

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility :	THE ANDERSONS MARATHON HOLDINGS LLC	SRN :	B8570
Location :	26250 B DR N	District :	Kalamazoo
		County :	CALHOUN
City :	SHERIDAN TWP	State:	MI
Zip Code :	49224	Compliance Status :	Non Compliance
Source Class :	MAJOR	Staff :	Cody Yazzie
FCE Begin Date :	8/2/2022	FCE Completion Date :	9/26/2024
Comments :	In a recent ROP semi annual certification the facility received a VN for a deviation that had been disclosed. The VN has not yet been responded to or resolved. During the most recent inspection the facility appeared to be in compliance with all other req.		

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/28/2024	ROP Semi 1 Cert	Non Compliance	<p>The facility submitted an ROP Certification form with original signature from responsible official and date. The facility reported the EU-GRAINRECIEVE reported 7 dates of deviation. Receiving pit was operating while the elevator baghouse C-201 was taken out of service due to construction updates on the Receiving pit and building. Hopper bottom trucks were dumped on this pit to control fugitive dust. Complete construction and re-install of baghouse c-201 in fall of 2024.</p> <p>Due to the facility actively operating without the baghouse in service, a violation letter was sent on September 12, 2024. Rule 910 violation.</p>
08/02/2024	On-site Inspection	Compliance	Scheduled Inspection
08/01/2024	CEM RATA	Compliance	<p>Quarterly CEMS Report</p> <p>The facility submitted the report with an ROP certification with original signature and date from the responsible official. Facility states that the thermal oxidizer (C-10) operated a total of 2,062 hours during the quarter. There was no reports of out-of-control hours.</p>

Activity Date	Activity Type	Compliance Status	Comments
06/05/2024	CEM RATA	Compliance	<p>Quarterly CEMS Report</p> <p>The facility submitted the report with an ROP certification with original signature and date from the responsible official. The facility reported the CEMs was operating for 100% of the time and had 0 hours out of control. There were 0 excess emissions reported during this time period.</p>
06/05/2024	Other Non ROP	Compliance	<p>Air permit exemption demonstration, and email correspondence.</p> <p>Proposed to replace the two outside ground piles with temporary storage enclosures included in EU-GRAINSTORED with two permanent grain storage bins. Each unit will be the Chief Agri Bin Model (CB40-25) bins and have the following dimensions and capacity:</p> <p>Bin Diameter = 123 ft 9 in Eave Height = 88 ft 5 in Peak Height = 121 ft Eave Capacity = 904,621 bushels Peak Capacity = 1,016,952 bushels Peak Metric Tons = 25,831 metric tons</p> <p>Demonstration was reviewed by district supervisor Monica Brothers. It will be the responsibility of the facility to keep a copy of the document on file to make available to AQD staff upon request for the new units.</p>
05/30/2024	CEM RATA	Compliance	<p>Annual RATA Report</p> <p>The facility submitted RATA results with an ROP certification form with an original signature and date from the responsible official. Results showed that the calculated value for NOx (lb/MMBtu) was 4.78% which is less than the acceptable 20% and the O2 (%) was -0.074% which is less than the accepted 1.0% average difference. The results are acceptable and show compliance with the RATA requirements.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/14/2024	NSPS (Part 60)	Compliance	Facility submitted the Semi-Annual LDAR Report with an ROP certification form with original signature and date of responsible official.
04/04/2024	ROP Annual Cert	Compliance	The facility submitted the annual ROP certification form with an original signature and date from the responsible official. No reported deviations.
04/04/2024	ROP SEMI 2 CERT	Compliance	The facility submitted the semi-annual ROP certification form with an original signature and date from the responsible official. No deviations were reported.
04/04/2024	Annual Emissions Report (or MAERS)	Compliance	The facility submitted an ROP certification form with an original signature and date of the responsible official. The facility submits the certification for the annual emission inventory report to MiEnviro portal. No deviations were reported.
02/22/2024	CEM RATA	Compliance	Quarterly CEMS Report The facility submitted the report with an ROP certification with original signature and date from the responsible official. The facility reported the CEMs was operating for 100% of the time and had 0 hours out of control. There were 0 excess emissions reported during this time period.
11/02/2023	NSPS (Part 60)		Quarterly CEMS Report. The facility submitted the reported with an ROP certification form with an original signature and date. The facility reported that during the third quarter, there were no downtime hours for the CEMs on C-10, which operated for a total of 2,075 hours. This accounts for 100% of total operational time. There were 0 reported incidents of excess emissions.
10/05/2023	ROP Semi 1 Cert	Compliance	The facility submitted an ROP certification form with original signature and date of the responsible official stating that all monitoring and associated recordkeeping requirements in the ROP were met with no deviations during this reporting period.

