

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> Michigan Sugar Company - Bay City	<b>SRN :</b> B1493
<b>Location :</b> 2600 S Euclid Ave	<b>District :</b> Bay City
	<b>County :</b> BAY
<b>City :</b> BAY CITY <b>State:</b> MI <b>Zip Code :</b> 48706	<b>Compliance Status :</b> Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Kathy Brewer
<b>FCE Begin Date :</b> 6/1/2019	<b>FCE Completion Date :</b> 6/1/2021
<b>Comments :</b> FCE 6/1/2019 to 6/1/2021 Does not address Consent Judgement compliance	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
06/01/2021	Excess Emissions (CEM)	Compliance	<p>3rd Quarter CEM Summary Reports for Boilers 6, 7, 8. A cylinder gas audit was performed 9/5/2019</p> <p>CEMS report for Boiler #6 indicated no excess emissions and no CEMS Downtime (0%). 0.6 hours of non-monitor equipment malfunctions.</p> <p>Boiler #7 also did not report any excess emissions for the quarter. 1.6 hours of CEMS downtime (0.11%) due to unknown cause.</p> <p>Boiler #8 reported no excess emission for the quarter and CEMS downtime of 1.3 hr (0.11%) due to unknown cause.</p> <p>A cylinder gas audit was performed 9/5/2019 Passing results is plus or minus 15% of the average audit value, or plus or minus 5 ppm, whichever is greater. audit results reported average accuracies for the NOX and O2 CEMS for all three boilers below plus or minus 7.6%.</p>

Activity Date	Activity Type	Compliance Status	Comments
06/01/2021	Excess Emissions (CEM)	Compliance	Cylinder Gas Audit for Boilers 6, 7, 8 A cylinder gas audit was performed 9/5/2019 Passing results is plus or minus 15% of the average audit value, or plus or minus 5 ppm, whichever is greater. audit results reported average accuracies for the NOX and O2 CEMS for all three boilers below plus or minus 7.6%.
06/01/2021	Excess Emissions (CEM)	Compliance	<p>First quarter operating report and CEM summary reports for boilers 6, 7, 8 and gas audit CEMS report for Boiler #6 iand #7 ndicated no excess emissions and no CEMS Downtime (0%). 0 hours of non-monitor equipment malfunctions.</p> <p>Boiler #8 reported no excess emission for the quarter and CEMS downtime of 101.4 hrs (5%) due to monitor equipment malfunction</p> <p>A cylinder gas audit was performed 3/26/2020. Passing results is plus or minus 15% of the average audit value, or plus or minus 5 ppm, whichever is greater. audit results reported average accuracies for the NOX and O2 CEMS for all three boilers below plus or minus 3.2%.</p>

Activity Date	Activity Type	Compliance Status	Comments
06/01/2021	Excess Emissions (CEM)	Compliance	<p>Second Quarter Summary Report for Gaseous Excess Emission and Monitoring System CGA initiated June 2020, not completed. Boiler 7-8 CEMs require repairs. CEMS report for Boiler #6 indicated no excess emissions and 0.17 hr CEMS Downtime (0.01%). of non-monitor equipment malfunctions. Boiler #7 also did not report any excess emissions for the quarter. 0.17 hours of CEMS downtime (0.02%) due to monitor equipment malfunctions . Boiler #8 reported no excess emission for the quarter and CEMS downtime of 0.5 hr (0.09%) due to monitor equipment malfunctions .</p> <p>A cylinder gas audit was performed 8/20/2020 Passing results is plus or minus 15% of the average audit value, or plus or minus 5 ppm, whichever is greater. audit results reported average accuracies for the NOX and O2 CEMS for all three boilers below plus or minus 5.2%.</p>
06/01/2021	CEM RATA	Compliance	2020 RATA Boilers 6,7,8, All <20% of mean reference value or <10% of standard
04/13/2021	Complaint Investigation	Unknown	4/13 mtg with MSC BC. Response to VN due April 28. CJ allows 30 days from VN for mtg, then additional 30 days to resolve or request negotiation extension. (May 28). Low DO in aeration ponds 24 consecutive days are in violation of CJ. DO returned to >1 mg/l 4/15/2021
03/23/2021	Complaint Investigation	Non Compliance	odor evaluation in response to 4 complaints received between March 15 and March 23, 2021. Aeration ponds had DO leveld < 1.0 mg/l A violation for nuisance odors in violation of R901 will be sent to MSC BC.
03/18/2021	ROP Monthly	Compliance	January 2021 - Anamet SO2 Gas Generation - 12 month rolling total of 0.90 tons.
03/18/2021	ROP Annual Cert	Compliance	
03/18/2021	ROP SEMI 2 CERT	Compliance	

