

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

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 : Compliance
Source Class : MAJOR	Staff : Kaitlyn DeVries
FCE Begin Date : 9/30/2020	FCE Completion Date : 9/29/2021
Comments : 2021 FCE	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/27/2021	CEM RATA	Compliance	<p>The Part 75 Continuous Emissions Monitoring (CEMS) Relative Accuracy Test Audit (RATA) was received on time and complete for Unit 3.</p> <p>The report indicates each of the pollutants meeting the require Relative Accuracy (RA) for SO₂, NO_x, CO₂, and Flows. This report, however, is subject to review from AQD's TPU.</p>
09/27/2021	MACT (Part 63)	Compliance	<p>The Unit 3 Mercury Continuous Emissions Monitoring System (CEMS) Relative Accuracy Test Audit (RATA) to monitor and report compliance with the Mercury (Hg) emission limit promulgated in 40 CFR Part 63 Subpart UUUUU was received on time and complete. The report indicated the results meets the required relative accuracy (RA). This report, however, is subject to review from AQD's TPU.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/27/2021	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. This report is for units 1, 2, and 3.</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 during the reporting period. 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 2021, and December 2019, respectively. No excess emission or deviations in work practice standards were reported for any of the units.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/27/2021	ROP Semi 1 Cert	Compliance	<p>The Semi0Annual Compliance Report pursuant to MI-ROP-B2835-2020a was received on time and complete (Postmarked 9-15-21). A total of three (3) deviations were reported for the reporting period. The first two (2) deviations were for EUBOILER2 and EUBOILER3 and for the UBAS system associated with the SCR's for each unit failing. The failure in the UABS interrupted the ammonia flow, thus decreasing the NOx control. This previously reported to the AQD, and JHC was able to keep the NOx emissions below the emission limit while the repairs were made. As a result of this, updates were made to the MMAP and the new plan was submitted to the AQD. The final deviation was for EUSDA_U3 for some visible emissions exceeding 5% originating from the A1 recycle mix tank scrubber vent. This was also previously reported to the AQD. JHC did troubleshooting and has subsequently fixed the underlying problem and has re-routed the exhaust back to the scrubber system bypassing the vent. KD was able to observe this in the most recent on-site inspection. No further action is necessary at this time.</p>
09/27/2021	CAM Excursions/Exceedances	Compliance	<p>The Compliance Assurance Monitoring (CAM) excursion/exceedance report was received on time and complete (Postmarked 9-15-21). No excursions or exceedances were reported for the reporting period.</p>
09/27/2021	CAM monitor downtime	Compliance	<p>The Compliance Assurance Monitoring (CAM) monitor downtime report was received on time and complete (Postmarked 9-15-21). No COMS downtime was reported for the reporting period.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/22/2021	MACT (Part 63)	Compliance	<p>The 2nd Quarter MATS PM CEMS for Subpart UUUUU report for Unit 3 was received on time and complete. A PM CEMS is utilized to demonstrate compliance with the filterable PM 30-day boiler operating day rolling average limit of 0.03 lb/MMBTU. The records show the 30-day rolling average at the end of the quarter to be 0.000546 lb/MMBTU, which is compliant with the 0.030 lb/MMBTU limit. The highest rolling average for the quarter was on June 10, 2021 at 0.000558 lb/MMBTU.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/22/2021	Excess Emissions (CEM)	Compliance	<p>The 2nd Quarter Excess Emissions report pursuant to MI-ROP-B2835-2020a for Units 1, 2 & 3, and the Opacity Monitor Assessment for 3 was received on time and complete.</p> <p>Unit 1: There was a total of 123,690 Minutes (2,061.5 hours) of operation for the reporting period. The COMS monitor had no downtime and no excess emissions. The CEMS SO2 monitor had 8 hours (0.41%) downtime with no associated excess emissions. The downtime was due to monitor malfunctions and quality assurance testing.</p> <p>Unit 2: There was a total of 108,263 minutes (1,804.4 hours) operating hours for Unit 2 during the reporting period. The COMS monitor had no downtime and no excess emissions. The SO2 CEMS had 1.6 hours (0.09%) monitor downtime and no excess emissions. The downtime was due to calibrations.</p> <p>Unit 3: There was a total of 81,224 minutes (1,353.7 Hours) of operating time for Unit 3 during the reporting period. No excess emissions were reported, but a total of 0.24% (192 minutes) of COMS monitor downtime was reported. This was all due to Quality Assurance actions including maintenance, filter audits, and re-calibrations. The NOx CEMS had 2 hours (0.19%) downtime, but no associated excess emissions. The downtime was due to monitor malfunctions which resulted in troubleshooting and analyzer repairs. The SO2 monitor also had 2 hours (0.19%) downtime, but no associated excess emissions. The downtime was due to monitor malfunctions which resulted in troubleshooting and analyzer repairs.</p> <p>The Unit 3 Opacity tests was also received. The associated low, mid, and high level opacity checks indicated passing results.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/22/2021	CEM RATA	Compliance	<p>The Mercury Continuous Emissions Monitoring System (CEMS) Relative Accuracy Test Audit (RATA) for Units 1 and 2 was received on time and complete.</p> <p>The report indicates each of the pollutants meeting the required alternative RATA result as allowed under the MATS rule. This report, however, is subject to review from AQD's TPU.</p>
09/17/2021	On-site Inspection	Compliance	<p>The purpose of this inspection was to determine compliance with the facility's renewable operating permit (ROP) MI-ROP-B2835-2020b.</p>
07/22/2021	CEM RATA	Compliance	<p>The Part 75 Continuous Emissions Monitoring System (CEMS) Relative Accuracy Test Audit (RATA) for Units 1 and 2 was received on time and complete.</p> <p>The report indicates each of the pollutants meeting the require Relative Accuracy (RA). This report, however, is subject to review from AQD's TPU.</p>

