

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

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| Facility : J. H. Campbell Plant | | SRN : | B2835 |
| Location : 17000 Croswell | | District : | Grand Rapids |
| | | County : | OTTAWA |
| City : | WEST OLIVE | State: | MI Zip Code : 49460 Compliance Status : |
| Source Class : MAJOR | | Staff : | Kaitlyn DeVries |
| FCE Begin Date : 9/21/2018 | | FCE Completion Date : | 9/20/2019 |
| Comments : FY 2019 FCE | | | |

List of Partial Compliance Evaluations :

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|---------------|-------------------|---|
| 09/19/2019 | Stack Test | Compliance | The 2nd quarter MATS test report for Unit 2 was received on time and complete. Consumers Energy (CE) is utilizing quarterly stack testing to demonstrate compliance with the Particulate Matter (PM) and Hydrogen Chloride (HCl) requirements promulgated by 40 CFR Part 63 Subpart UUUUU. During testing, Unit 1 was operating within the maximum normal operating load requirement range of 90 - 110% of the design capacity and was burning 100% western coal. Results indicate a PM emission rate of 0.0015 lb/mmBTU. This emission rate is compliant with the MATS limit of 0.03 lb/mmBTU and the low emitting EGU (LEE) limit of 0.015 lb/mmBTU. The HCl results show an emission rate of 0.00006 lb/mmBTU. This is compliant with the MATS limit of 0.0020 lb/mmBTU and the LEE limit of 0.0010 lb/mmBTU. This test demonstrates 12 consecutive tests that are compliant with the LEE limits. A total of 12 (3 years) consecutive tests are required to obtain LEE status, therefore this test demonstrates the successful meeting of LEE eligibility criteria of 63.10005(h). |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|-----------------|-------------------|---|
| 09/19/2019 | MACT (Part 63) | Compliance | Consumers Energy's J.H Campbell Generating Complex submitted an updated Notice of Compliance Status (NOCS) pursuant to the Mercury and Air Toxics Standard 40 CFR Part 63 Subpart UUUUU 63.10030(e) for Boiler Unit 2. Stack testing had previously been used to demonstrate compliance with the PM and HCl emission limits, however, 12 consecutive quarterly stack tests have indicated compliance with the Low emitting EGU (LEE) criteria as defined in 63.1005(h)(1)(i). Therefore the NOCS is being updated indicating compliance with LEE and subsequent testing is conducted every three (3) years. |
| 09/19/2019 | CEM RATA | Compliance | The Mercury CEMS RATA for Units 1 and 2 were received on time and complete. The results indicate that both are within the 20% allowed relative accuracy. However, the results should be reviewed by AQD's TPU. |
| 09/19/2019 | ROP Semi 1 Cert | Compliance | The Semi-Annual ROP Certification report pursuant to MI-ROP-B2835-2013b was received on time and complete. A total of one (1) deviation was reported for the reporting period. The deviation was for excess opacity during the first quarter of 2019. This excess opacity event had previously been reported to AQD, and a Violation Notice was issued at that point. No further action is required at this time. |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|----------------------------|-------------------|--|
| 09/19/2019 | MACT (Part 63) | Compliance | <p>The Semiannual Compliance report pursuant to 40 CFR Part 63 Subpart UUUUU for Coal-and Oil-Fired Electric Utility Steam Generating Units, Mercury and Air Toxics Standard (MATS) was received on time and complete.</p> <p>EUBOILER1 and EUBOILER2 demonstrated compliance with the MATS requirements via Stack testing for PM and HCl, and through a certified Mercury (Hg) and diluent CEMS for Hg. EUBOILER1 was able to achieve LEE status on May 14, 2019 and EUBOILER2 on June 12, 2019. No emergency bypass of the control equipment was done from those times through June 30, 2019. EUBOILER3 demonstrated compliance with the MATS requirements via CEMS for PM, Hg, and SO2.</p> <p>Tune-ups for the three units were conducted in August 2018, June 2018, and June and July 2018, respectively. No excess emission or deviations in work practice standards were reported for any of the units.</p> |
| 09/19/2019 | CAM Excursions/Exceedances | Compliance | <p>The CAM excursion and exceedance report was received on time and complete. Once (1) incident of a CAM excursion and exceedance was reported for BOILER2. This excess emissions event was previously reported to AQD and a Violation notice was issued. No further action is required at this time.</p> |