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01/26/2021	On-site Inspection	Compliance	On site inspection and record review portion of FCE.
09/25/2020	Complaint Investigation	Compliance	area observation in response to 2 complaints of dust from truck traffic, 8 odor complaints since 9/14/20
09/08/2020	Complaint Investigation	Non Compliance	Odor observation in response to complaints of odor. Source of odor was MSC BC pond solids left in field. Odors caused R901 violation
09/04/2020	Complaint Investigation	Compliance	review 14 odors complaints Aug 14 - Sept 4, 2020
09/03/2020	Complaint Investigation	Unknown	Dust from facility truck traffic. Also spoke with complainant and it was windy enough that dirt was blowing off beet piles..
08/11/2020	Complaint Investigation	Compliance	review (6) complaints received 7/29/2020 -8/10/2020
08/06/2020	ROP Monthly	Compliance	June 2020 - Anamet SO2 Gas Generation - 12 month rolling total of 0.69 tons.
07/28/2020	Complaint Investigation	Compliance	follow up to six odor complaints received 6/20/2020 to 7/23/2020
06/18/2020	Odor Evaluation	Compliance	Slight, intermittent odors with manure, septic, lime, urine, or deodorizer characteristics were noted. The odors at the time of observations were not of sufficient intensity to verify a Rule 901 violation. Also met with complainants at their residence
06/02/2020	ROP Annual Cert	Compliance	<p>No CAM exceedances reported. Boiler #6 had 5 instances of CEM related deviations: 179 hours total CEMS downtime (&lt;5% operating time)</p> <p>Boiler #7 had 5 instances of CEM related downtime for 12 hrs total (&lt;5% operating time)</p> <p>Also failed to submit CEMS required report for FGBOILERS within 60 days of testing completed</p> <p>Boiler #8 had 2 instances of CEM related downtime for a total of one hour (&lt;5%)</p> <p>Other parameters indicate no emission exceedances occurred during CEMS monitor downtime.</p>

Activity Date	Activity Type	Compliance Status	Comments
06/02/2020	ROP SEMI 2 CERT	Compliance	No CAM exceedances reported. Boiler #6 had 3 instances of CEM related deviations: 154 hours total CEMS downtime (<5% operating time) Other parameters indicate no emission exceedances occurred during CEMS monitor downtime.
06/02/2020	CAM Excursions/Exceedances	Compliance	No CAM exceedances reported
06/02/2020	CAM monitor downtime	Compliance	No CAM monitoring downtime reported. Pellet dryer is CAM subject device
05/13/2020	Odor Evaluation	Compliance	Odor observation performed in response to 6 complaints between April 27 and May 13, 2020. A mix of desugarization and lime odors were present but at the time of the observation not of sufficient intensity to verify a Rule 901 violation.
04/27/2020	Odor Evaluation	Compliance	Odor observation performed in response to 3 complaints between April 7 and April 27, 2020. A mix of desugarization, manure, lime, and septic odors were present but at the time of the observation not of sufficient intensity to verify a Rule 901 violation.
04/23/2020	Meeting Notes		Response to 4-101-2020 email requesting additional information re: pond solids removal and WWTS changes during campaign
04/20/2020	Telephone Notes		Summary 4-20-20 call and 4-10-2020 email
04/08/2020	CO/CJ		Addendum for WRD request re: fecal coliform elevated levels. Investigation found Saginaw river water holding tank biofouling was source.
04/06/2020	Odor Evaluation	Compliance	Odor observation performed in response to 11 complaints between March 20 and April 6, 2020. Rotting beets and septic odors were present but at the time of the observation not of sufficient intensity to verify a Rule 901 violation.
03/19/2020	Complaint Investigation	Compliance	Odor observation Mar 19, on site visit Mar 20. No R901 at time of odor observation but on site visit found potential odor sources due to rerouting of flume pond effluent and decomposing sugar beets.

