

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : J. H. Campbell Plant	SRN : B2835
Location : 17000 Croswell	District : Grand Rapids
	County : OTTAWA
City : WEST OLIVE State: MI Zip Code : 49460	Compliance Status : Compliance
Source Class : MAJOR	Staff : Kaitlyn DeVries
FCE Begin Date : 8/24/2016	FCE Completion Date : 8/23/2017
Comments : Fiscal Year 2017 FCE	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/09/2017	Scheduled Inspection	Compliance	The purpose of this inspection was to determine compliance with the facility's renewable operating permit (ROP) MI-ROP-B2835-2013a, Permit to Install (PTI) Numbers 39-15, 18-15 and 141-12, and USEPA fleetwide Federal Consent Decree. This report will serve as the final partial compliance evaluation (PCE) to complete the full compliance evaluation (FCE) for the facility for fiscal year 2017.

Activity Date	Activity Type	Compliance Status	Comments
08/04/2017	Excess Emissions (CEM)	Compliance	<p>The Second Quarter (Q2) Excess Emissions Report for Units 1, 2 &amp; 3 and the Opacity Monitor Assessment for Unit 3 was received on time and complete (received 7/26/2017). A total of 107755 minutes (1796 hours) of operating time was reported for Unit 1, a total of 127746 minutes (2129 hours) of operating time was reported for Unit 2, and a total of 102081 minutes (1701 hours) of operation times for Unit 3.</p> <p>Unit 1: No COMs downtime or excess opacity was reported for the reporting period. No SO2 CEMS downtime was reported for the reporting period.</p> <p>Unit 2: No COMs downtime or excess opacity was reported for the reporting period. A total of 4 hours (0.19%) of CEMS monitor downtime was reported for the SO2 CEMS, but no excess emissions were reported.</p> <p>Unit 3: A total of 378 minutes (6.3 hours or 0.37%) of COMS monitor downtime was reported, but no excess emissions were indicated. Much of the downtime was due to filter audits and maintenance checks. The NOx CEMS was down for a total of 15 hours, thus having a 93% availability. Similarly, the SO2 CEMS was down for 13 hours, thus having an 81% availability. Neither reported any excess emissions for the reporting period. The COMS audit was also included in this submittal, and indicates passing results.</p>

Activity Date	Activity Type	Compliance Status	Comments
07/27/2017	ROP Other	Compliance	The 2nd Quarter Fugitive Dust Report was received on 7/13/2017. No dust complaints were received during the reporting period. The facility utilized several control measures during the quarter including application of brine, a water truck, and other dust suppression agents. The staff also conducted surveillance daily to ensure no fugitive emissions. No further action is necessary.
07/13/2017	MACT (Part 63)	Compliance	The Particulate Matter (PM) and Hydrogen Chloride (HCl) stack test report for 40 CFR Part 63 Subpart UUUUU (MATS) for Unit 1 was received on time and complete (received 6/20/2017). This testing is to satisfy the requirements of testing for Quarter 1 of 2017. For this test, Unit 1 was burning 100% Western Subbituminous coal and operating within the maximum normal operating load requirement range of 90 and 110% of the design capacity. The report indicates a three (3) run average of 0.0024 lb/mmBTU for PM, which is compliant with the MATS limit of 0.030 lb/mmBTU and the low emitting electric generating unit (LEE) limit of 0.015 lb/mmBTU. Similarly, the three (3) run average for HCl was 0.0001 lb/mmBTU, which is compliant with the MATS limit of 0.0020 lb/mmBTU and the LEE limit of 0.0010 lb/mmBTU. These results can be used to support qualification as LEE facility for PM and HCl. Three (3) consecutive years of quarterly testing is required to obtain LEE status.

