

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 : 5/1/2018	FCE Completion Date : 5/1/2019
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
05/01/2019	Scheduled Inspection	Compliance	Scheduled Inspection and Records Review
03/19/2019	MACT (Part 63)	Compliance	Semi- Annual Report for MATS UUUUU. TES shows compliance with the heat input based emission limits for all MATS subject pollutants. Tune-up last conducted 1/25/18 for both Units.
03/19/2019	ROP SEMI 2 CERT	Compliance	2nd Semi-annual Cert, 1 Deviation; previously reported. due opacity exceeding 10% from bypassing baghouse during startup/shutdown of Unit2. Corrective actions were taken, and the Maintenance Management Plan was followed.
03/19/2019	CAM Excursions/Exceedances	Compliance	No CAM excursions/exceedances occurred in FGBOILERS.
03/19/2019	CAM monitor downtime	Compliance	There were 9 incidents of monitoring downtime to COMS that occurred during the reporting period. Time span of COMS downtime ranged from 0.1 hours to 1.2 hours. Each incident was previously reported to the DEQ. Due to software issues, maintenance activities, or quarterly QA testing.
03/19/2019	ROP Annual Cert	Compliance	4 Deviations reported for the year. Company actions were adequate, and were reported to DEQ within proper reporting periods.

Activity Date	Activity Type	Compliance Status	Comments
02/20/2019	MAERS	Compliance	See MAERS for further info. - Checked proper SCC codes were used, verified all equipment was covered, and control equipment was addressed. Emission limits were less than permitted limits. Compared reported emission with calculated emissions. Coal usage was down from 2017, TDF usage and Nat. Gas was up since 2017.
02/11/2019	Excess Emissions (CEM)	Compliance	4th quarter excess emission report. Boiler 1 had no excess emissions reported. Boiler 2 opacity excess emissions = 0.02%, due to start-up/shutdown, process problems, & other known causes. Company actions were adequate.
01/25/2019	CEM RATA	Compliance	2018 RATA for EUBOILER 1 and 2. Submitted results to demonstrate compliance with the relative accuracy requirements contained in the ROP.
01/25/2019	MACT (Part 63)	Compliance	MATS PM 4th Qtr 2018 Testing. 9th 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.
01/25/2019	MACT (Part 63)	Compliance	MATS testing for Mercury (Hg). The facility reported they comply with MATS Hg lb/MMBtu as well as the annual mass emission limit & meet LEE qualification for EUBOILER01 and EUBOILER02.
01/14/2019	Stack Test Observation	Compliance	Stack test observation for MATS PM testing.
11/09/2018	Excess Emissions (CEM)	Compliance	3rd quarter excess emission report. Boilers 1 and 2 had no excess emissions reported.
09/14/2018	ROP Semi 1 Cert	Compliance	3 deviations; all previously reported, due to opacity exceeding 10% from too hot of temps & bypassing baghouse during startup/shutdown of FGBOILERS. DEQ already contacted and was informed.
09/14/2018	MACT (Part 63)	Compliance	MATS Semi Annual Compliance - TES shows compliance with the heat input based emission limits for all MATS subject pollutants. Tune-up last conducted 1/25/18 for both Units.

Activity Date	Activity Type	Compliance Status	Comments
09/14/2018	Stack Test	Compliance	MATS PM 3rd Qtr 2018 Testing - 8th 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. Did not change out atomizers during testing. Testing appeared to have went smoothly.
09/14/2018	CAM Excursions/Exceedances	Compliance	No CAM excursions/exceedances occurred in FGBOILERS.
09/14/2018	CAM monitor downtime	Compliance	There were 10 incidents of monitoring downtime to COMS that occurred during the reporting period. Time span of COMS downtime ranged from 0.1 hours to 0.7 hours. Each incident was previously reported to the DEQ. Due to software issues, maintenance activities, or quarterly QA testing.
08/15/2018	Excess Emissions (CEM)	Compliance	2nd quarter excess emission report. Boiler 1 had no excess emissions reported. Boiler 2 opacity excess emissions = 0.01%, & CO Mass = 0.23% due to quality control system check and maintenance. Company actions were adequate.
07/02/2018	CEM RATA	Compliance	2018 RATA Notice for the week of 8/13/2018 to RATA CO CEMS, SO2 and CO2 CEMS for EUBOILERS 1 and 2.
06/12/2018	Stack Test	Compliance	MATS PM 2nd Qtr 2018 Testing. 7th 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. Did not change out atomizers during testing. Testing appeared to have went smoothly.
06/06/2018	Excess Emissions (CEM)	Compliance	1st quarter excess emission report. Boiler 1 opacity excess emissions = 0.01% due to high temps, so bypassed baghouse & unit shutdown. Boiler 2 opacity excess emissions = 0.08% due to maintenance. Company actions were adequate.

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06/06/2018	Rule 912	Compliance	A follow-up from 4/16/18 email, Unit 2 exceeded of the CO emission limit of 115.2 pph based on 24-hr rolling avg. Cause is still being investigated. TES took action to minimize erratic CO emissions, and having Detroit Stoker come and inspect issues, Unit 2 will be offline for inspection.
06/06/2018	Stack Test	Compliance	MATS PM 1st Qtr 2018 Testing. 6th 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. Appears to have changed out Atomizer during testing, and excluded data. Will have TPU review if possible.
05/18/2018	MAERS	Compliance	See MAERS for further info. - Checked SCC codes and emission factors, checked calculated emissions vs permitted emission limits, and verified all permitted equipment was reported.

Name: Caryn Okrus Date: 5/1/19

Supervisor: SN
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