UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, ILLINOIS 60604

DATE: JUL 13 2018

SUBJECT: CLEAN AIR ACT INSPECTION REPORT
Didion Milling-Cambria

FROM: Gregory Gehrig, Environmental Engineer
AECAB (MI/WI)

THRU: Sarah Marshall, Section Chief
AECAB (MI/WI)

TO: File

BASIC INFORMATION

Facility Name: Didion Milling-Cambria

Facility Location: 501 S Williams St, Cambria, WI

Date of Inspection: June 28, 2018

Lead Inspector: Gregory Gehrig, Environmental Engineer

Other Attendees: From Didion Milling-Cambria: Joe Winch, Environmental Manager; Russ Abarr, Plant Manager; Derrik Clark, VP Operations; Carl Hendricks, Environmental Technician.

Contact email address: Joe Winch <jwinch@didionmilling.com>

Purpose of Inspection: CAA Compliance

Facility Type: Ethanol production from corn

Regulations Central to Inspection: SIP, NSPS and MACT

Arrival Time: 0805 hrs
Departure Time: 1045 hrs

Facility Name: Didion Milling-Cambria
Facility Location: 501 S Williams St, Cambria, WI
Date of Inspection: June 28, 2018

Inspection Type:
☒ Unannounced Inspection
☐ Announced Inspection

OPENING CONFERENCE

☒ Credentials Presented
☒ CBI warning to facility provided

The following information was obtained verbally from facility personnel and observations onsite.

Company Ownership: No changes in past 5 years.

Process Description:
Didion Milling-Cambria (Didion) is permitted to produce 60 million gallons per year of ethanol from corn. They also produce distillers dried grains (DDGS). The facility was designed and built by Delta T. Didion utilizes five fermentors, one beer well for fermentation and a ring dryer to produce DDGS from mash. Didion uses a scrubber to recover ethanol from the fermentation process. Didion uses two regenerative thermal oxidizers (RTOs) to control emissions from DDGS drying and the ethanol recovery scrubber. They load out denatured ethanol via both rail and tank wagon, but mostly by rail where a flare controls loadout emissions. The facility was operating normally at the time of inspection.

TOUR INFORMATION

EPA toured the facility: Yes

Data Collected and Observations:
Didion was operating normally during the facility tour. FLIR video was taken of VOC emission points and possible VOC emission points, along with regular photos and videos. The following was observed during the tour:

- Grain offloading.
- RTO #1 and #3.
- DDGS cooling.
- Fermentors and beer well. Venting observed from agitators, manway seals and pressure relief/conservation vents (PRCVs).
- Distillation, molecular sieves and vacuum pumps.
- Rail ethanol loadout, including flare. Didion was loading out E-85 and some smoking of the flare was observed, which Didion indicated was typical during loadout of E-85 loadout. A VOC leak was noted at a fitting on the flexible return line to the flare was imaged with the FLIR camera, but not recorded.

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Field Measurements: were not taken during this inspection.

RECORDS REVIEW

- Facility Diagram (taken).
- Calibration gas used for LDAR Instrument, which is an RKI Eagle and the calibration gas uses 10% hexane.

CLOSING CONFERENCE

Requested documents:

- LDAR meter specifications.

Compliance Assistance: EPA indicated that Didion should mitigate uncontrolled venting from the components on top of the fermenters, beer well and rail loadout as well as take measures to mitigate flare smoking during E-85 loadout.

Concerns: Uncontrolled venting from the components on top of the fermenters, beer well and rail loadout as well as flare smoking during E-85 loadout.

SIGNATURES

Lead Inspector: _____ Date: 7-12-18

Section Chief: _____ Date: 7/13/18

Facility Name: Didion Milling-Cambria
Facility Location: 501 S Williams St, Cambria, WI
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APPENDIX A: IMAGE LOG

1. Inspector Name: Gregory Gehrig	**2. Date(s) of Inspection:** June 28, 2018
3. Company/Facility Name: Didion Milling-Cambria	**4. Street Address, City, State:** 501 S Williams St, Cambria, WI
5. Number of Videos and Photos: 14	**6. Archival Record Location:** CD: Didion Inspection Images 6.28.2018

Video Number	File Name	Date and Time (CDT)	Description of Image
1	MOV_2168	6/28/2018 0921	FLIR Image of RTO #1
2	MOV_2170	6/28/2018 0926	FLIR Image of RTO #3
3	MOV_2171	6/28/2018 0933	FLIR Image of DDGS baghouse exhaust
4	MOV_2172	6/28/2018 0952	FLIR Image of Beer Well Agitator
5	MOV_2175	6/28/2018 0958	FLIR Image of Beer Well square manway
6	MOV_2176	6/28/2018 1002	FLIR Image of Beer Well round manway
7	MOV_2180	6/28/2018 1008	FLIR Image of Beer Well round manway
8	MOV_2181	6/28/2018 1024	FLIR Image of PRCV, agitator and square manway on Ferm 3; Round manway, PRCV, agitator, square manway on Ferm 2; Round manway, PRCV, agitator, square manway on Ferm 1.
9	MOV_2182	6/28/2018 1028	Bad Image
10	MVI_087	6/28/2018 0907	Corn offloading
11	MVI_088	6/28/2018 0915	Loadout Flare

Photo Number	File Name	Date and Time (CDT)	Description of Image
1	IMG_0086	6/28/2018 0846	Calibration gas for LDAR instrument
2	IMG_0089	6/28/2018 916	Loadout Flare
3	IMG_0090	6/28/2018 0916	DDGS cooling cyclone outlet