

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : WEYERHAEUSER NR COMPANY		SRN : B7302
Location : 4111 W FOUR MILE RD		District : Gaylord
		County : CRAWFORD
City : GRAYLING	State: MI	Zip Code : 49738
Compliance Status :		Compliance
Source Class : MAJOR	Staff : Sharon LeBlanc	
FCE Begin Date : 11/11/2018	FCE Completion Date :	11/12/2019
Comments : FCE for Fiscal Year 2020. Sgl		

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
11/12/2019	CEMS Test Observation	Compliance	RATA observations for VOC CERM's for EUPRESSLINE and associated biofilter control device. sgl
11/12/2019	Scheduled Inspection	Compliance	Scheduled site inspection for fiscal year 2020. Site inspection conducted in conjunction with annual RATA testing. sgl
10/14/2019	ROP Other	Compliance	RATA test protocols for Annual CEMS certification requirements. Received electronically w/o 10/7/2019. Tentative test dates 11/12-11/13/2019. sgl
10/10/2019	Excess Emissions (CEM)	Compliance	2019 3rd Quarter EER- Monitor downtime reporting. See 10/10/2019 report review. sgl
10/10/2019	Other	Compliance	Review of 2019 third quarter excess emission and monitor summary report. sgl
09/23/2019	ROP Other	Compliance	Third Quarter Calibration Gas Audit Report (CGA) was received on 9/12/2019. CGA was conducted on September 5, 2019 for Press VOC Monitor, Dryer VOC Monitor and Dryer CO Monitor. Both the Dryer VOC and the CO monitors are dual range monitors. The "press" VOC monitor is a single range instrument. Accuracies were reported to test within allowable ranges.sgl

Activity Date	Activity Type	Compliance Status	Comments
09/23/2019	ROP Other	Compliance	2019 Semi-Annual Data Assessment Dryer System Opacity Monitor Audit Report. Facility has a Teledyne lighthawk opacity monitor servicing the Dryer RO stack. The instrument is installed, calibrated, maintained and operated in compliance with appropriate regulations. Attenuators used were NIST certifiable, and were calibrated on 4/17/2014 and 4/8/2015. The next attenuator calibration is due by 4/7/2020. Readings reported were within the 3% allowed, passing the audit. sgl
07/17/2019	CAM monitor downtime	Compliance	First Semi-Annual CAM Monitor Downtime report for EUPRESSLINE & FGDRYERS.
07/17/2019	Other	Compliance	First Semi-annual CAM Monitor Downtime report for 2019.
07/17/2019	CAM Excursions/Exceedances	Compliance	2019 first semi-annual CAM excess emissions report - no excess emissions reported for period. Refer to July 17, 2019 submittal review report for details.
07/16/2019	MACT (Part 63)	Compliance	Jan-June 2019 Semi-Annual MACT Report - refer to June 16, 2019 review for comments. sgl
07/16/2019	Other	Compliance	Semi Annual PCWP MACT report review.
07/09/2019	Excess Emissions (CEM)	Compliance	2cnd qtr 2019 excess emission and monitor downtime report.- See Data evaluation/summary dated July 9, 2019. CO spikes continuing for FGDRYERS. Appear to have shown decreases since vendor logic correction. 3rd quarter report should provide additional information.
07/09/2019	Other	Compliance	2cnd qtr 2019 excess emission and monitor downtime report.

