N 2927- FCE-20181218

## DEPARTMENT OF ENVIRONMENTAL QUALITY

## AIR QUALITY DIVISION

## FCE Summary Report

Facility : W2	2Fuel LLC		SRN :	N7927
Location: 15	71 W BEECHER RD		District :	Jackson
			County :	LENAWEE
City: ADR	IAN State: MI Z		npliance tus :	Non Compliance
Source Class : SM OPT OUT Staff : Mike Kovalchick				
FCE Begin Date	: 2/6/2017		CE Completion	12/18/2018
Comments :	ents: Company remains out of compliance with NSPS VVa. They expect to start conducting required LDAR leak detection testing in January 2019. Company currently has a PTI application submitted for 2 new distillation columns to recover methanol.			

## List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
12/17/2018	Scheduled Inspection	Non Compliance	Unannounced inspection/FCE of W2Fuel LLC.
04/23/2018	MAERS	Compliance	Source reported only 1.9 tons of VOC, most of which is methanol. They provided a spreadsheet for calculations. PTI 89-17A to be issued soon. It will have the following emissions units: EUOUTTANKS, EUINTANKS, EUTRANSESTER, EUBATCH, EUMODULAR, EUPURFIFICATION, EULOADOUT, EUWWTMT, and EUBOILER. EUMODULAR will be a new process. Hopefully will be incorporated into next year's MAERS. No concerns.

Activity Date	Activity Type	Compliance Status	Comments
05/09/2017	MAERS	Non Compliance	Newly added MAERS source. Facility is currently under Enforcement. There is no concurrence yet between the facility and AQD on what the emissions have been. Most of the VOC emissions are of the HAP methanol. The facility is proceeding with obtaining a PTI. The process to obtain the PTI should improve emission estimates for next year. The Company reported about 2 tons of emissions although the actual total may be closer to 10 tons. However, due to lack of conclusive evidence, the Company's MAERS estimates are acceptable for now.

Name: M. Koundehed Date: 1418/2015 Supervisor:

81