Activity Date	Activity Type	Compliance Status	Comments
08/07/2023	CEM RATA	Compliance	<p>Quarterly CEMS Report</p> <p>The facility submitted the report with an ROP certification with original signature and date from the responsible official. The facility reported the CEMs was operating for 100% of the time and had 0 hours out of control. There were 0 excess emissions reported during this time period.</p>
07/31/2023	NSPS (Part 60)	Compliance	<p>Facility submitted the Semi-Annual LDAR Report with an ROP certification form with original signature and date of responsible official.</p> <p>The semi-annual report is prepared for reporting requirements in MI-ROP-B8570-2023 and 40 CFR 60.487 (Subpart VV) and 40 CFR 60.487a (Subpart VVa). During the entire reporting period, no valve or connector leaks were detected. No pump leaks were detected.</p>
07/13/2023	Excess Emissions (CEM)	Compliance	<p>The facility submitted the reported with an ROP certification form with an original signature and date. The facility reported that during the first quarter, there was 28 hours of downtime for the CEMs on C-10, which operated for a total of 2,159 hours. This accounts for a total of 97.73% of total operational time. There were 0 reported incidents of excess emissions.</p>
04/27/2023	CEM RATA	Compliance	<p>The facility submitted results from the RATA along with a signed ROP certification form.</p> <p>The facility reports that the facility CEMS was 9.07% of the calculated value for NOx (limit 20% lb/MMBtu) and the O2% was -0.118% (less than 1% average difference).</p>

Activity Date	Activity Type	Compliance Status	Comments
03/15/2023	ROP Annual Cert	Compliance	<p>The facility submitted the annual ROP certification form with an original signature and date from the responsible official.</p> <p>Facility reports that during the entire reporting period, the source was in compliance with all terms and conditions contained in the ROP except for those identified. Deviations are:</p> <p>FGC-20: Several dates in July and August for a total of 12 days. Due to turnover, the preventative maintenance work orders were not entered in the maintenance system, MAPCON. Training has been done to perform data entry and procedures established for a monthly review.</p> <p>EU-DIESELPUMP2: October - December the Diesel pump 2 ran more than 50 hours of non-emergency use. Training has been done with authorized personnel to restrict fire pump use.</p> <p>FG-OXID2: October 12 - December, the emissions exceeded to the VOC limit of 4.5 lb/hr. A malfunction in the oxidizer caused the malfunction, which was corrected in December and a stack test showed compliance. A VN was written for the exceedance and the facility is entering into an ACO.</p>

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03/15/2023	ROP SEMI 2 CERT	Compliance	<p>The facility submitted the semi-annual ROP certification form with an original signature and date from the responsible official.</p> <p>Facility reports that during the entire reporting period, the source was in compliance with all monitoring and recordkeeping requirements in the ROP except for those identified. Deviations are:</p> <p>FGC-20: Several dates in July and August for a total of 12 days. Due to turnover, the preventative maintenance work orders were not entered in the maintenance system, MAPCON. Training has been done to perform data entry and procedures established for a monthly review.</p> <p>EU-DIESELPUMP2: October - December the Diesel pump 2 ran more than 50 hours of non-emergency use. Training has been done with authorized personnel to restrict fire pump use.</p> <p>FG-OXID2: October 12 - December, the emissions exceeded to the VOC limit of 4.5 lb/hr. A malfunction in the oxidizer caused the malfunction, which was corrected in December and a stack test showed compliance. A VN was written for the exceedance and the facility is entering into an ACO.</p>
03/15/2023	Annual Emissions Report (or MAERS)	Compliance	The facility submitted an ROP certification form with an original signature and date of the responsible official. The facility submits the certification for the annual emission inventory report (MAERS).
03/07/2023	CEMS Test Observation	Compliance	CEMS RATA on FGOXID thermal oxidizer under MI-ROP-B8670-2015b and 40 CFR, Part 60, Subpart Db.

