



ALEXANDRIA
13179 N. 100 E.
Alexandria, IN 46001
Ph: (765) 724-4384
poet.com/alexandria

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

June 27, 2024

Indiana Department of Environmental Management
Compliance and Enforcement Branch, Office of Air Quality
100 N. Senate Avenue
MC 61-53 IGCN 1003
Indianapolis, IN 46204-2251

RE: Semiannual LDAR Monitoring Report (December 2023 – May 2024)
POET Biorefining – Alexandria, Alexandria, Indiana

Dear Air Compliance Manager:

The report for monitoring components in volatile organic compound (VOC) service for fugitive emissions at the POET Biorefining - Alexandria ethanol facility located in Alexandria, Indiana, is included with this cover letter. The purpose of this report is to address the applicable requirements in 40 CFR Part 60, Subpart VVa for Leak Detection and Repair (LDAR), Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry.

This report was prepared by the contractor retained to manage the LDAR program at the Alexandria facility. The contractor completed the routine monitoring events between December 2023 and May 2024. This report identifies the process units and leaks detected from valves, pumps, and connectors. Additionally, component counts, delay-of-repairs, and dates of process unit shutdowns are included as Attachment A.

The information contained in this document is true, accurate, and complete to the best of my knowledge, available information, and belief.

If you have any questions regarding this notification, please contact Marissa Heald at (765) 724-0413.

Sincerely,
POET Biorefining - Alexandria

Dan McMahan
General Manager

POETB-023-0014
Attachments

Received State of Indiana
6-28
JUL 01 2024
Department of Environmental Management
OFFICE OF AIR QUALITY



June 13, 2024

Ms. Marissa Heald
POET Biorefining – Alexandria
13179 N. 100 E.
Alexandria, IN 46001

RE: Semiannual LDAR Monitoring Report (December 2023 – May 2024)
POET Biorefining – Alexandria, Alexandria, Indiana

Dear Ms. Heald:

During December 2023 through May 2024, routine monthly fugitive emissions monitoring was completed as required for the Leak Detection and Repair (LDAR) program at the POET Biorefining – Alexandria ethanol facility located in Alexandria, Indiana. The monitoring activities were completed to address applicable New Source Performance Standards (NSPS) Subpart VVa regulation requirements.

Subpart VVa Requirements

Subpart VVa requires submittal of a semiannual report that includes the:

1. Number of valves, pumps, connectors, and compressors for which leaks were detected.
2. Number of valves, pumps, connectors, and compressors for which leaks were not repaired within 15 days and placed on the delay-of-repair (DOR) list.

The facility is required to report the reason(s) for each DOR and an explanation (if applicable) regarding the technical infeasibility of repairing the component without a process unit shutdown. Additionally, Subpart VVa requires reporting of process unit shutdown dates that occurred within the reporting period and revisions to the component inventory that was included in the prior report.

Results

The Alexandria facility consists of three process units subject to the Subpart VVa regulation. Trihydro personnel monitored components in volatile organic compound (VOC) service in accordance with the United States Environmental Protection Agency (USEPA) Method 21 protocol. Connectors are required to be monitored on an annual basis and connectors in the Distillation and Storage Process Units were monitored during this reporting period.



Ms. Marissa Heald
June 13, 2024
Page 2

During the December 2023 through May 2024 reporting period, 25 leaks were detected during component monitoring at the facility. The number of valves, pumps, and connectors for which leaks were detected at each of the three process units is presented in the monitoring data reports (Attachment A).

Initial repairs were completed on the 25 components identified as leaking. Repairs were confirmed for 16 of the leaking components during subsequent monitoring. Maintenance and operations personnel indicated that 9 leaking components could not be repaired without a process unit shutdown. Therefore, authorization to put the components on DOR was provided by Alexandria personnel. A summary of components authorized for DOR during this reporting period is provided in Attachment A.

During this reporting period, six components were added to and two components were removed from the prior inventory at the Alexandria facility.

The facility reported one process unit shutdown during the reporting period, from April 8 to 10, 2024.

If you have any questions or comments concerning the LDAR program, please contact Alex Jameson by phone at (307) 745-7474 or e-mail ajameson@trihydro.com or Mike Ogden by phone at (307) 745-7474 or e-mail at mogden@trihydro.com.