Activity Date	Activity Type	Compliance Status	Comments
07/13/2017	MACT (Part 63)	Compliance	<p>The Particulate Matter (PM) and Hydrogen Chloride (HCl) stack test report for 40 CFR Part 63 Subpart UUUUU (MATS) for Units 1 and 2 was received on time and complete (received 7/3/2017). This testing is to satisfy the requirements of testing for Quarter 2 of 2017. For this test both units were burning 100% Western Subbituminous coal and operating within the maximum normal operating load requirement range of 90 and 110% of the design capacity. For Unit 1, the report indicates a three (3) run average of 0.0031 lb/mmBTU for PM, which is compliant with the MATS limit of 0.030 lb/mmBTU and the low emitting electric generating unit (LEE) limit of 0.015 lb/mmBTU. Similarly, the three (3) run average for HCl was 0.0001 lb/mmBTU, which is compliant with the MATS limit of 0.0020 lb/mmBTU and the LEE limit of 0.0010 lb/mmBTU. For Unit 2, the report indicates a three (3) run average of 0.0025 lb/mmBTU for PM, which is compliant with the MATS limit and the LEE limit. The three (3) run average for HCl was 0.0001 lb/mmBTU, which is compliant with both the MATS and the LEE limit. These results can be used to support qualification as LEE facility for PM and HCl. Three (3) consecutive years of quarterly testing is required to obtain LEE status.</p>

Activity Date	Activity Type	Compliance Status	Comments
07/03/2017	CEM RATA	Compliance	<p>The report for the CEMS Rata for Units 1 &amp; 2 was received on time and complete (received 6/14/2017). The RATAs included gas RATAs, CO2, SO2, and NOx volumetric flow RATAs at all loads, for Unit 1, and high and low loads only for unit 2. The results indicate that units 1 and 2 were able to meet the required &lt;10% RA specified in 40 CFR Part 75 Appendix A and Appendix B as well as the requirements of MI-ROP-B2835-2013a. However, preliminary results showed failing results for the Flow B and Flow Average for Unit 1 for the mid range operating level. J.H. Campbell (JHC) subsequently identified some errors and corrected them, ultimately presenting the findings to EPA which granted them approval to correct the flow B monitor output. AQD TPU (D. Patterson) agrees with the changes made to Flow B monitor. An additional review will be conducted by AQD's TPU.</p>
06/30/2017	MACT (Part 63)	Compliance	<p>The Particulate Matter (PM) and Hydrogen Chloride (HCl) stack test report for 40 CFR Part 63 Subpart UUUUU (MATS) for Unit 2 was received on time and complete (received 6/8/2017). For this test, Unit 2 was burning 100% Western Subbituminous coal. The report indicates a three (3) run average of 0.0020 lb/mmBTU for PM, which is compliant with the MATS limit of 0.030 lb/mmBTU and the low emitting electric generating unit (LEE) limit of 0.015 lb/mmBTU. Similarly, the three (3) run average for HCl was 0.0001 lb/mmBTU, which is compliant with the MATS limit of 0.0020 lb/mmBTU and the LEE limit of 0.0010 lb/mmBTU. These results can be used to support qualification as LEE facility for PM and HCl. Three (3) consecutive years of quarterly testing is required to obtain LEE status.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/22/2017	ROP Annual Cert	Compliance	The facility resubmitted the Annual Certification with corrected deviations on May 11, 2017. The first deviation noted, has already been reported. The newly reported deviation is recognizing that the facility failed to conduct the 4th quarter PM CEMS Absolute Correlation Audit (ACA) as required by the MATS Regulation in reference to Part 60, appendix F. The ACA audit was conducted in the Q1 of 2017, and passed with no modifications. The facility has since implemented procedures to ensure understanding of the QA/QC requirements. Since the audit was conducted and no errors or modifications ensued, no further action is necessary.
05/22/2017	ROP SEMI 2 CERT	Compliance	The facility resubmitted the Semi-Annual Certification with corrected deviations on May 11, 2017. The first deviation has previously been reported. The newly reported deviation is recognizing that the facility failed to conduct the 4th quarter PM CEMS Absolute Correlation Audit (ACA) as required by the MATS Regulation in reference to Part 60, appendix F. The ACA audit was conducted in the Q1 of 2017, and passed with no modifications. The facility has since implemented procedures to ensure understanding of the QA/QC requirements. Since the audit was conducted and no errors or modifications ensued, no further action is necessary.
05/02/2017	Excess Emissions (CEM)	Compliance	1st Quarter 2017 Excess Emissions/CEMS Performance Reports; see CA_B283539610. (SLachance, 5/2/17)
05/02/2017	Other	Compliance	Review of Q1 2017 Excess Emissions/CEMS Performance Reports for Units 1,2 and 3; including Unit 3 COMS Audit. (SLachance, 5/2/17)

