

B2155  
MAWILA-FCE

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

FCE Summary Report

<b>Facility :</b> SOLUTIA INC	<b>SRN :</b> B2155
<b>Location :</b> 5100 W JEFFERSON AVE	<b>District :</b> Detroit
	<b>County :</b> WAYNE
<b>City :</b> TRENTON <b>State:</b> MI <b>Zip Code :</b> 48183	<b>Compliance Status :</b> Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> C. Nazaret Sandoval
<b>FCE Begin Date :</b> 9/29/2020	<b>FCE Completion Date :</b> 9/29/2021
<b>Comments :</b> FCE for FY2021	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/09/2021	ROP Semi 1 Cert	Compliance	ROP Section 1 Semiannual Certification Report for period 1/1/2021 to 6/30/2021. The facility reported one deviation that occurred on 1/19/2021 and involved the flexible group FGRESTORCHILL. The coolant return valves for the condensers on the two butyraldehyde storage tanks (EUBUTCH21-51 and EUBUTCH21-52) were inadvertently closed resulting in no coolant flow through the condensers for a few days. However, the fault did no cause problems or exceedances above the emission limits for the tanks and it did not trigger violation of ROP permit limits. For more details refer to the ROP Deviation Report - Semiannual Certification Report for period 1/1/2021 to 6/30/2021.
09/09/2021	ROP Semi 1 Cert	Compliance	ROP Section 2 Semiannual Certification Report for period 1/1/2021 to 6/30/2021. No deviations reported for the cited period.

Activity Date	Activity Type	Compliance Status	Comments
07/20/2021	MACT (Part 63)	Compliance	<p>NESHAP Subpart VVVVVV Semiannual Compliance Report for period 1/1/2021 to 6/30/2021 - includes summary report for excess emissions and CMS performance.</p> <p>The excess emission summary indicated that there were no excess emissions during the reporting period. The CMS performance summary reported no downtime during the reporting period.</p> <p>The report is in compliance with the requirements of 63.11501(d) and 63.10(e)(3)(vii). For 63.10(e)(3)(vii), the report includes: identification of the HAPs, process unit description, the emission and operating parameters limitations, CMS equipment information, date of latest CMS certification and total operating time during the reporting period. For details refer to the submittal in AQD files.</p>
07/20/2021	ROP Qrtly Cert	Compliance	<p>Leak Detection and Repair (LDAR) monitoring results for the 2nd quarter of 2021 as required by State Rule 628 and the MI-ROP-B2155-2009a for: (a) FG-RESETHOAC, condition IX.1 and (b) Source Wide, condition VI.3. The monitoring results reported (0) leaks from pressure relief devices out of a total of 49 that were monitored , (0) pump seal leaks out of 54 monitored seals, and (0) leaks from a total of 1,215 process valves monitored.</p>
05/19/2021	Other	Compliance	<p>MAERS review/audit comments of the 2020 reported emissions. AQD completed/passed the audit on 5/19/2021. For details see report CA_B21557649.</p>
05/11/2021	On-site Inspection	Compliance	FY 2021 Scheduled Inspection

