

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : THE ANDERSONS MARATHON HOLDINGS LLC	SRN : B8570
Location : 26250 B DR N	District : Kalamazoo
	County : CALHOUN
City : SHERIDAN TWP State: MI Zip Code : 49224	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Amanda Chapel
FCE Begin Date : 1/1/21	FCE Completion Date : 8/26/2022
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/16/2022	On-site Inspection	Non Compliance	
08/11/2022	NSPS (Part 60)	Compliance	Facility submitted the Semi-Annual LDAR Report with an ROP certification form with original signature and date of responsible official. On January 2022 to June 2022, there were no valves or connector leaks detected. One pump leak was detected on Tag 251. The pump seal was replaced on 4/13/22 during plant shutdown.
08/11/2022	Excess Emissions (CEM)	Compliance	The facility submitted a Quarterly CEMS Report and Excess Emissions summary with an ROP certification form with original signature of RO and date. The facility reported one incident which account for 49 hours of CEMs downtime. This resulted in data availability of 97.62%. The CEMs downtime was attributed to a leaking drain pump tubing. The tubing was replaced. No excess emissions were reported.
04/27/2022	ROP Annual Cert	Compliance	Revised ROP Annual Certification - Previous Report Submittal compliance box not checked Facility re-submitted the annual ROP certification form as the compliance box was not checked. Previously reported deviation can be found under the ROP Annual Cert dated 3/17/22

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04/27/2022	MAERS	Compliance	<p>MAERS ROP Certification</p> <p>The facility submitted the MAERS 2021 certification on an ROP Certification Form with original signature and date from the responsible official. The MAERS report was reviewed by EGLE staff. Emissions reported were in line with previous year's emissions and consistent with attached documentation.</p>
04/27/2022	CEM RATA	Compliance	<p>Annual RATA Report</p> <p>The facility submitted RATA results with an ROP certification form with an original signature and date from the responsible official. Results showed that the calculated value for NOx (lb/MMBtu) was 2.96% which is less than the acceptable 20% and the O2 (%) was 0.134% which is less than the accepted 1.0% average difference. The results are acceptable and show compliance with the RATA requirements.</p>
04/27/2022	Excess Emissions (CEM)	Compliance	<p>Quarterly CEMS report - NOx CEMs Operating Time and Excess Emissions Summary</p> <p>Facility submitted an ROP certification form indicating this is the quarterly CEMs report. The form included an original signature and date from the responsible official.</p> <p>Facility indicates that there were 0.0 hours of CEMs downtime, which operated for 2160 hours during the quarter. There were no excess emissions during the reporting period.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/22/2022	ROP SEMI 2 CERT	Compliance	The facility submitted an ROP certification form with an original signature and date. The facility reports that there was a deviation of FGCHP from June 2021 until December 2021. The natural gas flow monitoring device was not operating in a satisfactory manner, recording an exceedance in the 12-month rolling usage. The facility believes that there was a malfunction with the monitoring device and not the actual gas usage as usage did no increase during this time. The monitoring device is being replaced in April 2022.
03/21/2022	ROP Annual Cert	Non Compliance	The facility submitted an ROP certification form with an original signature and date. The facility reports that there was a deviation of FGCHP from June 2021 until December 2021. The natural gas flow monitoring device was not operating in a satisfactory manner, recording an exceedance in the 12-month rolling usage. The facility believes that there was a malfunction with the monitoring device and not the actual gas usage as usage did no increase during this time. The monitoring device is being replaced in April 2022.
02/25/2022	Excess Emissions (CEM)	Compliance	<p>The facility submitted an ROP certification with an original signature and date for the quarterly CEMs report. This includes both the CEMs downtime summary and the excess emissions report (EER).</p> <p>The facility reports that there was 97.86% of data availability or 2.14% downtime and 0.0 hours out of control. The facility also reports 0 events of excess emissions.</p>
02/23/2022	CEMS Test Observation	Compliance	

Activity Date	Activity Type	Compliance Status	Comments
01/25/2022	ROP Semi 1 Cert	Compliance	<p>Facility submitted an ROP certification form with an original signature and date from the responsible official. Semi-Annual LDAR Report submitted meet requirements of PTI 144-15C and MI-ROP-B8570-2015a and 40 CFR 60.487 (Subpart VV) and 40 CFR 60.487a (Subpart VVa). Facility reports that there are 1888 points included in the monitoring database, 43 pumps in the monitoring database, and no compressors subject to requirements.</p>
12/22/2021	Stack Test	Compliance	<p>TPU provided QA/QC results from the stack test performed on February 16, 2021 on the thermal oxidizer C-10. Results are as follows:</p> <p>VOC Limit: 4.2 pph Result: 1.8pph (42.7%) NOx Limit: 27.5 pph Result: 9.26 pph (33.7%) CO Limit: 21.4 pph Result: 2.5 pph (11.5%) PM10/PM2.5 Limit: 3.1 pph Result: 2.08 pph (67.1%) Acetaldehyde Limit: 0.35 pph Result: 0.1 pph (29.3%)</p> <p>The results were determined to be acceptable by TPU.</p>
11/24/2021	Excess Emissions (CEM)	Compliance	<p>The facility submitted a signed and dated ROP certification form. The facility reported a total CEMs downtime of 19.62%. This was a total of 423 hours for unknown causes. EGLE TPU has sent a VN for this exceedance as it's more than the 10% of downtime allowed.</p>

