

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Michigan Sugar Company - Bay City	SRN : B1493
Location : 2600 S Euclid Ave	District : Saginaw Bay
	County : BAY
City : BAY CITY State: MI Zip Code : 48706	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Sharon LeBlanc
FCE Begin Date : 6/1/2013	FCE Completion Date : 2/1/2015
Comments : outstanding compliance issues with respect to MAP and CO min Plans for Boiler 8 and ROP mod conditions for lime kiln still need to be agreed upon. sgl	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
01/23/2015	ROP Monthly	Compliance	Monthly Anamet SO2 Emission Rates for EUAEROBIC DIGESTER
01/22/2015	Stack Test Observation	Compliance	Oversight with TPU staff of lime kiln testing after pressure header (SVLIMEKILNPRESSURE RELF)-
12/29/2014	Odor Evaluation	Non Compliance	odor survey in response to odor complaints received 12/26 &12/27/2014
12/16/2014	Odor Evaluation	Non Compliance	Odor Survey in response to odor complaints received prior to activity. sgl
12/15/2014	ROP Monthly	Compliance	Monthly Anaerobic Digester Emissions
12/10/2014	Other	Compliance	Review of CEMS calibration records for 2014-sgl
12/08/2014	Odor Evaluation	Compliance	odor evaluation in response to complaints received for odors experienced in courtland farms subd. on 12/7/2014
12/08/2014	Scheduled Inspection	Non Compliance	Site inspection as part of full compliance inspection- note RATA scheduled to begin was postponed by at least half a day.
11/20/2014	Stack Test Observation	Unknown	Lime kiln stack test
11/17/2014	ROP Monthly	Compliance	Monthly Anaerobic Digester Emissions Report

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11/12/2014	Odor Evaluation	Compliance	odor survey in response to PEAS complaint No. 12099 and electronic complaint- Process odors were the only odors detected during survey.
11/10/2014	Other Non ROP		copy of 114(a) request submittal to EPA
11/03/2014	Excess Emissions (CEM)	Compliance	Quarterly boiler summary reports- Boilers 6 and 7 experienced analyzer issues during quarter. sgl
10/27/2014	Odor Evaluation	Non Compliance	odor evaluation for complaints received for dates of 10/24-10/27/2014.
10/16/2014	Odor Evaluation	Non Compliance	Odor evaluation based on DEQ Staff notification of strong Ammonia odors on west side of facility.
10/14/2014	Odor Evaluation	Compliance	Odor evaluation in response to odor complaints received 10/13 & 14/2014. Complainants reported strong unpleasant odors. sgl
10/07/2014	ROP Monthly	Compliance	Monthly Anaerobic Digester Emissions Report
09/24/2014	Odor Evaluation	Compliance	odor evaluation in response to odors reported the previous weekend in residential area NE of facility.
09/18/2014	ROP Semi 1 Cert	Compliance	
09/11/2014	Odor Evaluation	Compliance	process odor and "burnt" odor noted downwind of facility. sgl
09/10/2014	Odor Evaluation	Compliance	odor survey- follow up for 9/8/2014 complaint. sgl
09/09/2014	ROP Monthly	Compliance	Monthly Anaerobic Digester Emissions Report - no activity for month of august 2014.
08/21/2014	Odor Evaluation	Compliance	Odor survey in response to 8/18/2014 complaint. Note rains the 18, 19 and mandatory meeting the 20th delayed the activity.
08/13/2014	Odor Evaluation	Non Compliance	odor evaluation in response to August 8, 2014, complaint. Delay in response due to rains.
08/13/2014	ROP Monthly	Compliance	monthly anaerobic digester emissions summary
08/04/2014	Odor Evaluation	Non Compliance	Odor evaluation in response to complaint sent via e-mail on 8/1/2014. Rule 901 Violation confirmed.
07/31/2014	ROP Qrtly Cert	Compliance	Quarterly Boiler Summary Reports, submittal date July 25, 2014

