

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : POET Biorefining - Caro, LLC	SRN : N6996
Location : 1551 Empire Drive	District : Bay City
	County : TUSCOLA
City : CARO State: MI Zip Code : 48723	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Gina McCann
FCE Begin Date : 6/25/2021	FCE Completion Date : 2/7/2023
Comments : FCE from 6/25/2021 through 2/7/2023	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
01/20/2023	Rule 912	Non Compliance	Exceedance during stack testing. Scrubber 1 went down and needed to be cleaned during testing. Re-routed emissions to scrubber 2. Scrubber 2 was down since May due to malfunctions. Engineering testing suggested could operate scrubber 2 at higher flow to achieve 97% efficiency. Testing firm "saw" excess ethanol on Scrubber 2 while waiting for scrubber 1 to be cleaned.
01/11/2023	Stack Test Observation	Unknown	FGDDGSDRYERS stack test observation
12/21/2022	CAM Excursions/Exceedances	Non Compliance	38 hours FGFERM&DIST had a process upset. Both scrubbers were down. Mechanical failure in scrubber 2 caused VOC exceedance. LOV wrote for R912 in 5/2022.
12/21/2022	CAM monitor downtime	Non Compliance	38 hours FGFERM&DIST had a process upset. Both scrubbers were down. Mechanical failure in scrubber 2 caused VOC exceedance. LOV wrote for R912 in 5/2022.
12/21/2022	NSPS (Part 60)	Compliance	Subpart VVa No exceedances reported.
12/01/2022	On-site Inspection		Scheduled inspection. MI-ROP-N6996-2018a
10/19/2022	ROP Semi 1 Cert	Compliance	
07/11/2022	Complaint Investigation	Compliance	Complaint Investigation

Activity Date	Activity Type	Compliance Status	Comments
05/11/2022	Rule 912	Non Compliance	A Rule 912 Report was submitted describing the events that led to VOC and acetaldehyde emission limit exceedances for the two scrubbers onsite. A violation notice will be issued for the VOC and acetaldehyde emission limit exceedances of MI-ROP-N6996-2018a. (AShaffer, 05/11/22)
04/01/2022	NSPS (Part 60)	Compliance	As required by MI-ROP-N6996-2018, a Semi-Annual VVa Report was submitted to the AQD. The reporting time periods were 07/01/2021 through 12/31/2021. Speaking with company staff it appears all applicable items are included for this report. During this time period there appeared to be two incidents. The first incident occurred in July when P409 was found to read above threshold limits. A reinspection showed the pump seal was within limits. No further action was taken. The second incident occurred on 12/13 when a seal for P406 was found to be leaking. The leak was fixed on 12/16 during a process shutdown. Annual PRV testing was mentioned to have been performed by VRC PROTX on 12/01. The dates and times the beer feed was off was also provided. After further review, no further action is necessary at this time. (AShaffer, 04/01/22)

Activity Date	Activity Type	Compliance Status	Comments
03/28/2022	ROP Annual Cert	Compliance	As required by MI-ROP-N6996-2018, an Annual Compliance Report, was received by the AQD on 03/15/21. The reporting time period was from 01/01/21 through 12/31/21. Six deviations were reported with five being previously reported in the 1st half and one additional deviation reported in the second half reporting period. The additional deviation was for EU200TANK2 and occurred on 10/08/21. The deviation was described as the floating roof for T802 was standing while the tank was being emptied and cleaned in order to perform an API653 inspection. The deviation lasted for 45 min. After further review, no further action is necessary for this additional deviation. Errors were noted, however, were concluded to be minor. The report was received on time and properly certified. (AShaffer, 03/28/22)
03/28/2022	ROP SEMI 2 CERT	Compliance	As required by MI-ROP-N6996-2018, a Semi-Annual Compliance Report, was received by the AQD on 03/10/22. The reporting time period was from 07/01/21 through 12/31/21. One deviation was reported and was for EU200TANK2 on 10/08/21. The deviation was described as the floating roof for T802 was standing while the tank was being emptied and cleaned in order to perform an API653 inspection. The deviation lasted for 45 min. After further review, no further action is necessary for this one deviation. The report was received on time and properly certified. (AShaffer, 03/28/22)
03/28/2022	MAERS	Compliance	As required by MI-ROP-N6996-2018, a MAERS Report Certification was submitted for the 2021 MAERS Report which was submitted on 02/25/22. The 2021 MAERS Report Certification was concluded to be acceptable. (AShaffer, 03/28/22)

