

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 : 10/1/2021	FCE Completion Date : 9/30/2022
Comments : FY 2022 FCE	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/20/2022	On-site Inspection	Compliance	The purpose of this inspection was to determine compliance with the facility's renewable operating permit (ROP) MI-ROP-B2835-2020b.
09/12/2022	CEM RATA	Compliance	<p>The Mercury Continuous Emissions Monitoring System (CEMS) Relative Accuracy Test Audit (RATA) for Units 1 and 2 was received on time and complete.</p> <p>The report indicates each of the pollutants meeting the required alternative RATA result as allowed under the MATS rule. This report, however, is subject to review from AQD's TPU.</p>

Activity Date	Activity Type	Compliance Status	Comments
08/23/2022	Excess Emissions (CEM)	Compliance	<p>The 2nd Quarter 2022 Excess Emissions report pursuant to MI-ROP-B2835-2020b for Units 1, 2 & 3, and the Opacity Monitor Assessment for 3 was received on time and complete.</p> <p>Unit 1: There was a total of 112,564 Minutes (1,876.1 hours) of operation for the reporting period. The COMS monitor had no downtime. No downtime was reported for the SO2 CEMS either. No excess emissions were reported.</p> <p>Unit 2: There was a total of 104,831 minutes (1,747.2 hours) operating hours for Unit 2 during the reporting period. Neither the COMS monitor nor the SO2 CEMS reported any downtime. Neither had any excess emissions.</p> <p>Unit 3: There was a total of 110,733 minutes (1,845.5 Hours) of operating time for Unit 3 during the reporting period. The COMS reported 132 minutes (0.12%) downtime with no associated excess emissions. The downtime was due to QA inspections and maintenance. The NOx CEMS had 4hours (0.23%) downtime and no associated excess emissions. The downtime was due to monitor malfunctions and recalibrations. The SO2 monitor had no downtime and no associated excess emissions.</p> <p>The Unit 3 Opacity tests was also received. The associated low, mid, and high level opacity checks indicated passing results.</p>

Activity Date	Activity Type	Compliance Status	Comments
08/23/2022	Stack Test	Compliance	<p>The required triennial HCl and PM stack test report pursuant to MI-ROP-B2835-2020b to demonstrate compliance with 40 CFR Part 63 Subpart UUUU (MATS) was received on time and complete. Testing is conducted triennially since Units 1 and 2 have qualified as a low emitting EGU (LEE). The results for Units 1 and 2 are as follows:</p> <p>Unit 1: PM: Emission Limit: 0.030 lb/MMBtu and 0.015 lb/MMBtu (LEE Limit) and 0.015 lb/1,000 lb exhaust gas @ 50% exhaust air. Emission Result: 0.0006 lb/MMBTU and 0.0005 lb/1,000 lb exhaust gas @ 50% exhaust air.</p> <p>HCl: Emission Limit: 0.0020 lb/MMBtu and 0.0010 lb/MMBtu (LEE Limit) Emission Result: <0.00004 lb/MMBtu</p> <p>Unit 2: PM: Emission Limit: 0.030 lb/MMBtu and 0.015 lb/MMBtu (LEE Limit) and 0.015 lb/1,000 lb exhaust gas @ 50% exhaust air. Emission Result: 0.0011 lb/MMBTU and 0.0009 lb/1,000 lb exhaust gas @ 50% exhaust air.</p> <p>HCl: Emission Limit: 0.0020 lb/MMBtu and 0.0010 lb/MMBtu (LEE Limit) Emission Result: 0.00005 lb/MMBtu</p>

Activity Date	Activity Type	Compliance Status	Comments
08/19/2022	MACT (Part 63)	Compliance	<p>The 2nd Quarter particulate matter CEMS report pursuant to 40 CFR Part 63, Subpart UUUUU for Unit 3 was received on time and complete. A PM CEMS is utilized to demonstrate compliance with the filterable PM 30-day boiler operating day rolling average limit of 0.03 lb/MMBTU. The records show the 30-day rolling average at the end of the quarter to be 0.000485 lb/MMBTU. The highest rolling average for the reporting period was 0.000535, which is compliant with the 0.030 lb/MMBTU limit.</p>