| 09/19/2019 | CAM monitor downtime | Compliance | <p>The CAM monitor downtime report was received on time and complete. Monitor downtime reported for Unit 1 and 2. Unit 1 had a total of 18 6- minute time periods of downtime and Unit 2 had a total of 17 6-minute periods of downtime. These vents were also reported in the COMS monitor downtime reports.</p> |

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| 09/18/2019 | Excess Emissions (CEM) | Compliance | <p>The 2nd Quarter Excess Emissions for Units 1, 2 & 3, the Annual Opacity Monitor Assessment for Unit 1 & 2 and the Quarterly Opacity Monitor Assessment for Unit 3 was received on time and complete.</p> <p>Unit 1: There was a total of 108228 Minutes (1803.8 hours) of operation for the reporting period. The COMS monitor had a total of 108 minutes (0.10%) downtime with no associated excess emissions. The downtime was due to the annual COMS audit. The CEMS SO2 monitor had 15 hours (0.84%) downtime with no associated excess emissions. The downtime was due to monitor troubles and troubleshooting.</p> <p>Unit 2: There was a total of 90452 minutes (1507.53 hours) operating hours for Unit 2 during the reporting period. The COMS monitor had a total of 102 minutes (0.11%) downtime with no associated excess emissions. The downtime was due to the annual audit. No monitor downtime or excess emissions were reported for the SO2 CEMS for Unit 2 during the reporting period.</p> <p>Unit 3: There was a total of 131041 minutes (2184 Hours) of operating time for Unit 3 during the reporting period. No excess emissions were reported, but a total of 0.12% (156 minutes) of COMS monitor downtime was reported. This was all due to Quality Assurance actions including filter audits. The NOx CEMS had 6.0% (131) hours of monitor downtime, but no associated excess emissions. The downtime was primarily due to performance testing , with other downtime due to monitor malfunctions. Similarly, the SO2 CEMS had 0.05% (1 hour) of monitor downtime with no associated excess emissions. The downtime as due to monitor recalibrations.</p> <p>The Units 1, 2, and 3 Opacity test were also received. The</p> |
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| 09/18/2019 | Excess Emissions (CEM) | Compliance | associated low, mid, and high level opacity checks indicated passing results. |
| 08/30/2019 | MACT (Part 63) | Compliance | The Unit 3 MATS (40 CFR Part 63 Subpart UUUUU) PM CEMS 2nd Quarter Report was received on time and complete. The highest 30-day rolling average during the reporting period was 0.000498 lb/MMBTU, which is compliant with the limit of 0.030 lb/MMBTU. |
| 08/22/2019 | Scheduled Inspection | Compliance | The purpose of these inspections was to determine compliance with the facility's renewable operating permit (ROP) MI-ROP-B2835-2013b, and PTI No. 18-15A, which is being rolled into ROP during the renewal, which is currently in house with AQD. The observations made during each visit will comprise this Full Compliance Evaluation (FCE) for Fiscal Year 2019. |
| 08/08/2019 | MACT (Part 63) | Compliance | Consumers Energy's J.H Campbell Generating Complex submitted an updated Notice of Compliance Status (NOCS) pursuant to the Mercury and Air Toxics Standard 40 CFR Part 63 Subpart UUUUU 63.10030(e) for Boiler Unit 1. Stack testing had previously been used to demonstrate compliance with the PM and HCl emission limits, however, 12 consecutive quarterly stack tests have indicated compliance with the Low emitting EGU (LEE) criteria as defined in 63.1005(h)(1)(i). Therefore the NOCS is being updated indicating compliance with LEE and subsequent testing is conducted every three (3) years. |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|---------------|-------------------|--|
| 08/06/2019 | Stack Test | Compliance | <p>The 2nd quarter MATS test report for Unit 1 was received on time and complete. Consumers Energy (CE) is utilizing quarterly stack testing to demonstrate compliance with the Particulate Matter (PM) and Hydrogen Chloride (HCl) requirements promulgated by 40 CFR Part 63 Subpart UUUUU. During testing, Unit 1 was operating within the maximum normal operating load requirement range of 90 - 110% of the design capacity and was burning 100% western coal. Results indicate a PM emission rate of 0.0025 lb/mmBTU. This emission rate is compliant with the MATS limit of 0.03 lb/mmBTU and the low emitting EGU (LEE) limit of 0.015 lb/mmBTU. The HCl results show an emission rate of 0.00005 lb/mmBTU. This is compliant with the MATS limit of 0.0020 lb/mmBTU and the LEE limit of 0.0010 lb/mmBTU. This test demonstrates 12 consecutive tests that are compliant with the LEE limits. A total of 12 (3 years) consecutive tests are required to obtain LEE status, therefore this test demonstrates the successful meeting of LEE eligibility criteria of 63.10005(h).</p> |
