% CEMS downtime for the 4th quarter of 2015, due to the zirconium cell failure. However at that time it was determined by TPU that it did not reflect a violation of conditions in 40 CFR part 60, subpart Db. A request for supplemental from the initial failure of the zirconium cell in the previous quarter, thru the 1st quarter of 2016 has been requested of the company by TPU staff to better determine if the company has met the minimum monitoring requirements under the referenced subpart. Should it be determined that the minimum requirement has not been met, a VN will be issued to the company by TPU staff. Copies of the correspondence associated with the request and determination may be found in the general and reporting files in the district office.</p> <p>sgl</p>

Activity Date	Activity Type	Compliance Status	Comments
05/11/2016	CEM RATA	Compliance	<p>First Quarter 2016, Cylinder Gas Audit - boilers 6,7,8</p> <p>Cylinder Gas Audit conducted on March 3, 2016. Audit results reported that accuracy for Nox and O2 CEMS units in question met the plus or minus 15% of average value, or plus or minus 5, ppm, whichever is greater requirements for passing audit. No irregularities were reported.</p>
04/26/2016	ROP Monthly	Compliance	Anamet SO2 Gas Generation report for the month of March 2016. Total for 12 month rolling is 0.74 tons.
04/25/2016	Odor Evaluation	Compliance	Odor evaluation in response to odor complaints since 4/22/2016.
04/21/2016	Odor Evaluation	Compliance	odor evaluation in response to odor complaints received for the period of 4/19-4/21/16. Note that various odors were reported to have been detected. Only one location reported fairly strong sulfury-sewagy odors, however these were intermittent with the wind gusts. No Rule 901 violation was verified.
04/18/2016	Odor Evaluation	Compliance	Odor evaluation in response to odor complaints received since 4/15/2016. Odors were detected but were determined not to meet the intensity and duration thresholds that would result in a rule 901 violation.
04/14/2016	Odor Evaluation	Non Compliance	odor evaluation in response to odor complaints received from the period of 4/11/2016 to 4/14/2016. Odors were detected downwind of the plant at an intensity and duration to verify a rule 901 violation.
04/11/2016	Odor Evaluation	Compliance	odor survey in response to odor complaints received for period of 4/6/2016 thru 4/11/2016. Note that distinct and in some cases objectionable odors were detected downwind of the facility, some were determined to be process, all were determined to be intermittent and linked to wind intensity and duration.

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04/05/2016	Odor Evaluation	Compliance	sour odors noted downwind of the facility, but not of an intensity to meet threshold for Rule 901 violation. Noted beets being hauled off the site. sgl
03/30/2016	Odor Evaluation	Compliance	very strong manure like odors were reported at one location, but were intermittent in nature. So the intensity and duration threshold was not met for a rule 901 violation. sgl

Activity Date	Activity Type	Compliance Status	Comments
03/28/2016	ROP Semi 1 Cert	Compliance	<p>document dated 9/14/2015. Delay in processing due to wait for response from company regarding incorrect ROP number on document, and question as to why company was not identifying Rule 901 Violations as deviations. I.E. the company feels that the violations are only alleged, and contest the occurrences. Further correspondence may be found in the district files.</p> <p>Six deviations were reported for the facility during the first half of 2015. Deviations reported for Euboiler #6 were 4.2 hours to 24 hours in length. All were CEMS in nature. Two were reported for CEMS associated with boiler #6 and were reported to be linked with a power outage that occurred on 4/14/2015.</p> <p>Two deviations were reported for the CEMS associated with Boiler #7. The Unit was reported to have problems with the chiller. CEMS downtime during the two events was 3.42 and 24 hrs.</p> <p>The two deviations reported for EUBOILER#8 were like those reported for EUBOILER#6 CEMS deviations resulting from a power outage.</p> <p>Company had been notified of incorrect ROP number in September 2015, after multiple discussions the company determined that a letter acknowledging the correct ROP Number would address the administrative error, without resulting in a late submittal. Electronic copy of correspondence received 3/28/2016, hardcopy received 3/30/2016. sgl</p>
03/22/2016	Odor Evaluation	Non Compliance	<p>odor evaluation in response to odor complaints received from 3/16-3/22/16. Odors were reported present in a residential area downwind of the plant and of an intensity and duration to be determined a Rule 901 Violation.</p>