Activity Date	Activity Type	Compliance Status	Comments
07/22/2021	ROP Other	Compliance	<p>The 2nd Quarter Fugitive Dust Report for 2021 was received on time and complete. The facility utilized a variety of dust control activities including, utilizing irrigation on top of coal stack out conveyor 42B when temperatures were above freezing, restoring the coal pile irrigation system to service on April 27, fueling plants directly from trains , when possible, operating a foam dust suppression system on four of the most heavily sued conveyors within the coal handling system, spraying a dust suppression agent on western coal, applying a dust suppressant on the coal pile perimeter roads west of Lakeshore Avenue on May 26, grooming and compacting both the western and eastern coal storage piles, utilizing condition measures during ash unloading operations at the landfill, placing condition ash in horizontal lifts and utilizing a roller to compact the material in the active fill area of the storage cell, controlling dust and supplementing ash condition with a water truck, and conducting daily surveillance rounds on site to ensure adequate dust control was maintained. The facility also benefited from an estimated 10.05 inches of precipitation occurring on 31% of days during this time period. No further action is required at this time.</p>
05/25/2021	MACT (Part 63)	Compliance	<p>The Unit 3 MATS (40 CFR Part 63 Subpart UUUUU) PM CEMS 1st Quarter 2021 Report was received on time and complete. The highest 30-day rolling average during the reporting period was 0.00049 lb/MMBTU, which is compliant with the limit of 0.030 lb/MMBTU.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/18/2021	Excess Emissions (CEM)	Compliance	<p>The 1st Quarter 2021 Excess Emissions report pursuant to MI-ROP-B2835-2020a for Units 1, 2 & 3, and the Opacity Monitor Assessment for 3 was received on time and complete.</p> <p>Unit 1: There was a total of 129,600 Minutes (2,160 hours) of operation for the reporting period. The COMS monitor had no downtime and no excess emissions. The CEMS SO2 monitor had no downtime and no excess emissions.</p> <p>Unit 2: There was a total of 112,487 minutes (1,874.8 hours) operating hours for Unit 2 during the reporting period. The COMS monitor had no downtime and no excess emissions. The SO2 CEMS reported 2.07 hours (0.11%) monitor downtime with no associated excess emissions. The downtime was due to periodic maintenance and monitor re-calibrations.</p> <p>Unit 3: There was a total of 128,797 minutes (2,146.6 Hours) of operating time for Unit 3 during the reporting period. No excess emissions were reported, but a total of 0.09% (114 minutes) of COMS monitor downtime was reported. This was all due to Quality Assurance actions including maintenance, filter audits, and re-calibrations. Neither the NOx CEMS nor the SO2 monitor reported any downtime and there were no excess emissions.</p> <p>The Unit 3 Opacity tests was also received. The associated low, mid, and high level opacity checks indicated passing results.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/27/2021	MAERS	Compliance	<p>ROP certification form for MAERS received 3-15-21: EUCOMBTURB removed from the site and EUASHNEW replaced with EUBYPRODUCT. The NOx, SO2 and PM emissions from oil usage in the boilers was accounted for in the emissions from coal, as CEMS and stack tests were conducted. CEMS and Stack test data used when available. Higher NH3 emissions than AQD calculated due to higher ammonia slip from the UBAS from the SCR's for Units 2 and 3. JHC is reporting EF's for PM, unlike historically for the PJFF's. MAERS and EPA EF's used for other combustion equipment, like the generators and boilers. HAP emissions reported with associated supporting documentation. Full documentation of emissions available as a hard copy. No changes were made to the report.</p>
04/26/2021	ROP Other	Compliance	<p>The 1st Quarter Fugitive Dust Report for 2021 was received on time and complete. The facility utilized a variety of dust control activities including, fueling the plant directly from trains, grooming and compacting the coal piles, spraying a dust suppressant agent on the western coal and when applicable during the unloading process, using conditioning measures during ash unloading operations at the landfill, using a foam dust suppression system on four of the most heavily used conveyors within the coal handling system, daily surveillance of the site to ensure there was adequate dust control, utilizing conditioning measures during ash unloading operations at the landfill, returning the water truck to service, and placing conditioned ash in horizontal lifts and utilizing a roller to compact the material in the fill area of the storage cell. The facility also benefited from an estimated 2.40 inches of precipitation occurring on 24% of days during this time period. No further action is required at this time.</p>