| 07/31/2019 | CEM RATA | Compliance | <p>The Continuous Emission Monitoring System (CEM) Relative Accuracy Test Audit (RATA) for Units 1 & 2 for CO₂, SO₂, and NO_x was received on time and complete. The results meet the acceptable 40 CFR Part 75 Appendix A Relative Accuracy (RA) performance specifications of =10%, ± 15.0 ppm, or ± 0.200 lb/mmBtu. The results also meet the reduced annual RATA frequency conditions of = 7.5%, ± 12 ppm, or ± 0.00015 lb/mmBTU, as applicable per Appendix B of Part 75. However, a full review by AQD's TPU will be required to determine compliance.</p> |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|---------------|-------------------|--|
| 07/19/2019 | ROP Other | Compliance | <p>The 2nd Quarter Fugitive Dust Report for 2019 was received on time and complete. The facility utilized a variety of dust control activities including returning the irrigation systems to working condition following the cold weather season, application of dust suppression agents, fueling the plant directly from trains, foam dust suppression systems, grooming and compacting the coal piles, using conditioning measures during ash unloading operations at the landfill, daily surveillance of the site to ensure there was adequate dust control, and deploying final cover to close the remaining acreage in Cell 3 and part of Cell 4 of the landfill. A water truck was also used during those activities. AQD did not receive any dust complaints during this time period. No further action is required at this time.</p> |

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| 06/03/2019 | Excess Emissions (CEM) | Compliance | <p>The First Quarter Excess Emissions for Units 1, 2 & 3 and Opacity Assessment for Unit 3 was received on time and complete. The reports are pursuant to MI-ROP_B2835-2013b.</p> <p>Unit 1: There was a total of 129600 Minutes (2160 hours) of operation for the reporting period. No COMS monitor downtime or excess emissions were reported. Similarly, no CEMS monitor downtime or excess emissions were reported for the SO2 CEMS.</p> <p>Unit 2: There was a total of 127748 minutes (2129 hours) operating hours for Unit 2 during the reporting period. No COMS monitor downtime was reported, but a total of 0.14% (180 Minutes) of excess emissions was reported. AQD has previously issued a Violation for excess emissions resulting from this event. No further action will be taken regarding the excess emissions. No monitor downtime or excess emissions were reported for the SO2 CEMS for Unit 2 during the reporting period.</p> <p>Unit 3: There was a total of 108760 minutes (1812.6 Hours) of operating time for Unit 3 during the reporting period. No excess emissions were reported, but a total of 0.18% (198 minutes) of COMS monitor downtime was reported. This was all due to Quality Assurance actions including filter audits. The NOx CEMS had 0.40% (7.07) hours of monitor downtime, but no associated excess emissions. The downtime was due to monitor malfunctions and the associated repair of the analyzer. Similarly, the SO2 CEMS had 0.40% (7.07 hours) of monitor downtime with no associated excess emissions. Like the NOx CEMS, the downtime as due to monitor malfunctions and the associated repair of the analyzer.</p> <p>The Unit 3 Opacity test was also received. The associated low, mid, and high level opacity checks</p> |
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| 06/03/2019 | Excess Emissions (CEM) | Compliance | indicated passing results. This test was the primary reason for the COMS downtime reported during this report. |
| 05/08/2019 | MACT (Part 63) | Compliance | The 1st quarter Boiler Unit 3 Particulate Matter (PM) 30-day rolling average report pursuant to MI-ROP-B2835-2013b and 40 CFR Part 63 Subpart UUUUU was received on time and complete. The results indicate continuous compliance with the limit of 0.030 lb/MMBTU. The boiler operated for a total of 720 hours during the reporting period and had a highest 30-day rolling average of 0.000490 lb/MMBTU. No further action is necessary at this time. |