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03/18/2016	ROP Annual Cert	Compliance	Annual cert received in a timely manner. Requested correction to semi cert to include deviation for O2 CEMS for December 2015. Received correction dated 3/21/2016.sgl

03/18/2016	ROP SEMI 2 CERT	Compliance	<p>7 deviations were reported for the later half of 2015 by the facility, however two were duplicates of each other, and one deviation was four 4 dates in December, so 9 deviations/events were actually reported. All were for failure to monitor NOx emissions on a continuous basis. All were CEMS related issues.</p> <p>Three CEMS related deviations were reported for the CEMS associated with EUBOILER#6. These occurred on September 13, 2015, October 8, 2015, December 25, 2015, December 28, 2015, December 29, 2015 and December 31, 2015. Downtimes reported for September, October and December were, 3.8, 2.4 and 14.6 hours, respectively.</p> <p>One CEMS related issue/event was reported for the CEMS associated with EUBOILER#7 for July 28 through 30, 2015, and totaled 23.2 hours. This event occurred with Boiler #7 down for maintenance. CSD-1 testing was being performed on Boiler #7, the facility reports that during that time, the ozone lamp in the Boiler #7 CEMS was being repaired so no CEMS monitoring occurred for the period.</p> <p>Two issues/events were reported for the CEMS associated with EUBOILER#8. These events occurred in September 2015 (September 2 and 3rd, 2015 and an associated downtime on September 18, 2015 totaling 25.4 hours) and December (December 18 through 31st, 2015) This later event is the result of a failed zirconium cell in the CEMS oxygen probe. The quarterly boiler report for the 4th quarter of 2015 reported >300 hours of O2 CEMS downtime. The SEMI 2 CERT form only identified 14.6 hours of NOx CEMS downtime. A request was made for a corrected form to also include the O2 CEMS deviation. TPU staff indicated that no VN would be issued for the December deviations, as careful</p>
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03/18/2016	ROP SEMI 2 CERT	Compliance	review of Db allows for as much as 27% downtime. The time reported was only 14.7% downtime. Correction for Boiler #8 CEMS downtime was submitted 3/21/2016. sgl
03/18/2016	CAM Excursions/Exceedances	Compliance	No CAM deviations (EUPELLETPRODUCTION) reported
03/18/2016	CAM monitor downtime	Compliance	reported no CAM monitor downtime or deviations- only applicable unit is eupelletproduction
03/18/2016	ROP Monthly	Compliance	Anamet SO2 Gas Generation for month of February 2016. Reported 0.09 tons per month, 0.86 tons total for 12 month rolling total. sgl
03/16/2016	Odor Evaluation	Compliance	odor survey in response to odor complaints received since 3/9/2016. No complaints were received 3/10 or 3/11/2016. Note a manure like odor was detected for one location, but was intermittent with gusts. A manure like and sewer odor was detected at a second location was determined to be intermittent in intensity.
03/09/2016	Odor Evaluation	Non Compliance	Odor survey in response to odor complaints received for period of 3/3/16 thru 3/9/16. Sharp Manure like odor was noted downwind of the facility.
03/07/2016	Odor Evaluation	Compliance	Odor evaluation in response to odor complaints received for the period of 3/3/16 and 3/7/16. unpleasant sewer like odors detected were determined to not meet odor intensity and duration thresholds to meet Rule 901 violation.
03/02/2016	Odor Evaluation	Compliance	Odor evaluation in response to odor complaints for period of 2/23/2016 to 3/2/2016. Manure like odor was noted, but was intermittent and mixed with burnt sugar process odor. Combo was unpleasant, but did not meet the odor intensity and duration threshold criteria for Rule 901.
02/23/2016	Odor Evaluation	Compliance	Only normal process odors were identified during odor survey. sgl
02/22/2016	ROP Monthly	Compliance	January 2016 Anamet SO2 Gas Generation - 12 month rolling total is 0.90 tons. sgl

