

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection**

N089067352

|  |                                      |                                  |
|--|--------------------------------------|----------------------------------|
| <b>FACILITY:</b> National Energy of Lincoln LLC  |                                      | <b>SRN / ID:</b> N0890           |
| <b>LOCATION:</b> 509 West Traverse Bay Road, LINCOLN                                   |                                      | <b>DISTRICT:</b> Gaylord         |
| <b>CITY:</b> LINCOLN   |                                      | <b>COUNTY:</b> ALCONA            |
| <b>CONTACT:</b> Robert Travis , Plant Manager  |                                      | <b>ACTIVITY DATE:</b> 05/10/2023 |
| <b>STAFF:</b> David Bowman   | <b>COMPLIANCE STATUS:</b> Compliance | <b>SOURCE CLASS:</b> MAJOR       |
| <b>SUBJECT:</b> Scheduled inspection as part of FY 23 inspections for title V sources. |                                      |                                  |
| <b>RESOLVED COMPLAINTS:</b>  |                                      |                                  |

On 14 April 2023 I, David Bowman MI EGLE AQD, conducted a scheduled inspection and records review of National Energy of Lincoln LLC operating under the conditions of renewable operating permit (ROP) MI-ROP-N0890-2020. The source is located at 509 West State Street, Lincoln, MI in Alcona County. Google Maps calls West state street West Traverse Bay Rd, travel West from F41 and West Traverse Bay Rd interchange approximately 1 Mile. The source is easily seen on the South side of the road and has its own drive that is approx. 0.10 mile long.

National Energy of Lincoln LLC. is a wood fired boiler electric utility plant located within the Lincoln city limits. The plant’s primary fuel is wood chips, supplemented with tire-derived fuel (TDF), pentachlorophenol treated wood, creosote treated wood, particle board, and plywood. The fuel is delivered to the site by truck and/or train and stored on-site in piles that are managed to control fugitive dust. The fuels are fed through handling systems to the boiler which uses the heat from combustion to produce steam. The steam is used to drive a generator that produces approximately 17 megawatts of electricity at full capacity. Air emissions from the boiler are controlled by a multiple cyclonic collector and an electrostatic precipitator. Ash from the boiler is collected, treated with water, and transported to a landfill for disposal.

Source is a true minor for hazardous air pollutants (HAP). Source is subject to MACTs for Boilers and engines. There were no PTIs issued since the issuing of this ROP.

The ROP covers:

Source Wide Conditions

Emission Units (EU) EURMHANDLING, EUBOILER, EUASHHANDLING, EUGENERATOR, and EUCLDCLNR.

Flexible Group (FG) FGCOLDCLEANERS.

Source Wide Conditions:

**II. Material Limits**

| Month/Fuel | Particle Board and Plywood | Burned in Boiler | Creosote Treated Wood | Burned in Boiler | Pentachlorophenol | Burned in Boiler | TDF     | Burned in Boiler |
|------------|----------------------------|------------------|-----------------------|------------------|-------------------|------------------|---------|------------------|
| Jan-22     | 0.00                       | 0.00             | 50224.00              | 2559.71          | 0.00              | 0.00             | 7079.18 | 559.60           |
| Feb-22     | 0.00                       | 0.00             | 47940.00              | 3556.89          | 0.00              | 0.00             | 6788.46 | 429.96           |

|        |          |      |           |         |           |      |           |        |   |
|--------|----------|------|-----------|---------|-----------|------|-----------|--------|---|
| Mar-22 | 0.00     | 0.00 | 46875.91  | 4607.70 | 0.00      | 0.00 | 6408.03   | 520.60 | : |
| Apr-22 | 0.00     | 0.00 | 46070.60  | 3662.30 | 0.00      | 0.00 | 6473.56   | 382.20 | : |
| May-22 | 0.00     | 0.00 | 47086.20  | 3806.31 | 0.00      | 0.00 | 6304.02   | 548.70 | : |
| Jun-22 | 0.00     | 0.00 | 49031.77  | 3457.67 | 0.00      | 0.00 | 6217.50   | 542.60 | : |
| Jul-22 | 0.00     | 0.00 | 46464.88  | 3577.70 | 0.00      | 0.00 | 6155.84   | 630.40 | : |
| Aug-22 | 0.00     | 0.00 | 42073.82  | 0.00    | 0.00      | 0.00 | 6157.13   | 706.12 | : |
| Sep-22 | 0.00     | 0.00 | 35346.49  | 0.00    | 0.00      | 0.00 | 6345.88   | 740.21 | : |
| Oct-22 | 0.00     | 0.00 | 28471.94  | 0.00    | 0.00      | 0.00 | 6538.12   | 588.45 | : |
| Nov-22 | 0.00     | 0.00 | 25354.79  | 98.40   | 0.00      | 0.00 | 7236.35   | 792.40 | : |
| Dec-22 | 0.00     | 0.00 | 20005.65  | 254.00  | 0.00      | 0.00 | 7509.01   | 975.70 | : |
| Limit  | 6935 tpy |      | 60200 tpy |         | 14308 tpy |      | 16060 tpy |        | n |

Burned in boiler is tons in month, amounts received are 12-month rolling total in tons.