Activity Date	Activity Type	Compliance Status	Comments
08/02/2022	ROP Other	Compliance	<p>The 2nd Quarter Fugitive Dust Report for 2022 was received on time and complete. The facility utilized a variety of dust control activities including, utilizing irrigation on top of coal stack out conveyor 42B and the coal pile irrigation system when temperatures were above freezing, fueling plants directly from trains when possible, operating a foam dust suppression system on four of the most heavily used conveyors within the coal handling system, spraying a dust suppression agent on western coal, grooming and compacting the coal storage piles, utilizing conditioning measures during ash unloading operations at the landfill, placing conditioned ash in horizontal lifts and utilizing a roller to compact the material in the active fill area of the storage cell, developing a plan to restore the full coal pile irrigation system during the upcoming period, returning the water truck to service in the active fill area of the storage cell as temperatures allowed, restoring the coal pile irrigation system to service following the cold weather season, applying a dust suppressant on the roadways, and conducting daily surveillance rounds on site to ensure adequate dust control was maintained. The facility also benefited from an estimated 8.51 inches of precipitation occurring on 38% of days during this time period. No further action is required at this time.</p>

Activity Date	Activity Type	Compliance Status	Comments
06/10/2022	Excess Emissions (CEM)	Compliance	<p>The 1st Quarter 2022 Excess Emissions report pursuant to MI-ROP-B2835-2020b for Units 1, 2 & 3, and the Opacity Monitor Assessment for 3 was received on time and complete.</p> <p>Unit 1: There was a total of 71,545 Minutes (1,192.4 hours) of operation for the reporting period. The COMS monitor had 24 (0.03%) minutes of monitor downtime. No downtime was reported for the SO2 CEMS. No excess emissions were reported. The downtime was to do periodic maintenance.</p> <p>Unit 2: There was a total of 91,074 minutes (1,517.9 hours) operating hours for Unit 2 during the reporting period. The COMS monitor had no downtime while the SO2 CEMS reported 6.2 hours (0.64%) downtime. Neither had any excess emissions. The downtime was due to calibrations, and failed calibrations.</p> <p>Unit 3: There was a total of 103,411 minutes (1,723.5 Hours) of operating time for Unit 3 during the reporting period. No COMS downtime or excess emissions were reported. The NOx CEMS had 13 hours (0.90%) downtime and no associated excess emissions. The downtime was due to monitor malfunctions and recalibrations. The SO2 monitor had 5 hours (0.35%) downtime and no associated excess emissions. The downtime was due to monitor malfunctions and repairs.</p> <p>The Unit 3 Opacity tests was also received. The associated low, mid, and high level opacity checks indicated passing results.</p>

Activity Date	Activity Type	Compliance Status	Comments
06/10/2022	MACT (Part 63)	Compliance	<p>The 1st Quarter particulate matter CEMS report pursuant to 40 CFR Part 63, Subpart UUUUU for Unit 3 was received on time and complete. A PM CEMS is utilized to demonstrate compliance with the filterable PM 30-day boiler operating day rolling average limit of 0.03 lb/MMBTU. The records show the 30-day rolling average at the end of the quarter to be 0.000471 lb/MMBTU, which was the highest rolling average for the reporting period, and is compliant with the 0.030 lb/MMBTU limit.</p>
05/18/2022	MAERS	Compliance	<p>Report certification with Supplemental Control Template submittal certification received on 3/28/22 (postmarked 3/25/22).</p> <p>Added 99% CE for PM for Boiler 1,2,and 3. Ammonia estimates are high, but are accounted for due to the ammonia slip associated with the SCR's for the boilers. Hg emissions for Boiler 3 accounted for all under the western coal. This unit combusts eastern and western coal. Eastern coal has a higher Hg content, thus the higher emissions. Stack test and CEM data used where applicable. 5.18.2022. KDeVries</p>