Activity Date	Activity Type	Compliance Status	Comments
02/17/2016	Odor Evaluation	Compliance	Odor survey in response to odor complaints received since 2/8/2016 odor survey. Unusual odors detected downwind of the facility, but not of a consistent intensity/duration to verify a Rule 901.
02/08/2016	Odor Evaluation	Compliance	odor evaluation in response to odor complaints received from 2/5/2016 thru 2/8/2016. Odors were detected but were determined to not meet intensity and duration thresholds for Rule 901 violation.
02/04/2016	Odor Evaluation	Compliance	odor evaluation in response to odor complaints between 1/26/2016 and 2/4/2016.
02/01/2016	Excess Emissions (CEM)	Non Compliance	<p>4th quarter operating excess emission reports and CEM summary reports for boilers 6, 7, 8. Submittal also included annual RATA for the facility.</p> <p>Boiler No. 6, reported no excess emissions, and 17 hours (0.8% of operating time) of CEMs downtime due to non-monitor equipment malfunctions. The company reports that the CEM downtime was due to moisture problems. The chiller and peristaltic pump used for moisture control were repaired.</p> <p>Boiler #7 reported no excess emissions for the quarter and no CEM System Downtime.</p> <p>Boiler #8 reported no excess emissions, however, they also reported 325 hours of CEMS monitor downtime (14.7% of operating time) due to the zirconium cell in the oxygen probe failing. Lbs /MMBTU of NOx could not be calculated. sgl</p>

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02/01/2016	CEM RATA	Compliance	2015 annual RATA for facility was conducted by Network Environmental Inc. The testers reported also determining the moisture content (US EPA Method 4) for boiler#8, for the company to use in their lbs/MMBTU calculations. Testing was conducted on December 15-16th 2015. Relative accuracies reported for all three RATA audits were reported below the 20% allowable.
01/25/2016	Odor Evaluation	Non Compliance	odor survey in response to odor complaints received between 1/21 and 1/25/2016.
01/21/2016	Odor Evaluation	Compliance	odor survey in response to odor complaints received since 1/8/2016. light non process odors were noted, however they were very intermittent, and did not meet thresholds for intensity and duration.
01/20/2016	ROP Monthly	Compliance	Anamet S2 Gas Generation-Monthly report for December 2015. Total 0.05 lbs/month, 0.92 tons/12 month rolling average. sgl
01/08/2016	Odor Evaluation	Compliance	Sour or manure like odors were detected during evaluation activities, but were determined to not of sufficient duration to verify a rule 901 violation.
01/06/2016	Odor Evaluation	Compliance	odors were detected, but were reported to not be of an intensity that would warrant a rule 901 violation.
12/23/2015	Odor Evaluation	Non Compliance	odor evaluation in response to complaints received for period from 12/15/2015 through 12/23/2015.
12/22/2015	ROP Other		Lime Kiln Emission Calculations proposed for compliance determination. Company requested that method be approved method in district files, to allow flexibility should better data become available in the future. Any changes must be with approval of district supervisor. ROP will reference approved calculation methods in District files. sgl

Activity Date	Activity Type	Compliance Status	Comments
12/15/2015	ROP Monthly	Compliance	Anamet SO2 gas generation - monthly emission reporting for EUAEROBICDIGESTER for the month of November 2015.
12/14/2015	Odor Evaluation	Compliance	odor evaluation in response to complaints received after 12/11/2015. Note that odor were present but did not meet the intensity and duration thresholds, due to the intermittency of the odors.
12/11/2015	Odor Evaluation	Non Compliance	odor evaluation in response to odor complaints received since 12/10/2015.
12/10/2015	Other Non ROP		114a Response to inquiry regarding waste water treatment system - copies were also provided to AQD and WD-Division Chief Offices.
12/08/2015	Odor Evaluation	Non Compliance	Odor evaluation in response to odor complaints received since December 3, 2015
12/03/2015	Odor Evaluation	Compliance	unpleasant odors were noted, but were determined not to meet the thresholds of intensity and duration for a Rule 901 violation, though it was very very close.
11/30/2015	Odor Evaluation	Compliance	odor evaluation in response to odor complaints received since 11/19/2015. Odors were noted at only one location but were very faint, and intermittent, other locations if odors were detected were clearly associated with process.
11/19/2015	Odor Evaluation	Compliance	manure like odors and a sour (think sour kraut) odor was noted in addition to various process odors, but were intermittent, and did not meet the intensity and duration thresholds for a rule 901 violation.
11/16/2015	ROP Monthly	Compliance	Anamet SO2 Gas Generation Report for the Month of October. 12 Month rolling total for emissions is 0.92 tons.
11/12/2015	Odor Evaluation	Compliance	Odor evaluation conducted in response to complaints received since 11/6/2015. Sulfury or sewer-like odors were noted, but were determined to be intermittent in nature. So no Rule 901 Violation was verified.