Activity Date	Activity Type	Compliance Status	Comments
11/14/2019	ROP Semi 1 Cert	Compliance	4 deviations for CEMS monitoring downtime also reported in EER. 1 deviation for failure to submit CEMS report for boiler6 & 6 w/in 60 days.
11/14/2019	CAM Excursions/Exceedances	Compliance	None reported
11/14/2019	CAM monitor downtime	Compliance	No CAM monitoring downtime reported. Pellet dryer is CAM subject device
11/12/2019	Excess Emissions (CEM)	Compliance	<p>First Quarter CEM Summary Reports for Boilers 6, 7, and 8. A cylinder gas audit was performed 2/21/2019</p> <p>CEMS report for Boiler #6 indicated no excess emissions and 24.2 (1.13%) hours of non-monitor causes.</p> <p>Boiler #7 also did not report any excess emissions for the quarter and 0.7 hr of CEMS downtime (0.01%) due to unknown cause.</p> <p>Boiler #8 reported no excess emission for the quarter and CEMS downtime of 0 hours CEMS downtime.</p> <p>A cylinder gas audit was performed 2/21/2019</p> <p>Passing results is plus or minus 15% of the average audit value, or plus or minus 5 ppm, whichever is greater. audit results reported average accuracies for the NOX and O2 CEMS for all three boilers below plus or minus 6%.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/12/2019	Excess Emissions (CEM)	Compliance	<p>Second Quarter Operating Report for Gaseous Excess Emission and Monitoring System. A cylinder gas audit was performed 4/25/2019 CEMS report for Boiler #6 indicated no excess emissions and 0 hours of non-monitor equipment malfunctions. Boiler #7 also did not report any excess emissions for the quarter. 4.8 hours of CEMS downtime (0.25%) due to 4.1 hrs monitor equipment malfunctions and 0.7 hr unknown cause. Boiler #8 reported no excess emission for the quarter and CEMS downtime of 0.7 hr (0.09%) due to unknown cause.</p> <p>A cylinder gas audit was performed 4/25/2019 Passing results is plus or minus 15% of the average audit value, or plus or minus 5 ppm, whichever is greater. audit results reported average accuracies for the NOX and O2 CEMS for all three boilers below plus or minus 5%.</p>
11/12/2019	Complaint Investigation	Compliance	Review & evaluate odor complaints received between 9/27/2019 and 11/12/2019
09/27/2019	Complaint Investigation	Compliance	Complains of Snow Like material from MSC on windy days
09/05/2019	Malfunction Abatement Plan	Compliance	Case No. 17-000727-CE Decanter (Centrifuge) Required by Appendix Section III.A.4. KLB comments to C.Bauer & C. Hare: " I don't see any discussion of critical spare parts & suppliers or anticipated malfunctions & responses. The site has had 3 years of operation so probably have some notions of likely malfunction and response options. A description of what happens to the flume flow if there is a malfunction in one, two, or three centrifuges would be useful. "
07/08/2019	ROP Monthly	Compliance	June 2019 - Anamet SO2 Gas Generation - 12 month rolling total of 0.91 tons. Did not operate in June
07/02/2019	Other	Compliance	Call re: Anaerobic digester solids in Channel; Use of Odorboss and H2O2 during "solids removal"

Activity Date	Activity Type	Compliance Status	Comments
07/01/2019	Meeting Notes	Compliance	7-1-2019 Tour of WWTP and grounds in response to odor complaints
06/24/2019	ROP Monthly	Compliance	May 2019 - Anamet SO2 Gas Generation - 12 month rolling total of .92 tons.
06/14/2019	ROP Monthly	Compliance	REVISED February 2019 - Anamet SO2 Gas Generation - 12 month rolling total of .92 tons.

*Kathy Bruner*

Name: \_\_\_\_\_

05/23/2022

Date: \_\_\_\_\_

*Chris Hare*

Supervisor: \_\_\_\_\_