



We Are The **3R**

January 25, 2018

Air Quality Compliance Tracking Coordinator
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, MN 55155-4194

RE: Deviation Report – Sanimax South Saint Paul
AQ Facility ID: 03700070

Dear Sir/Madam, enclosed please find the deviation report for the period of July to December 2017 for the above referenced facility.

Please feel free to contact me if you have any questions regarding the report.

Thank you.

Dua Thor
Sanimax
Environmental, Health and Safety
Tel. 651.451.6858 ext. 1520



**Minnesota Pollution
Control Agency**

520 Lafayette Road North
St. Paul, MN 55155-4194

DRF-2

Deviation Reporting Form

Air Quality Permit Program

Doc Type: Excess Emission Report

General Information about Deviation and Compliance Reporting

If your permit requires you to submit deviation reports or an annual compliance certification, you should use the *Deviation Reporting Forms* (DRFs) and *Annual Compliance Certification Report* (CR-04), unless you get Minnesota Pollution Control Agency (MPCA) approval to use another format or your facility's permit specifies otherwise. There are two separate DRF forms: DRF-1 and DRF-2.

DRF-1 is used to report direct excess stack emissions recorded by Continuous Emission Monitoring Systems (CEMS) and Continuous Opacity Monitoring Systems (COMS).

DRF-2 is used to report deviations recorded by periodic monitoring systems, deviations of permitted operating conditions and surrogate parameters whether recorded periodically or continuously, or potential excess emissions identified through recordkeeping.

Some examples: flow rate, temperature, throughput, control equipment operating parameters, fuel-use records

CR-04: is used to report facility compliance status at the end of each year *if required by your permit*.

**Address hard copy
report submittals to:** Air Compliance Tracking Coordinator
Minnesota Pollution Control Agency
520 Lafayette Road North
St. Paul, Minnesota 55155-4194

Or

E-mail a signed and scanned PDF copy to: AQRoutineReport.PCA@state.mn.us
(see e-mail instructions in "Routine Air Report Instructions Letter" at <http://www.pca.state.mn.us/nwqh472>)

General Facility Information

Facility name: Sanimax USA LLC - South St Paul AQ file no.: 578
County: Dakota AQ permit no.: 03700070- 007
Time period covered by report: ☐ January 1 - June 30 ☒ July 1 - December 31 2017 (year)

Description of Deviations

Provide the following information regarding each individual deviation from permit conditions identified by either your periodic or continuous monitoring system. Be sure to report any deviations which occurred during monitor downtime or monitor bypasses. Use the same numbering system as used in the facility permit.

Date of deviation	Emission unit ID no.	Monitor ID no.	Cite permit condition which was deviated from	Detailed description of deviation, why it occurred, and corrective action taken
				See Attached Spreadsheet - all listed there.

Description of Monitor Downtime

Provide the following information regarding each period when a periodic or continuous monitoring system for any permitted operating condition or surrogate parameter did not record required data. Use the same numbering system as used in facility permit.

Date and time of missed record	Monitor ID no.	Emission unit ID no.	Pollutant or parameter monitored	Cause of the monitor downtime and corrective action taken
None				

Summary of Deviations and Monitor Downtime

Fill out a separate row of the table for each periodic monitoring system.

Monitor ID no. (Use same number from facility permit.)	Total number of readings taken (during period covered by report)	Total number of readings indicating deviations	Percent of readings indicating deviations (To calculate, divide total number of readings taken that indicate deviations by the total number of readings. Multiply that number by 100.)	Total no. of readings missed (Indicate the number of times that data was not recorded as required by your permit.)	Total percentage of readings missed (Divide number of readings missed during reporting period by number of readings required during same period. Then multiply by 100.)
See Attached					

Deviations Discovered Through Recordkeeping

List each deviation that was discovered through recordkeeping (e.g., your fuel use records indicate that you exceeded your fuel use limits). Provide at least the date(s) of each deviation; magnitude of deviation; associated emission unit, the cause of each deviation, and the corrective action taken.

1. None
2. _____
3. _____

Certification

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete.

Responsible Official

Print name: BENJAMIN BERTRAM Title: PLANT MANAGER
 Signature: [Signature] Date: 1/22/2018

Note: The individual signing must meet the definition of "responsible official" in Minn. R. 7007.0100, subp. 21.