Activity Date	Activity Type	Compliance Status	Comments
04/26/2021	Stack Test	Compliance	The required HCl testing pursuant to MI-ROP-B2835-2020 and 40 CFR Part 63 Subpart UUUUU was conducted during a trial burn of wester bituminous and subbituminous coal that contained different chlorine content that what is normally combusted. The results indicated a three (3) run average emission rate of 0.0001 lbs/MMBTU, which is compliant with the limit of 0.0020 lbs/MMBTU and the LEE limit of 0.0010 lbs/MMBTU.

Activity Date	Activity Type	Compliance Status	Comments
04/06/2021	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. EUBOILER3 demonstrated compliance with the MATS requirements via CEMS for PM, Hg, and SO2.</p> <p>During the reporting period, EUBOILER2 had a trial burn of western bituminous coal, but this coal type is not considered to be a different fuel type with respect to the MATS rule. This coal was burned to test the HCl emissions from a different blend of coal, with emission testing conducted in December 2011. The testing was not considered to be periodic testing per LEE and 40 CFR 63.1000(c)(1)(iii), nor spaced 1,050 days apart from the last LEE test per 40 CFR 63.1006(f)(1)(iii), and was not included in the test reporting section of this report.</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>

Activity Date	Activity Type	Compliance Status	Comments
04/06/2021	ROP Annual Cert	Compliance	The Annual Compliance Report pursuant to MI-ROP-B2835-2020 and 2020a was received on time and complete. Two (2) deviations were reported for the reporting period. The first deviation was for EUBOILER 1 and some excess emissions that occurred in Q2 as a result of an upset during routine maintenance on the unit. The other deviation was for EUBYPRODUCT and the bin vent filter/transfer tank issues resulting in visible emissions. Both incidents were properly reported and corrective actions were taken. No further action is necessary at this time.
04/06/2021	CAM Excursions/Exceedances	Compliance	The CAM excursion/exceedance report was received on time and complete. No excursions or exceedances were reported for the reporting period.
04/06/2021	CAM monitor downtime	Compliance	The CAM monitor downtime report was received on time and complete. Downtime was reported for all three (3) boiler COMS. The downtime was primarily due to AQ activities, malfunctions, and re-calibrations. Detailed downtime information was reported in the quarterly excess emissions reports (EER).
04/06/2021	ROP SEMI 2 CERT	Compliance	The Semi-Annual Compliance report pursuant to MI-ROP-B2835-2020 and 2020a was received on time and complete. One (1) deviation was reported for the reporting period. The deviation was for EUBYPRODUCT and faulty bin vent filter/valve issues that resulted in intermittent Visible Emissions from the bin vent filter emergency relieve vents for the transfer tanks. This was for a total of 18.5 hours, and was reported via a Rule 912 notification. This issue has since been addressed and the issue was fixed. No further action is necessary at this time.

Activity Date	Activity Type	Compliance Status	Comments