**III. Process/Operational Restrictions**

1. Permittee shall implement and maintain a program for fugitive emissions...

Discussion of plan – See MACES>Compliance Activity report CA\_N089067136

2. Permittee shall implement and maintain a malfunction abatement plan (MAP)

Discussion of Plan – See MACES>Compliance Activity report CA\_N089067138

3. In the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction... has 45 days to revise the MAP...

Discussion – There have been no changes made during the reviewed period.

**VI. Monitoring**

1. Permittee shall maintain records of activities associated with Fugitive Emission Control Plant...

**Discussion--** Source uses daily and weekly check sheets that are kept on file. If any areas require maintenance then a work order is generated using E-Maintenance program.

**2. By 5<sup>th</sup> calendar day of month permittee shall calculate total fuel received for previous month...**

**Discussion –** See the above chart for data, source is tracking total fuel by month and rolling 12-month totals.

**VII. Reporting**

**1. Prompt reporting of deviations pursuant to general conditions 21 and 22 of Part A.**

**Discussion –** See MACES>reports received for any information relating to this requirement.

**2. Semiannual reporting of monitoring and deviations pursuant to general condition 23 of part A...**

**Discussion –** See MACES>reports received for any information relating to this requirement.

**3. Annual certification of compliance pursuant to general conditions 19 and 20 of Part A...**

**Discussion –** See MACES>reports received for any information relating to this requirement.

**EURMHANDLING**

**Raw material handling equipment, including the primary and secondary screens, radial stacker, raw material pile, two hoppers to chip raw material, and several conveyors. The conveyors move the raw material to feed the boiler. With no pollution control equipment.**

**1. Emission Limits**

| Pollutant             | Limit | Time period      | Monitoring method |
|-----------------------|-------|------------------|-------------------|
| Visible Emission (VE) | 5%    | 6-minute average | SC V.1            |

**See SC V.1 for data relating to this requirement.**

**Conditions observed on day of inspection were zero VE.**

**III. Process/Operational Restrictions**

**1. If VE exceed 5% permittee shall shut down the process with in 24hrs or conduct maint to correct...**

**Discussion –** Records indicate that there has not been a 5% VE recorded.

**2. If Inspections of equipment reveal any damage or leaks repair as soon as practicable.**

**Discussion –** ROP references a table that is not in the ROP and has to be corrected in the next ROP renewal.

**V. Testing/Sampling**

**1. Permittee shall observe VE and record VE once per calendar day.**

**Discussion:** Employees fill out daily check sheets for the observations.

**VI. Monitoring/Recordkeeping**

**1. records of the daily VE shall be made available upon request by AQD...**

Discussion: Reading on 12 Mar 22 Zero; 21 May 2022 Zero; 4 July 2022 Zero; 25 Feb 2023 Zero.

2. Records of weekly inspections of drop chutes, conveyor chutes, and other enclosures...

Discussion – Source uses a weekly check sheet to ensure that any issues are noted and if one is found a work order is created in E-Maintenance program and addressed.

VII. Reporting

1. Prompt reporting of deviations pursuant to general conditions 21 and 22 of Part A.

Discussion – See MACES>reports received for any information relating to this requirement.

2. Semiannual reporting of monitoring and deviations pursuant to general condition 23 of part A...

Discussion – See MACES>reports received for any information relating to this requirement.

3. Annual certification of compliance pursuant to general conditions 19 and 20 of Part A...

Discussion – See MACES>reports received for any information relating to this requirement.

IX. Other requirements

1. permittee shall perform weekly inspections of drop chutes, conveyor covers, and other enclosures....

Discussion – Source uses a weekly check sheet to ensure that any issues are noted and if one is found a work order is created in E-Maintenance program and addressed.

EUBOILER

230 million BTU per hour spreader-stoker boiler. It burns wood and tire derived fuel (TDF) to generate steam to power an electrical generator of 18 MW nameplate capacity. Natural gas is used to fire during start up of the boiler. The boiler is subject to MACT JJJJJ. Pollution control equipment for the boiler is a multiple cyclonic collector and electrostatic precipitator.