Activity Date	Activity Type	Compliance Status	Comments
05/06/2021	NSPS (Part 60)	Compliance	Semiannual report for period 11/1/2020 to 4/30/2020, as required by 40 CFR Subpart NNN and in accordance with the requirements of 60.660(c)(6) and 60.665(1)(5), was timely submitted and postmarked by AQD Detroit on 5/6/2021. According to the report, there were no changes in equipment or operation which would increase the vent stream flow rate above the low flow exemption level established in 60.660(c)(6).
04/22/2021	ROP Qrtly Cert	Compliance	Leak Detection and Repair (LDAR) monitoring results for the 1st quarter of 2021 as required by State Rule 628 and the MI-ROP-B2155-2009a for: (a) FG-RESETHOAC, condition IX.1 and (b) Source Wide, condition VI.3. The monitoring results reported (0) leaks from pressure relief devices out of a total of 49 that were monitored, (1) pump seal leaks out of 55 monitored seals, and (2) leaks from a total of 524 process valves monitored.  According to the report, there were no items put on repair delay during the current period and all detected leaks were repaired within the required 15-days timeframe.
02/25/2021	ROP SEMI 2 CERT	Compliance	ROP Section 1 Semiannual Certification Report for period 7/1/2020 to 12/31/2020. No deviations reported for the cited period.
02/25/2021	ROP SEMI 2 CERT	Compliance	ROP Section 2 Semiannual Certification Report for period 7/1/2020 to 12/31/2020. No deviations reported for the cited period.
02/25/2021	ROP Annual Cert	Compliance	ROP Section 2, Annual Certification Report for calendar year 2020. No deviations reported.
02/25/2021	ROP Annual Cert	Compliance	ROP Section 1, Annual Certification Report for calendar year 2020. Two (2) deviations were reported during the first semester of the year. For details, refer to previous reporting under ROP Section 1, Semiannual Certification Report for period 1/1/2020 to 6/30/2020.

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02/25/2021	ROP Other	Compliance	ROP certification report for the submittal of the 2020 MAERS and supplemental control template, both submitted electronically on 2/22/2021
02/22/2021	MAERS	Compliance	MAERS report submitted on February 22, 2021 for emission year 2020 - AQD audited and passed the submittal. See audit comments on report No.CA_B215557649.
01/26/2021	MACT (Part 63)	Compliance	<p>NESHAP Subpart VVVVVV Semiannual Compliance Report for period 7/1/2020 to 12/31/2020 - includes summary report for excess emissions and CMS performance.</p> <p>The excess emission summary indicated that there were no excess emissions during the reporting period. The CMS performance summary reported no downtime during the reporting period.</p> <p>The report is in compliance with the requirements of 63.11501(d) and 63.10(e)(3)(vii). For 63.10(e)(3)(vii), the report includes: identification of the HAPs, process unit description, the emission and operating parameters limitations, CMS equipment information, date of latest CMS certification and total operating time during the reporting period. For details refer to the submittal in AQD files.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/26/2021	ROP Qrtly Cert	Compliance	<p>Leak Detection and Repair (LDAR) monitoring results for the 4th quarter of 2021 as required by State Rule 628 and the MI-ROP-B2155-2009a for: (a) FG-RESETHOAC, condition IX.1 and (b) Source Wide, condition VI.3. The monitoring results reported (0) leaks from pressure relief devices out of a total of 49 that were monitored , (7) pump seal leaks out of 58 monitored seals, and (0) leaks from a total of 43 process valves monitored.</p> <p>According to the report, there were no items put on repair delay during the current period and all detected leaks were repaired within the required 15-days timeframe.</p>
11/06/2020	NSPS (Part 60)	Compliance	<p>The semiannual report for period 5/1/2020 to 10/31/2020, as required by 40 CFR Subpart NNN and in accordance with the requirements of 60.660(c)(6) and 60.665(1)(5) was timely submitted for the Pre-extractive Column, and it was postmarked by AQD Detroit on 11/6/2020.</p> <p>According to the report, there were no changes in equipment or operation which would increase the vent stream flow rate above the low flow exemption level established in 60.660(c)(6).</p>
10/23/2020	ROP Qrtly Cert	Compliance	<p>Leak Detection and Repair (LDAR) monitoring results for the 3rd quarter of 2020 as required by State Rule 628 and the MI-ROP-B2155-2009a for: (a) FG-RESETHOAC, condition IX.1 and (b) Source Wide, condition VI.3. The monitoring results reported (0) leaks from pressure relief devices out of a total of 49 that were monitored , (2) pump seal leaks out of 56 monitored seals, and (2) leaks from a total of 1,685 process valves monitored.</p> <p>According to the report, there were no items put on repair delay during the current period and all detected leaks were repaired within the required 15-days timeframe.</p>

Name: GA Anderson Date: 5/13/2022 Supervisor: JK