

APRIL FCE 2017 0815

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Anderson Development Company		SRN : A2851
Location : 1415 East Michigan Street		District : Jackson
		County : LENAWEE
City : ADRIAN	State: MI	Zip Code : 49221
Compliance Status :		Compliance
Source Class : SM OPT OUT		Staff : Stephanie Weems
FCE Begin Date : 02/23/2016		FCE Completion Date : 8/15/2019
Comments : Full compliance evaluation.		

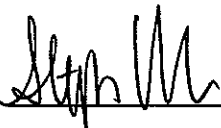
List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/08/2019	Scheduled Inspection	Compliance	Scheduled inspection
04/24/2019	MAERS	Compliance	Audit complete. Reviewed previous MAERS submissions in regards to dust collector emissions. 5/15/2017 review shows that dust collector VOC evaluation occurred. Inspector called facility and they reported that they accounted for styrene emissions for dust collector using Plant 2 Line 1 emission unit, using emission factor that was in PTI, which generates a low number for styrene. Therefore, system calc numbers were ignored and "0" was entered for VOC emissions from dust collector.
04/23/2018	MAERS	Compliance	Company failed to include attachment to support material balances/emission calculations. Email sent to Company to request it. Company submitted spreadsheet which I added to the MAERS reports. VOC/Particulate emissions remain minor with only 3 tons of VOC and lesser particulate. No compliance concerns.

Activity Date	Activity Type	Compliance Status	Comments
05/15/2017	MAERS	Compliance	Large difference in VOC(styrene) reported emissions from dust collector vs AQD calculated. Called Company. They said they accounted for styrene emissions for dust collector using Plant 2 Line 1 emission unit using emission factor that was state in PTI permit which generates a low number for styrene. System calculated numbers ignored and entered "0" for VOC emissions from dust collector. No other concerns.
03/31/2017	Malfunction Abatement Plan	Compliance	Malfunction Abatement Plan (MAP) Revision, PTI 131-04E

04/20/2016	MAERS	Compliance	<p>Audit findings are acceptable and facility-provided backup data are attached to the file. On April 19, 2016, I attended an in-person meeting at Anderson Development Company (ADC) to discuss a separate matter and also shared several MAERS-related questions / concerns. Several additions and removals from their 2015 MAERS report were noted and the facility confirmed that changes were made to better reflect their current permit. Previous MAERS reports included separate reporting of xylene and acetone emissions because their past permits had specific references to these pollutants. The 2015 MAERS report now aggregates all of these VOC emissions under EU Storage Tanks. ADC previously reported emissions using various EPA EFs, but the 2015 report is now based on batch records, which use site-specific EFs that were developed under their permit application. These EFs are more accurate and take into account a 90% VOC reduction / control efficiency due to the use of carbon drums / air pollution control equipment. This is why the facility now reports an almost 50% facility-wide VOC reduction (2014 MAERS 5.83 tons and 2015 MAERS 2.41 tons of facility-wide VOC emissions).</p> <p>It was determined that the EUDUSTCOLLECTORS and the EUWAXES reported in the 2015 MAERS report, as operating under Rule 290, are actually already covered under ADC's PTI. EU WAX is associated EUPLT1, has no air pollution control (APC) equipment, and is referenced in the facility's malfunction abatement plan (MAP). The baghouse is associated with EUPLT2LINE1 and EUPLT2LINE3 and is referenced in the facility's MAP. ADC gave me permission to update their MAERS report to indicate that these two EUs do not operate under a Rule 201 exemption. I updated their 2015 MAERS report and re-submitted.</p> <p>-MMG</p>
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Activity Date	Activity Type	Compliance Status	Comments
04/19/2016	Meeting Notes	Compliance	Anderson Development Meeting to Discuss Permit Changes

Name:  Date: 8.15.19 Supervisor: 