1. Emission limits-

| Date/Emission | CO pph   | CO MMBtu   | NOx pph  | NOx MMBtu  | SO2 pph    | SO2 MMBtu  |
|---------------|----------|------------|----------|------------|------------|------------|
| 2/25/2022     | 18.88    | 0.0992     | 41.18    | 0.2161     | 17.78      | 0.0926     |
| 3/12/2022     | 19       | 0.0971     | 45.67    | 0.2324     | 31.28      | 0.1588     |
| 5/21/2022     | 22.56    | 0.0948     | 46.1     | 0.1938     | 44.67      | 0.1872     |
| 7/4/2022      | 38.39    | 0.1699     | 45.52    | 0.2017     | 34.27      | 0.1512     |
| Limits        | 57.5 pph | 0.25/MMBtu | 57.5 pph | 0.25/MMBtu | 0.25/MMBtu | 0.25 MMBtu |



| Month/Emission | Sulfer Acid | VOC  | Lead  | Benzo(a) pyrene | Dioxins/Furans (TEQ) | Mercury |
|----------------|-------------|------|-------|-----------------|----------------------|---------|
| Jan-22         | 4.5         | 0.7  | 0.006 | 3.20E-06        | 4.23E-09             | 0.0004  |
| Feb-22         | 4.3         | 0.7  | 0.006 | 3.10E-06        | 4.08E-09             | 0.0004  |
| Mar-22         | 4.2         | 0.7  | 0.006 | 3.00E-06        | 3.90E-09             | 0.0004  |
| Apr-22         | 4.0         | 0.7  | 0.006 | 2.90E-06        | 3.79E-09             | 0.0004  |
| May-22         | 4.0         | 0.6  | 0.006 | 2.80E-06        | 3.70E-09             | 0.0004  |
| Jun-22         | 3.9         | 0.6  | 0.006 | 2.80E-06        | 3.62E-09             | 0.0004  |
| Jul-22         | 3.8         | 0.6  | 0.006 | 2.70E-06        | 3.53E-09             | 0.0004  |
| Aug-22         | 3.7         | 0.6  | 0.006 | 2.60E-06        | 3.44E-09             | 0.0004  |
| Sep-22         | 3.6         | 0.6  | 0.006 | 2.60E-05        | 3.38E-09             | 0.0004  |
| Oct-22         | 3.7         | 0.6  | 0.006 | 2.60E-06        | 3.47E-09             | 0.0004  |
| Nov-22         | 3.9         | 0.6  | 0.006 | 2.70E-06        | 3.61E-09             | 0.0004  |
| Dec-22         | 3.9         | 0.6  | 0.006 | 2.80E-06        | 3.63E-09             | 0.0004  |
| Limit          | 23.7        | 19.1 | 0.03  | 6.50E-06        | 2.30E-08             | 0.0006  |

| Month/Emission | Arsenic | total Chromium | Hexavent Chromium | HCL | PM -10 |
|----------------|---------|----------------|-------------------|-----|--------|
| Jan-22         | 0.00046 | 0.0070         | 0.0012            | 1.4 | 9.40   |

|        |         |        |        |     |      |
|--------|---------|--------|--------|-----|------|
| Feb-22 | 0.00044 | 0.0067 | 0.0011 | 1.4 | 9.10 |
| Mar-22 | 0.00042 | 0.0064 | 0.0011 | 1.3 | 8.70 |
| Apr-22 | 0.00041 | 0.0062 | 0.0010 | 1.3 | 8.40 |
| May-22 | 0.00040 | 0.0062 | 0.0010 | 1.2 | 8.20 |
| Jun-22 | 0.00039 | 0.0061 | 0.0010 | 1.2 | 8.10 |
| Jul-22 | 0.00038 | 0.0058 | 0.0010 | 1.2 | 7.80 |
| Aug-22 | 0.00037 | 0.0057 | 0.0009 | 1.2 | 7.60 |
| Sep-22 | 0.00036 | 0.0056 | 0.0009 | 1.2 | 7.50 |
| Oct-22 | 0.00037 | 0.0057 | 0.0010 | 1.2 | 7.70 |
| Nov-22 | 0.00039 | 0.0059 | 0.0010 | 1.2 | 8.00 |
| Dec-22 | 0.00039 | 0.0060 | 0.0010 | 1.2 | 8.10 |
| Limit  | 0.233   | 0.186  | 0.0071 | 8.9 | 98.9 |

Unless noted all amounts are in tons per year (tpy). Totals are 12-month rolling averages.

## II. Material Limits

See Source wide table for material limits data.

6. Permittee shall not exceed 0.8%, by weight, of chlorine, not 5 ppm, by weight of hexavalent chromium, nor 0.5 ppm, by weight of mercury in any fuels.....

Discussion – Source conducts annual testing of fuels. Current test was submitted in February 2023. Results are pending, but were checked in April. Still processing. Records of the testing is kept onsite. Limits have been met historically verified by test data.

## III. PROCESS/OPERATIONAL RESTRICTION(S)

1. The permittee shall not burn TDF and pentachlorophenol-treated wood in the EU BOILER simultaneously.

Discussion – source has not burned any pentachlorophenol wood with TDF.