Activity Date	Activity Type	Compliance Status	Comments
06/27/2019	ROP Other	Compliance	2019 - Second Quarter Calibration Gas Audit (CGA) Report for VOC and CO monitors associated with the biofilter (VOC only) and FGDRYERS (VOC and CO). Audit was conducted on June 20, 2019 for second quarter of calendar year. Document reported that the monitors were challenged with known concentrations of audit gasses three times at each audit point. Results reported indicated that VOC readings were within the +/- 5% for VOCs and +/- 15% for CO required to pass the audit.sgl
06/03/2019	Other	Compliance	TPU certification approval for previously existing CAI Model 601 CEMS that were sent out for upgrading to dual range monitors to address CO spikes for FGDRYERS.
05/24/2019	Other	Compliance	E-mail update/notification of logic correction for RTOs.sgl
04/15/2019	Excess Emissions (CEM)	Compliance	2019 First Quarter Excess Emissions and monitor downtime reporting. See submittal review in compliance activities for 4/15/2019.
04/15/2019	Other	Compliance	2019 First Quarterly excess emission and monitor downtime review.sgl
04/15/2019	ROP Other	Compliance	2019 first Quarter Monitor Downtime and Excess emission report reviewed. See 4/15/2019 compliance activity for summary.sgl
04/01/2019	ROP Other	Compliance	First Quarter - Calibration Gas Audit (CGA) report for Dryer RTO Stack CO and VOC monitors, and press Stack VOC Monitor. All accuracies were reported within the plus or minus 5% for VOC and plus or minus 15% for CO. VOC accuracies were <1.5%, and CO accuracies were reported <3%.sgl

Activity Date	Activity Type	Compliance Status	Comments
03/29/2019	CEM RATA	Compliance	RATA Test Report FGDRYERS RTO CO monitors conducted 2/28 and 3/1/2019. Note that testing was conducted for both the active CO monitor and the spare monitor kept by the Facility. Both monitors have been reconfigured for dual range calibrations in response to CO spiking being experienced by the Facility. RATA results indicated that both units performed at less than 10% relative accuracy, passing the testing.
03/28/2019	ROP Other	Compliance	7-Day Calibration Drift Report for newly reconfigured dryer CO dual-range monitor. s/n B06014-M. Note that this unit was RATA tested pm 2/28/2019. Test results indicated that the CO monitor easily passed RATA. Following testing the monitor was reported to have been taken offline and to be held as a spare. sgl
03/28/2019	ROP Other	Compliance	Semi Annual Data Assessment Dryer system Opacity Monitor Audit Report for monitor Dryer RO Stack. Audit was conducted on March 21, 2019. Filters used for RATA met appropriate calibration certifications, and do not require recertification until April 7, 2020. Teledyne LightHawk Model 560 was reported to meet RATA requirements. sgl
03/18/2019	MAERS	Compliance	2018 MAERS, Facility emissions reported were consistent with previous year. Scheduled downtime for the summer to replace the pressline and pulp dryers resulted in overall reductions of apx. 25% in emissions for the facility. Submittal was received in a timely manner, and appropriate backup documentation was included in the submittal. A copy of backup may be found in the file.

Activity Date	Activity Type	Compliance Status	Comments
03/04/2019	ROP Other	Compliance	CAM Plan for FGDRYERS- Facility Staff noted as part of recent file review and reporting that the most recent CAM Plan they had on file (submitted as part of the 2014 ROP Renewal application) referenced use of Opacity monitors to determine compliance. However, the permitted compliance instrumentation referenced in ROP MI-ROP-B7302-2016b is the thermocouples. The Facility electronically submitted a revised CAM Plan to reflect the RTO thermocouples. The document will be reviewed, approved and a copy put in the files. sgl
02/28/2019	Stack Test Observation	Compliance	CO CEMS RATA Testing for recently reconfigured, dual range units. Testing done by Bureau Veritas. agl
02/05/2019	ROP Other	Compliance	Test Date notification for CO RATA for FGDRYERS
02/01/2019	ROP Other	Compliance	Electronic receipt of proposed test plan for CO Rata for FGPULPDRYERS submitted by Bureau Veritas. Hard copy of test plan received 2/4/2019. Test date to be determined anticipate end of February 2019.
01/24/2019	CEM RATA	Compliance	RATA for EUPRESSLINE VOC CEMS and FGDRYERS VOC & CO CEMS. Note that Formaldehyde destruction efficiency was also verified for EUPRESSLINE biofilter. Test activities were completed on December 11 & 12, 2018. RATA results indicated that the relative accuracies for all three CEMS tested during the events were less than 10% of standard. The destruction efficiency for the Biofilter averaged 97.6%. sgl
01/24/2019	ROP Other	Compliance	7-Day calibration drift report for a newly reconfigured CO monitor for FGDRYERS. Monitor had recently been modified to a dual range monitor. Unit is serial number B06015-M . Note that this unit is the same unit as the CGA received 1/16/2019. Document forwarded to TPU for review.