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02/15/2023	Stack Test	Compliance	<p>The facility submitted an ROP certification form with original signature and date for test results for testing completed on FGOXID2 C-10A.</p> <p>Testing results are as follows: Total PM10/PM2.5 - 3.55 lb/hr (limit 5.01 lb/hr) SO2 - 1.9 lb/hr (limit 10.8 lb/hr) NOx - 8.7 lb/hr (limit 10.8 lb/hr) CO - 6.0 lb/hr (limit 9.1 lb/hr) Destruction Efficiency - 98% (limit 98%) Total VOCs** - Less than 4.5 lb/hr (limit 4.5 lb/hr) Acetaldehyde** - 0.27 lb/hr (limit 0.33 lb/hr) **Total VOC by FTIR includes acetaldehyde, acetic acid, acrolein, ethanol, ethyl acetate, formaldehyde, formic acid, 2-furaldehyde, methanol. Methane was detected, but was not included as it's an exempt VOC.</p>
01/30/2023	NSPS (Part 60)	Compliance	<p>Facility submitted the Semi-Annual LDAR Report with an ROP certification form with original signature and date of responsible official. This is submitted to satisfy conditions in MI-ROP-B8570-2015b and 40 CFR Part 60 Subparts VV and VVa. The report spans from July 2022 to January 2022. In July 2022, there were two valve leaks detected. The valves were repaired the same day they were detected. No pump leaks were detected. No other valves, connector, or pump leaks were detected for the duration of the reporting period. The distillation unit was shut down October 3-7, 2022. All other process units contained inventory.</p>
01/26/2023	CEM RATA	Compliance	<p>Intent to Test Notice for Annual CEMS RATA. Test will be conducted in accordance with attached plan. The facility will be operating in compliance with permit conditions and at least 50% of maximum routine operating conditions for the facility. Test will be conducted on March 7, 2023.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/26/2023	Excess Emissions (CEM)	Compliance	<p>Quarterly CEMS Report</p> <p>The facility submitted the report with an ROP certification form and original signature of a responsible official. The facility reported the NOx CEMs operated for 2093 hours of 2098 operating hours or had downtime of 0.24%. Reported downtime was associated with a broken air hose sensor and a chiller pump failure on 11/4/22 and 11/5/22, respectively.</p> <p>The facility also included the fourth quarter CGA report performed on November 28, 2022.</p>
01/11/2023	Stack Test	Compliance	<p>The facility submitted stack testing results for FGMILL2 and EU-COOLINGDRUM with an ROP certification form which contains an original signature and date. Results are as follows:</p> <p>EU-COOLINGDRUM Total PM10/PM2.5 - 0.81 lb/hr (limit 2.14 lb/hr) Total VOCs* - 11.8 lb/hr (limit 13.6 lb/hr) *Total VOC by FTIR include acetaldehyde, acetic acid, acrolein, ethanol, ethyl acetate, formaldehyde, formic acid, 2-furaldehyde, methanol</p> <p>FGMILL2 Filterable PM10/PM2.5 - 0.17 lb/hr (limit 0.64 lb/hr)</p>
12/15/2022	Excess Emissions (CEM)	Compliance	<p>The facility submitted the EER with a signed and dated ROP Certification form. The facility reports the CEMs operated 95.46% of the time. Therefore the CEMs downtime was 4.54%. The facility reported no excess emissions events during this time period.</p>

Activity Date	Activity Type	Compliance Status	Comments
12/15/2022	ROP Other	Compliance	The facility is required to report the installation of the pre-condenser under PTI 144-15G FGFERM SC VII.5. The facility put the pre-condenser into operation on October 10, 2019. The facility previously notified the department of trial operations on the pre-condenser in March 2020. Testing was completed on this unit in 2021. This PTI is being rolled into the ROP.
12/09/2022	Stack Test Observation	Compliance	
11/01/2022	Stack Test Observation	Compliance	
09/22/2022	ROP Semi 1 Cert	Compliance	The facility submitted an ROP Certification form with original signature from responsible official and date. The facility reported one deviation during the reporting period. The facility reports that due to excessive turn over and short staffing in the maintenance department, the preventative maintenance work orders were not entered in the maintenance system (MAPCON). Training was completed with responsible personnel to perform data entry and procedures established for a monthly review of the system.
08/16/2022	On-site Inspection	Non Compliance	
08/11/2022	NSPS (Part 60)	Compliance	Facility submitted the Semi-Annual LDAR Report with an ROP certification form with original signature and date of responsible official. On January 2022 to June 2022, there were no valves or connector leaks detected. One pump leak was detected on Tag 251. The pump seal was replaced on 4/13/22 during plant shutdown.
08/11/2022	Excess Emissions (CEM)	Compliance	The facility submitted a Quarterly CEMS Report and Excess Emissions summary with an ROP certification form with original signature of RO and date. The facility reported one incident which account for 49 hours of CEMs downtime. This resulted in data availability of 97.62%. The CEMs downtime was attributed to a leaking drain pump tubing. The tubing was replaced. No excess emissions were reported.

Name:

Cody Yarn

Date:

9/24/24

Supervisor:

[Signature]