Activity Date	Activity Type	Compliance Status	Comments
04/21/2017	ROP Other	Compliance	1st Quarter 2017 Fugitive Dust Report; no complaints or known issues this reporting period. The report identifies multiple dust control measures implemented during the quarter. (SLachance, 4/21/17)
04/11/2017	Stack Test Observation	Compliance	Stack Test Observations for Unit 2; Unit 2 Performance and Control Overview
04/06/2017	Other	Compliance	Review of required ROP reports for JHC Section 1 for the period ending 12/31/16, including SEMI-2 and ANNUAL Reports of certified deviations and semi-annual CAM Reports (excursions and monitoring downtime) for the second half of 2016. (SLachance, 4/6/17)
04/06/2017	Other	Compliance	Review of Semi-Annual MATS Report for the period ending 12/31/16 (SLachance, 4/6/17)
04/06/2017	ROP Annual Cert	Compliance	Postmarked 3/14/17; amended upon request to include copy of SEMI-1 report; see CA_B283539295. (SLachance, 4/6/17)
04/06/2017	ROP SEMI 2 CERT	Compliance	Postmarked 3/14/17; see CA_B283539295. (SLachance, 4/6/17)
04/06/2017	CAM Excursions/Exceedances	Compliance	Postmarked 3/14/17; see CA_B283539295. (SLachance, 4/6/17)
04/06/2017	CAM monitor downtime	Compliance	Postmarked 3/14/17; see CA_B283539295. (SLachance, 4/6/17)
04/06/2017	MACT (Part 63)	Compliance	Starting Q1 2017, facility will use Part 75 SO2 CEMS for Unit 3 to show compliance with alternative limit for HCl per MATS. MATS allows CEMS-monitored SO2 as a surrogate for HCl, with a 30-day rolling limit of 0.2 #SO2/mmBtu. Data attached to amended NOCS demonstrates compliance with this (max = 0.125 #SO2/mmBtu.) SLachance, 4/6/17
04/06/2017	MACT (Part 63)	Compliance	MATS semiannual compliance report; period ending 12/31/16; Units 1, 2 and 3 pursuant to 40 CFR 63 Subpart UUUUU. See CA_B283539296. (SLachance, 4/6/17)

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03/29/2017	MAERS	Compliance	ROP Certification form for MAERS received 3/14/17 (Section 1) and 3/16/17 (Section 2); see Audit notes in Audit Console of electronic- MAERS; no changes to emissions as reported. (SLachance, 3/29/17). Updates were made to the FY 2017 MAERS Report as per the notification received on May 15, 2017. SLachance made appropriate modifications in the MAERS database. 5.22.2017. KDeVries
03/24/2017	Malfunction Abatement Plan	Compliance	MAPs for each Unit's new AQCS and support equipment; see on-site review discussion in CA_B281538865. (SLachance, 3/24/17)
03/24/2017	Site Review	Compliance	Unit 3 Review including site visit and on-site assessment of control equipment and CEMS (SLachance, 3/24/17)
03/15/2017	ROP Annual Cert	Compliance	Annual Compliance Certification Report for ROP No. MI-ROP-B2835-2013(a), SECTION 2 for the period ending 12/31/16 was received timely and properly certified. Facility attests to No Deviations from the SECTION 2 requirements of the permit. No known issues at this time; targeted for FCE Inspection in FY '017. (SLachance, 3/15/17)
03/15/2017	ROP SEMI 2 CERT	Compliance	Semi-Annual Compliance Certification Report for ROP No. MI-ROP-B2835-2013(a), SECTION 2 for the period ending 12/31/16 was received timely and properly certified. Facility attests to No Deviations from the SECTION 2 requirements of the permit. No known issues at this time; targeted for FCE Inspection in FY '017. (SLachance, 3/15/17)