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01/23/2019	CAM monitor downtime	Compliance	Semi-Annual CAM Monitor Downtime Reporting for 2cnd half of 2018. Document review dated 1/23/2019. sgl
01/23/2019	Other	Compliance	Review of Annual compliance certification report as well as 2cnd Semi-Annual compliance certification, CAM and PCWP MACT Reporting for 2018. sgl
01/23/2019	CAM Excursions/Exceedances	Compliance	CAM Excursions/Exceedance Reporting for 2cnd half of 2018. See submittal review dated 1/23/2019. sgl
01/23/2019	MACT (Part 63)	Compliance	PCWP MACT semi-annual report for last half of 2018. See review document dated 1/23/2019. sgl
01/23/2019	ROP Annual Cert	Compliance	Annual Compliance Certification Forms for 2018. See the Submittal review dated 1/23/2019. sgl
01/23/2019	ROP SEMI 2 CERT	Compliance	2cnd semi annual certification for 2018. See the submittal review document dated 1/23/2019. sgl
01/22/2019	MACT (Part 63)	Compliance	Annual Boiler MACT (40 CFR, Part 63, Subpart DDDDD) Compliance Report- Document submitted for EUIBW and EUOEN. No compliance issues reported for the two units with respect to Boiler MACT.
01/16/2019	ROP Other	Compliance	1/10/2019 - Calibration Gas Audit Report for FGDRYERS CO CEMs (dual range) The document is the CGA Test results for a recently reconfigured CO CEMS unit for FGDRYERS. CGA activities were conducted on January 10,2019. Five different gas concentrations were used to complete the CGA and ranged from zero to 543.6 ppm. All accuracies were reported within the allowed 15% for CO. The highest deviation reported was 2.24% for the audit midpoint in the low range. sgl

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01/14/2019	Excess Emissions (CEM)	Compliance	<p>2018, 4th Quarter EER and monitor summary report. Bio press reported no excess emissions for quarter. the biopress VOC CEMS downtime totaled 6.53 hours (0.50% operating time) over 6 events.</p> <p>RO Stack for dryer reported no excess emissions or VOC CEMS downtime for the quarter. However, the opacity meter associated with the stack reported excess emissions of 0.01% of operating time, and 48 minutes of Opacity CEMS downtime (0.06% of operating time) over 7 events. The CO CEMS was reported to have had no excess emissions, but did report 37.2 hours downtime (36.93 hours of which were the result of temporary spikes above the monitors range) totaling 2.76% of operations.</p> <p>The Dryer VOC CEMS failed to report any excess emissions or VOC CEMS monitor downtime for the quarter. All units were corrected in a timely manner. sgl</p>
01/02/2019	ROP Other	Compliance	<p>Press VOC Monitor Malfunction Report for event on December 18, 2018. Sample pump bearing failure resulted in VOC CEMS being offline for 191 minutes. District Staff was notified by phone of incident. sgl</p>
12/11/2018	CEMS Test Observation	Compliance	<p>VOC CEMs RATA for EUPRESSLINE and FGDRYERS, and Destruction Efficiency for Biofilter.</p>
11/29/2018	Excess Emissions (CEM)	Compliance	<p>Third Quarter EER- Note only operated 16 day during quarter. Monitor downtime was limited to events on two different calendar days. CEMs downtime for RO Stack(7/3/2018 CO for 0.06% operating time and on 7/3 & /12/2018 VOC for 0.35% operating time) EE were limited to opacity for one event (7/13/2018 0.23% operating time)</p>

Name:

Shawak Blac

Date:

1/31/2020

Supervisor:

SG