| 05/08/2019 | MACT (Part 63) | Compliance | The 1st quarter MATS test report for Unit 1 was received on time and complete. Consumers Energy (CE) is utilizing quarterly stack testing to demonstrate compliance with the Particulate Matter (PM) and Hydrogen Chloride (HCl) requirements promulgated by 40 CFR Part 63 Subpart UUUUU. During testing, Unit 2 was operating within the maximum normal operating load requirement range of 90 - 110% of the design capacity and was burning 100% western coal. Results indicate a PM emission rate of 0.0001 lb/mmBTU. This emission rate is compliant with the MATS limit of 0.03 lb/mmBTU and the low emitting EGU (LEE) limit of 0.015 lb/mmBTU. The HCl results show an emission rate of 0.00005 lb/mmBTU. This is compliant with the MATS limit of 0.0020 lb/mmBTU and the LEE limit of 0.0010 lb/mmBTU. This test demonstrates 11 consecutive tests that are compliant with the LEE limits. A total of 12 (3 years) consecutive tests are required to obtain LEE status. |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|----------------|-------------------|--|
| 05/08/2019 | MACT (Part 63) | Compliance | <p>The 1st quarter MATS test report for Unit 2 was received on time and complete. Consumers Energy (CE) is utilizing quarterly stack testing to demonstrate compliance with the Particulate Matter (PM) and Hydrogen Chloride (HCl) requirements promulgated by 40 CFR Part 63 Subpart UUUUU. During testing, Unit 2 was operating within the maximum normal operating load requirement range of 90 - 110% of the design capacity and was burning 100% western coal. Results indicate a PM emission rate of 0.0005 lb/mmBTU. This emission rate is compliant with the MATS limit of 0.03 lb/mmBTU and the low emitting EGU (LEE) limit of 0.015 lb/mmBTU. The HCl results show an emission rate of 0.00004 lb/mmBTU. This is compliant with the MATS limit of 0.0020 lb/mmBTU and the LEE limit of 0.0010 lb/mmBTU. This test demonstrates 11 consecutive tests that are compliant with the LEE limits. A total of 12 (3 years) consecutive tests are required to obtain LEE status.</p> |
| 04/24/2019 | ROP Other | Compliance | <p>The 1st Quarter Fugitive Dust Report for 2019 was received on time and complete. The facility utilized a variety of dust control activities including precipitation on 53% of the days with the seasonal snowfall around 70 inches. Other dust control activities included: irrigation systems, a water truck, dust suppression agents, brine application, fueling the plant directly from trains, foam dust suppression systems, grooming and compacting the coal piles, using conditioning measures during ash unloading operations at the landfill, developing a plan to restore the full coal pile irrigation system during the upcoming period, and daily surveillance of the site to ensure there was adequate dust control. AQD did not receive any dust complaints during this time period. No further action is required at this time.</p> |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|----------------------------|-------------------|--|
| 04/01/2019 | ROP Annual Cert | Compliance | The Annual ROP Certification report pursuant to MI-ROP-B2835-2013b was received on time and complete (Postmarked 3/15/19). A total of one (1) deviation was reported for the reporting period. The deviation was for excess opacity during the third and fourth quarters of 2018. |
| 04/01/2019 | ROP SEMI 2 CERT | Compliance | The Semi-Annual ROP Certification report pursuant to MI-ROP-B2835-2013b was received on time and complete (Postmarked 3/15/19). A total of one (1) deviation was reported for the reporting period. The deviation was for excess opacity during the third and fourth quarters of 2018. |
| 04/01/2019 | CAM Excursions/Exceedances | Compliance | This report was received on time and complete (Postmarked 3/15/19). No CAM excursions or exceedances were reported for the reporting period. No further action is required. |
| 04/01/2019 | CAM monitor downtime | Compliance | This report was received on time and complete (Postmarked 3/15/19). Downtime was reported for FGBOILER12 and EUBOILER3 due to issues with the COMS units. The monitors have since been serviced and returned to normal operations. This has been reported as a deviation. |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|-----------------|-------------------|--|
