

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : J. H. Campbell Plant	SRN : B2835
Location : 17000 Crosswell	District : Grand Rapids
	County : OTTAWA
City : WEST OLIVE State: MI Zip Code : 49460	Compliance Status : Compliance
Source Class : MAJOR	Staff : Steve Lachance
FCE Begin Date : 8/2/2015	FCE Completion Date : 8/2/2016
Comments : FCE for FY '016. (SLachance, 8/3/16)	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/02/2016	Scheduled Inspection	Compliance	On-site activities for FY '016 Inspection - also Unit 1 PM Stack Testing Observations for MATS and Consent Decree. See CA_B283535787. (SLachance, 8/3/16)
08/01/2016	Other	Compliance	Review of 2nd Quarter 2016 Excess Emissions/CMS Performance Reports. Various COMS and CEMS are separated and placed into service this quarter per Consent Decree and MATS requirements. See CA_B283535748. (SLachance, 8/1/16)

Activity Date	Activity Type	Compliance Status	Comments
07/20/2016	CEM RATA	Compliance	<p>Various Relative Accuracy Test Audit (RATA) reports for new, reconfigured CEMS for Units Boiler1, Boiler2, and FGBOILERS12. Includes Flow, Moisture, CO2, SO2 and NOx. All systems passed RATA Performance requirements. The report concludes (page 11) that the monitoring and performance requirements of 40 CFR 60 Appendices B1 through B12, Acid Rain requirements of 40 CFR 75 Appendices A and B, and MI-ROP -B2835-2013a are satisfied. Portions of the testing were overseen/observed by SLachance and AQD-TPU personnel. Final report subject to further technical review by AQD-TPU. (SLachance, 7/20/16)</p>
07/18/2016	ROP Other	Compliance	<p>Quarterly Fugitive Dust Control Report (Q2 2016); Received timely and properly certified; outlines measures taken to mitigate fugitive dust conditions on -site. No known issues, no complaints received. (SLachance, 7/18/16)</p>

Activity Date	Activity Type	Compliance Status	Comments
07/07/2016	Stack Test Observation	Compliance	<p>Unit 2 testing for HCl per 40 CFR 63 Subpart UUUUU (Mercury and Air Toxics Standard; "MATS") Thursday 7/7/16 for the HCl test on Unit 2. This was "worst case" scenario at 369 MW (gross) and 60/40 blended coal. The Dry Sorbent Injection rate guaranteed by vendor for compliance is reportedly 1500 pph lime. At 4:30 PM, but at an injection rate of about 7500 pph lime, HCl concentrations were about 1 ppm, which was the target compliant emission rate (with a margin of comfort.) The test period/window was going to close by 10 PM or so, and after much Consumers' Internal Discussion, they pulled the plug on the test rather than doing the test just to pass; they needed to understand the day's issue(s) as to why the SDI was underperforming. Something was clearly abnormal, if only with respect to expected performance of the SDI. On Friday, 7/8/16 they tested on 100% Western coal; and passed at about 40% of limit (at 6000 pph lime injection.) Clean Air Engineering seemed to be doing a good job out there. Their system HCl recovery rates were about 86% on Friday, 7/7/16. (SLachance, 7/11/16)</p>
06/09/2016	ROP Other	Compliance	<p>Certification test reports for the new J.H. Campbell Units 1 & 2 COMS. Subject to further review by AQD-TPU, but the report indicates acceptable initial performance of these new, separated Continuous Opacity Monitoring Systems. SLachance spot-checked various values (S/Ns, filter densities, recorded readings, etc.) against his report from 3/30/16 and found concurrence between the test reports and those documented observations. (SLachance, 6/9/16)</p>
06/07/2016	CEMS Test Observation	Compliance	<p>Observation of Unit 1 Hg Performance Certification</p>
06/05/2016	Site Review	Compliance	<p>Visible Emissions from Unit 3</p>

