

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 : 10/1/2019	FCE Completion Date : 9/30/2020
Comments : Fiscal Year 2020 Full Compliance Evaluation	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/30/2020	Stack Test	Compliance	<p>The HCl performance testing report for Unit 2 burning western bituminous and subbituminous coal that contained different chlorine, heat content and moisture content compared to the western subbituminous or mixtures of western subbituminous and eastern bituminous coals than normally combusted was received on time and complete. This test was to evaluate the compliance with the HCl Emission limits pursuant to 40 CFR Part 63 Subpart UUUU or MATS.</p> <p>The average of the three (3) runs indicated an emission limit of 0.0001 lb/MMBTU, which is compliant with the MATS limit of 0.0020 lb/MMBTU and the LEE limit of 00010 lb/MMBTU. This results indicates this new blend will still be complaint with the limits established in MATS as well as the LEE limits.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/30/2020	MACT (Part 63)	Compliance	<p>The Semiannual Compliance report pursuant to 40 CFR Part 63 Subpart UUUUU for Coal-and Oil-Fired Electric Utility Steam Generating Units, Mercury and Air Toxics Standard (MATS) was received on time and complete.</p> <p>EUBOILER1 and EUBOILER2 demonstrated compliance with the MATS requirements via Stack testing for PM and HCl, and through a certified Mercury (Hg) and diluent CEMS for Hg. EUBOILER1 was able to achieve LEE status on May 14, 2019 and EUBOILER2 on June 12, 2019. No emergency bypass of the control equipment was done from those times through June 30. EUBOILER3 demonstrated compliance with the MATS requirements via CEMS for PM, Hg, and SO2.</p> <p>During this reporting period, EUBOILER2 had additional stack testing conducted due to the combustion of a different blend of fuel, than normally used. Stack test data indicated compliance with the MATS emission limits for HCl and were not considered to be part of the normal compliance testing.</p> <p>Tune-ups for the three units were conducted in August 2018, June 2018, and June and July 2018, respectively. No excess emission or deviations in work practice standards were reported for any of the units.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/30/2020	ROP Semi 1 Cert	Compliance	The semi-annual ROP Certification report pursuant to MI-ROP-B2835-2013 and MI-ROP-B2835-2020 (Postmarked 9-15-20) was received on time and complete. One (1) deviation was reported for the reporting period. The deviation was for EUBOILER1 and some excess emissions that occurred in Q2 as a result of an upset during routine maintenance on the unit. Corrective actions were take to update operating procedures to alarm early in in this type of event. This exceedance was reported in the Q2 EER. No further action is necessary at this time.
09/30/2020	CAM Excursions/Exceedances	Compliance	The CAM excursion/exceedance report was received on time and complete (Postmarked 9-15-20). No excursions or exceedances were reported for the reporting period.
09/30/2020	CAM monitor downtime	Compliance	The CAM Monitor downtime report was received on time and complete (Postmarked 9-15-20). Downtime was only reported for EUBOILER3 for COMS monitor downtime. The downtime was due to various AQ activities throughout the semi-annual period. No further action is required at this time.
09/17/2020	Scheduled Inspection	Compliance	The purpose of this inspection was to determine compliance with the facility's renewable operating permit (ROP) MI-ROP-B2835-2020a.
08/12/2020	CEM RATA	Compliance	This report was received on time and complete. The report is the CEMS RATA for 40 CFR Part 63 Subpart UUUUUU for Unit 3 and is subject to review from AQD's TPU. The report indicates passing results for the alternative RATA result of a concentration of less than 0.5 ug/scm.

Activity Date	Activity Type	Compliance Status	Comments
08/12/2020	Excess Emissions (CEM)	Compliance	<p>The 2nd Quarter Excess Emissions for Units 1, 2 & 3, and the Quarterly Opacity Monitor Assessment for Unit 3 was received on time and complete.</p> <p>Unit 1: There was a total of 6,298 Minutes (104.9 hours) of operation for the reporting period. The COMS monitor had a no downtime no excess emissions. The CEMS SO2 monitor had 1.23 hours (2.39 %) downtime due to periodic maintenance and calibrations, but did not report any excess emissions.</p> <p>Unit 2: There was a total of 67,889 minutes (1,131.48 hours) operating hours for Unit 2 during the reporting period. The COMS monitor had no downtime or excess emissions. CEMS SO2 monitor had 7.93 hours (0.70%) downtime with no excess emissions. The downtime was due to periodic maintenance and re-calibration of the instruments.</p> <p>Unit 3: There was a total of 119,407 minutes (1990.1 Hours) of operating time for Unit 3 during the reporting period. No excess emissions were reported, but a total of 0.11% (132 minutes) of COMS monitor downtime was reported. This was all due to Quality Assurance actions including maintenance, filter audits, and re-calibrations. CEMS NOx had 7 hours (0.43%) downtime, but no associated excess emissions. The downtime was due to monitor malfunctions which resulted in troubleshooting and analyzer repairs. The SO2 monitor also had 7 hours (0.43%) downtime with no excess emissions. The downtime was due to monitor malfunctions, inspections, and maintenance.</p> <p>The Units 3 Opacity test was also received. The associated low, mid, and high level opacity checks indicated passing results.</p>

