

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> THE ANDERSONS MARATHON HOLDINGS 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> Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Amanda Chapel
<b>FCE Begin Date :</b> 1/1/2019	<b>FCE Completion Date :</b> 9/30/2020
<b>Comments :</b>	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
08/31/2020	Scheduled Inspection	Compliance	
08/25/2020	NSPS (Part 60)	Compliance	<p>Facility submitted the quarterly CGA with the CEMS excess emissions report. The report was submitted with an ROP certification form with an original signature and date from the responsible official.</p> <p>Oxygen and NOx were used for gasses. Data shows the CGA passed.</p>
08/24/2020	Excess Emissions (CEM)	Compliance	<p>The facility submitted an ROP quarterly report and the CEMS downtime summary together. This included a signed ROP certification form by the responsible official.</p> <p>The facility reported that the thermal oxidizer (C-10) operated a total of 1,573 hours during the quarter. They also reported the plant was shut down for an extended period of maintenance during the COVID-19 emergency order. There was no CEMS downtime reported for this quarter. There were no excess emissions reported during this time as well.</p>

Activity Date	Activity Type	Compliance Status	Comments
08/24/2020	ROP SEMI 2 CERT	Compliance	<p>The facility submitted an ROP quarterly report and the CEMS downtime summary together. This included a signed ROP certification form by the responsible official.</p> <p>The facility reports that during the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.</p> <p>The facility submitted an updated report with a signed ROP certification indicating that there was one deviation on 3/31/20. Emissions exceeded 5% opacity in monthly observation of EUCORNBINS 1 and 2. The facility submitted an updated application to change this opacity limit.</p>
08/24/2020	ROP Other	Compliance	<p>The facility submitted a ROP semi-annual report with original signature from the responsible official along with the Leak Detection and Repair certification for the facility. This report is being submitted to meet reporting requirements for 40 CFR Part 60 Subpart VV and VVa.</p> <p>During the time period January 2020 to June 2020, no valve leaks were detected and no pump leaks were detected. Plant was shutdown from April 3rd to April 27th.</p>
06/16/2020	ROP Semi 1 Cert	Compliance	<p>Facility submitted a signed and dated ROP certification form. The facility states that during the entire reporting period, all monitoring and recordkeeping requirements in the ROP were met and no deviations were reported. This is the original, mailed copy of the previous ROP certification report that was emailed.</p>

Activity Date	Activity Type	Compliance Status	Comments
06/16/2020	Excess Emissions (CEM)	Compliance	Facility submitted a signed and dated ROP certification form by the responsible official. The facility submitted documentation showing they passed the quarterly cylinder gas audit (CGA) and the CEMs system reported no excess emissions (EER) during the time period.
04/17/2020	ROP Other		<p>Facility submitted an electronic deviation report and ROP certification report with a signature and date. Facility will submit the original deviation report and certification with original signature and date to the office via mail.</p> <p>Facility reports that FGCORNBIN had a deviation from SC I.3 the 5% opacity limit and a higher opacity was observed. The facility is going to request a permit modification to change the visible emission limit and the recordkeeping requirement.</p>
03/27/2020	MAERS	Compliance	The facility submitted their MAERS report on 2/20/20. It was audited on 3/27/20 and the documentation provided by the company verifies the emissions reported.
03/06/2020	ROP Annual Cert	Compliance	Facility submitted an Annual ROP Compliance Certification with original signature and date. Facility indicated one deviation from October 19-December 19 in the EU-DieselPump2 Condition III.5. The diesel pump was operated for more than 100 hours during the calendar year. The pump will be strictly monitored with the use MapCon PM program. Hours will be monitored and recorded regularly. A VN will not be sent at this time.