2. **The permittee may burn TDF and particle board and/or plywood simultaneously if stack tests, approved by the AQD, demonstrate that these fuels can be co-fired without exceeding any emission limit specified in this permit.**

**Discussion – Source has not burned any particle board or plywood with TDF.**

3. The permittee shall begin firing EU BOILER from a cold start using natural gas only.  
Discussion- Cold start process listed in PM/MAP starts on natural gas only until proper temperature is reached to begin loading of approved fuels.
4. The permittee shall not operate EUBOILER unless the multiple cyclone collector and electrostatic precipitator are operating properly.

**Discussion—Start up and operation process ensures that this occurs. At time of inspection both were operating correctly.**

1. **The permittee shall not operate EUBOILER for more than 8,600 hours per 12-month rolling time period, as determined at the end of each calendar month.**

**Discussion CY 22 had 8,218.8 hours of operation.**

2. The permittee shall properly maintain the monitoring system including keeping necessary parts for routine repair of the monitoring equipment.

**Discussion Verification of the PM/MAP review and spot check of parts on hand verified that source is maintaining parts for routine repairs.**

1. Except as specified in paragraph (c) of Section 63.11223, stated in SC III.8, the permittee must conduct a tune-up of the boiler biennially...

**Discussion Boiler is tuned biennially. Last tune up was 1-31-23. Details of the tuning are kept in E-Maintenance at the source. Records of certification of compliance are kept at the source and have not been requested by AQD.**

1. **Boilers with an oxygen trim system that maintains an optimum air-to-fuel ratio that would otherwise be subject to a biennial tune—up...**

**Discussion Last tune up was 1-31-23. Details of the tuning are kept in E-Maintenance at the source. Records of certification of compliance are kept at the source and have not been requested by AQD.**

1. The boiler shall comply with the definition of the biomass subcategory...

**Discussion - source operates within the guidelines and definition of a biomass burner.**

#### **IV. Design/Equipment Parameters**

1. **Permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record NOx and SO2 concentration (CEMS)...**

**Discussion – This is occurring, the PM/MAP and CAM plan address the requirements of the operation and records provided indicate that monitoring and recording is occurring.**

2. **Permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record CO concentration (CEMS)...**

**Discussion – This is occurring, the PM/MAP and CAM plan address the requirements of the operation and records provided indicate that monitoring and recording is occurring.**

**3. Permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record O2 concentration (CEMS)...**

**Discussion – This is occurring, the PM/MAP and CAM plan address the requirements of the operation and records provided indicate that monitoring and recording is occurring.**

**4. Permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record visible emission (COMS)...**

**Discussion – This is occurring, the PM/MAP and CAM plan address the requirements of the operation and records provided indicate that monitoring and recording is occurring.**

**5. Performance Spec 1 shall be used for installation, initial eval, and operation of the COMS...**

**Discussion – This occurred at installation of the device and has reoccurred when new devices are installed and verified by TPU.**

**6. Performance Spec 2 shall be used for the installation, initial eval, and operation of the NOx and SO2 CEMS...**

**Discussion This occurred at installation of the device and has reoccurred when new devices are installed and verified by TPU.**

**7. Performance Spec 3 shall be used for the installation, initial eval, and operation of the O2 CEMS...**

**Discussion This occurred at installation of the device and has reoccurred when new devices are installed and verified by TPU.**

**8. Performance Spec 4 shall be used for the installation, initial eval, and operation of the CO CEMS...**

**Discussion This occurred at installation of the device and has reoccurred when new devices are installed and verified by TPU.**

**9. The span value for the NOx, SO2, CO and O2 CEMS shall be 2.0 times the lowest emission standard or as specified in federal regulations...**

**Discussion Daily check of the span values are shown in the records provided. The span on day of inspection was:**

| Measured | Span Value |
|----------|------------|
| NOx      | 425        |
| SO2      | 465        |
| CO       | 846        |
| O2       | 15.2       |

**10. Span value for COMS shall be between 60% and 80%**

Discussion—Daily check of the span value is occurring as shown in the records provided.

11. Permittee shall calibrate and standardize the COMS in accordance the procedures set forth in App F of 40 CFR Part 60...

Discussion – records and plans indicate that the source is utilizing the procedures as required.

12. Boiler shall maintain an O2 trim that maintains an optimum air-to-fuel ratio...

Discussion – O2 Trim is maintained on the boiler to ensure maximum efficiency.

#### V. Testing/Sampling

1. Permittee shall sample each type of fuel burned on an annual basis and have the samples tested for chromium and mercury...

Discussion—Testing is conducted annually. CY23 test has been submitted but as of the publishing of this report the results have not been returned to the company.

2. Permittee shall sample all solid fuels...on an annual basis and test for chlorine content...

Discussion-- Testing is conducted annually. CY23 test has been submitted but as of the publishing of this report the results have not been returned to the company.

3. The permittee shall verify PM-10, arsenic, benzo(a)pyrene, hydrogen chloride, hexavalent chromium, total chromium, lead, mercury compounds, Sulfuric Acid, TCDD Toxic Equivalent, and VOC expressed as propane emission rates ...