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11/05/2015	Odor Evaluation	Compliance	Odor evaluation in conjunction with GMAP activities by other regulatory agency. Odors were detected downwind, but were not of an intensity to verify a rule 901 violation.
11/04/2015	Odor Evaluation	Compliance	Non process odors were detected during the odor evaluation, but were determined to either be of an intermittent nature or not intense enough to warrant a Rule 901 Violation.
11/04/2015	Excess Emissions (CEM)	Compliance	<p>3rd Quarterly Boiler Summary Reports, and 3rd Quarter cylinder gas audit results. Review of the Boiler operating summary indicated that with the exception of Boiler #8 in July, all three boilers were operated every month for the 3rd quarter.</p> <p>The facility did not operate any excess emissions for the period. CEMs downtime was reported for CEMS for all three boilers. The CEMS for boiler#6 reported 3.8 hours (0.20% of operating time) due to non monitor equipment malfunctions (low sample flow pressure). The CEMS for boiler#7 was reported to have 23.2 hours (1.9%) downtime due to monitor equipment malfunctions. In this case the downtime was due to mandatory testing on the boiler and the ozone bulb for the Nox analyzer was burned out. The CEMS for boiler#8 was reported to be down 25.4 hours (1.99%) Due to the nox analyzer malfunctioning. A rental unit was installed until the repairs could be made.</p> <p>The company was asked for additional information regarding the malfunction of the CEMS for boiler #8. The responding e-mail is attached.</p> <p>The CGA for the 3rd quarter was conducted on 9/29/2015. The CGA reported reading within the acceptable accuracy range (15% or 5ppm whichever is greater). All three units reported average accuracies below 6%.sgl</p>

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10/29/2015	Odor Evaluation	Compliance	odor evaluation conducted in response to odor complaints received for the period of 10/28-10/29/2015. Odors reported were process odors. No manure-like odors were detected during the activities.
10/27/2015	Odor Evaluation	Compliance	odor evaluation in response to odor complaints received for the period of 10/23-10/27/2015. Note manure-like odors were detected by were intermittent.
10/22/2015	Odor Evaluation	Compliance	Limited odors were detected, those not determined as process odors were of limited duration and intensity, and did not verify a Rule 901 violation.
10/20/2015	ROP Monthly	Compliance	Anamet SO2 gas generation for the month of September 2015. Note that totals reported for 12 month rolling are less than 1 ton/yr. sgl
10/16/2015	Odor Evaluation	Compliance	faint, intermittent manure-like odors noted with process odors at one of 10 locations evaluated. Not of intensity or duration for Rule 901 Violation.
10/13/2015	Odor Evaluation	Compliance	Odor evaluation for complaints received on 10/12 and 10/13/2015. No non process odors were noted in residential areas surrounding the facility. sgl
10/08/2015	Odor Evaluation	Compliance	Barely detectable odors were reported present downwind of the facility.
10/02/2015	Odor Evaluation	Compliance	odor evaluation in response to odor complaints received from creekwood circle residential area for 10/02/2015.
10/01/2015	Odor Evaluation	Compliance	Odor survey confirmed odors present, but not of sufficient intensity or duration to verify Rule 901 Violation.
09/28/2015	Odor Evaluation	Compliance	odor survey in response to odor complaints received for period of 9/25-9/28/15. No Rule 901 violation was verified.
09/23/2015	Odor Evaluation	Compliance	odor survey in response to odor complaints received 9/22 and 9/23/2015 - No verification of Rule 901 Violation .