Activity Date	Activity Type	Compliance Status	Comments
08/12/2020	MACT (Part 63)	Compliance	The Unit 3 MATS (40 CFR Part 63 Subpart UUUUU) PM CEMS 2nd Quarter Report was received on time and complete. The highest 30-day rolling average during the reporting period was 0.000523 lb/MMBTU, which is compliant with the limit of 0.030 lb/MMBTU.
08/12/2020	CEM RATA	Compliance	<p>This report was received on time and complete. The report is the Part 75 NOx, SO2, and CO2 CEMS RATA Unit 2 and is subject to review from AQD's TPU.</p> <p>The report indicates meets the required Relative Accuracy (RA) for each of the specified pollutants.</p>
07/13/2020	ROP Other	Compliance	<p>The 2nd Quarter Fugitive Dust Report for 2020 was received on time and complete. The facility utilized a variety of dust control activities including, fueling the plant directly from trains, foam dust suppression systems, grooming and compacting the coal piles, spraying a dust suppressant agent, using conditioning measures during ash unloading operations at the landfill, daily surveillance of the site to ensure there was adequate dust control, using the coal pile irrigation system when the temperatures were above freezing, using the water truck in the active fill area of the dry ash landfill, placing conditioned ash in horizontal lifts and utilizing a roller to compact the material in the fill area of the storage cell, application of dust suppressant on the primary traveled roads, and returning the coal pile irrigation system to service. The facility also benefited from an estimated 13.84 inches of precipitation occurring on 41% of days during this time period. No further action is required at this time.</p>

Activity Date	Activity Type	Compliance Status	Comments
06/24/2020	Excess Emissions (CEM)	Compliance	<p>The 1st Quarter Excess Emissions for Units 1, 2 & 3, and the Quarterly Opacity Monitor Assessment for Unit 3 was received on time and complete.</p> <p>Unit 1: There was a total of 61,238 Minutes (1,020.6 hours) of operation for the reporting period. The COMS monitor had a no downtime and six minutes (0.1%) excess emissions. The excess emissions were due to startup/shutdown activities. The CEMS SO2 monitor had no downtime or excess emissions.</p> <p>Unit 2: There was a total of 75,416 minutes (1256.93 hours) operating hours for Unit 2 during the reporting period. The COMS monitor had no downtime or excess emissions. CEMS SO2 monitor had 1 hour (0.08%) downtime with no excess emissions. The downtime was due to QA and re-calibration of the instruments.</p> <p>Unit 3: There was a total of 131,041 minutes (2,184 Hours) of operating time for Unit 3 during the reporting period. No excess emissions were reported, but a total of 0.09% (120 minutes) of COMS monitor downtime was reported. This was all due to Quality Assurance actions including maintenance and re-calibrations. CEMS NOx had 5 hours (0.23%) downtime, but no associated excess emissions. The downtime was due to monitor malfunctions which resulted in troubleshooting and analyzer repairs. The SO2 monitor had no downtime or excess emissions.</p> <p>The Units 3 Opacity test was also received. The associated low, mid, and high level opacity checks indicated passing results.</p>