03/15/2021	MACT (Part 63)	Compliance	<p>The Annual Compliance report pursuant to MI-ROP-B2835-2020a and 40 CFR Part 63 Subpart DDDDD for EUAUXBLR3B, EUAUXBLR3C, and EUAUXBLR12 was received on time and complete. The total operating hours for EUAUXBLR12 for the 61 month compliance period was 20,304 hours and most recently was tuned up on August 27, 2020. EUAUXBLR3B and EUAUXBLR3C were also most recently tuned up on August 27, 2020.</p> <p>None of the boilers have associated emission limitations.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/15/2021	Excess Emissions (CEM)	Compliance	<p>The 4th Quarter Excess Emissions report pursuant to MI-ROP-B2835-2020a for Units 1, 2 & 3, and the Opacity Monitor Assessment for 3 was received on time and complete.</p> <p>Unit 1: There was a total of 111,623 Minutes (1,860.4 hours) of operation for the reporting period. The COMS monitor had no downtime and no excess emissions. The CEMS SO2 monitor had 20 hours (1.09%) downtime with no associated excess emissions. The downtime was due to monitor malfunctions and associated repairs.</p> <p>Unit 2: There was a total of 46,259 minutes (771 hours) operating hours for Unit 2 during the reporting period. The COMS monitor had no downtime and no excess emissions. The SO2 CEMS SO had no downtime and no excess emissions.</p> <p>Unit 3: There was a total of 132,481 minutes (2,208 Hours) of operating time for Unit 3 during the reporting period. No excess emissions were reported, but a total of 0.10% (132 minutes) of COMS monitor downtime was reported. This was all due to Quality Assurance actions including maintenance, filter audits, and re-calibrations. The NOx CEMS had 9 hours (0.44%) downtime, but no associated excess emissions. The downtime was due to monitor malfunctions which resulted in troubleshooting and analyzer repairs. The SO2 monitor also had no downtime and no excess emissions.</p> <p>The Unit 3 Opacity tests was also received. The associated low, mid, and high level opacity checks indicated passing results.</p>

Activity Date	Activity Type	Compliance Status	Comments
03/15/2021	MACT (Part 63)	Compliance	<p>The Unit 3 MATS (40 CFR Part 63 Subpart UUUUU) PM CEMS 4th Quarter Report was received on time and complete. The highest 30-day rolling average during the reporting period was 0.000482 lb/MMBTU, which is compliant with the limit of 0.030 lb/MMBTU.</p>
03/15/2021	Stack Test	Compliance	<p>The Unit 2 Stack Test for PM Testing pursuant to MI-ROP-B2835-2020a, 40 CFR Part 63 Subpart UUUUU and the Federal EPA Consent Decree was received on time and complete.</p> <p>Testing was done on 100% Western coal operating near 1005% of the MW rated output at a maximum normal load range of 197 and 290 MW. The Condensable Particulate Matter (CPM) and Filterable Particulate Matter (FPM) results were as follows:</p> <p>FPM - 0.01 lb/1000 lb exhaust gas corrected to 50% excess air and 0.0015 lb/MMBTU. Both indicate compliance with emission limits of 0.15 lbs/1000 lb exhaust gas and 0.015 lb/MMBTU.</p> <p>CPM - 0.0046 lb/MMBTU. There is no emission limit for CPM, but was required by the Consent Decree to be tested.</p>