Activity Date	Activity Type	Compliance Status	Comments
03/06/2020	ROP SEMI 2 CERT	Compliance	Facility submitted a Semi-Annual ROP Compliance Certification with original signature and date. Facility indicated one deviation from October 19-December 19 in the EU-DieselPump2 Condition III.5. The diesel pump was operated for more than 100 hours during the calendar year. The pump will be strictly monitored with the use MapCon PM program. Hours will be monitored and recorded regularly. A VN will not be sent at this time.
03/06/2020	MAERS	Compliance	Facility submitted an ROP Compliance Certification stating the MAERS report was submitted and accurate with an original signature and date.
01/30/2020	ROP SEMI 2 CERT	Compliance	Facility submitted the semi-annual report with an original signature and date of the responsible official.  Facility reports that during the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.
01/30/2020	Excess Emissions (CEM)	Compliance	Quarterly NOX CEMS Reporting - Thermal Oxidizer (C-10) and waste heat recovery boiler (HRSG)  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 were zero hours of CMS downtime (0.0% of operating time) during the reporting period. The ethanol plant was down 0 hours during the reporting period for maintenance and repairs.
01/21/2020	Stack Test Observation	Compliance	

Activity Date	Activity Type	Compliance Status	Comments
11/05/2019	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 3rd Quarter CEMS report. The CEMS report states that there were no excess NOX emissions during the reporting period. The report states that there were 81 hours of known CMS downtime (3.96% of operating time) during the reporting period. RATA certification was performed on 2/26/19. Cylinder gas audit was performed on 7/12/19.</p>
11/05/2019	Other Non ROP	Compliance	<p>As required by PTI #119-19, Andersons Marathon Holdings LLC informs the Department of the installation of Baghouse C-201 for EU-GRAINRECEIVE on October 14, 2019.</p>
08/30/2019	ROP Semi 1 Cert	Compliance	<p>Facility submitted an ROP semi-annual report with original signature and date from the responsible official. Facility reported 2 deviations. On 3/22/19 FG-FERM2 has a blockage in the water distributor tray in C-40A. Maintenance cleared the blockage. On 3/21/19 FG-OXID had PM 10/2.5 limits tested at 1.4 pph and the permit limit was 1.0 pph. A VN was sent for this and an application was submitted to revise this emission limit. No VN will be sent at this time for the additional exceedance.</p>

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08/06/2019	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 2nd Quarter CEMS report. The CEMS report states that there were no excess NOX emissions during the reporting period. The report states that during the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms and conditions occurred. There are no excess emissions or CMS downtime reported.</p>
08/06/2019	ROP Semi 1 Cert	Compliance	<p>ROP Semi-annual Compliance Certification Report</p> <p>Certification report contains an original dated signature by the facility's responsible official. The report states that there were no deviations from ROP terms and conditions during the reporting period.</p>
05/07/2019	Excess Emissions (CEM)	Compliance	<p>Facility submitted report with original signature and date of responsible official.</p> <p>Facility reports that during the whole reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations occurred.</p>

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04/18/2019	CEM RATA	Compliance	Annual RATA: NOX/O2 CEMS unit installed on FGOXID (MI-ROP-B8570-2015a)  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 4.02% during testing versus a test method criteria of < 20%. The calculated relative accuracy for the O2 CEMS (%) compared to the reference monitor was 0.102% versus a test method criteria of < 1.0% average difference.
03/21/2019	Stack Test Observation	Compliance	
03/06/2019	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.
03/05/2019	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.
03/01/2019	Other Non ROP	Compliance	Letter received to notify the department that installation of the pre-condenser for FGFERM has been completed. Trial operations commenced on February 4, 2019.
02/26/2019	CEMS Test Observation	Compliance	RATA test for FGOXID as required by Permit MI-ROP-B8570-2015a

Activity Date	Activity Type	Compliance Status	Comments
02/08/2019	NSPS (Part 60)	Compliance	<p>NSPS, Subparts VV and VVa: Leak, Detection and Repair Semi-Annual Report</p> <p>During the reporting period, the facility reports no deviations and all monitoring and associated recordkeeping in the ROP were met.</p>
02/07/2019	CEM RATA	Compliance	<p>CEMS Quarterly Report: Thermal Oxidizer C-10 and Waste Heater Recovery Boiler (HRSG)</p> <p>Facility reports that during the reporting period of October 1, 2018 and December 31, 2018, all monitoring and recordkeeping associated with the ROP were met and no deviations occurred. Facility reports 0% of time with excess emissions and 0% time with CEMs downtime.</p>

Name: *Amber Clapp* Date: 9/30/20

Supervisor: *RIL 10/2/20*