Activity Date	Activity Type	Compliance Status	Comments
02/23/2017	Release Reports	Compliance	PEAS Report No. 16680 for a early-morning release (<20 lbs) of dry flyash. SLachance called site contact Mr.Mike Rabideau (616-738-3273) for follow-up; it was determined to be Unit 3 ash handling system. Through a series of conversations and emails with KCunningham of Consumers' Jackson Office, it was determined to be a small release that was "over-reported" to PEAS. See also letter received 2/21/17. (SLachance, 2/23/17)
02/23/2017	MACT (Part 63)	Compliance	MATS PM CEMS 4th Quarter 2016 report for Boiler Unit 3 per Subpart UUUUU; PM CEMS indicates continuous compliance with applicable PM Limit for the reporting period. Limit = 0.03 lb/mmBtu, 30-day rolling average values 0.00046 - 0.00051 lb/mmBtu. (SLachance, 2/23/17)
02/23/2017	Release Reports	Compliance	Follow-up to PEAS-reported incident; small intermittent release of Unit 3 fly ash was identified and cleaned up. SLachance agrees that the original PEAS contact was not required; the affected equipment remains out of use until the "fluidizing element" that failed is analyzed for cause of failure and permanently fixed. SLachance agrees that no other reporting is required per ROP. (SLachance, 2/23/17)
01/30/2017	Excess Emissions (CEM)	Compliance	4th Quarter 2016 Excess Emissions (units 1, 2 & 3) & Quarterly opacity monitor assessment for Unit 3; See CA_B283538444. (SLachance 1/30/17)
01/30/2017	MACT (Part 63)	Compliance	Performance test report for Hydrogen Chloride compliance with MATS for Unit 3; Q4 2016. Reported rate from 11/29/16 test is <0.00020 #/mmBtu at full load (868 MW, gross) compared to 0.0020 #/mmBtu allowed. Based on LEE status and historical results, facility is switching to SO2-CEMS compliance basis starting in Q1 2017. The results of this report are subject to possible further review by AQD-TPU. (SLachance, 1/30/17)

Activity Date	Activity Type	Compliance Status	Comments
01/30/2017	MACT (Part 63)	Compliance	Boiler MACT compliance report for Subpart DDDDD for Unit 3 Auxiliary Boilers; last tune-up in October 2016, on 2-year schedule. These are diesel-fired, 9.8 mmBtu/hr boilers.
01/30/2017	Other	Compliance	Review of Q4 2016 Excess Emissions and CEMS Performance Reports
01/17/2017	MACT (Part 63)	Compliance	40 CFR 63 Subpart UUUUU - MATS - Unit 1 - PM; stack test report for 4th Quarter 2016. Test completed on 11/9/16. Results indicate 0.003 # PM/mmBtu, compared to limit of 0.030; and Low Emitting EGU limit of 0.015. Unit Load was 273 MW(gross), i.e., "Full Load" and Fabric Filter control in use at time of test. Test submitted via CEDRI and also subject to possible further review by AQD-TPU. (SLachance, 1/17/17)
01/17/2017	MACT (Part 63)	Compliance	40 CFR 63 Subpart UUUUU - MATS - Unit 1 - Hydrogen Chloride; stack test report for 4th Quarter 2016. Test completed on 11/9/16. Results indicate 0.000117 # HCl/mmBtu, compared to limit of 0.0020; and Low Emitting EGU limit of 0.001. 2nd quarter in row for LEE. Unit Load was 274 MW(gross), i.e., "Full Load" and Dry Sorbent Injection (DSI) in use at time of test. Test submitted via CEDRI and also subject to possible further review by AQD-TPU. (SLachance, 1/17/17)
01/17/2017	ROP Other	Compliance	4th Quarter 2016 Fugitive Dust Report; no complaints or known issues this reporting period. The report identifies multiple dust control measures implemented during the quarter. (SLachance, 1/17/17)