Activity Date	Activity Type	Compliance Status	Comments
02/23/2021	ROP Other	Compliance	<p>The 4th Quarter Fugitive Dust Report for 2020 was received on time and complete. The facility utilized a variety of dust control activities including, fueling the plant directly from trains, grooming and compacting the coal piles, spraying a dust suppressant agent on the western coal and when applicable during the unloading process, using conditioning measures during ash unloading operations at the landfill, using a foam dust suppression system on four of the most heavily used conveyors within the coal handling system, daily surveillance of the site to ensure there was adequate dust control, using the coal pile irrigation system until the equipment was winterized in November, utilizing conditioning measures during ash unloading operations at the landfill, and placing conditioned ash in horizontal lifts and utilizing a roller to compact the material in the fill area of the storage cell. The facility also benefited from an estimated 7.30 inches of precipitation occurring on 32% of days during this time period. No further action is required at this time.</p>
01/06/2021	Rule 912	Compliance	<p>Review of 912 Notification for Release from the transfer tower associated with Unit 2 (EUBYPRODCUT). See complete evaluation in activity report XX</p>
01/06/2021	Other	Compliance	<p>Review of Rule 912 Notification to resolve the PEAS Release notification.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/05/2021	CEM RATA	Compliance	The Mercury (Hg) Continuous Emissions Monitoring System (CEMS) Relative Accuracy Test Audit (RATA) Report for Unit 3 pursuant to 40 CFR Part 63 Subpart UUUU for the Mercury and Air Toxics Standard (MATS) was received on time and complete. The results indicate a RA of 20.34% with an alternative RATA result of 0.282 ug/scm. While the 20.34% is above the 20% passing result, the regulation allows for a passing result using either method. This report is subject to further review from AQD's TPU.
01/05/2021	CEM RATA	Compliance	The Part 75 CEMS RATA for Unit 1 for SO ₂ , NO _x and CO ₂ was received on time and complete. The report indicates each of the pollutants meeting the require Relative Accuracy (RA). This report, however, is subject to review from AQD's TPU.
01/05/2021	ROP Other	Compliance	The 3rd Quarter Fugitive Dust Report for 2020 was received on time and complete. The facility utilized a variety of dust control activities including, fueling the plant directly from trains, grooming and compacting the coal piles, spraying a dust suppressant agent, using conditioning measures during ash unloading operations at the landfill, using a foam dust suppression system on four of the most heavily used conveyors, daily surveillance of the site to ensure there was adequate dust control, using the coal pile irrigation system, using the water truck in the active fill area of the dry ash landfill and on the roadways including Lakeshore Avenue, placing conditioned ash in horizontal lifts and utilizing a roller to compact the material in the fill area of the storage cell, and application of dust suppressant on the primary traveled roads. The facility also benefited from an estimated 5.86 inches of precipitation occurring on 21% of days during this time period. No further action is required at this time.

