

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> THE ANDERSONS ALBION ETHANOL, LLC	<b>SRN :</b> B8570
<b>Location :</b> 26250 B DR N	<b>District :</b> Kalamazoo
	<b>County :</b> CALHOUN
<b>City :</b> SHERIDAN TWP <b>State:</b> MI <b>Zip Code :</b> 49224	<b>Compliance Status :</b> Non Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Rex Lane
<b>FCE Begin Date :</b> 7/9/2017	<b>FCE Completion Date :</b> 7/9/2018
<b>Comments :</b> FCE Report	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
06/26/2018	Self Initiated Inspection	Non Compliance	Self Initiated Inspection
04/27/2018	Excess Emissions (CEM)	Compliance	CEMS Report: 1st Quarter - 2018  ROP Certification Report contains an original dated signature by the facility's responsible official. The last RATA certification was on 1/30/18. The facility reported one hour of monitor downtime during the quarterly reporting period for preventative maintenance and no excess emissions. -RIL
03/20/2018	ROP SEMI 2 CERT	Compliance	ROP Semi-annual Certification Report  Certification report contains an original dated signature by the facility's responsible official. The report indicates that there were no deviations from ROP terms and conditions during the reporting period. -RIL
03/20/2018	ROP Annual Cert	Compliance	ROP Annual Certification Report  Certification report contains an original dated signature by the facility's responsible official. The report indicates that there were no deviations from ROP terms and conditions during the reporting period. -RIL

Activity Date	Activity Type	Compliance Status	Comments
02/27/2018	CEM RATA	Compliance	<p>Annual RATA: NOX/O2 CEMS unit installed on FGOXID (MI-ROP-B8570-2015a)</p> <p>ROP certification report was included with the RATA test report and contains an original dated signature by the facility's responsible official. The calculated relative accuracy for the NOX CEMS (lb/MMBtu) compared to the reference monitor was 3.94% during testing versus a test method criteria of &lt; 20%. The calculated relative accuracy for the O2 CEMS (%) compared to the reference monitor was 0.118% versus a test method criteria of &lt; 1.0% average difference. -RIL</p>
02/02/2018	Excess Emissions (CEM)	Compliance	<p>Quarterly NOX CEMS Reporting - Thermal Oxidizer (C-10) and waste heat recovery boiler (HRSG)</p> <p>ROP certification report was included with the 4th Quarter CEMS report. The CEMS report states that there were no excess NOX emissions during the reporting period. The report states that there was one hour of QA calibration downtime (0.05% of operating time) during the reporting period for the cylinder gas audit on 10/25/17. Last certification RATA was on 1/18/17. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
02/02/2018	NSPS (Part 60)	Compliance	<p>40 CFR Part 60, Subparts VV and VVa LDAR Semi-annual Compliance Report: 7/1/17 - 12/31/17</p> <p>LDAR report included an ROP certification report that contains an original dated signature by the facility's responsible official. The report covers the existing process equipment subject to NSPS, Subpart VV and the new process equipment in the plant expansion under PTI No. 144-15B subject to NSPS, Subpart VVa. The facility reports that there are now 3,431 monitoring points in the database. The report states that there were no pump leaks during the reporting period and no valve leaks during the months of July, November or December 2017. A number of flange or valve leaks were reported in August, September and October 2017. Some leak repairs had to be postponed until a shutdown event when it could be isolated, repaired and monitored to confirm a successful repair. -RIL</p>
01/30/2018	CEMS Test Observation	Compliance	FGOXID: Annual RATA Test
11/06/2017	Excess Emissions (CEM)	Compliance	<p>Quarterly NOX CEMS Reporting - Thermal Oxidizer (C-10) and waste heat recovery boiler (HRSG)</p> <p>ROP certification report was included with the Quarterly CEMS report. The CEMS report states that there were no excess NOX emissions during the reporting period. The report states that there was three hours of QA calibration downtime (0.15% of operating time) during the reporting period. Last certification RATA was on 1/18/17. Last cylinder gas audit was on 7/12/17. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
10/27/2017	Stack Test	Non Compliance	<p>An ROP certification report was included with the facility's Emission Test Report related to PTI No. 144-15A (expansion of ethanol plant). Testing was conducted between 7/25/17 and 8/2/17 and most test days were observed by MDEQ field staff. Several test results were 90+% of their respective emission limits (e.g. FGFERM, FGFERM2 and FGOXID2) and one VOC exceedance was reported for EU-COOLINGDRUM. Tested VOC value was 7.1 pounds/hour versus an emission limit of 3.54 pounds/hour. Field staff requested TPU review of the test report due to proximity of certain test values to their respective limits. TPU staff indicated that the test report review may not be completed for a couple months. Therefore, field staff sent a violation notice on 10/27/17 for the VOC exceedance on EU-COOLINGDRUM. If any additional exceedances are determined through TPU review, staff will sent out another violation notice. -RIL</p>
10/17/2017	ROP Semi 1 Cert	Compliance	<p>Facility submitted a revision to their ROP Semi 1 certification report. The revised report states that there were no deviations during the reporting period. See comments on 9/18/17 ROP Semi 1 certification report for further details. -RIL</p>
10/17/2017	ROP Semi 1 Cert	Compliance	<p>Facility's ROP certification report had an original dated signature by the responsible office. The initial report identified three deviations that staff determined were associated with PTI equipment that hasn't yet been incorporated into the ROP by modification. Staff left a voice mail message for Ms. Melissa Farrington on 9/25/17 regarding the deviations and suggesting that they may want to submit a revised certification report that only identifies deviations associated with the current ROP. -RIL</p>

Activity Date	Activity Type	Compliance Status	Comments
08/04/2017	NSPS (Part 60)	Compliance	<p>NSPS, Subpart VV: LDAR Semi-annual Report</p> <p>Facility has a total of 1,114 valves (1,036 liquid service, balance gas), 58 pumps and no compressors. In January 2017, facility reported a total of two valve leaks from Ferm 3 and Ferm 7 that were repaired when the tanks were emptied. In February 2017, facility reported one leak on Sieve vaporizer # 2 that was repaired and monitored. No valve or pump leaks were detected March 2017 through May 2017. In June 2017, the facility reported a total of two leaks for the 200 proof flash receiver and 200 proof flash vessel # 1 that were repaired and monitored.</p>
08/04/2017	Excess Emissions (CEM)	Compliance	<p>Excess Emissions Reporting - Thermal Oxidizer C-10</p> <p>Facility reported no excess NOX emissions during the reporting period.</p>
08/04/2017	CEM RATA	Compliance	<p>Quarterly CEMS Monitoring Report</p> <p>Facility reported a total of 120 hours of monitor downtime (5.5% of source operating hours) during the reporting period. Per the report, the NOX daily calibration was out of calibration due to plant personnel oversight from 6/16/17 - 6/22/17. Manual calibration was done once situation was discovered and personnel have been re-trained. Annual RATA was performed and passed on 1/18/17. The NOX quarterly CGA was successfully passed on 4/12/17.</p>
07/28/2017	Stack Test Observation	Unknown	Stack test observation of the thermal oxidizer C-10A identified in their permit as FG-OXID2.
07/25/2017	Stack Test Observation		<p>Emission Test Observations for 7/25/17; 7/27/17; 7/31/17 and 8/1/17</p> <p>FGFERM, FGFERM2, EU-COOLINGDRUM, FGOXID2 and FGCHP</p>

Name: \_\_\_\_\_

RIL

Date: \_\_\_\_\_

7/9/18

Supervisor: \_\_\_\_\_

MID 7/17/2018