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07/31/2014	Excess Emissions (CEM)	Compliance	Quarterly CEMs report with cylinder gas audit report- no compliance issues noted.
07/25/2014	Telephone Notes		Call from Saginaw County regarding complaints received by his office regarding land application activities north of riverside, city of saginaw
07/25/2014	Odor Evaluation	Compliance	odor evaluation in response to odor complaint received 7/24/2014. Note City of Saginaw Water and Sewer called 7/25/2014 regarding residence complaints they received the previous day.sgl
07/21/2014	Odor Evaluation	Compliance	Odor evaluation/survey in response to complaints received 7/18 and 7/20/2014. Complaints reported strong odors. Odor survey did NOT identify objectionable odors of duration for a violation of rule 901.
07/14/2014	ROP Monthly	Compliance	Monthly Anaerobic Digester Emissions Report - still has thrupt in June.
07/12/2014	Other	Non Compliance	Noted odors at intersection of Salzburg and S. Euclid.
07/11/2014	Odor Evaluation	Non Compliance	Odor evaluation in response to PM odor complaints for 7/10/2014- Rule 901 violation verified. sgl
07/08/2014	Odor Evaluation	Compliance	odor evaluation in response to a lunchtime complaint from resident NW of the facility. Violation not verified
07/07/2014	Odor Evaluation	Compliance	odor evaluation in response to odor complaints received 7/2, 7/5 and 7/7/2014. Odors were present but intensity varied widely based on wind speed. potential for non-compliance existed.
07/07/2014	Odor Evaluation	Non Compliance	follow up odor survey for odors reported post morning survey-limited extent (3 locations)
07/01/2014	Odor Evaluation	Non Compliance	Rule 901 verification
06/30/2014	Odor Evaluation	Non Compliance	Rule 901 Verification
06/27/2014	Odor Evaluation	Non Compliance	odor evaluation in response to 2 complaints made that morning. Rule 901 violation verified.
06/26/2014	Odor Evaluation	Compliance	odors present but did not have duration and intensity for Rule 901 violation
06/24/2014	ROP Monthly	Compliance	Monthly Anaerobic Digester Emissions Report

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06/23/2014	Complaint Investigation	Non Compliance	WWTP residuals application at 3781 Wadsworth Road resulting in odor complaints. Rule 901 violation.
06/23/2014	Odor Evaluation	Non Compliance	odor survey in response to complaints received for the weekend of 6/21-22/2014 and on 6/23/2014. Rule 901 violation verified.
06/20/2014	Odor Evaluation	Non Compliance	odor evaluation in response to odor complaint(s) received Friday, June 20, 2014.
06/18/2014	Odor Evaluation	Non Compliance	Odor evaluation in response to odor complaint received 6/17/2014 - note Rule 901 Violation was verified
06/17/2014	Other		List of dates in which odors were bad for neighborhood NE of facility (Mt. Zion Lutheran Church area)
06/16/2014	Odor Evaluation	Compliance	odor evaluation in response to 6/16/2014 complaint- sgl
06/11/2014	Odor Evaluation	Compliance	odor evaluation in response to odor complaint received from creekwood subdivision- no verification of rule 901 violation.
06/09/2014	Odor Evaluation	Non Compliance	odor evaluation in response to odor complaints received on 6/6/2014 and 6/9/2014. Rule 901 Violation verified. sgl
06/05/2014	Odor Evaluation	Compliance	Odor intensity was identified, but not duration-not verifiable Rule 901 violation.
06/03/2014	Odor Evaluation	Non Compliance	Odor evaluation in response to 2 odor complaints received Monday, June 2, 2014. Rule 901 Violation verified at one location of 11.
06/03/2014	ROP Monthly	Compliance	April Anaerobic Digester Emissions Report- submittal dated 5/28/2014.
05/29/2014	Odor Evaluation	Non Compliance	odor evaluation in response to odor complaints received morning of 5/29/2014- Rule 901 violation was verified.
05/27/2014	Odor Evaluation	Non Compliance	Odor evaluation in response to recent odors- duration and intensity confirmed in afternoon- sgl
05/22/2014	Odor Evaluation	Compliance	odor verification in response to two odor complaints received 5/21/2014. sgl

