

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : ZFS Ithaca, LLC	SRN : P0788
Location : 1266 E. Washington Road	District : Lansing
	County : GRATIOT
City : ITHACA State: MI Zip Code : 48847	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Michelle Luplow
FCE Begin Date : 7/29/2019	FCE Completion Date : 9/24/2020
Comments : Non-compliance is associated with exceedance of CO emission limits on EUDRYING1.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/22/2020	Stack Test	Non Compliance	Test report received electronically 8/26/20, hard copy received 9/4/20. Testing conducted June 9, 2020 and June 11, 2020 on EUSHIPRECEIVE (PM) and EUDRYING1 (PM10, PM2.5, NOx, CO). Test report indicates compliance with all emission limits, except for CO. Limit is 5.54 lb/hr and test results indicate 5.85 lb/hr. VN has been issued. Reported operating parameters similar to those I recorded during the test.
09/22/2020	Stack Test	Compliance	Method 9 Visible Emission Observations stack test report for grain handling, EUSHIPRECEIVE (truck unloading only), SVSHIPRECEIVE (EUSHIPRECEIVE stack VE's), SVDRYING (EUDRYING1 stack VE's). All readings indicate compliance with opacity limits for each emission unit. (0% VE's reported throughout). Data AQD recorded during test conflicts slightly (some VE's observed), but ZFS Ithaca still remains in compliance based on AQD readings as well.
07/29/2020	Scheduled Inspection	Compliance	Scheduled, announced compliance inspections conducted in June and July 2020, to determine compliance with PTI 20-17B.

Activity Date	Activity Type	Compliance Status	Comments
07/29/2020	Stack Test Observation	Compliance	Stack test observation on 7/29/20 for EUPREP, EUEXTRACTION and EUDC, as part of a 4-day compliance test.
06/09/2020	Stack Test Observation	Compliance	Stack Test Observation for VE and PM testing on EUSHIPRECEIVE (truck unloading, baghouse SVSHIPRECEIVE) and EUHANDLING
05/28/2020	MAERS	Compliance	Electronic MAERS report received 3/13/20. Audit completed 5/28/20. Check MAERS for any review comments.
04/21/2020	Other Non ROP	Compliance	FGBOILERS - notification that startup date is the same as the installation completed date. Installation for EUBOILER1 and EUBOILER2 was completed on November 11, 2019. PTI requires reporting of complete installation 30 days after activity date. Report is late.
04/21/2020	Other Non ROP	Compliance	Installation date notifications for the following equipment (report is late): EUPREP - 2/10/20 EUHULLGRINDING - 2/10/20 EUPelletizing - 2/19/20 EUMEALGRINDING - 2/10/20 EUHULLSTORAGE - 2/10/20 EUHULLLOADOUT - 2/17/20 EULOADOUT - 2/17/20 EUEXTRACTION - 2/10/20 EUDC - 2/10/20 EUMEALSTORAGE - 2/10/20
04/21/2020	Other Non ROP	Compliance	Installation date notification for EUTANK1, EUTANK2, EUTANK3 (EUEXTRACTION) and the mineral oil absorption system, all associated with FGEXTRACTION. Installation complete 12/20/19. Report is late.
04/21/2020	Other Non ROP	Compliance	EUDRYING installation completion date reported: October 10, 2019. Report is late.
04/21/2020	Other Non ROP	Compliance	EUSHIPRECEIVE, EUHANDLING, EUBINS (of FGHANDLING) installation complete notification. Installation complete on July 22, 2019. Required to report install complete date 10 days after installation. Report is late. Commencement of trial operations began on July 22, 2019.

Activity Date	Activity Type	Compliance Status	Comments
04/06/2020	MACT (Part 63)	Compliance	Boiler MACT NESHAP Subpart DDDDD Initial Notification report for FGBOILERS 2 boilers (EUBOILER1, EUBOILER2). Both are Johnson fire tub Boilers at a rated heat input capacity of 95 MMBtu/hr each and operated on natural gas.
04/06/2020	NSPS (Part 60)	Compliance	FGBOILERS (EUBOILER1 & EUBOILER2) NSPS Subpart Dc Notification Report. Installation date reported (2019) is vague. Request to submit more specific commenced construction dates. Revised dates provided 4/20/20: Construction commenced November 14, 2018, startup for both was November 11, 2019. NSPS requires the initial notification of commenced construction and startup within 15 days of these activities. Report is late.
04/06/2020	Other Non ROP	Compliance	Startup notifications for the following equipment: EUPREP - 2/10/20 EUHULLGRINDING - 2/10/20 EPELLETIZING - 2/19/20 EUMEALGRINDING - 2/10/20 EUHULLSTORAGE - 2/10/20 EUHULLLOADOUT - 2/17/20 EULOADOUT - 2/17/20 EUEXTRACTION - 2/10/20 EUDC - 2/10/20 EUMEALSTORAGE - 2/10/20
04/06/2020	Other Non ROP	Compliance	Startup notification for EUTANK1, EUTANK2, EUTANK3 and the mineral oil absorption system, all associated with FGEXTRACTION. Startup (fill) of tanks commenced on 2/5/2020.
03/06/2020	MACT (Part 63)	Compliance	MACT NESHAP Subpart GGGG notification for initial startup of the hexane storage tanks (EUTANK1, EUTANK2, EUTANK3) and the mineral oil adsorption system (MOS). Commencement of operation (filling) began on 2/5/2020.

Activity Date	Activity Type	Compliance Status	Comments
01/14/2020	Malfunction Abatement Plan	Compliance	MAP for all equipment requiring a MAP was received 1/14/20. MAP contains all components required by the PTI, in thorough detail, for each emission unit and associated control devices. MAP is considered acceptable and approved. MAP was submitted less than the required 60 days prior to startup for this equipment (~ 30 days).
10/23/2019	NSPS (Part 60)	Compliance	NSPS Subpart DD notification of initial startup for EUDRYING. Commencement of operations began on October 10, 2019.
08/05/2019	NSPS (Part 60)	Compliance	NSPS Subpart DD notification of initial startup for FGHANDLING which includes EUSHIPRECEIVE, EUHANDLING, and EUBINS. Commencement of trial operations began on July 22, 2019.

Name: Michelle Luplow Date: 9/29/20

Supervisor: B.M.