Activity Date	Activity Type	Compliance Status	Comments
06/24/2020	MACT (Part 63)	Compliance	The Unit 3 MATS (40 CFR Part 63 Subpart UUUUU) PM CEMS 1st Quarter Report was received on time and complete. The highest 30-day rolling average during the reporting period was 0.000503 lb/MMBTU, which is compliant with the limit of 0.030 lb/MMBTU.
05/07/2020	MAERS	Compliance	<p>ROP Certification form for MAERS received 3-16-20: PM, SO₂, and NO_x emissions from the use of NG in the boilers are accounted for in the Coal emissions. Small changes in the actual reporting of the emissions are done this year compared to previous year due to the change in the staff at the facility and the way they reported. Control efficiencies (CE) for such items as PM and some metals for the boilers is accounted for in the emission factor used for calculating emissions. This is due to the multiple control devices that are used. While the AQD calculated emissions for those pollutants do not have the CE's entered, the facility reported emissions are correct, and no changes have been made. Ammonia estimates are high, but are accounted for due to the ammonia slip associated with the SCR's for the boilers. No changes have been made to the report.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/23/2020	ROP Other	Compliance	<p>The 1st Quarter Fugitive Dust Report for 2020 was received on time and complete. The facility utilized a variety of dust control activities including, fueling the plant directly from trains, foam dust suppression systems, grooming and compacting the coal piles, spraying a dust suppressant agent, using conditioning measures during ash unloading operations at the landfill, daily surveillance of the site to ensure there was adequate dust control, using the coal pile irrigation system when the temperatures were above freezing, returning the water truck to service as temperatures allowed, and placing conditioned ash in horizontal lifts and utilizing a roller to compact the material in the fill area of the storage cell. The facility also benefited from an estimated 7.39 inches of precipitation occurring on 35% of the days to add additional dust control across the facility. AQD did not receive any dust complaints during this time period. No further action is required at this time.</p>
04/01/2020	ROP Annual Cert	Compliance	<p>The Annual Compliance Report pursuant to MI-ROP-B2835-2013b was received on time and complete. A total of two (2) deviations were reported for the reporting period; one for each semi-annual compliance period. One deviation was for some missing attachments being uploaded to CEDRI, which have been subsequently uploaded, and the other was for excess opacity in the first quarter. A Violation Notice was issued after the excess emissions event and the Violation has since been resolved. No further action is required.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/01/2020	ROP SEMI 2 CERT	Compliance	The Semi-Annual Compliance Certification Report Pursuant to MI-ROP-MB2835-2013b was received on time and complete (postmarked 3-16-2020). One (1) deviation was reported for the reporting period. The deviation was for EUBOILER3. The deviation was for some PDF MATS reports not completely being uploaded to CEDRI. All reports were, submitted to the AQD, just missing some elements in CEDRI. These were later uploaded
04/01/2020	CAM Excursions/Exceedances	Compliance	The CAM excursion/exceedance report was received on time and complete. No excursions or exceedances were reported for the reporting period.
04/01/2020	CAM monitor downtime	Compliance	The CAM monitor downtime report was received on time and complete. Downtime was only reported for EUBOILER3 for COMS monitor downtime. The downtime was due to various AQ activities throughout the semi-annual period. No further action is required at this time.
03/24/2020	ROP Annual Cert	Compliance	The Annual Certification Report for Section 2 was received pursuant to MI-ROP-B2835-2013b. The turbine was decommissioned and rendered inoperable during 2019 and is no longer part of the newly effective MI-ROP-B2835-2020 recently issued. No deviations were reported since the unit is not in operation. No further action is necessary at this time.
03/24/2020	ROP SEMI 2 CERT	Compliance	The Second Semi-Annual Certification Report for Section 2 was received pursuant to MI-ROP-B2835-2013b. The turbine was decommissioned and rendered inoperable during 2019 and is no longer part of the newly effective MI-ROP-B2835-2020 recently issued. No deviations were reported since the unit is not in operation. No further action is necessary at this time.

Activity Date	Activity Type	Compliance Status	Comments
03/24/2020	MACT (Part 63)	Compliance	<p>The Semiannual Compliance report pursuant to 40 CFR Part 63 Subpart UUUUU for Coal-and Oil-Fired Electric Utility Steam Generating Units, Mercury and Air Toxics Standard (MATS) was received on time and complete.</p> <p>EUBOILER1 and EUBOILER2 demonstrated compliance with the MATS requirements via Stack testing for PM and HCl, and through a certified Mercury (Hg) and diluent CEMS for Hg. EUBOILER1 was able to achieve LEE status on May 14, 2019 and EUBOILER2 on June 12, 2019. No emergency bypass of the control equipment was done from those times through December 31, 2019. EUBOILER3 demonstrated compliance with the MATS requirements via CEMS for PM, Hg, and SO2.</p> <p>Tune-ups for the three units were conducted in August 2018, June 2018, and June and July 2018, respectively. No excess emission or deviations in work practice standards were reported for any of the units.</p>
02/05/2020	MACT (Part 63)	Compliance	<p>The Unit 3 MATS (40 CFR Part 63 Subpart UUUUU) PM CEMS 4th Quarter Report was received on time and complete. The highest 30-day rolling average during the reporting period was 0.000846 lb/MMBTU, which is compliant with the limit of 0.030 lb/MMBTU.</p>