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05/21/2014	Odor Evaluation	Compliance	odor survey in response to voice mail complaint left on 5/20/2014. No rule 901 violation was identified.
05/13/2014	ROP Qrtly Cert	Compliance	quarterly boiler summary reports-CEMs Downtime for quarter very limited (1.8% for boiler #6 and 0.37% for boiler #8)- sgl
05/12/2014	Odor Evaluation	Compliance	Odor Evaluations conducted AM and PM in response to odor complaints received on 5/12/2014. Note that with the variability of the winds it was determined that a Rule 901 violation could not be varified. Though manure-like odors were identified. sgl
05/08/2014	Odor Evaluation	Non Compliance	odor evaluation in response to 2 odor complaints received 5/8/2014. Verification of 901 odor violation source is reported by facility to be lime (PCC) and stagnant columbia drain. sgl
04/21/2014	Complaint Investigation	Non Compliance	odor evaluation in response to 4/17/2014 odor complaint. Strong manure like odors were detected and determined to be a violation of R. 901. company notified electronically.
04/17/2014	ROP Monthly	Compliance	Monthly Anaerobic Digester Emissions Report for month of march 2014.
04/17/2014	MAERS	Compliance	2013 MAERS Submittal (electronic) - signed paper certifications received 3/3/2014.
04/11/2014	Complaint Investigation		Strong odor complaint investigation conducted morning of 4/11/14. Anonymous complaints received afternoon of 4/10/14 and morning of 4/11/14. rfo 4/14/2014
04/09/2014	Complaint Investigation	Non Compliance	Odor evaluation conducted as complaint investigation- note that odor intensity was significant, but due to wind gusts the odors were only experienced intermittently - also noted dust control issues for facility.
03/31/2014	Odor Evaluation	Non Compliance	verified Rule 901 violation.
03/27/2014	Odor Evaluation	Non Compliance	odor evaluation conducted as result of odor complaint received earlier in day.

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03/20/2014	Odor Evaluation	Compliance	Note- No odors that could clearly be associated with the treatment ponds was noted during survey, but extremely strong process odors of a "5" "strong enough to be overpowering and intolerable for any length of time" were noted.
03/18/2014	Odor Evaluation	Non Compliance	odor evaluation in response to anonymous complaint sgl
03/10/2014	Odor Evaluation	Non Compliance	Odor evaluation in response to complaint forwarded by OEA for voice mail left the weekend of 3/8-3/9-2014. AQD district staff verbally confirmed that odors downwind of the facility had been strong over the weekend. sgl
03/07/2014	Odor Evaluation	Non Compliance	Distinct and objectionable "manure"-like odors noted at 3 of 9 odor survey locations.
03/06/2014	ROP SEMI 2 CERT	Compliance	Semi-Annual Report Certification
03/06/2014	ROP Annual Cert	Compliance	Annual Compliance Certification-
03/03/2014	Excess Emissions (CEM)	Compliance	Correction of Monthly Anaerobic Digester Emissions Reports using DEQ approved emission factor
03/03/2014	Excess Emissions (CEM)	Compliance	Monthly Anaerobic Digester Emissions Report
03/03/2014	CEM RATA	Compliance	Annual CEM RATA Tech Programs Review Letter.
02/28/2014	ROP Monthly	Compliance	Monthly Anaerobic Digester Emissions Report
02/19/2014	Odor Evaluation	Compliance	Odor Survey for residential areas surrounding MSC - Bay City Facility. Strong odors were noted from Ponds by Water Resources staff on M-84, Monday 2/17/2014. Complaint from Public was received using voice mail by Office of Environmental Assistance Wednesday 2/19/2014. sgl
02/12/2014	Odor Evaluation	Compliance	Odor Survey in response to 2/11-12/2014 complaint from courtland circle.
01/30/2014	ROP Qrtly Cert	Compliance	Quarterly Boiler Summary Reports - Gas Fired Boilers #6,7,8 and Annual Rata for boiler CEMS.Deviations were downtime for preventative maintenance for each sample pump for units. sgl
01/27/2014	ROP Monthly	Compliance	Monthly Anaerobic Digester Emissions Report for December 2013- report uses proposed quantification method that has not been approved to date. sgl

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12/13/2013	ROP Monthly	Compliance	Facility has determined emission using quantification methods proposed in a November 15, 2013, report.
12/02/2013	Other Non ROP		11/18/2013 H2S Sampling Report for EUANAEROBICDIGESTER- 12 samples over 1-plus year of operation indicated significantly lower H2S production than at time of permitting- report proposes future calculations of H2S emissions based on formula generated from data- sgl
12/02/2013	ROP Monthly	Compliance	Emission calculations submitted were based on values determined by proposed formula generated from analytical testing data and outlined in 11/15/2013 report received 11/19/2013. sgl
11/18/2013	ROP Qrtly Cert	Compliance	Note- TPU received reort on 8/1/2013. Hard copy not available in district files. Absence noted as part of CEMs calibration data review for the first 3 quarters of 2013. sgl
11/15/2013	Other	Compliance	Review of CEMs calibration records for Quarters 1-3 of 2013. Review identified one incorrect date on deviation report for period. Correction for the typo is being re-submitted. sgl
11/13/2013	Odor Evaluation	Compliance	odor evaluation in response to complaint C-14-00173, received 11/7/2013. Intensity/duration not sufficient to be considered a violation. sgl
10/31/2013	ROP Monthly	Pending	Malfunction of newly installed biogas flow meter. Facility started up 9/17/2013, meter was not repaired till 10/30/2013. Flow based on COD conversion calculations.
10/31/2013	ROP Qrtly Cert	Compliance	Quarterly Boiler and Excess Emissions reports for Boilers 6,7,8. No excess emissions reported, CEMs downtime limited to CEMS for Boiler 7 and resulted in less than 10% downtime. Cylander Gas Audit conducted 9/30/2013- all tested below the allowed 15% deviation. sgl
10/21/2013	Odor Evaluation	Compliance	Odor Evaluation in response to verbal complaint for weekend of 10/19 & 20/2013.