| 04/01/2019 | MACT (Part 63) | Compliance | <p>The Semiannual Compliance report pursuant to 40 CFR Part 63 Subpart UUUUU for Coal-and Oil-Fired Electric Utility Steam Generating Units, Mercury and Air Toxics Standard (MATS) was received on time and complete (postmarked 3/15/2019).</p> <p>EUBOILER1 and EUBOILER2 demonstrated compliance with the MATS requirements via Stack testing for PM and HCl, and through a certified Mercury (Hg) and diluent CEMS for Hg. EUBOILER3 demonstrated compliance with the MATS requirements via CEMS for PM, Hg, and SO2.</p> <p>Tune-ups for the three units were conducted in August 2018, June 2018, and June and July 2018, respectively. No excess emission or deviations in work practice standards were reported for any of the units.</p> |
| 03/25/2019 | ROP Annual Cert | Compliance | <p>The annual compliance reports pursuant to MIOROP-B2835-2013b for section 2 were received on time and complete. No deviations were reported for the reporting period. No further action is necessary at this time.</p> |
| 03/25/2019 | ROP SEMI 2 CERT | Compliance | <p>The semi-annual compliance reports pursuant to MIOROP-B2835-2013b for section 2 were received on time and complete. No deviations were reported for the reporting period. No further action is necessary at this time.</p> |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|---------------|-------------------|--|
| 02/20/2019 | Rule 912 | | <p>The Unit 2 Excess Emission Event Report pursuant to Rule 912 was received within the specified 10 day window.</p> <p>The excess opacity emissions were due to one of the secondary air pre-heaters failing causing an inability to remove heat from the flue gas coming from the furnace, therefore increasing the temperatures in the pulse jet fabric filter PJFF baghouse. This in turn caused the PJFF to go into automatic emergency bypass mode. Plant staff tried to reduce the flue gas temperature and get the PJFF back online, but after multiple attempts it couldn't, and the unit needed to be taken off line. The entire duration of these events lasted from 1657 to 1936 (159 minutes), with 100% opacity being reported from 1700 to 1929 (2 hours 29 minutes).</p> <p>It should be noted that during this timeframe, The Midcontinent Independent System Operator (MISO) was operating under a state of conservative system operations, where all equipment that could be made available to increase generation capability was to be put into service. This was in response to the State of Michigan's declaration of a State of Emergency under Executive Order 2019-1 due to extremely low temperatures.</p> |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|----------------|-------------------|--|
| 02/07/2019 | MACT (Part 63) | Compliance | <p>The 4th quarter MATS test report for Unit 2 was received on time and complete. Consumers Energy (CE) is utilizing quarterly stack testing to demonstrate compliance with the Particulate Matter (PM) and Hydrogen Chloride (HCl) requirements promulgated by 40 CFR Part 63 Subpart UUUUU. During testing, Unit 2 was operating within the maximum normal operating load requirement range of 90 - 110% of the design capacity and was burning 100% western coal. Results indicate a PM emission rate of 0.0013 lb/mmBTU. This emission rate is compliant with the MATS limit of 0.03 lb/mmBTU and the low emitting EGU (LEE) limit of 0.015 lb/mmBTU. The HCl results show an emission rate of 0.00006 lb/mmBTU. This is compliant with the MATS limit of 0.0020 lb/mmBTU and the LEE limit of 0.0010 lb/mmBTU. This test demonstrates 10 consecutive tests that are compliant with the LEE limits. A total of 12 (3 years) consecutive tests are required to obtain LEE status.</p> |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|----------------|-------------------|--|
| 02/07/2019 | MACT (Part 63) | Compliance | <p>The 4th quarter MATS test report for Unit 1 was received on time and complete. Consumers Energy (CE) is utilizing quarterly stack testing to demonstrate compliance with the Particulate Matter (PM) and Hydrogen Chloride (HCl) requirements promulgated by 40 CFR Part 63 Subpart UUUUU. During testing, Unit 1 was operating within the maximum normal operating load requirement range of 90 - 110% of the design capacity and was burning 100% western coal. Results indicate a PM emission rate of 0.0008 lb/mmBTU. This emission rate is compliant with the MATS limit of 0.03 lb/mmBTU and the low emitting EGU (LEE) limit of 0.015 lb/mmBTU. The HCl results show an emission rate of 0.00005 lb/mmBTU. This is compliant with the MATS limit of 0.0020 lb/mmBTU and the LEE limit of 0.0010 lb/mmBTU. This test demonstrates 10 consecutive tests that are compliant with the LEE limits. A total of 12 (3 years) consecutive tests are required to obtain LEE status.</p> |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|------------------------|-------------------|---|
