

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : TES Filer City Station	SRN : N1685
Location : 700 Mee Street P.O. Box 12	District : Cadillac
	County : MANISTEE
City : FILER CITY State: MI Zip Code : 49634	Compliance Status : Compliance
Source Class : MAJOR	Staff : Caryn Owens
FCE Begin Date : 03/24/2016	FCE Completion Date : 3/24/2017
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
03/24/2017	Scheduled Inspection	Compliance	Scheduled Inspection and Records Review
03/17/2017	Telephone Notes	Compliance	Rule 912 Report
03/17/2017	Rule 912	Compliance	CO exceedance in lb/MMBtu 24-hr rolling average due to plant tripping while the facility was taking Boiler 1 offline. See Telephone notes from 3/17/17.
03/08/2017	ROP Annual Cert	Compliance	10 Deviations reported for the year. Company actions were adequate, and were reported to DEQ within proper reporting periods.
03/08/2017	ROP SEMI 2 CERT	Compliance	6 deviations; one previously reported. 2 of the deviations due to possible opacity exceeding 5% from lime storage silo and ash silo, but at night, so unverified. 3 deviations were from the facility challenging the requirements of NOx and SO2 CEMS with limits, DEQ already corrected w/ ROP.
03/08/2017	CAM Excursions/Exceedances	Compliance	No CAM exceedance occurred In FGBOILERS.
03/08/2017	CAM monitor downtime	Compliance	There were 6 incidents of monitoring downtime that occurred during the reporting period. Time span of COMS downtime ranged from 0.1 hours to 0.6 hours. Each incident was previously reported to the DEQ. Due to software issues or quarterly QA testing.

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03/06/2017	MAERS	Compliance	See MAERS for additional info.
03/02/2017	Sample Results Review	Compliance	Hg discussion on whether MATS LEE test will be accepted.
03/02/2017	Excess Emissions (CEM)	Compliance	4th quarter excess emission report. Boiler 1 opacity excess emissions = 0.01%; reason due baghouse bypass/high temp. Boiler 2 opacity excess emissions = 0.08% due to baghouse bypass/high temp and atomizer changeout. Company actions were adequate.
03/02/2017	MACT (Part 63)	Unknown	MATS testing for Mercury (Hg). The facility reported they passed, however, there are TPU questions regarding the QA/QC. Waiting for follow up from TPU.
01/27/2017	Stack Test	Compliance	MATS & PM 4TH Quarter Testing for the year. However, the 3rd quarter PM testing did not pass for LEE Status, so this begins the first compliant test for LEE Status. Based on the analytical results, the average of the 3 runs of PM testing were below 0.015 lb/MMBtu (which is 50% below 0.030lb/MMBtu to demonstrate LEE). Add'l rw will be completed by J. Howe TPU.
11/18/2016	Excess Emissions (CEM)	Compliance	3rd quarter excess emission report. Boiler 1 opacity excess emissions = 0.02%; the reasons are due to QA problem, a quarterly calibration was completed. Boiler 2 opacity excess emissions = 0.07% due to startup/shutdown & process problems. Company actions were adequate.
10/05/2016	Stack Test Observation	Compliance	PM Quarterly MATS Stack Testing
09/26/2016	Stack Test	Compliance	PM-LEE MATS Testing, 4th PM test performed for a 3-year duration of quarterly sampling. Based on results, the average of the 3 runs of PM testing were 0.022lb/mmBtu, and need to start LEE demonstration over. Add'l review will be completed by J. Howe TPU.
09/26/2016	Stack Test	Compliance	Hg Mercury MATS Test Protocol. 30 day mercury performance test, scheduled for the week of October 18, 2016.

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09/16/2016	CAM Excursions/Exceedances	Compliance	2 CAM opacity exceedance occurred In FGBOILERS. Due to QA in EUBOILER01 and Start-up/Shut-down in EUBOILER02. The COMS exceedances were previously reported, and corrective action was adequate.
09/16/2016	CAM monitor downtime	Compliance	There were 7 incidents of monitoring downtime that occurred during the reporting period. Time span of COMS downtime ranged from 0.1 hours to 5.7 hours. Each incident was previously reported to the DEQ.
09/16/2016	ROP Semi 1 Cert	Compliance	One deviation was previously reported in accordance with requirements of the ROP. The remaining deviations are a result of facility challenging the required span value of the NOx and SO2 CEMS. The company will address the span value CEMS via minor modification to the ROP.
08/19/2016	Stack Test	Compliance	PM-LEE MATS Testing, 3rd PM test performed for a 3-year duration of quarterly sampling. Based on the analytical results, the average of the 3 runs of PM testing were below 0.015 lb/mmBtu (which is 50% below 0.030lb/mmBtu to demonstrate LEE). Add'l rvw will be completed by J. Howe TPU.
08/19/2016	MACT (Part 63)	Compliance	MATS Notification of Compliance - Demonstrated Compliance w/ Subpart UUUUU limits. Currently pursuing LEE status for PM, using SO2 as a surrogate for HCl & PM as a surrogate for non-metal HAPs. Compliance Cert. signed by Responsible Official. Compliance status submitted on time.
08/19/2016	Excess Emissions (CEM)	Compliance	2nd quarter excess emission report. Boiler 1 opacity excess emissions = 0.02%; the reasons are due to QA problem, a quarterly calibration was completed. Boiler 2 opacity excess emissions = 0.03% due to startup/shutdown & process problems. Company actions were adequate.

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08/19/2016	CEM RATA	Compliance	RATA 2016 Protocol RATA for Part 75 for Boilers 1 & 2, and inlet SO ₂ , CO (on SO ₂ lb/mmBtu basis) and outlet CO on Units 1 & 2. Jeremy Howe will be attending RATA.
06/02/2016	Excess Emissions (CEM)	Compliance	1st quarter 2016 EER. Boiler 1 excess emissions consisted of opacity (0.30%), NO _x , 24-hr SO ₂ , 30 day-SO ₂ , SO ₂ combined stack, and CO was 0.24%. Reduction SO ₂ (1.05%), and COM Mass (0.29%) EE were due to communication loss between PLC & DAHS. Boiler 2 excess emissions consisted of opacity (0.03%) and SO ₂ (0.14%) due to communication loss between PLC & DAHS. System is back to normal and no further action by AQD staff necessary.
05/16/2016	Stack Test	Compliance	PM-LEE MATS Testing, 2nd PM test performed for a 3-year duration of quarterly sampling. Based on the analytical results, the average of the 3 runs of PM testing were below 0.015 lb/mmBtu (which is 50% below 0.030lb/mmBtu to demonstrate LEE). Add'l rww will be completed by J. Howe TPU.

Name: *Daryn Owens* Date: *3/24/17* Supervisor: *SN*