Activity Date	Activity Type	Compliance Status	Comments
05/24/2016	Site Review	Compliance	On-Site Review; observation of Unit 2 RATA with DPatterson of AQD-TPU. 60:40 fuel blend (W:E coal) with DSI control of acid gas. All was OK with operations, but observed SO2 ppm were perilously close to the upper limit of the "Low" range for the RATA (300 ppm), so testing pace was slow as facility fine tuned operation of boiler with controlled DS to keep SO2 in "Low" range. (Low refers to emissions for the monitor, NOT boiler load.) Note at full load, each of the three silos will store about 2 day's worth of lime; injection rates are reportedly on the order of 1000 pounds per hour +/- (SLachance, 5/25/16)
04/29/2016	Other	Compliance	Review of Q1 2016 Excess Emissions/CEMS Performance Reports (SLachance, 4/29/16)
04/29/2016	Excess Emissions (CEM)	Compliance	1st Quarter Excess Emissions; see CA_B283534383. (SLachance, 4/29/16)
04/19/2016	ROP Other	Compliance	1st Quarter Fugitive Dust report; received timely and properly certified; no complaints received this quarter; no known fugitive dust issues. (SLachance, 4/19/16)
03/31/2016	MAERS	Compliance	ROP Certification form for MAERS received 3/21/16 (Post-Marked 3-15-16) Selected for Audit based on High Pre-Audit Score and Targeted Inspection in FY '016. See notes in Audit Console of e-MAERS. (SLachance, 3/31/16)
03/30/2016	Site Review	Compliance	Unit 1 and Unit 2 (separated) COMS Initial Certification Test Observations
03/21/2016	ROP Annual Cert	Compliance	SECTION 2 COMBUSTION TURBINE; no deviations from the ROP reported for the Annual period ending 12-31-15; no known issues. Very limited operations in 2015 per inspection and EI2015 MAERS reporting. (SLachance, 3/21/16)

Activity Date	Activity Type	Compliance Status	Comments
03/21/2016	ROP SEMI 2 CERT	Compliance	SECTION 2 COMBUSTION TURBINE; no deviations from the ROP reported for the Semi-Annual period ending 12-31-15; no known issues. Very limited operations in 2015 per inspection and EI2015 MAERS reporting. (SLachance, 3/21/16)
03/21/2016	ROP Annual Cert	Compliance	Postmarked 3/15/16; properly certified. Annual Report of certified deviations for the period ending 12/31/16; both deviations are generalized statements of previously-reported short-term Opacity Exceedances. These have been reported and reviewed via required quarterly performance reports. Opacity Performance has met or exceeded 99.97% for all units for all quarters in 2015. Opacity events are avoided and minimized per maintenance, monitoring and standard procedures. No further action is necessary. (SLachance, 3/21/16)
03/21/2016	ROP SEMI 2 CERT	Compliance	Postmarked 3/15/16; properly certified. Semi-Annual Report of certified deviations for the period ending 12/31/16; the deviation is a generalized statement of previously-reported short-term Opacity Exceedances. These have been reported and reviewed via required quarterly performance reports. Opacity Performance has met or exceeded 99.97% for all units for all quarters in 2015. Opacity events are avoided and minimized per maintenance, monitoring and standard procedures. No further action is necessary. (SLachance, 3/21/16)
03/21/2016	CAM Excursions/Exceedances	Compliance	Postmarked 3/15/16; CAM Excursion Report for the semi-annual period ending 12/31/15; none for any of the CAM-regulated units (EUBOILER1, EUBOILER2, EUBOILER3, EUCOAHAND, EUFLYASH. No known issues. (SLachance, 3/21/16)