Activity Date	Activity Type	Compliance Status	Comments
05/17/2022	ROP Other	Compliance	<p>The 1st Quarter Fugitive Dust Report for 2022 was received on time and complete. The facility utilized a variety of dust control activities including, utilizing irrigation on top of coal stack out conveyor 42B and the coal pile irrigation system when temperatures were above freezing, fueling plants directly from trains when possible, operating a foam dust suppression system on four of the most heavily used conveyors within the coal handling system, spraying a dust suppression agent on western coal, grooming and compacting the coal storage piles, utilizing conditioning measures during ash unloading operations at the landfill, placing conditioned ash in horizontal lifts and utilizing a roller to compact the material in the active fill area of the storage cell, developing a plan to restore the full coal pile irrigation system during the upcoming period, returning the water truck to service in the active fill area of the storage cell as temperatures allowed, and conducting daily surveillance rounds on site to ensure adequate dust control was maintained. The facility also benefited from an estimated 5.72 inches of precipitation occurring on 34% of days during this time period. No further action is required at this time.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/05/2022	ROP Annual Cert	Compliance	<p>The Annual Certification pursuant to MI-ROP-B2835-2020a and 2020b was received on time and complete (Postmarked 3/15/22). A Revised version with added deviation received on 3/28/22, due to the oversight of an additional deviation that had previously been discussed with the AQD. The semi-annual deviations were for EUSCA_U3, when there was intermittent Visible Emissions over three periods of 120 minutes, 197 minutes, and 97 minutes. This was due to some bin vent filters and additional troubleshooting was done to fix this including replacement of 25 filter bags. The other deviation was for the recycle mix tank associated with EUSDA_U3. This was due to ash buildup in the lines causing intermittent visible emissions on multiple dates. Various corrective actions were taken to fix the issue. The three (3) deviations that were reported for the first-semi-annual reporting period were for the UBAS system as well. Since all of these issues have been revised, and the MMAP has been updated accordingly to ideally prevent these types of issues in the future. No further action is necessary.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/05/2022	ROP SEMI 2 CERT	Compliance	<p>The Semi-Annual Certification pursuant to MI-ROP-B2835-2020a and 2020b was received on time and complete (Postmarked 3/15/22). A Revised version with added deviation received on 3/28/22, due to the oversight of an additional deviation that had previously been discussed with the AQD. The deviations were for EUSCA_U3, when there was intermittent Visible Emissions over three periods of 120 minutes, 197 minutes, and 97 minutes. This was due to some bin vent filters and additional troubleshooting was done to fix this including replacement of 25 filter bags. The other deviation was for the recycle mix tank associated with EUSDA_U3. This was due to ash buildup in the lines causing intermittent visible emissions on multiple dates. Various corrective actions were taken to fix the issue. Since all of these issues have been revised, and the MMAP has been updated accordingly to ideally prevent these types of issues in the future. No further action is necessary.</p>
05/05/2022	CAM Excursions/Exceedances	Compliance	<p>The Compliance Assurance Monitoring (CAM) excursion/exceedance report was received on time and complete (Postmarked 3-15-22). No excursions or exceedances were reported for the reporting period.</p>
05/05/2022	CAM monitor downtime	Compliance	<p>The CAM monitor downtime report was received on time and complete (Postmarked 3/15/22). The report indicated only downtime for the COSM associated with EUBOILER1 and EUBOILER2, with the downtime being due to QA activities. This downtime was also reported in the Quarterly Excess Emissions Report.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/05/2022	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 (Post-marked 3/15/2022). This report is for units 1, 2, and 3.</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 during the reporting period. 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 2021, June 2021, and September 2021, respectively. No excess emission or deviations in work practice standards were reported for any of the units.</p>