Activity Date	Activity Type	Compliance Status	Comments
12/15/2016	MACT (Part 63)	Compliance	MATS - Unit 2 Quarterly Hydrogen Chloride Stack Test report; per 40 CFR 63 Subpart UUUUU Table 5; at 100% Eastern coal. Results indicate 0.00019 #HCl/mmBtu heat input, respectively; compared to limit of 0.0020. Gross loads for Plant Operations during tests are documented on page 2-1 and Appendix G as 358 MW. Report has been submitted to CEDRI and is subject to possible further review by AQD-TPU. (SLachance, 10/11/16)
12/14/2016	MACT (Part 63)	Compliance	MATS - 40 CFR 63 UUUUU - Ongoing (Quarterly) Compliance Particulate Matter Compliance Stack Test Report for Unit 2. Test completed 10/25/16. Results indicate Low-Emitting EGU (LEE) Status with reported results of 0.003 lb/mmBtu compared to the overall compliance limit of 0.03 lb/mmBtu. Operating conditions for the test were 360+/- MW (gross) on 100% eastern coal; i.e., 92-99% & full unit load. Results are also used for compliance with federal Consent Decree (effective limit = 0.015 lb/mmBtu.) Report is subject to possible further review by AQD-TPU. (SLachance, 12/13/16)
11/21/2016	MACT (Part 63)	Compliance	Boiler Unit 3 Particulate Matter 30-day rolling average, 3rd Quarter 2016 Report; based on PM CEMS; for the few days in the quarter after successful correlation of PM CEMS with Method 5 PM Test results, monitored PM emissions are well below those allowed by MATS. (SLachance, 11/21/16)
11/02/2016	CEMS Test Observation	Compliance	Review of MATS - 40 CFR 63 UUUUU; PM CEMS Certification Report and correlation of PM CEMS with PM test results for EUBOILER3. (SLachance, 11/2/16)

Activity Date	Activity Type	Compliance Status	Comments
11/02/2016	Stack Test	Compliance	<p>CONSENT DECREE - PM Stack Testing for Units 2 and 3 - Consent Decree establishes filterable PM emission limit of 0.0015 lb/mmBtu for Unit 2 and Unit 3. Testing was completed from August 22 through 23, 2016. Reported Results indicate 0.004 lb/mmBtu for Unit 2 (296 MW, gross load); and 0.0007 lb/mmBtu for Unit 3 ("Base Load"). Reports are subject to possible further technical review by AQD-TPU. (SLachance, 11/2/16)</p>
11/02/2016	MACT (Part 63)	Compliance	<p>MATS - 40 CFR 63 UUUUU; PM CEMS Certification Report and correlation of PM CEMS with PM test results for EUBOILER3; this is subject to further possible review by AQD-TPU. Per Table 1 and Figure 2 of the report, PM concentration in mg/m3 can be described by the following equation:</p> $PM = 0.359 + 0.556 X, \text{ where } X = \text{PM monitor response value.}$ <p>This equation is based on data collected in an acceptable manner per standards established by Performance Specification No. 11 of 40 CFR 60, Appendix B. (SLachance, 11/2/16)</p>
11/02/2016	MACT (Part 63)	Compliance	<p>MATS - 40 CFR 63 UUUUU - Hydrogen Chloride Performance testing for Unit 3; initial compliance demonstration on August 30, 2016; Spray Dryer Absorption control; Unit Load = 863 MW (gross); HCl emissions = 1.4E-04 lb/mmBtu; MATS HCl limit = 2.0E-03 lb/mmBtu. Report is subject to further review by AQD-TPU. Future compliance may use certified SO2 monitoring/30-day rolling average SO2 &lt; 0.20 lb SO2/mmBtu. (SLachance, 11/2/16)</p>
11/01/2016	Excess Emissions (CEM)	Compliance	<p>Quarterly Excess Emissions Report/CEMS Performance Reports for 3rd Quarter 2016. See CA_B283537424. (SLachance 11/1/16)</p>