Activity Date	Activity Type	Compliance Status	Comments
02/05/2020	Excess Emissions (CEM)	Compliance	<p>The 4th Quarter Excess Emissions for Units 1, 2 & 3, and the Quarterly Opacity Monitor Assessment for Unit 3 was received on time and complete.</p> <p>Unit 1: There was a total of 83,158 Minutes (1,386 hours) of operation for the reporting period. The COMS monitor had a no downtime or excess emissions. The CEMS SO2 monitor had no downtime or excess emissions.</p> <p>Unit 2: There was a total of 104,755 minutes (1,746 hours) operating hours for Unit 2 during the reporting period. The COMS monitor had no downtime or excess emissions. CEMS SO2 monitor had no downtime or excess emissions.</p> <p>Unit 3: There was a total of 80,208 minutes (1,336.8 Hours) of operating time for Unit 3 during the reporting period. No excess emissions were reported, but a total of 0.68% (546 minutes) of COMS monitor downtime was reported. This was all due to Quality Assurance actions including filter audits. CEMS NOx and SO2 monitors had no downtime or excess emissions.</p> <p>The Units 3 Opacity test was also received. The associated low, mid, and high level opacity checks indicated passing results.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/22/2020	ROP Other	Compliance	<p>The 4th Quarter Fugitive Dust Report for 2019 was received on time and complete. The facility utilized a variety of dust control activities including, fueling the plant directly from trains, foam dust suppression systems, grooming and compacting the coal piles, spraying a dust suppressant agent, using conditioning measures during ash unloading operations at the landfill, daily surveillance of the site to ensure there was adequate dust control, and using the coal pile irrigation system until it was winterized. The facility also benefited from an estimated 14.66 inches of precipitation occurring on 49% of the days to add additional dust control across the facility. AQD did not receive any dust complaints during this time period. No further action is required at this time.</p>
11/20/2019	MACT (Part 63)	Compliance	<p>The Particulate Matter Continuous Monitoring System Relative Correlation Audit Test Report for Unit 3 pursuant to 40 CFR Part 63 Subpart UUUUU (MATS) was received on time and complete. Testing was conducted at three (3) different PM mass concentration levels using PM spiking. All of the data points must be within +/- 25% of the emission limit, relative to the correlation regression line, and they were. Since the fall within the regression line, no new regression line is plotted.</p>
11/15/2019	CEM RATA	Compliance	<p>CEM RATA for Unit 3. Subject to review from AQD's TPU.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/15/2019	ROP Other	Compliance	The 3rd Quarter Fugitive Dust Report for 2019 was received on time and complete. The facility utilized a variety of dust control activities including, application of dust suppression agents, fueling the plant directly from trains, foam dust suppression systems, grooming and compacting the coal piles, using conditioning measures during ash unloading operations at the landfill, daily surveillance of the site to ensure there was adequate dust control, deploying final cover to close the remaining acreage in Cell 3 and part of Cell 4 of the landfill, and developing a fugitive dust control training that the facility will implement to employees in Q4 of 2019. A water truck was also used during those activities. AQD did not receive any dust complaints during this time period. No further action is required at this time.
11/15/2019	CEM RATA	Compliance	This report was received on time and complete. The report is the CEMS RATA for 40 CFR Par 63 Subpart UUUUUU for Unit 3 and is subject to review from AQD's TPU.
11/15/2019	MACT (Part 63)	Compliance	The Unit 3 MATS (40 CFR Part 63 Subpart UUUUU) PM CEMS 3rd Quarter Report was received on time and complete. The highest 30-day rolling average during the reporting period was 0.000764 lb/MMBTU, which is compliant with the limit of 0.030 lb/MMBTU.

Activity Date	Activity Type	Compliance Status	Comments
11/15/2019	Excess Emissions (CEM)	Compliance	<p>The 3rd Quarter Excess Emissions for Units 1, 2 & 3, and the Quarterly Opacity Monitor Assessment for Unit 3 was received on time and complete.</p> <p>Unit 1: There was a total of 132,480 Minutes (2,208 hours) of operation for the reporting period. The COMS monitor had a no downtime or excess emissions. The CEMS SO2 monitor had no downtime or excess emissions.</p> <p>Unit 2: There was a total of 129,339 minutes (2131.45 hours) operating hours for Unit 2 during the reporting period. The COMS monitor had no downtime or excess emissions. A total of 1 hour (0.05 %) monitor downtime with no associated excess emissions were reported for the SO2 CEMS for the reporting period.</p> <p>Unit 3: There was a total of 132,478 minutes (2208 Hours) of operating time for Unit 3 during the reporting period. No excess emissions were reported, but a total of 0.10% (132 minutes) of COMS monitor downtime was reported. This was all due to Quality Assurance actions including filter audits. The NOx CEMS had 0.27 % (6 hours) of monitor downtime, but no associated excess emissions. The downtime was primarily due to monitor malfunctions. The SO2 CEMS had no monitor downtime or excess emissions.</p> <p>The Units 3 Opacity test was also received. The associated low, mid, and high level opacity checks indicated passing results.</p>

Name: Kaitlyn DeVries Date: 9/30/2020

Supervisor: 