Sincerely,
Trihydro Corporation

Mike Ogden
Senior LDAR Project Manager

Alex Jameson
LDAR Project Manager

POETB-023-0014

Attachment

ATTACHMENT A

**PROCESS UNIT MONITORING DATA REPORTS
DECEMBER 1, 2023 TO MAY 31, 2024**

Semi-Annual Report

From: 12/1/2023 To: 5/31/2024, Rule: Subpart VVa

POET Sites

Facility: **POET - Alexandria**

Unit: **DISTILLATION**

Count:	Valves: 380	Pumps: 11	Compressors: 0	PRVs: 8	Connectors: 1084					
# Added:	0	0	0	0	0					
# Perm. OOS:	0	0	0	0	0					
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Dec 2023	0	0	1	0	0	0	0	0	0	0
Jan 2024	1	0	0	0	0	0	0	0	0	0
Feb 2024	0	0	0	0	0	0	0	0	0	0
Mar 2024	1	0	0	0	0	0	0	0	0	0
Apr 2024	3	0	0	0	0	0	0	0	8	2
May 2024	1	0	2	1	0	0	0	0	3	3

Delay of Repairs:

Area:	Tag:	Leak Date:	Repair Date:	Type:	Reason:
NA	450-002	4/16/2024	Not Repaired	CON	REPAIR INFEASIBLE W/O SHUTDOWN
NA	512-007	4/17/2024	Not Repaired	CON	REPAIR INFEASIBLE W/O SHUTDOWN
NA	4013-002	5/14/2024	Not Repaired	CON	REPAIR INFEASIBLE W/O SHUTDOWN
NA	4018-005	5/14/2024	Not Repaired	CON	REPAIR INFEASIBLE W/O SHUTDOWN
NA	435-000	5/14/2024	Not Repaired	PMP	REPAIR INFEASIBLE W/O SHUTDOWN
NA	9579-001	5/14/2024	Not Repaired	CON	REPAIR INFEASIBLE W/O SHUTDOWN

Late Repairs:

No Late Repairs.

Semi-Annual Report

From: 12/1/2023 To: 5/31/2024, Rule: Subpart VVa

POET Sites

Facility: **POET - Alexandria**

Unit: **INDUSTRIAL ALCOHOL**

Count:	Valves: 745	Pumps: 17	Compressors: 0	PRVs: 28	Connectors: 2310					
# Added:	0	0	0	0	0					
# Perm. OOS:	0	0	0	0	0					
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Dec 2023	0	0	0	0	0	0	0	0	0	0
Jan 2024	0	0	0	0	0	0	0	0	0	0
Feb 2024	0	0	0	0	0	0	0	0	0	0
Mar 2024	0	0	0	0	0	0	0	0	0	0
Apr 2024	2	0	0	0	0	0	0	0	0	0
May 2024	0	0	0	0	0	0	3	3	0	0

Delay of Repairs:

Area:	Tag:	Leak Date:	Repair Date:	Type:	Reason:
STORAGE	1448-000	5/14/2024	Not Repaired	PRV	REPAIR INFEASIBLE W/O SHUTDOWN
STORAGE	1501-000	5/14/2024	Not Repaired	PRV	REPAIR INFEASIBLE W/O SHUTDOWN
STORAGE	1633-000	5/14/2024	Not Repaired	PRV	REPAIR INFEASIBLE W/O SHUTDOWN

Late Repairs:

No Late Repairs.

Semi-Annual Report

From: 12/1/2023 To: 5/31/2024, Rule: Subpart VVa

POET Sites

Facility: **POET - Alexandria**

Unit: **STORAGE**

Count:	Valves: 322	Pumps: 7	Compressors: 0	PRVs: 2	Connectors: 909					
# Added:	3	0	0	0	3					
# Perm. OOS:	1	0	0	0	1					
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Dec 2023	0	0	0	0	0	0	0	0	0	0
Jan 2024	0	0	0	0	0	0	0	0	0	0
Feb 2024	0	0	0	0	0	0	0	0	0	0
Mar 2024	0	0	0	0	0	0	0	0	0	0
Apr 2024	0	0	0	0	0	0	0	0	0	0
May 2024	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.



7021 2720 0000 0131 0811

Retail



46204

U.S. POSTAGE PAID
FCM LG ENV
ALEXANDRIA, IN 46001
JUN 28, 2024

\$9.68

RDC 99

R2305K134758-05



/ 13179 N 100 E, PO Box 717, Alexandria, IN 46001

IDEM
COMPLIANCE, OFFICE OF AIR QUALITY
100 NORTH SENATE AVENUE
MC 61-53 IGCN 1003
INDIANAPOLIS, IN 46204-2251

