

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : DOW AGROSCIENCES LLC		SRN :	B4942
Location : 305 N HURON AVE		District :	Saginaw Bay
		County :	HURON
City : HARBOR BEACH	State: MI	Zip Code : 48441	Compliance Status : Compliance
Source Class : MAJOR	Staff : Gina McCann		
FCE Begin Date : 8/12/2015	FCE Completion Date :	7/21/2017	
Comments : FCE			

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
07/11/2017	Scheduled Inspection	Compliance	Inspection of MI-ROP-B4942-2015a
04/28/2017	MACT (Part 63)	Compliance	Subpart MMM Periodic Report and NOCS Report.
04/27/2017	ROP Annual Cert	Compliance	<p>EU-Process=Documentation missing for a Closed vent visual inspection record for the back-end product recovery process vent line is missing. No leaks were identified during the inspection, corrective action was to locate record and properly store it in library binder.</p> <p>FG-UTILITIES=VN for new emission factors derived during testing. PTI 303-98E resolved VN.</p> <p>FG-Turbines= Emission exceedance when SoLoNOx burner was offline, PTI 303-98E resolved VN.</p>
04/27/2017	MAERS	Compliance	PTI 303-98E was issued that segregates operating modes with SoLoNOx offline, MAERS submittal reflected changes and 2016 stack test EF were used.

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04/27/2017	ROP SEMI 2 CERT	Compliance	<p>EU-Process=Documentation missing for a Closed vent visual inspection record for the back-end product recovery process vent line is missing. No leaks were identified during the inspection, corrective action was to locate record and properly store it in library binder.</p> <p>FG-UTILITIES=VN for new emission factors derived during testing. PTI 303-98E resolved VN.</p> <p>FG-Turbines= Emission exceedance when SoLoNOx burner was offline, PTI 303-98E resolved VN.</p>
09/21/2016	MACT (Part 63)	Compliance	Periodic Report 40 CFR 63 Subpart MMM; Subpart MMM Updated NOCS Report. No deviations, CMS downtime, leaks, etc. to report. glm
09/20/2016	ROP Semi 1 Cert	Compliance	Deviation for VN issued 3/17/2016 for R912 violation due to SoLoNOx technology off line. Testing to determine EF on May 25/26 and PTI application submitted September 19, 2016.
06/14/2016	Stack Test	Compliance	Subpart MMM required stack test. TTU 850 - 865 Emission test. NOx, PM, VOC, NH3, CH3OH. All emissions were well below limits (<50% pf limit) except 2 TTUs had PM (limit =0.006 lbs/1000 lbs) averages of 0.003, one had emissins of 0/004 lbs/1000 lbs.
05/31/2016	Stack Test Observation	Compliance	FGFACILTY testing to demonstrate NOx emissions during SoLoNOx shutdown & to show compliance with emission limits
03/29/2016	MACT (Part 63)	Compliance	Periodic Report 40 CFR 63 Subpart MMM; Subpart MMM Updated NOCS Report. NOCSR revised in 2015 to update Method of Controls for TTU and Wastewater storage tank emissions from Thermal Incinerator to Catalytic Incinerator. See attached review reports in file

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03/29/2016	MACT (Part 63)	Compliance	Periodic Report 40 CFR 63 Subpart MMM; Subpart MMM Updated NOCS Report. TTU testing performed in October 2015. See attached review reports in file
03/16/2016	ROP Annual Cert	Non Compliance	VN sent for NOx emissions from FG-Utilities for 4 days
03/16/2016	ROP SEMI 2 CERT	Compliance	Deviation listed for February 2015, Also included in Annual report. VN sent for NOx emission exceedences.
03/10/2016	Meeting Notes		SoLoNOx operation during subzero weather; PTI application for FG Utilities
02/08/2016	Meeting Notes	Non Compliance	NOx turbine emission in sub zero temps/ SoLoNOx
10/26/2015	Stack Test Observation		4 TTU 's 1/5 year performance test
09/15/2015	ROP Semi 1 Cert	Compliance	Subpart MMM Periodic Report; Subpart MMM Updated NOCS Report. FG-UTILITIES & FG-TURBINES SoLoNOx Turbines. In sub-zero temperatures SoLoNOx technology impacted by higher density air and shuts off. Increased NOx emissions for 91 hours over 6 days in Feb 2015. Changed operating scenario to use other energy units during subzero temps which increases overall NOx site emissions but w/in operating scenario limits. Performed emission testing in February & submitted PTI for operating SoLoNOx in sub zero conditions. No VN as corrective actions implemented
08/14/2015	MACT (Part 63)	Compliance	NOCS 40 CFR Part 63, Subpart MMM Periodic Report - No excess emissions or parameter exceedances, no monitoring downtime, and no SSMP revisions were made for this reporting period. A revised NOCSR was submitted with this report but filed separately.

Activity Date	Activity Type	Compliance Status	Comments
08/14/2015	MACT (Part 63)	Compliance	<p>40 CFR Part 63, Subpart MMM Periodic Report - No excess emissions or parameter exceedances, and no SSMP revisions were made for this reporting period. A revised NOCSR was submitted with this report but filed separately.</p> <p>Reported monitoring downtime on bioreactor was 2.75 hrs (0.06% of operating time) due to an error during maintenance/streamlining control computer. Estimate of annual average HAP emissions (Methanol & small % xylene) from pesticide manufacture was 7 tons.</p>

Name: *Alina L. Mc...* Date: 7/21/17

Supervisor: *C. Hase*