

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : DOW AGROSCIENCES LLC		SRN : B4942	
Location : 305 N HURON AVE		District : Saginaw Bay	
		County : HURON	
City : HARBOR BEACH	State: MI	Zip Code : 48441	Compliance Status : Compliance
Source Class : MAJOR		Staff : Kathy Brewer	
FCE Begin Date : 8/1/2014		FCE Completion Date : 8/11/2015	
Comments :			

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/11/2015	Scheduled Inspection	Compliance	FCE for ROP MI-ROP-B4942-2010d
04/20/2015	MAERS	Compliance	Emission Factors included w/paper ROP Cert form for MAERS submittal. Stack tests, fermentation rates, destruction efficiency, engineering estimates & AP42 are used.
04/17/2015	ROP Annual Cert	Compliance	On 4/2014 pressure relief valve release during purge. Pressure gauge & transmitter installed; exhaust regulator replaced. On 12/8/2014 data link failure for historical records 2 hrs, 40 mins. Updated SOP & training. On multiple days in winter 2014 SoLoNOx technology on turbines (for NOx control) not working due to sub zero temp. Facility operated in Supplemental Mode during sub zero temps. Emission test performed 2/2015. Permit mod may be submitted. Information regarding corrective action and action taken to prevent recurrence sufficiently resolved each non-compliance issue. Therefore, a VN was not issued for deviations listed in the report.

Activity Date	Activity Type	Compliance Status	Comments
04/17/2015	ROP SEMI 2 CERT	Compliance	On 12/8/2014 data link failure for historical records 2 hrs, 40 mins. Updated SOP & training. Information regarding corrective action and action taken to prevent recurrence sufficiently resolved each non-compliance issue. Therefore, a VN was not issued for deviations listed in the report.
04/17/2015	ROP Semi 1 Cert	Compliance	On 4/2014 pressure relief valve release during purge. Pressure gauge & transmitter installed; exhaust regulator replaced. Information regarding corrective action and action taken to prevent recurrence sufficiently resolved each non-compliance issue. Therefore, a VN was not issued for deviations listed in the report.
03/30/2015	Rule 912	Compliance	<p>RULE 912 Report for FG-UTILITIES & FG-TURBINES SoLoNOx Turbines. In sub-zero temperatures SoLoNOx technology impacted by higher density air and shuts off. Increased NOx emissions for 91 hours over 6 days in Feb 2015. Changed operating scenario to use other energy units during subzero temps which increases overall NOx site emissions but w/in operating scenario limits.</p> <p>FGTURBINES 3.8 lb/hr calendar day limit (NSPS GG)FGUTILITIES NOx yearly limit of 59.57 tons/yr. (Rule 205(3)) Hourly limit of 13.6 lbs/hr based on annual limit. FGTURBINE NSPS NOx limit not exceeded for calendar day. FGUTILITIES averaging period not designated in emission table but as "Test Protocol".</p> <p>Dec 2014 - March 2015 NOx emission 12 month rolling was 30.82, 30.66, 30.61, and 30.49 TPY. Site will submit PTI app to allow for SoLoNOx non operating during subzero conditions. Potentially increase FGUTILITIES hourly lb/hr value. Because NOx hourly limit based on major threshold w/TPY limit, and TPY not exceeded, no VN sent. Not major for NOx so not evaluated for HPV.</p>

Name: K. [Signature]

Date: 8/19/2015

Supervisor: C. [Signature]