Activity Date	Activity Type	Compliance Status	Comments
09/23/2015	ROP Monthly	Compliance	Anamet SO2 Gas Generation for the month of August 2015. emission totals reported below permit limits.
09/21/2015	Odor Evaluation	Compliance	Odor Evaluation to resolve approx. 18 complaints received 9/18/2015- 9/21/2015
09/21/2015	Odor Evaluation	Compliance	Odor Survey to investigate 3 odor complaints received 9/21/2015
09/17/2015	Odor Evaluation	Non Compliance	odor evaluation in response to apx. 7 odor complaints received between 9/16/2015 and 9/17/2015
09/16/2015	Odor Evaluation	Compliance	odor evaluation in response to apx. 9 odor complaints received between 9/14/2015 and 9/16/2015.
09/08/2015	Odor Evaluation	Compliance	odor evaluation in response to odor complaints received for the period of 9/5/2015 thru 9/8/2015. sgl
09/04/2015	Odor Evaluation	Non Compliance	odor evaluation in response to apx. 15 odor complaints received on 9/4/2015.
09/03/2015	Odor Evaluation	Non Compliance	AQD District Staff noted objectionable odors of sufficient intensity and duration to result in Rule 901 Violation.
09/01/2015	Odor Evaluation	Compliance	intermittent manure-like odor (offensive) was noted in addition to continuous cooking beets (process) odor.
08/31/2015	Odor Evaluation	Compliance	odor eval in response to odors received from 8/27-8/30/15. Manure-like odors were determined to be present, but intermittent in nature.
08/26/2015	Odor Evaluation	Compliance	unpleasant odors were identified, but were of intermittent nature. sgl
08/19/2015	Odor Evaluation	Compliance	odor evaluation was conducted in response to odor complaints received on August 19, 2015. Sour manure-like odors were noted, but were not of an intensity or duration to verify a rule 901 violation.
08/18/2015	Odor Evaluation	Compliance	odor evaluation in response to odor complaints received during the period of August 14thru August 18, 2015. Note that sour manure-like odors were identified, but due to inconsistency in intensity and duration, no odor violation was verified.

Activity Date	Activity Type	Compliance Status	Comments
08/18/2015	ROP Monthly	Compliance	July 2015 Anamet SO2 gas generation. No thrupt for the month of July 2015.
08/10/2015	Odor Evaluation	Compliance	odor evaluation for complaints received for period of August 9 through August 10, 2015. Odors were noted at one downwind location but based on intensity and duration were determined not to be a Rule 901 Violation.
08/07/2015	Odor Evaluation	Compliance	Odor evaluation in response to odor complaints received on 8/7/2015. Odors were reported, but Rule 901 violation was not determined present due to intensity and duration criteria .
08/06/2015	Odor Evaluation	Compliance	Odor evaluation in response to odor complaints received for evening of August 5th and August 6th. Note that odors were noted at single location but were not of an intensity and duration to be a 901 violation.
08/04/2015	Odor Evaluation	Non Compliance	odor evaluation conducted in response to odor complaint received earlier in the day. Odors were noted but were not of an intensity and duration to verify a rule 901 violation. sgl
08/04/2015	Excess Emissions (CEM)	Compliance	quarterly boiler summary reports - CEMS for boilers 6,7 & 8 were reported down during the quarter for CGA as well as a power outage. percent downtimes for CEMS varied based on hours of operation for the quarter. boilers 6 & 8 were <3% operating time, but boiler 7 was 35.81 % due to a very limited operating period (77 hours) for quarter. sgl
08/04/2015	ROP Other	Compliance	Cylinder Gas Audit on gas fired boilers #6, #7, & #8. CGA was conducted on June 11, 2015. All NOX and O2 testing for the reverenced boilers reported percent accuracies of less than 5%. in compliance with requirements.
07/29/2015	Odor Evaluation	Compliance	odor evaluation in response to complaints received from July 26 thru July 29, 2015. Odor intensity and duration were not sufficient to warrant Rule 901 violation.