03/03/2022	MACT (Part 63)	Compliance	<p>The 4th Quarter MATS PM CEMS for 40 CFR Part 63 Subpart UUUUU report for Unit 3 was received on time and complete. A PM CEMS is utilized to demonstrate compliance with the filterable PM 30-day boiler operating day rolling average limit of 0.03 lb/MMBTU. The records show the 30-day rolling average at the end of the quarter to be 0.000459 lb/MMBTU, which is compliant with the 0.030 lb/MMBTU limit. The highest rolling average for the quarter was on December 2 at 0.000642 lb/MMBTU.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/03/2022	Excess Emissions (CEM)	Compliance	<p>The 4th Quarter Excess Emissions report pursuant to MI-ROP-B2835-2020b for Units 1, 2 & 3, and the Opacity Monitor Assessment for 3 was received on time and complete.</p> <p>Unit 1: There was a total of 131,171 Minutes (2,186 hours) of operation for the reporting period. The COMS monitor had 126 (0.10%) minutes of monitor downtime. No downtime was reported for the SO2 CEMS. No excess emissions were reported. The downtime was to do Quality Assurance testing.</p> <p>Unit 2: There was a total of 343 minutes (5.7 hours) operating hours for Unit 2 during the reporting period. The COMS monitor and SO2 CEMS had no downtime and no excess emissions.</p> <p>Unit 3: There was a total of 132,475 minutes (2,208 Hours) of operating time for Unit 3 during the reporting period. No excess emissions were reported, but a total of 1.85% (2,448 minutes) of COMS monitor downtime was reported. This was all due to Quality Assurance actions including maintenance, filter audits, and re-calibrations. The NOx CEMS had no downtime and no associated excess emissions. The SO2 monitor had no downtime and no associated excess emissions.</p> <p>The Unit 3 Opacity tests was also received. The associated low, mid, and high level opacity checks indicated passing results.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/24/2022	ROP Other	Compliance	<p>The 4th Quarter Fugitive Dust Report for 2021 was received on time and complete. The facility utilized a variety of dust control activities including, utilizing irrigation on top of coal stack out conveyor 42B and the coal pile irrigation system until it was winterized in November, fueling plants directly from trains when possible, operating a foam dust suppression system on four of the most heavily used conveyors within the coal handling system, spraying a dust suppression agent on western coal, grooming and compacting both the western and eastern coal storage piles, utilizing conditioning measures during ash unloading operations at the landfill, placing conditioned ash in horizontal lifts and utilizing a roller to compact the material in the active fill area of the storage cell, and conducting daily surveillance rounds on site to ensure adequate dust control was maintained. The facility also benefited from an estimated 8.20 inches of precipitation occurring on 47% of days during this time period. No further action is required at this time.</p>
12/09/2021	MACT (Part 63)	Compliance	<p>The Unit 3 PM CEMS RRA Test Report pursuant to 40 CFR Part 63 Subpart UUUUU 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.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/19/2021	MACT (Part 63)	Compliance	<p>The 3rd Quarter MATS PM CEMS for 40 CFR Part 63 Subpart UUUUU report for Unit 3 was received on time and complete. A PM CEMS is utilized to demonstrate compliance with the filterable PM 30-day boiler operating day rolling average limit of 0.03 lb/MMBTU. The records show the 30-day rolling average at the end of the quarter to be 0.000567 lb/MMBTU, which is compliant with the 0.030 lb/MMBTU limit. The highest rolling average for the quarter was on multiple days in July at 0.0006 lb/MMBTU.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/19/2021	Excess Emissions (CEM)	Compliance	<p>The 3rd Quarter Excess Emissions report pursuant to MI-ROP-B2835-2020a and b for Units 1, 2 & 3, and the Opacity Monitor Assessment for 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 and SO2 CEMS had no downtime and no excess emissions.</p> <p>Unit 2: There was a total of 105,978 minutes (1,766.3 hours) operating hours for Unit 2 during the reporting period. The COMS monitor and SO2 CEMS had no downtime and no excess emissions.</p> <p>Unit 3: There was a total of 126,437 minutes (2,107.3 Hours) of operating time for Unit 3 during the reporting period. No excess emissions were reported, but a total of 0.11% (138 minutes) of COMS monitor downtime was reported. This was all due to Quality Assurance actions including maintenance, filter audits, and re-calibrations. The NOx CEMS had 4 hours (0.20%) 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 and no associated excess emissions.</p> <p>The Unit 3 Opacity tests was also received. The associated low, mid, and high level opacity checks indicated passing results.</p>

Activity Date	Activity Type	Compliance Status	Comments
11/08/2021	ROP Other	Compliance	<p>The 3rd Quarter Fugitive Dust Report for 2021 was received on time and complete. The facility utilized a variety of dust control activities including, utilizing irrigation on top of coal stack out conveyor 42B, fueling plants directly from trains when possible, operating a foam dust suppression system on four of the most heavily used conveyors within the coal handling system, spraying a dust suppression agent on western coal, applying a dust suppressant on the coal pile perimeter roads west of Lakeshore Avenue with a water truck, grooming and compacting both the western and eastern coal storage piles, utilizing conditioning measures during ash unloading operations at the landfill, placing condition ash in horizontal lifts and utilizing a roller to compact the material in the active fill area of the storage cell, controlling dust and supplemented ash conditioning with a water truck, and conducting daily surveillance rounds on site to ensure adequate dust control was maintained. The facility also benefited from an estimated 4.54 inches of precipitation occurring on 24% of days during this time period. No further action is required at this time.</p>

Name: Kaitlyn D. [Signature] Date: 09/30/2022 Supervisor: [Signature]