Discussion – Source has tested for these in previous stack test to verify the emission rates that are used for compliance and MAERS reporting.

4. The permittee shall verify the PM10, arsenic, benzo(a)pyrene, hydrogen chloride, hexavalent chromium, total chromium, lead, mercury compounds, H<sub>2</sub>SO<sub>4</sub>, TCDD Toxic Equivalent, and VOC emission rates from EUBOILER, at a minimum, every five years ...

Discussion – Date last test verified 7/28/2020. Data found at MACES>Emission Measurement>CES Tests> report CT\_24757984

5. The permittee shall verify PM emission rates from EUBOILER ...

Discussion Date last test verified 7/28/2020. Data found at MACES>Emission Measurement>CES Tests> report CT\_24757984

6. The permittee shall verify the PM emission rate from EUBOILER, at a minimum, every five years from the date of the last test.

Discussion- Date last test verified 7/28/2020. Data found at MACES>Emission Measurement>CES Tests> report CT\_24757984

7. The permittee shall perform exhaust gas flow rate testing for EUBOILER to determine the average flow rate which shall be used, in conjunction with CEM data, to calculate NO<sub>x</sub>, SO<sub>2</sub>, and CO pound per hour emission rates.

Discussion— Date of last gas flow rate test 3/2/2023. There had been a large discrepancy from previous test and many leaks had been found and repaired during an outage. Retesting was completed to ensure that accurate emission data was able to be used for the boiler.

8. Annual flow rate testing shall be performed using an approved method listed in 40 CFR Part 60, Appendix A...

Discussion TPU approves and sends out letter for the testing citing the correct testing methods to use.

9. The permittee shall verify the exhaust gas flow rate from EUBOILER, at a minimum, one calendar year from the date of the last test.

Discussion – Previous test was Aug 2022 and current test was Mar 2023.

10. The permittee shall notify the AQD Technical Programs Unit Supervisor and the District Supervisor not less than 7 days of the time and place before performance tests are conducted.

Discussion- Notification timelines have been met and accepted by TPU and District Office.

#### VI. Monitoring/Record Keeping

1. The permittee shall use the COMS to assure compliance with the PM limit. An excursion for PM shall be two consecutive 1-hour block average opacity values greater than 15 percent opacity....

Discussion COMS is monitoring and recording as required for this condition.

2. The permittee shall monitor and record the visible emissions from EUBOILER on a continuous basis in a manner and with instrumentation acceptable to the AQD. Six minute averages shall be based on 36 or more equally spaced instantaneous opacity measurements per six minute period.

Discussion Records provided indicate that this condition is being met.

1. The permittee shall use the COMS as an indicator of proper functioning of the electrostatic precipitator. The appropriate range of opacity defining proper function of the electrostatic precipitator is 0-15 percent opacity.  
Discussion – COMS is utilized as well as data from the ESP controller to ensure that both are operating properly.
2. In the event of an excursion of more than 15 percent opacity, based on two consecutive 1-hour block averages, the permittee shall examine and correct the electrostatic precipitator primary and secondary voltage in accordance to the MAP.  
Discussion PM/MAP addresses this, for any excursions see MACES>Reports Received.
3. The permittee shall implement a quality improvement plan if the total duration of opacity excursions is greater than 5 percent of the total EU BOILER operating time during the reporting time, excluding startup and shutdown.  
Discussion –No plan has been required.
4. The permittee shall operate the COMS during all required periods when EUBOILER is operating. Data recorded during monitoring malfunctions, repairs, and QA/QC operations shall not be used to demonstrate compliance with 40 CFR Part 64.  
Discussion – Records provided indicate that this is being conducted.

5. The permittee shall monitor and record the CO, NO<sub>x</sub>, SO<sub>2</sub>, and O<sub>2</sub> emissions from EU BOILER on a continuous basis in a manner and with instrumentation acceptable to the AQD.  
Discussion – Records provided indicate that this is being conducted.

6. For all pollutants not monitored by CEMS, the permittee shall establish emission factors using the most recent stack testing data. These emission factors shall be applied to calculate emissions of each pollutant. in the same units across the same time periods as the emission limits in Section I of this table.  
Discussion Records indicate that this is being conducted using stack test data from the 2020 test referred to above.

- 1. The permittee shall calculate and maintain records of CO, NO<sub>x</sub>, and SO<sub>2</sub> in pounds per hour and pounds per million BTU heat input emission rates using hourly averages of continuous emission monitoring data, in parts per million, and the average flow rate established in the most recent flow data testing.**

Discussion Records provided indicate that this is being conducted.

- 1. The permittee shall calculate and maintain records of PM, PM-10, VOC, Lead, and Sulfuric Acid from EUBOILER in pounds per million BTU heat input, using emission factors based on the most recent emissions tests.**  
Discussion – Records provided indicate that this is being conducted.
- 2. The permittee shall calculate and maintain records of PM-10, VOC, Arsenic, Benzo(a)pyrene, Hydrogen Chloride, Hexavalent Chromium, Total Chromium, Lead, Mercury Compounds, H<sub>2</sub>SO<sub>4</sub>, and TCDD Toxic Equivalent, in pounds per hour, from EUBOILER, using emission factors based on the most recent emissions tests.**

Discussion – Records provided indicate that this is being conducted.

