DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Stack Test Observation

B184674456

FACILITY: Occidental Chemical Corporation		**SRN / ID:** B1846
LOCATION: 1600 S. Madison St., LUDINGTON		**DISTRICT:** Cadillac
CITY: LUDINGTON		**COUNTY:** MASON
CONTACT: Steve Jones , HESS Manager		**ACTIVITY DATE:** 10/22/2024
STAFF: Tammie Puite	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: EUPELLETDRY Emission Test.		
RESOLVED COMPLAINTS:		

Observed testing on the EUPELLETHNDL pellet material handling process for Particulate Matter (PM) at this facility. Protocol for this testing was received on September 20, 2024, and approved on October 4, 2024. This test was required by Renewable Operating Permit Number MI-ROP-B1846-2021. Testing on site was being performed by Montrose Air Quality Services. The permitted limits for PM from this unit are 0.03 lbs/1000 lbs of exhaust gases. Steve Jones and Seth Garrity were representing Oxy and Jeremy Howe, Amy Beaver, and Dylan Reich were present from AQD TPU Unit.

I arrived onsite at 8:30 am. Odors from asphalt paving were strong, at the office. Testing didn't start until 10:46 am for Run 1. Each run is 160 minutes. I received a brief tour of the 3 processes, Pellet, Flake, and Bulk. There were no excess emissions from the stacks, only slight calcium chloride odors detected in the air while walking the plant. All vegetation between the plant and the waters edge was vibrant green, and showed no stress from the emissions. Lots of safety precautions onsite, and staff are highly trained when to notice an issue before it becomes a problem.

Process conditions that were to be recorded for this test was: Differential Pressure in inches, Scrubbing Fluid Flow Rate in GPM, Natural Gas Flow to Dryer, and Brine Flow to Dryer GPM. During Testing, Natural Gas flow was 1712 scfm, and Brine Flow was 1550 GPM, with 1750 GPM being average flow. The scrubber differential pressure was 23.4" for the testing, and 24.5" is normal. All testing levels were within permitted range. The company stated that they were testing at lower GPM and differential pressure, to simulate a scenario where they would have higher emissions, from a less efficient production process. Everything is automated, so levels did not vary. Rob Dickman noted for the 2019 Testing was performed with the differential pressure at 18.2" of water, the PM Test for 2019, stated that 1550 GPM of Brine, and 25" of water.

No issues were noted during this testing event.

NAME _____ DATE 12-4-24 SUPERVISOR _____