Due Dates

Air Emission Permit – Option D, where control equipment is used to reduce actual reported emissions	Deviation Report – if a deviation occurred	January 30 and July 30
Air Emission Permit – State or Federal Total Facility or General	Deviation Report – whether or not a deviation occurred	January 30 and July 30
	Compliance Certification	January 31

Date of Deviation	Emission Unit ID no.	Monitor ID no.	Cite permit condition which was deviated from	Detailed description of deviation, why it occurred , and corrective action taken	Equipment
7/6 - 7/7	CE012		Low Differential Pressure	Scrubber foaming, added anti-foam	Ruminant
7/20 - 7/21	CE012		Low Differential Pressure	Scrubber foaming, added anti-foam	Ruminant
8/25 - 8/26	CE012		Low Differential Pressure	Scrubber foaming, added anti-foam	Ruminant
8/14 - 8/15	CE003		Low Recirculation	Electrical pump, replaced electrical contacts and starter.	Feather
8/22-8/25, 8/28 - 8/29	CE001		Low Differential Pressure	Lines plugged, freed on its own.	Blood
9/1 - 9/6	CE025		High Differential Pressure	Differential pressure stuck at 10, electrical connection issues fixed on 9/6	Poultry
9-Oct	CE025		High Differential Pressure	Plugged line, line cleared	Poultry
16-Oct	CE025		High Differential Pressure	No explanation found, problem fixed	Poultry
18-Oct	CE025		High Differential Pressure	Plugged line, line cleared on its own	Poultry
10/30 -10/31	CE003		Low Differential Pressure	Condensor Fan issues - maintenance fixed	Feather
9/22 - 9/23	CE012		Low Differential Pressure	Scrubber foaming, added anti-foam	Ruminant
10-Oct	CE012		Low Differential Pressure	Scrubber foaming, added anti-foam	Ruminant
26-Oct	CE012		Low Differential Pressure	Scrubber foaming, added anti-foam	Ruminant
9/6 - 9/7	CE001		Low Differential Pressure	Loss of vacuum - situation mitigated.	Blood
9/11 - 9/12	CE001		Low Differential Pressure	Loss of vacuum - situation mitigated.	Blood
9/29 - 9/30	CE001		Low Differential Pressure	Drip Valves open - closed Drip valves	Blood
10/12 - 10/13	CE001		Low Differential Pressure	Loss of vacuum - situation mitigated.	Blood
11/7	CE001		Low Venturi flowrate	Pump issues left unresolved. restarted pump.Flow increased above limit	Blood
11/9	CE025		Low Venturi flowrate	Valve on the discharge side was adjusted. Returned the valve to normal position to allow for higher flow	Poultry
11/14 - 11/15	CE001		Low Venturi flowrate	Plugged nozzles. Unplugged nozzles.	Blood
12/2	CE001		Low Venturi flowrate	Xcel energy was working on power lines and blood room lost power 2 to 3 times while they were running. Scrubber/Venturi shut down twice	Blood
12/11	CE025		Low Venturi flowrate / DP	Fire suppression test shut down scrubber system -restarted when simulation was over.	Poultry
12/12	CE012		Low Venturi flowrate / DP	Fire suppression test shut down scrubber system -restarted when simulation was over.	Ruminant
12/14 - 12/15	CE003		Low Venturi flowrate	Most likely due to a faulty flowmeter that was replaced 2 days later	Feather
12/20	CE012		Low Venturi flowrate / DP	Fire suppression test shut down scrubber system -restarted when simulation was over.	Ruminant
12/26	CE025		Low Venturi flowrate / DP	Fire suppression test shut down scrubber system -restarted when simulation was over.	Poultry
12/29	CE012		Low Venturi DP	Procedure not followed. Delay in starting up. Re-training occurred.	Ruminant

Summary of Deviations and Monitor Downtime

Monitor ID	Total number of readings taken	Total number of readings indicating deviations	Percent of readings indicating deviations	Total number of readings missed	Total percent of readings missed
CE009	156	0	0%	0	0
CE003	468	18	4%	0	0
CE006	156	0	0%	0	0
CE014	156	0	0%	0	0
CE001	468	54	12%	0	0
CE010	156	0	0%	0	0
CE011	156	0	0%	0	0
CE016	156	0	0%	0	0
CE012	468	39	8%	0	0
CE025	468	36	8%	0	0