Activity Date	Activity Type	Compliance Status	Comments
03/28/2022	CAM Excursions/Exceedances	Compliance	As required by MI-ROP-N6996-2018, a CAM Excursion / Exceedance Report was submitted to the AQD. The reporting time periods were 07/01/2021 through 12/31/2021. During this time period no excursions / exceedances were reported. (AShaffer, 03/28/22)
03/28/2022	CAM monitor downtime	Compliance	As required by MI-ROP-N6996-2018, a CAM Monitor Downtime Report was submitted to the AQD. The reporting time periods were 07/01/2021 through 12/31/2021. During this time period no monitoring downtime events occurred. (AShaffer 03/28/22)
10/21/2021	Rule 912	Compliance	An alleged Rule 912 incident and associated report, dated October 7, 2021, was submitted to the AQD. Additionally, the company had contacted AQD staff regarding the incident on October 4, 2021. The report discussed how they had a temperature and water flow deviation from the MAP for the Wet Scrubber system (CE004), however, no emission limit had been exceeded. Additional information had been provided regarding the incident. No further action is necessary at this time. (AShaffer, 10/21/2021)

Activity Date	Activity Type	Compliance Status	Comments
10/18/2021	NSPS (Part 60)	Compliance	<p>As required by MI-ROP-N6996-2018, a Semi-Annual VVa Report was submitted to the AQD. The reporting time periods were 01/01/2021 through 06/30/2021. During this time period there appeared to be three leaks. The first leak was in February where P409 was read above threshold limits. After follow up it was concluded that the pump seal was within limits. No further action was taken and this appears acceptable. The second leak was in April and a seal on P406 was found to be leaking. The pump required a production stoppage to repair, was placed on DOR and fixed during the April shutdown. The third leak was in June, and was the P406 seal leaking again. The leak was addressed during the downtime on June 8. Additionally, the tank farm P811 was found to be leaking and repaired immediately. The facility reported 124 hours for this time period where the beer feed was shut off. After further review, no further action is necessary at this time.</p>

Activity Date	Activity Type	Compliance Status	Comments
10/18/2021	ROP Semi 1 Cert	Compliance	As required by MI-ROP-N6996-2018, a Semi-Annual Compliance Report, was received by the AQD on 09/13/21. The reporting time period was from 01/01/21 through 06/30/21. During this time period five deviations were reported. Two of the five deviations were for FGFERMDIST and were failure to meet satisfactory operating conditions as outlined in the MAP, specifically, not meeting the 20 GPD of SBS through the scrubber. The two deviations occurred on 02/12/21 and 05/21/21 and were both 24 hours in length. The reasoning behind each deviation as well as corrections were discussed. After further review, no further action is necessary at this time. The remaining three deviations were described as the floating roof was standing in the maintenance mode for EUNATGASTANK1 / EU200TANK1 / EUNATGASTANK2. The dates of the three deviations were 04/06/21, 04/10/21 and 06/29/21. The first two deviations had been reported on 04/16/21. All three occurrences were due to the tank being emptied and cleaned in order to perform an API653 inspection. This appears acceptable. The report was properly certified and received on time. (AShaffer, 10/11/21)
10/11/2021	CAM Excursions/Exceedances	Compliance	As required by MI-ROP-N6996-2018, a CAM Excursion / Exceedance Report was submitted to the AQD. The reporting time periods were 01/01/2021 through 06/30/2021. During this time period no excursions / exceedances were reported. (AShaffer, 10/11/21)
10/11/2021	CAM monitor downtime	Compliance	As required by MI-ROP-N6996-2018, a CAM Monitor Downtime Report was submitted to the AQD. The reporting time periods were 01/01/2021 through 06/30/2021. During this time period no monitoring downtime events occurred. (AShaffer 10/11/21)

Activity Date	Activity Type	Compliance Status	Comments
09/14/2021	Site Review	Compliance	Follow up on odor complaints received on September 14 & 17, 2021.
08/13/2021	Rule 912	Compliance	A Rule 912 was submitted by POET regarding the emptying of two storage tanks covered under the ROP. Per API 653 standards, these tests are to be completed once every 10 years. The facility reported the following information. EUNATGASTANK1 - 4/6/21 from 0340 to 0845 resulting in emissions of 11.3655 lbs of VOC EU200TANK1 - 4/10/21 from 0545 to 1245 resulting in emissions of 77.01222 lbs of VOC The company had notified AQD staff on 04/05/21 of the event and various items regarding the emptying were discussed. This appears to be acceptable. (AShaffer, 08/13/21)
08/09/2021	Complaint Investigation	Compliance	Follow up on odor complaint received on August 9, 2021.
07/06/2021	Site Review	Compliance	Follow up on odor complaint that occurred on June 30, 2021.

Name: *Dina L. McE...* Date: 2-7-2023

Supervisor: *Chris Hare*