| 02/05/2019 | Excess Emissions (CEM) | Compliance | <p>The 4th Quarter Excess Emissions Report for Units 1, 2, and 3 and the Opacity Monitor Assessment for Unit 3 was received on time and complete.</p> <p>Unit 1: Unit 1 Continuous Opacity Monitoring system (COMS) operated for a total of 124034 minutes (2067 hours). There was no opacity monitor downtime or excess emissions reported. The SO2 Continuous Emissions Monitoring system (CEMS) operated for a total of 2032.42 hours, and had no excess emissions, but 10 hours (0.49%) monitor downtime. The downtime was due to misted calibrations on one operating day.</p> <p>Unit 2: The Unit 2 COMS had an operating time of 119812 minutes (1997 hours) and reported no monitor downtime but 66 minutes (0.06%) excess emissions. The reported excess emissions are due to troubleshooting and repairs to the baghouse. The SO2 CEMS operated for 1957.37 hours with no reported excess emissions and 1 hour (0.05%) of monitor downtime due to monitor trouble that was quickly repaired.</p> <p>Unit 3: The COMS for unit 2 was operated for a total of 132310 minutes (2205 hours) with 156 minutes (0.12%) monitor downtime due to Quality Assurance testing and filter audits. No excess emissions were associated with this. The nitrogen oxides (NOx) and SO2 CEMS units reported operating times of 1963 hours with 7 hours (0.66%) monitor downtime with no excess emissions. The downtime was due to troubleshooting and repairs to the analyzer.</p> <p>The Unit 3 opacity test indicated passing results, with no issues noted.</p> |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|-----------------------|-------------------|---|
| 02/05/2019 | MACT (Part 63) | Compliance | The 4th quarter Boiler Unit 3 Particulate Matter (PM) 30-day rolling average report pursuant to MI-ROP-B2835-2013b and 40 CFR Part 63 Subpart UUUUU was received on time and complete. The results indicate continuous compliance with the limit of 0.030 lb/MMBTU. The boiler operated for a total of 720 hours during the reporting period and had a highest 30-day rolling average of 0.000498 lb/MMBTU. No further action is necessary at this time. |
| 02/01/2019 | Telephone Notes | Non Compliance | Telephone notes regarding a malfunction that occurred at the facility on January 31, 2019 |
| 01/14/2019 | ROP Other | Compliance | The 4th Quarter Fugitive Dust Report was received on time and complete. The facility utilized a variety of dust control activities including precipitation on 40% of the days. Other dust control activities included: irrigation systems, a water truck, dust suppression agents, brine application, fueling the plant directly from trains, temporary foam dust suppression systems, grooming and compacting the coal piles, installing seed and mulch over at the ash storage facility, and daily surveillance of the site to ensure there was adequate dust control. AQD did not receive any dust complaints during this time period. No further action is required at this time. |
| 01/10/2019 | ROP Tech Review Notes | Compliance | ROP Technical Review notes for the 2018-2019 ROP Renewal. |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|---------------|-------------------|---|
| 11/26/2018 | Stack Test | Compliance | <p>The 3rd quarter MATS test report for Unit 1 was received on time and complete. Consumers Energy (CE) is utilizing quarterly stack testing to demonstrate compliance with the Particulate Matter (PM) and Hydrogen Chloride (HCl) requirements promulgated by 40 CFR Part 63 Subpart UUUUU. This test also satisfies the requirement for testing pursuant to MI-ROP-B2835-2013b, EUBOILER1 Special Condition V.4. During testing, Unit 1 was operating within the maximum normal operating load requirement range of 90 - 110% of the design capacity and was burning 100% western coal. Results indicate a PM emission rate of 0.0006 lb/mmBTU. This emission rate is compliant with the MATS limit of 0.03 lb/mmBTU and the low emitting EGU (LEE) limit of 0.015 lb/mmBTU. It is also compliant with the limits of 0.015 lb/MMBTU established in the ROP. The HCl results show an emission rate of 0.00011 lb/mmBTU. This is compliant with the MATS limit of 0.0020 lb/mmBTU and the LEE limit of 0.0010 lb/mmBTU. This test demonstrates 9 consecutive tests that are compliant with the LEE limits. A total of 12 (3 years) consecutive tests are required to obtain LEE status.</p> <p>In this report, CE also notes that since the PM results comply with the 0.015 lb/MMBTU emission limit outlined in the ROP, therefore allowing Unit 1 to have a reduced test frequency pursuant to paragraph 153 of the Consent Decree. However, until the LEE reduced frequency to MATS is met, quarterly testing will still be required.</p> |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|---------------|-------------------|---|