Activity Date	Activity Type	Compliance Status	Comments
03/21/2016	CAM monitor downtime	Compliance	Postmarked 3/15/16; CAM Monitor Downtime report for the semi-annual period ending 12/31/16. CAM is based on Visible Emissions for EUASHNEW and EUCOAHAND; all monitoring reported to be in place for the period. CAM is based on COMS for coal-fired boilers; minor COMS downtime for QA/QC and audit activities as previously reported/reviewed in required quarterly reports. No known issues. (SLachance, 3/21/16)
03/16/2016	ROP Other	Compliance	Start up notice for Unit 1 pollution control equipment as required by PTI and ROP. PJFF - 2/29/16; DSI - 3/28/16; ACI - 3/14/16. All equipment in place prior to the MATS compliance deadline of 4-16-16. (SLachance, 3/16/16)
02/03/2016	Excess Emissions (CEM)	Compliance	4th Quarter 2015 Excess Emissions and CEMS Performance Reports; see CA_B283533179. (SLachance, 2/3/16)
02/03/2016	Other	Compliance	Review of Q4 2015 Excess Emissions and CEMS Performance Reports
01/29/2016	MACT (Part 63)	Compliance	Notification of compliance for Subpart DDDDD; existing, limited use oil unit; per MI-ROP-B2835-2013; no emission limits; initial tune-up and one-time energy assessment reported to be completed. Timely and properly certified. (SLachance, 1/29/16)
01/20/2016	ROP Other	Compliance	4th Quarter Fugitive Dust Report; received timely and properly certified; no complaints received this quarter; no known fugitive dust issues. (SLachance, 1/20/16)
12/18/2015	CEM RATA	Compliance	CEMS RATA for Units 1 & 2 {common NOx monitor at mid-load}; RATA completed 10/27/15; observed in part by SL; CEMS meets performance requirements; report is subject to possible further review by AQD-TPU. (SLachance, 12/18/15)
10/30/2015	Excess Emissions (CEM)	Compliance	3rd Quarter 2015 Excess Emissions and CEMS Performance Reports; see CA_B283531997. (SLachance, 10/30/15)

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10/30/2015	Other	Compliance	Review of 3rd Quarter 2015 Excess Emissions and CEMS Performance Reports
10/27/2015	CEMS Test Observation	Compliance	NOx (only) RATA for Units 1 and 2; after 4 runs, difference between source CEMS and Reference Method (trailer) CEMS was about 11 ppm (and <15 ppm), as required to pass the complete RATA. Actual NOx emissions 50-60 ppm, 10% H2O. 10-12% Opacity, partial Opacity Matrix in file. Onsite from about 10 AM (local time, CEMS time is minus 1 hour) until 1:20 PM or so; Run 5 of required 9 was underway. (SLachance, 10/27/15)
10/16/2015	ROP Other	Compliance	3rd Quarter Fugitive Dust Control Report; no complaints or known issues for this reporting period. (SLachance, 10/16/15)
09/18/2015	ROP Semi 1 Cert	Compliance	Required ROP Report of Certified Deviations for the semi-annual period ending 6-30-15; Section 2 of MI-ROP-B2835-2013 is the Combustion Turbine on-site. NO deviations reported, but the unit did not operate and is in "moth-ball" status with the regional electric system operator. Report was timely and properly certified. (SLachance, 9/18/15)
09/18/2015	ROP Semi 1 Cert	Compliance	Postmarked 9-15-15; Required ROP Reports (Deviations, CAM excursions and CAM Down-time) for the Semi-Annual Period ending June 30, 2015. See CA_B283531254. (SLachance, 9/18/15)
09/18/2015	CAM Excursions/Exceedances	Compliance	Postmarked 9-15-15; Required ROP Reports (Deviations, CAM excursions and CAM Down-time) for the Semi-Annual Period ending June 30, 2015. See CA_B283531254. (SLachance, 9/18/15)
09/18/2015	CAM monitor downtime	Compliance	Postmarked 9-15-15; Required ROP Reports (Deviations, CAM excursions and CAM Down-time) for the Semi-Annual Period ending June 30, 2015. See CA_B283531254. (SLachance, 9/18/15)

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09/18/2015	Other	Compliance	Review of required ROP Reports (certified deviations, CAM excursions and CAM down-time) for the semi-annual period ending June 30, 2015. These reports apply to Section 1 of the permit. (SLachance, 9/18/15)
09/03/2015	Scheduled Inspection	Compliance	Scheduled Inspection for FY '015 with emphasis on Consent Decree Requirements and Unit 2; see CA_B283530996.

Name:

SJ Jordan

Date:

8/4/16

Supervisor:

[Signature]