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09/29/2021	ROP Semi 1 Cert	Compliance	<p>The facility submitted an ROP form with original signature and date from responsible official. The facility reports that during the 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>On March 17, 2022 the facility submitted an updated semi-annual ROP certification. The facility states that that there was a deviation of FGCHP from mid - 2020 until December 2021. The natural gas flow monitoring device was not operating in a satisfactory manner, recording an exceedance in the 12-month rolling usage. The facility believes that there was a malfunction with the monitoring device and not the actual gas usage as usage did no increase during this time. The monitoring device is being replaced in April 2022.</p>
08/23/2021	ROP Semi 1 Cert	Compliance	<p>The facility submitted a signed and dated ROP certification form. The facility reported 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>
08/23/2021	Excess Emissions (CEM)	Compliance	<p>The facility submitted a signed and dated ROP certification form. The facility reported 0% downtime of the CEMS. The CEMs operated a total of 2159 hours with a total operating time of 2159 hours.</p>
08/20/2021	Excess Emissions (CEM)	Compliance	<p>The facility submitted an ROP certification form with an original signature and date. The facility reported that there were a total of 2184 hours of reporting time during the reporting period with the facility running 1599 hours. The CEMs was operational for 1598 hours or 99.93% of the time.</p>

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08/20/2021	Stack Test	Compliance	<p>Facility completed testing of the fermenters on site, C40 and C40A. Testing occurred under two different conditions, one with the pre-condenser running and one without the pre-condenser running. The facility reports that under test condition 1, scrubber C40 had 9.08 total VOC and 0.01 acetaldehyde. C40A had 9.38 VOC and 0.18 acetaldehyde. This meets the emission limits of 14 total VOC and acetaldehyde. Under test condition 2, emissions from C40 were 13.1 VOC and 0.37 acetaldehyde and C40A was 5.2 VOC and 0.19 acetaldehyde. This is also in compliance with the permit limits.</p>
06/03/2021	Stack Test Observation	Compliance	
04/13/2021	ROP Annual Cert	Compliance	<p>Facility submitted a signed ROP certification form with original signature and date. Facility reports that during the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met except those reported deviations. The facility reported an emission exceedance of 5% on 3/31/20 which has been changed with a permit modification. Facility also reported a lapse in the visible emissions certification due to COVID. These issues are considered resolved.</p> <p>On March 17, 2022 the facility submitted an updated semi-annual ROP certification. The facility states that there was a deviation of FGCHP from mid - 2020 until December 2021. The natural gas flow monitoring device was not operating in a satisfactory manner, recording an exceedance in the 12-month rolling usage. The facility believes that there was a malfunction with the monitoring device and not the actual gas usage as usage did no increase during this time. The monitoring device is being replaced in April 2022.</p>

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04/13/2021	ROP SEMI 2 CERT	Compliance	<p>Facility submitted a signed ROP certification form with original signature and date. 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 other terms or conditions occurred.</p> <p>On March 17, 2022 the facility submitted an updated semi-annual ROP certification. The facility states that that there was a deviation of FGCHP from mid - 2020 until December 2021. The natural gas flow monitoring device was not operating in a satisfactory manner, recording an exceedance in the 12-month rolling usage. The facility believes that there was a malfunction with the monitoring device and not the actual gas usage as usage did no increase during this time. The monitoring device is being replaced in April 2022.</p>
04/13/2021	MAERS	Compliance	Facility submitted a signed ROP certification form with original signature and date. Facility certifies their MAERS 2020 emissions.
04/13/2021	CEM RATA	Compliance	Facility submitted their annual RATA results. The facility shows that they were at a NOx level of 8.09%, less than the 20% required by the permit. They were also at 0.057% O2, below the 1.0% average difference as allowed by the permit.
03/02/2021	CEMS Test Observation	Compliance	

Activity Date	Activity Type	Compliance Status	Comments
02/12/2021	Excess Emissions (CEM)	Compliance	<p>The facility submitted the CEMS Quarterly Report with CEMs downtime and excess emissions with a signed and dated ROP form signed by the responsible official.</p> <p>The facility reported 92.96% data availability with 154 hours out of control. They reported zero excess emissions. The CEMs PLC experienced a power failure on November 15, 2020 which was not restored until November 22, 2020 resulting in the missing data.</p> <p>The facility also included their fourth quarter CGA results with the report.</p>
02/12/2021	ROP SEMI 2 CERT	Compliance	<p>The facility submitted their semi-annual ROP report with an original signature and date from 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>
01/14/2021	Stack Test Observation	Compliance	

Name: Annelle Cross Date: 8/26/22

Supervisor: RL 8/29/22