Activity Date	Activity Type	Compliance Status	Comments
11/01/2016	MACT (Part 63)	Compliance	MATS - 40 CFR 63 UUUUU - Initial Compliance Particulate Matter Compliance Stack Test Report for Unit 2. Results indicate Low-Emitting EGU (LEE) Status with reported results of 0.004 lb/mmBtu compared to the overall compliance limit of 0.03 lb/mmBtu. Operating conditions for the test were 295 MW (gross) on western coal; i.e., full load. Subject to possible further review by AQD-TPU. (SLachance, 11/1/16)
11/01/2016	ROP Other	Compliance	3rd Quarter 2016 Fugitive Dust Report; no complaints or known issues this reporting period. The report identifies multiple dust control measures implemented during the quarter. (SLachance, 11/1/16)
11/01/2016	Other	Compliance	Review of 3rd Quarter 2016 Excess Emissions and CEMS Performance Reports, including a quarterly Opacity Monitor Assessment for Unit 3
10/17/2016	MACT (Part 63)	Compliance	MATS - Unit 3 Notice of Compliance Status (NOCS) for 40 CFR 63 Subpart UUUUU; timely and properly certified; also to be submitted electronically through CEDRI. Controls are Pulse-Jet Fabric Filter; SCR; Spray Dryer Absorption; and Activated Carbon Injection. Complying with heat input based limits for existing, coal but not low-rank fired units. Stack test for HCl; PM CEMS; and CEMS for Hg. 30-day rolling value for Hg per CEMS is 0.100 #Hg/mmBtu compared to limit of 1.2 #/mmBtu. PM and HCL estimates are "initial", actual reports not yet finalized. Facility may switch to SO2 CEMS for Acid Gas compliance with 3rd Quarter start of SDA. No emissions averaging; no deviations and no solid waste combusted. Using Paragraph 1 definition of startup from 63.10042. (SLachance, 10/17/16)

Activity Date	Activity Type	Compliance Status	Comments
10/17/2016	CEM RATA	Compliance	CEM RATA report for new systems on Unit 3; per Part 75 Appendices A and B; CO2, SO2, NOx and volumetric flow. All systems met Relative Accuracy of <10%; OR within 15.0 ppm; OR within 0.200 lb/mmBtu as variously allowed by Part 75. Each system qualified for reduced RATA frequency (annual) by demonstrating performance within 7.5% RA; OR 12 ppm; OR 0.015 lb/mmBtu. The report is subject to further possible review by AQD-TPU. (SLachance, 10/17/16)
10/12/2016	ROP Other	Compliance	Submittal of Air Quality Control Systems (AQCS) start-up notice per permit 18--15; specifically PJFF and SDA for Unit 3. (SLachance, 10/12/16)
10/12/2016	ROP Semi 1 Cert	Compliance	Postmarked 9/15/16; see CA_B283537095. (SLachance, 10/12/16)
10/12/2016	CAM Excursions/Exceedances	Compliance	Postmarked 9/15/16; see CA_B283537095. (SLachance, 10/12/16)
10/12/2016	CAM monitor downtime	Compliance	Postmarked 9/15/16; see CA_B283537095. (SLachance, 10/12/16)
10/12/2016	ROP Semi 1 Cert	Compliance	Facility submitted a timely and properly certified Semi-Annual Report for the period ending June 30, 2016 for Section 2 of ROP MI-ROP-B2835-2013a. (This covers the Combustion Turbine.) The facility attests to No Deviations from the permit for this reporting period. No known issues at this time. (SLachance, 10/12/16)
10/12/2016	Other	Compliance	Review of required ROP Reports (Semi-Annual, CAM Excursion, CAM Monitor Downtime) for the semi-annual reporting period ending June 30, 2016, pursuant to Section 1 of MI-ROP-B2835-2013a.
10/11/2016	MACT (Part 63)	Compliance	MATS - Unit 2 Standing Protocol for Quarterly Testing for HCl and PM; to be reviewed and approved by AQD-TPU. (SLachance, 10/11/16)