Activity Date	Activity Type	Compliance Status	Comments
07/21/2015	Odor Evaluation	Compliance	Odor evaluation in response to odor complaints received on 7/17 - 7/20/2015. sgl
07/16/2015	Odor Evaluation	Compliance	Odor survey conducted for odor complaints received on July 16, 2015. Odors were present, but determined to be intermittent in nature. sgl
07/16/2015	ROP Monthly	Compliance	Anamet SO2 Gas Generation - June 2015
07/14/2015	Odor Evaluation	Compliance	Odor survey conducted in response to odor complaints received 7/10 thru 7/13/2015. Odors noted were not of an intensity or duration to verify a rule 901 violation. sgl
07/09/2015	Odor Evaluation	Compliance	odor evaluation for odor complaints received 7/8 & 7/9/2015.
07/07/2015	Odor Evaluation	Compliance	odor evaluation in response to odor complaints received from July 3-7th, 2015. Intermittent odors, no verification of rule 901 violation.
07/01/2015	Odor Evaluation	Non Compliance	odor evaluation in response to odor complaints received for the period of 6/27-7/1/2015. Rule 901 violation verified.
07/01/2015	ROP Monthly	Compliance	May 2015 SO2 emissions
06/26/2015	Odor Evaluation	Non Compliance	odor verification activities for complaints received 6/26/2015
06/25/2015	Odor Evaluation	Non Compliance	Odor survey in response to complaints received for 6/25/15.
06/24/2015	Odor Evaluation	Compliance	Odor evaluation in response to odor complaints received for 6/20, 6/21 and 6/22/2015. Odors were detected but were determined to be not of an intensity and duration to result in a rule 901 violation.
06/17/2015	Odor Evaluation	Non Compliance	Rule 901 Violation verified during 6/17/2015 activities - company notified electronically.
06/16/2015	Odor Evaluation	Compliance	Intensity and duration of manure-like odors did not verify Rule 901 Violation
06/16/2015	ROP Monthly	Compliance	Anamet SO2 Gas Generation - May 2015
06/11/2015	Odor Evaluation	Compliance	Odor Evaluation in response to odor complaints received 6/11/2015. sgl

Activity Date	Activity Type	Compliance Status	Comments
06/10/2015	Complaint Investigation	Compliance	follow up to complaint of emissions from MSC Bay City Facility killing tree and leaving gunk on cars.
06/10/2015	Odor Evaluation	Compliance	Odor survey in response to odor complaints received 6/5-6/9/2015.
06/04/2015	Odor Evaluation	Compliance	odor evaluation in response to odor complaints received 6/4/2015. Activities did not verify Rule 901 Violation.
06/03/2015	Odor Evaluation	Non Compliance	Rule 901 violation verified-company notified electronically
06/01/2015	Odor Evaluation	Non Compliance	Rule 901 violation verified during follow up for odor complaints received 5/30/2015.
05/29/2015	Odor Evaluation	Non Compliance	Verification of Rule 901 Violation
05/28/2015	Odor Evaluation	Non Compliance	Rule 901 Violation verified
05/26/2015	ROP Monthly	Compliance	Monthly Anaerobic Digester Emissions Report for April, submitted 5/14/2015
05/15/2015	Other Non ROP	Compliance	lime kiln operation summary to supplement permit application submittal.
05/15/2015	Odor Evaluation	Compliance	odor survey in response to odor complaint made late in the evening of May 14, 2015.
05/13/2015	Odor Evaluation	Compliance	odor evaluation in response to complaints received for the May 7-9, 2015 period.
05/07/2015	Excess Emissions (CEM)	Compliance	Quarterly Boiler Summary Reports and excess emissions reports for first quarter of 2015. Cylinder Gas Audit for the quarter was also included in submittal. Non monitor equipment malfunctions for Boiler #7 CEMS was reported. A new O2 monitor and faulty RTD and chiller were reported. RATA for new O2 monitor was conducted in appropriate time period. sgl
05/05/2015	Odor Evaluation	Compliance	Odor evaluation in response to odor complaint(s) received May 4, 2015.
04/30/2015	Odor Evaluation	Compliance	
04/27/2015	Other Non ROP		Narrative description of the lime kiln operation and vents. Submitted by enviro-partners.com on behalf of MSC to clarify operations.
04/17/2015	Odor Evaluation	Compliance	odor evaluation in response to odor complaint received in Courtland Farms residential area on April 16, 2015.