- 1. The permittee shall calculate and maintain records of Arsenic, Benzo(a)pyrene, Hydrogen Chloride, Hexavalent Chromium, Total Chromium, Mercury Compounds, and TCDD Toxic Equivalent, as a concentration expressed in micrograms per dry standard cubic meter, from EUBOILER, using emission factors based on the most recent emissions tests.**  
Discussion – Records provided indicate that this is being conducted.

1. The permittee shall keep, in a satisfactory manner, monthly and 12-month rolling time period emission calculation records

of CO, NO<sub>x</sub>, SO<sub>2</sub>, PM-10, VOC, Hydrogen Chloride, Hexavalent Chromium, Total Chromium, Lead, Mercury Compounds, H<sub>2</sub>SO<sub>4</sub>, and TCDD Toxic Equivalent, in tons, from EUBOILER. The permittee shall use stack test results and the calculation in Appendix 7, or CEMS, to calculate pollutant emissions. The permittee shall keep all records on file at the facility and make them available to the Department upon request.

Discussion – Records provided indicate that this is being conducted. See EUBOILER I. Emission Limits chart for data relating to this requirement.

- 2. The permittee shall properly maintain the monitoring system including keeping necessary parts for routine repair of the monitoring equipment.**

Discussion PM/MAP and spot check during the inspection verify that this is being conducted.

- 1. The permittee shall operate the monitoring device during all periods that the emissions unit is operating. Data recorded during monitoring malfunctions, repair activities, and QA/QC operations shall not be used to determine 40 CFR Part 64 compliance.**

Discussion – Records provided indicate that this is being conducted.

- 1. The permittee shall monitor and record the natural gas usage in EUBOILER on a continuous basis in a manner and with instrumentation acceptable to the AQD.**

Discussion – Natural Gas usage is tracked.

- 1. By the fifth calendar day of each month, the permittee shall calculate the total usage of natural gas for the previous month and a 12-month rolling time period. The calendar month natural gas usage rate records and the 12-month rolling time period calculations shall be made available to the AQD upon request. These records may be stored electronically.**

Discussion – records inspected at the time of inspection show that this is being tracked. All records were accessed electronically and are kept at the source.

- 1. The permittee shall record and maintain records of the amounts of each fuel combusted during each day...**

Discussion Records are kept for daily fuel usage.

- 1. Each calendar day, the permittee shall calculate the total fuel burned...**

Discussion – Records are kept electronically that track the fuel



usage.

2. *The permittee shall maintain a written log of the hours of operation of EUBOILER. These records may be stored electronically....*

*Discussion – records indicate that all the required data points are being tracked and stored electronically.*

1. Upon detecting an excursion or exceedance, the owner or operator shall restore operation of EUBOILER (including the cyclone collector and ESP)...

Discussion – PM/MAP start up/shut down procedure is designed to minimize emissions during those periods, as well as excursions. See MACES>Reports Received for any information relating to excursions and the corrections.

2. **Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities ...**

**Discussion—Records provided indicate that this occurs. The work procedure at the plant is to ID issues early and repair prior to major issues.**

3. The permittee shall maintain written procedures for the opacity monitor quality assurance program, and shall make them available to Federal, State, and Local Air Quality representatives upon request.

**Discussion There is a written CAM plan (see MACES>Compliance Activity>report number CA\_N089067145)**

1. **The permittee must maintain the records specified in paragraphs (c)(1) through (7) of Section 63.11225, as listed below...**

**Discussion – Records and certification is maintained at the source.**

1. The permittee's records must be in a form suitable and readily available for expeditious review...

**Discussion Records provide were easily assessable and provided as requested during the site inspection.**

1. The permittee shall maintain records of monitoring data, monitor performance data, corrective actions taken..

**Discussion—Records provided indicate that this occurs.**

**28. The permittee shall monitor secondary voltage for the electrostatic precipitator.**

**Discussion – secondary voltage is monitored in the control room by the control room operator.**

## **VII. REPORTING**

**1. Prompt reporting of deviations pursuant to general conditions 21 and 22 of Part A.**

**Discussion – See MACES>reports received for any information relating to this requirement.**

**2. Semiannual reporting of monitoring and deviations pursuant to general condition 23 of part A...**

**Discussion – See MACES>reports received for any information relating to this requirement.**

**3. Annual certification of compliance pursuant to general conditions 19 and 20 of Part A...**

**Discussion – See MACES>reports received for any information relating to this requirement.**

1. Prior to installation or replacement of any CEMS or COMS, the permittee shall submit a monitoring plan to the District Supervisor for review and approval...  
Discussion – There is a written monitoring plan on file with the Gaylord District Office.
2. In accordance with 40 CFR 60.7(c) and (d) an excess emissions report (EER) and summary report...  
Discussion – See MACES> Reports Received for information on the EER.