| 11/26/2018 | Stack Test | Compliance | <p>The 3rd quarter MATS test report for Unit 2 was received on time and complete. Consumers Energy (CE) is utilizing quarterly stack testing to demonstrate compliance with the Particulate Matter (PM) and Hydrogen Chloride (HCl) requirements promulgated by 40 CFR Part 63 Subpart UUUUU. This testing is also being used to satisfy the testing requirements of MI-ROP-B2835-2013b, EUBOILER2, Special Condition V.4. During testing, Unit 2 was operating within the maximum normal operating load requirement range of 98 - 102% of the design capacity and was burning 100% western coal. Results indicate a PM emission rate of 0.0007 lb/mmBTU. This emission rate is compliant with the MATS limit of 0.03 lb/mmBTU and the low emitting EGU (LEE) limit of 0.015 lb/mmBTU. The emissions are also compliant with the 0.015 lb/MMBTU emission limit established in MI-ROP-B2835-2013b. The HCl results show an emission rate of 0.00011lb/mmBTU. This is compliant with the MATS limit of 0.0020 lb/mmBTU and the LEE limit of 0.0010 lb/mmBTU. This test demonstrates 9 consecutive tests that are compliant with the LEE limits. A total of 12 (3 years) consecutive tests are required to obtain LEE status.</p> <p>In this report, CE also notes that since the PM results comply with the 0.015 lb/MMBTU emission limit outlined in the ROP, therefore allowing Unit 2 to have a reduced test frequency pursuant to paragraph 153 of the Consent Decree. However, until the LEE reduced frequency to MATS is met, quarterly testing will still be required.</p> |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|----------------|-------------------|--|
| 11/08/2018 | MACT (Part 63) | Compliance | <p>The MATS PM CEMS Relative Response Audit (RRA) Test Report was received on time and complete. The results indicated a three (3) run average filterable PM (FPM) emission rate of 0.0006 lb/mmbtu, which is below the ROP limit (0.10 lb/mmbtu), the MATS limit (0.30 lb/mmbtu), and their Consent Decree limit (0.015 lb/mmbtu). The results also indicate that the responses were all within the specified criteria of 40 CFR Part 60 Appendix F procedure 2. These results will be QA'd by AQD's TPU.</p> |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|------------------------|-------------------|---|
| 11/08/2018 | Excess Emissions (CEM) | Compliance | <p>The 3rd Quarter Excess Emissions Report was received on time and complete. The report is for Units 1, 2, and 3. The Annual Opacity Monitor Assessments for Units 1 and 2 as well as the Quarterly Opacity Monitor Assessment for Unit 3 was also included.</p> <p>Unit 1 data indicates a total of 119332 minutes (1988.87 hrs) of operating time with 210 minutes (0.18%) of COMS downtime, but no associated excess emissions. No SO2 CEMS downtime or excess emissions were noted for Unit 1. The downtime for the COMS was due to calibrations, or regular maintenance.</p> <p>Unit 2 data indicates a total of 132342 minutes (2205.7 hrs) of operating time. There was a total of 180 minutes (0.14%) COMS downtime due to annual audits and regular maintenance. There was 30 minutes (0.02%) excess emissions reported due to startup/shutdown. There was no SO2 CEMS monitor downtime or excess emissions reported.</p> <p>Unit 3 data indicates a total of 132478 minutes (2207.97 hrs) of operating time with 120 minutes (0.09%) COMS monitor downtime, but no associated excess emissions. The downtime was due to calibrations and filter audits. The NOx and SO2 CEMS reported a total of 2205.08 hours of operation with 9 hours (0.41%) monitor downtime for the NOx CEMS and no downtime for the SO2 CEMS. Neither had any associated excess emissions. The downtime for NOx CEMS was due to troubleshooting on the analyzer as a result of malfunctions.</p> <p>The opacity filter audits for all of the units were also conducted and indicated passing results.</p> |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|----------------|-------------------|---|