Activity Date	Activity Type	Compliance Status	Comments
10/11/2016	MACT (Part 63)	Compliance	MATS - Unit 1 Standing Protocol for Quarterly Testing for HCl and PM; to be reviewed and approved by AQD-TPU. (SLachance, 10/11/16)
10/11/2016	MACT (Part 63)	Compliance	MATS - Unit 1 Notice of Compliance Status (NOCS) for 40 CFR 63 Subpart UUUUU; timely and properly certified; also to be submitted electronically through CEDRI. Controls are Pulse-Jet Fabric Filter; Dry Sorbent Injection; and Activated Carbon Injection. Complying with heat input based limits for existing, coal but not low-rank fired units. Stack tests for PM and HCl; CEMS for Hg. 30-day rolling value for Hg per CEMS is 0.446 #Hg/mmBtu compared to limit of 1.2 #/mmBtu. No emissions averaging; no deviations and no solid waste combusted. Using Paragraph 1 definition of startup from 63.10042. (SLachance, 10/11/16)
10/11/2016	MACT (Part 63)	Compliance	MATS - Unit 2 Notice of Compliance Status (NOCS) for 40 CFR 63 Subpart UUUUU; timely and properly certified; also to be submitted electronically through CEDRI. Controls are Pulse-Jet Fabric Filter; SCR; Dry Sorbent Injection; and Activated Carbon Injection. Complying with heat input based limits for existing, coal but not low-rank fired units. Stack tests for PM and HCl; CEMS for Hg. 30-day rolling value for Hg per CEMS is 0.525 #Hg/mmBtu compared to limit of 1.2 #/mmBtu. No emissions averaging; no deviations and no solid waste combusted. Using Paragraph 1 definition of startup from 63.10042. (SLachance, 10/11/16)

Activity Date	Activity Type	Compliance Status	Comments
10/11/2016	Stack Test	Compliance	MATS - Unit 1 Stack Test for PM per 40 CFR 63 Subpart UUUUU; results indicate Low-Emitting EGU (LEE) status for this pollutant, as results are less than half of applicable limit. Results were 0.0024-0.0026 #PM/MmBtu compared to Limit of 0.030#/MmBtu. Subject to possible further review by AQD-TPU. Also reported electronically via CEDRI. (SLachance, 10/11/16)
10/11/2016	MACT (Part 63)	Compliance	MATS - Unit 3 Mercury (Hg) Continuous Emissions Monitor (CEMS) Certification per Appendix A of 40 CFR 63 UUUUU; includes results of 7-day Calibration Error test; Linearity Check; 3-level system integrity check; and Hg CEMS Relative Accuracy Test Audit. In each case, the report asserts that the systems performed within acceptable limits. The report has been electronically submitted to CEDRI per the rule. The report is subject to possible further review by AQD-TPU. (SLachance, 10/11/16)
10/11/2016	Stack Test	Compliance	MATS - Unit 2 Hydrogen Chloride Stack Test report; per 40 CFR 63 Subpart UUUUU Table 5; at 100% Western and 60%/40% Western:Eastern coal mixes. Results indicate 0.00050 and 0.00024 #HCl/mmBtu heat input, respectively; compared to limit of 0.0020. Gross loads for Plant Operations during tests are documented in Appendix G. Report has been submitted to CEDRI and is subject to possible further review by AQD-TPU. (SLachance, 10/11/16)
10/11/2016	ROP Other	Compliance	Unit 3 - NEW - Continuous Opacity Monitoring (COMS) Certification Report; attests to proper performance of the new COMS system(s); subject to possible further review by AQD-TPU. (SLachance, 10/11/16)
09/26/2016	ROP Other	Compliance	Unit 2 PM compliance testing protocol for MATS; testing on 8/23/16



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09/16/2016	MACT (Part 63)	Compliance	The submittal of Unit 1 Hydrogen Chloride Stack Test Report for Mercury and Air Toxics Standard (MATS) compliance was completed on time and properly certified. Stack test results were completed utilizing sampling method EPAM3A/320 and were within compliance of limits obtained from 40 CFR 63, Subpart UUUUU. (AShaffer, 9/16/16) Full load and 100% Powder River Basin coal fuel. Average emission = 0.00051 lb HCl/mmBtu, MATS limit = 0.0020. Subject to possible further review by AQD-TPU. (SLachance, 9/26/19)
09/16/2016	CEM RATA	Compliance	Certification report for Mercury CEMS compliance testing for MATS for Units 1 & 2 was submitted on time and properly certified. The results were compared to Hg CEMS Performance Specifications in Mercury and Air Toxics Standard (MATS) 40 CFR Part 63, Subpart UUUUU; systems pass required QA/QC. Subject to possible further review by AQD-TPU. (AShaffer, 09/16/2016; SLachance, 9/26/16)

Name: Kailey D. [Signature] Date: 8/23/2017 Supervisor: [Signature]