Activity Date	Activity Type	Compliance Status	Comments
04/13/2015	Odor Evaluation	Compliance	Odor Survey in response to complaints received via voice mail messages on 4/13/2015.
04/13/2015	ROP Monthly	Compliance	Monthly Anaerobic Digester Emissions Report
04/06/2015	Odor Evaluation	Non Compliance	Rule 901 violation verified
04/01/2015	Odor Evaluation	Compliance	odor evaluation in response to voice mail and e-mail complaints received on 4/1/2015
03/30/2015	Odor Evaluation	Compliance	odor evaluation in response to March 28th and 29th complaints received. sgl
03/30/2015	ROP Annual Cert	Compliance	
03/30/2015	ROP SEMI 2 CERT	Compliance	
03/25/2015	Odor Evaluation	Compliance	odor survey in response to multiple odor complaints received between 11 AM and 1PM on 3/25/2015
03/17/2015	Odor Evaluation	Compliance	odor survey in response to complaints received 3/12-3/15/2015.
03/17/2015	ROP Monthly	Compliance	February 2015 Anaerobic Digester Emissions Report
03/11/2015	Odor Evaluation	Non Compliance	odor evaluation for odor complaints received after hours 3/9/2015 and on 3/10/2015.
03/09/2015	Odor Evaluation	Compliance	odor evaluation in response to three odor complaints received for 3/8 & 3/9/2015.
03/05/2015	Odor Evaluation	Compliance	odor evaluation in response to three odor complaints received Tuesday, 3/3/2015 for sewage like odors from facility.
03/02/2015	Odor Evaluation	Compliance	odor evaluation in response to 6 complaints received between 2/25-3/1/2015.
02/24/2015	Odor Evaluation	Compliance	odor survey conducted in response to odor complaints received 2/23 and 2/24/2015. Strong winds and gusts resulted in more intermittent manure-like odors closer to the facility, but more consistent odors farther away from the facility that is still having issues with the waste water treatment system.
02/20/2015	Odor Evaluation	Non Compliance	odor evaluation in response to complaints received on Feb. 20th, 2015. Rule 901 verified downwind of subject site.

Activity Date	Activity Type	Compliance Status	Comments
02/19/2015	Odor Evaluation	Compliance	odor survey in response to odor complaints received earlier the week of February 16, 2015. Odors downwind of the facility were verified, but due to the gusty nature of the winds were determined not to meet the duration criteria for a Rule 901 violation.
02/19/2015	Stack Test	Compliance	Compliance Emission Testing on SVLIMEKILNPRESSREFL
02/19/2015	ROP Monthly	Compliance	Monthly Anaerobic Digester Emissions Report
02/13/2015	Odor Evaluation	Compliance	Manure-like odors were identified, but were not of an intensity and duration to warrant a 901 violation
02/12/2015	Odor Evaluation	Non Compliance	odor evaluation in response to two complaints from courtland farms received the evening of 2/10/15. Facility initiated odor treatment activities to waste water treatment system on 2/8/2015.
02/10/2015	CEM RATA	Compliance	Boiler #7 had a replacement O2 CEMS installed on 1/27/2015. This is the RATA for the new unit.
02/09/2015	Odor Evaluation	Non Compliance	odor survey in response to odor complaints received during week of 2/1/2014
02/05/2015	ROP Qrtly Cert	Compliance	Quarterly Boiler Summary Reports and 2014 RATA Report- O2 CEMS reported down for boiler 7for 45 hours. sgl
02/02/2015	Odor Evaluation	Compliance	Odor Survey in response to 9 odor complaints (one of which was peas #12321) for odors experienced 1/28 and 1/29/2015. Note- Rule 901 Violation could not be verified

Name: Sharon Williams Date: 12/29/16

Supervisor: C. Hare