| 11/08/2018 | MACT (Part 63) | Compliance | <p>The 3rd Quarter MATS PM CEMS report for Unit 3 was received on time and complete. The report indicates compliance with the 30 boiler operating day rolling average limit of 0.030 lb/mmbtu with an average of 0.00050 lb/mmbtu and 99.7% - 100% monitor availability.</p> |
| 11/02/2018 | CEM RATA | Compliance | <p>The Mercury (Hg) CEMS RATA Test Report for Boiler Unit 3 pursuant to 40 CFR Part 63 Subpart UUUUU (MATS) was received on time and complete.</p> <p>The results show that the alternate criterion of the absolute difference of the Relative Mean and the CEMS Hg concentrations plus the confidence coefficient were < 0.5ug/scm when the average RM Hg concentration is < 2.5ug/scm. The results were 0.172 ug/scm. The results will be verified by AQD's TPU.</p> |
| 10/24/2018 | ROP Other | Compliance | <p>The 3rd Quarter Fugitive Dust report was received on time and complete (Postmarked 10/15/18). The facility utilized a variety of dust control activities including rainfall on 28% of the days. Other dust control activities included: irrigation systems, a water truck, dust suppression agents, brine application, fueling the plant directly from trains, temporary foam dust suppression systems, grooming and compacting the coal piles, installing seed and mulch over at the ash storage facility, and daily surveillance of the site to ensure there was adequate dust control. AQD did not receive any dust complaints during this time period. No further action is required at this time.</p> |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|----------------------------|-------------------|---|
| 10/16/2018 | CEM RATA | Compliance | <p>The Continuous Emissions Monitoring System (CEMS) Relative Accuracy Test Audit (RATA) report for EUBOILER3 was received on time and complete.</p> <p>The results meet the applicable 40 CFR 75 Appendix A relative accuracy (RA) performance specifications for SO₂, NO_x, and CO₂. JHC using using the alternate method for SO₂, and is complying with the 1.2 lb/mmbtu rather than the Consent Decree requirements. The CD requirements are assessed by calculating the lb/mmbtu rate derived so₂ mass divided by the heat input. AQD's TPU has looked into this, and found it to be OK.</p> |
| 10/03/2018 | ROP Semi 1 Cert | Compliance | This report was received on time and complete (Postmarked 9-14-18). No deviations were reported for the reporting period. No further action is necessary at this time. |
| 10/03/2018 | CAM Excursions/Exceedances | Compliance | This report was received on time and complete (Postmarked 9-14-18). No CAM excursions or exceedances were reported for the reporting period. No further action is necessary at this time. |
| 10/03/2018 | CAM monitor downtime | Compliance | This report was received on time and complete (Postmarked 9-14-18). Various instances of COMS monitor downtime was reported for EUBOILER3 totaling 0.14% of the operational time. No further action is necessary at this time. |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|----------------|-------------------|---|
| 10/03/2018 | MACT (Part 63) | Compliance | <p>The Semiannual Compliance with Mercury and Air Toxics Standard (MATS), 40 CFR Part 63 Subpart UUUUU for Units 1, 2, and 3 was received on time and complete. No malfunctions or work practice standard deviations were reported for any of the three (3) boilers. Additional compliance information for each unit is outlined below.</p> <p>Unit 1: Unit 1 complies with the provisions outlined in MATS using Stack test data for PM and HCl, but uses Certified Hg and diluent CEMS for Mercury. Stack test data for the two (2) quarters this report covers indicate compliance with the limits for PM and HCl. A total of 0.27% Hg CEMS monitor downtime was reported, but no excess emissions was identified.</p> <p>Unit 2: Unit 2 complies with the provisions outlined in MATS using Stack test data for PM, and HCl, but uses Certified Hg and diluent CEMS for Mercury. Stack test data for the two (2) quarters this report covers indicate compliance with the limits for PM and HCl. No excess emissions were reported for the reporting period, but a total 2.05% Hg CEMS monitor downtime was reported.</p> <p>Unit 3: Unit 3 complies with the provisions outlined in MATS using Certified CEMS for PM, Hg, and SO2. A total of 0.71% Hg CEMS monitor downtime, 0.51% PM CEMS monitor downtime, and 0.15% SO2 CEMS monitor downtime was reported.</p> <p>No excess emissions were reported for any of the units.</p> |

Name:

Kaithlyn Davis

Date:

9/10/2019

Supervisor:

[Signature]