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10/16/2013	Odor Evaluation	Compliance	Odor Evaluation in response to complaint received earlier in day of sewer odors.
10/14/2013	Odor Evaluation	Non Compliance	Odor Evaluation taken in response to odor complaint received from Creekwood Circle resident. Odors were reported to be ongoing- non process odors. sgl
09/30/2013	Odor Evaluation	Compliance	Odor evaluation in response to complaints received Friday September 27, 2013, regarding ongoing odors at plant. General observations at the time of the event were under foggy conditions with little to no breeze. Strong odor of raw beets noted south and southeast of beet piling grounds. Slight pond odor noted, but odor was more intermittent.
09/27/2013	Odor Evaluation	Compliance	odor evaluation- PM- Some swampy gas odors noted from pond located on Hotchkiss not owned or operated by MSC.
09/26/2013	ROP Monthly	Compliance	Monthly Anaerobic Digester Emissions- no emissions for august.
09/19/2013	Odor Evaluation	Compliance	odor evaluation/survey in response to odors reported previous day- Level 3 odor encountered at one of 10 locations but was of short duration/intermittent. sgl
09/18/2013	Odor Evaluation	Compliance	Odor evaluation by District Staff in response to two odor complaints received earlier that morning. Odors encountered during the evaluation were highly intermittent and in general low though distinct and were predominantly associated with beet sugar production/process.
09/17/2013	Odor Evaluation	Compliance	Odor evaluation conducted the morning of the start of campaign. No distinct and objectionable odors were noted of a duration or intensity to result in violation.
09/16/2013	Odor Evaluation	Non Compliance	Odor evaluation in response to recent odor complaint received by District Office. Odors noted were of intensity and/or duration to be a violation of rule 901.

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09/16/2013	ROP Semi 1 Cert	Non Compliance	Facility reported issues with CEMs associated with Boiler no. 8 (two instances) and Boiler No. 7 (2 instances).- No backup documentation was provided by facility to confirm dates and time periods. Deviation reports for CAM requirement included as part of submittal. sgl
09/15/2013	Odor Evaluation	Non Compliance	Odor verification by AQD District Staff during normal activities. Excessive odors had been reported earlier in the day by resident.
09/05/2013	Meeting Notes		Meeting of AQD and Water Resources District Staff with Michigan Sugar Staff regarding Waste Water Treatment Pond activities, recent odor issues and future odor control activities.
08/26/2013	ROP Monthly	Compliance	No thruput reported for month of July 2013. 12 month rolling total is 0.63 tons. cert form submitted. sgl
08/06/2013	Odor Evaluation		Odor Survey completed as follow-up to odor complaints received for period of 8/1-8/5/2013. Though elevated odors were noted, based on the intensity and duration, it was determined that no Rule 901 Violation had occurred. sgl.
08/01/2013	ROP Qrtly Cert	Compliance	2013 2cnd Qtrly boiler summary reports- CEMs reported down for minimal periods- cylinder gas audit performed on May 29, 2013.
07/17/2013	ROP Monthly	Compliance	Monthly Anaerobic Digester Emissions Report- report indicated that the digester had been taken off line May 27th, 2013, and that there were no production for the month of June 2013.
06/24/2013	ROP Monthly	Compliance	Monthly Anaerobic Digester Emissions Report - meter still reported broken for month of May-
06/13/2013	Other Non ROP	Compliance	Start-Up Shut-Down Plant for Boiler No. 8.

Name: Alicia A. Steed Date: 3/06/15 Supervisor: C. Stone