1. Each semiannual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken...  
Discussion See MACES> Reports Received for information on the semiannual reports.

1. Each semiannual report of monitoring and deviations shall include summary information on monitoring downtime...  
Discussion See MACES> Reports Received for information on semiannual reports.

1. The permittee shall report the results of the quality assurance procedures of the CEMS...  
Discussion See MACES> Reports Received for information on the QA procedures reported.

**9. The permittee shall submit the results of the quality assurance procedures of the COMS ...**

**Discussion – See MACES> Reports Received for information on COMS reporting.**

10. The permittee must prepare, by March 1 of each year...

**Discussion – This is kept on file at the source and has not been requested by AQD for submission**

1. **If the permittee intends to commence or recommence combustion of solid waste...**

**Discussion- The source has no intention of burning sold waste.**

1. If the permittee has switched fuels or made a physical change to the boiler and the fuel switch or change resulted in the applicability of a different subcategory within 40 CFR Part 63, Subpart JJJJJ...

**Discussion – the source has not switch any fuels of made any physical changes to the boiler.**

1. VIII. Stack/Vent Restrictions

| Stack and Vent ID | Max exhaust Diameter | Estimated Diameter | Minimum Stack Height | Estimated Stack Height                       |
|-------------------|----------------------|--------------------|----------------------|--|
| SV Boiler         | 72"                  | Approx 72"         | 150'                 | Approx 150' from the Nikkon Forestry Pro II. |

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**IX. OTHER REQUIREMENT(S)**

**1. The permittee shall promptly notify the AQD for the need to modify the CAM plan..**

Discussion – See MACES>Compliance Activity>report CA\_N089067145 for review of the current CAM plan during the site inspection.

**2. The permittee shall perform the COMS QA procedure set forth in 40 CFR Par 60 App F...**

Discussion – Records provided and CAM plan indicate that this occurs as required.

**3. The permittee shall perform the quarterly QA procedures of the CEMS...**

Discussion – PM/MAP, CAM plan, and records provided indicate that this occurs as required.

**4. The permittee shall develop and implement a quality control plan and program for the opacity monitor...**

Discussion – a monitoring plan is submitted and approved and on file with the Gaylord District Office.

**5. if the opacity monitor fails two consecutive annual audits, two consecutive quarterly audits, or five consecutive daily checks...**

Discussion- Source has not had this occur, but there is a process in place in case it happens.

1. The permittee shall comply with all applicable requirements of 40 CFR Part 64.

Discussion – Records indicate that this occurs.

**7. At all times the permittee must operate and maintain affected source, including air pollution control equipment..**

Discussion – records provided at the source indicate that source is fulfilling this requirement.

**8. If the permittee owns or operates an industrial, commercial, or institutional boiler and would be subject to 40 CFR Part 63, Subpart JJJJ....**

Discussion – source is not switching fuels or burning solid waste.

**9. For affected boiler that ceased burning solid waste...**

Discussion- source has never burned solid waste.

**10. For affected boilers that switch fuels or make physical change...**

Discussion – Source has not switched fuels or made any physical changes to the boiler.

**11. Table 8 to 40 CFR Part 63 Subpart JJJJJ....**

Discussion- records provided indicate that that source is fulfilling this requirement.

**12. If the permittee identifies a failure to achieve compliance with an emission limit...**

Discussion Source has followed the procedures required for handling excursions and exceedances.

**13. The permittee shall comply with all provisions of 40 CFR Part 63, Subpart JJJJJ....**

**Discussion – Records indicate that the source is meeting the requirements of this subpart.**

#### **EUASHHANDLING**

**Ash handling equipment. Fly ash and bottom ash is conveyed to a wet rotary unloader where water is added to control fugitive dust. The ash is then transported to an enclosed building where it is stored until trucked offsite. There are no pollution controls on this EU.**

#### **I. Emission Limit**

| <b>Pollutant</b> | <b>Limit</b> | <b>Time period</b>      | <b>Observed day of inspection</b> |
|------------------|--------------|-------------------------|-----------------------------------|
| <b>VE</b>        | <b>5%</b>    | <b>6 minute average</b> | <b>Zero</b>                       |

#### **III. Process/Operational limits**

**1. Permittee shall not operate the ash handling system unless the wetting system is installed...**

**Discussion—at the time of inspection I verified that the wetting system was installed. Ash in the storage are was also wet indicating that this system is operational as required.**

**2. If VE exceed 5% Opacity... within 24 hours, either shut down the process or conduct any maintenance ...**

**Discussion – There has not been any VE exceeding 5% in the records reviewed. The employees do not remember having a 5% VE in the past.**

#### **V. Testing/Sampling**

**1. Permittee shall observe and record VE once per calendar day...**

**Discussion – readings from 22 Jan 22 Zero; 15 March 2022 Zero; 6 June 2022 Zero**

#### **VI. Monitoring/Record Keeping**

**1. Records of daily VE, repairs and remedial actions performed.....**

**Discussion – Daily checks are recorded on the daily check sheets. Any remedial actions required are found in E-Maintenance as the employees id any repairs required.**

#### **VII. Reporting**

**1. Prompt reporting of deviations pursuant to general conditions 21 and 22 of Part A.**

**Discussion – See MACES>reports received for any information relating to this requirement.**

**2. Semiannual reporting of monitoring and deviations pursuant to general condition 23 of part A...**

**Discussion – See MACES>reports received for any information relating to this requirement.**

**3. Annual certification of compliance pursuant to general conditions 19 and 20 of Part A...**

**Discussion – See MACES>reports received for any information relating to this requirement.**

#### **EUGENERATOR**

#### **III. Process/Operational Restrictions**

1. Permittee shall not operate the standby diesel Generator more than 100 hours/year...

Discussion - Current hour reading 175.7 hours total use in CY 2022 total usage was 0.4 hours

2. Permittee shall operate and maintain in manner consistent with safety and good air pollution control rules...

Discussion—Source follows all requirements of this condition.

3. Permittee may operate for any combination of following purposes...no more than 100 hours/year...

Discussion – in CY 22 0.4 hours were for maintenance purposes.

4. Permittee may operate for up to 50 hours per year in nonemergency situations....

Discussion – In CY 22 the 0.4 hours of operation was used for non-emergency situations.

#### IV. Design/Equipment Parameters

1. Shall have a non-resettable hour meter...

Discussion – I verified that the hour meter is not resettable.

#### VI. Monitoring/Record Keeping

1. Permittee shall maintain records of hours of operation per calendar year..

Discussion—Records are maintained and were provided.

2. Permittee shall maintain records of sulfur content and heat value of each diesel fuel delivery...

Discussion – the sulfur content of the fuel is on each of the fuel deliveries.

#### VII. Reporting

1. Prompt reporting of deviations pursuant to general conditions 21 and 22 of Part A.

Discussion – See MACES>reports received for any information relating to this requirement.

2. Semiannual reporting of monitoring and deviations pursuant to general condition 23 of part A...

Discussion – See MACES>reports received for any information relating to this requirement.

3. Annual certification of compliance pursuant to general conditions 19 and 20 of Part A...

Discussion – See MACES>reports received for any information relating to this requirement.

#### IX. Other requirements

1. Must meet requirement of 40 CFR Part 63 Sub ZZZZ (RICE MACT)...

Discussion – Oil change last 1-23-23 ; Plug inspection 1-23-23 ; belts/hose inspection 1-23-23. All maintenance is recorded using the E-Maintenance software system.

#### FGCOLDCLEANERS

Cold Cleaners used for parts washing and falling under exemptions of rules. There are two cold cleaners at the source.

#### II. Material Limits

1. permittee shall not used cleaning solvents containing more than 5% by weight of....

Discussion – SDS showed that this condition is met.

### III. Process/Operational Restrictions

1. Cleaned parts shall drain for no less than 15 seconds...

Discussion – there is a draining area in both cleaners. The process used at the site requires use of these drains.

2. routine maintenance as required my manufacturer...

Discussion – Safety Klean is contracted to do all the maintenance for the clod cleaners onsite.

### IV. Design/Equipment Parameters

1. Cold cleaner must meet one of the following...

Discussion less than 10ft<sup>2</sup> or in plant emissions.

2. shall be equipped with a device for draining clean parts...

Discussion – there is a device for draining clean parts.

3. has a cover and is closed when not in use...

Discussion- lids are closed when not in use. Lids were closed when I inspected.

4. If REID vapor of solvent more than 0.3 PSIA must have lid close assist....

Discussion – REID Vapor is less than 0.3 PSIA

5. Reid Vapor of solvent greater than 0.6 PSIA, heated above 120F....

Discussion—REID vapor is less than 0.6 PSIA and it is not heated.

### VI. MONITORING/RECORDKEEPING

1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions.

Discussion—Solvent is not heated.

2. The permittee shall maintain the following information on file for each cold cleaner...

Discussion—The required information is located on the cold cleaner as required.

3. The permittee shall maintain written operating procedures for each cold cleaner. These written procedures shall be posted in an accessible, conspicuous location near each cold cleaner.

Discussion—each cold cleaner has operating instructions on the cleaner.

4. As noted in Rule 611(2)(c) and Rule 707(3)(c), if applicable, an initial demonstration that the waste solvent is a safety hazard shall be made prior to storage in non-closed containers...

Discussion – the solvent is not a safety hazard and all maintenance of the cleaner is from Safety Klean.

NAME 

DATE 6-20-23

SUPERVISOR 