Activity Date	Activity Type	Compliance Status	Comments
01/05/2021	CEM RATA	Compliance	<p>The Mercury (Hg) Continuous Emissions Monitoring System (CEMS) Relative Accuracy Test Audit (RATA) Report for Unit 1 pursuant to 40 CFR Part 63 Subpart UUUU for the Mercury and Air Toxics Standard (MATS) was received on time and complete. The results indicate a RA of 18.66% with an alternative RATA result of 0.182 ug/scm. Both indicate passing results. This report is subject to further review from AQD's TPU.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/05/2021	Excess Emissions (CEM)	Compliance	<p>The 3rd Quarter Excess Emissions report pursuant to MI-ROP-B2835-2020 and 2020a for Units 1, 2 & 3, and the Opacity Monitor Assessments for Units, 1, 2, and 3 was received on time and complete.</p> <p>Unit 1: There was a total of 83,979 Minutes (1,399 hours) of operation for the reporting period. The COMS monitor had 150 minutes (1.18%) of downtime with no excess emissions. The downtime was due to the annual audit. The CEMS SO2 monitor had no downtime and no excess emissions.</p> <p>Unit 2: There was a total of 103,593 minutes (1,726 hours) operating hours for Unit 2 during the reporting period. The COMS monitor had 576 minutes (0.56%) downtime with no excess emissions. The downtime was due to monitor issues and troubleshooting. CEMS SO2 monitor had no downtime and no excess emissions.</p> <p>Unit 3: There was a total of 132,428 minutes (2,207 Hours) of operating time for Unit 3 during the reporting period. No excess emissions were reported, but a total of 0.10% (126 minutes) of COMS monitor downtime was reported. This was all due to Quality Assurance actions including maintenance, filter audits, and re-calibrations. CEMS NOx had 4 hours (0.20%) downtime, but no associated excess emissions. The downtime was due to monitor malfunctions which resulted in troubleshooting and analyzer repairs. The SO2 monitor also had no downtime and no excess emissions.</p> <p>All three units Opacity tests were also received. The associated low, mid, and high level opacity checks indicated passing results.</p>

Activity Date	Activity Type	Compliance Status	Comments
01/05/2021	MACT (Part 63)	Compliance	The Unit 3 MATS (40 CFR Part 63 Subpart UUUUU) PM CEMS 3rd Quarter Report was received on time and complete. The highest 30-day rolling average during the reporting period was 0.000517 lb/MMBTU, which is compliant with the limit of 0.030 lb/MMBTU.
01/05/2021	Stack Test	Compliance	The report for Filterable and Condensable Particulate Matter (PM) Testing of Unit 1 pursuant to MI-ROP-B2835-2020a was received on time and complete. The results indicated Filterable PM (FPM) emissions of 0.001 lb/1000 lbs and 0.0013 lb/MMBTU. The results for Condensable PM (CPM) indicated emissions of 0.0097 lb/MMBTU.
12/14/2020	Telephone Notes	Unknown	Telephone notes regarding Fly Ash Release
11/04/2020	Telephone Notes		Status Update
10/14/2020	CEM RATA	Compliance	The CEMs RATA report for unit 3 for NOx, SO2, and CO2 gases was received on time and complete. The report indicates meets the required Relative Accuracy (RA) for each of the specified pollutants. This report is, however, subject to review by AQD's TPU.

Activity Date	Activity Type	Compliance Status	Comments
09/30/2020	Stack Test	Compliance	<p>The HCl performance testing report for Unit 2 burning western bituminous and subbituminous coal that contained different chlorine, heat content and moisture content compared to the western subbituminous or mixtures of western subbituminous and eastern bituminous coals than normally combusted was received on time and complete. This test was to evaluate the compliance with the HCl Emission limits pursuant to 40 CFR Part 63 Subpart UUUU or MATS.</p> <p>The average of the three (3) runs indicated an emission limit of 0.0001 lb/MMBTU, which is compliant with the MATS limit of 0.0020 lb/MMBTU and the LEE limit of 0.0010 lb/MMBTU. This results indicates this new blend will still be compliant with the limits established in MATS as well as the LEE limits.</p>

Activity Date	Activity Type	Compliance Status	Comments
09/30/2020	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. EUBOILER3 demonstrated compliance with the MATS requirements via CEMS for PM, Hg, and SO2.</p> <p>During this reporting period, EUBOILER2 had additional stack testing conducted due to the combustion of a different blend of fuel, than normally used. Stack test data indicated compliance with the MATS emission limits for HCl and were not considered to be part of the normal compliance testing.</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>

Activity Date	Activity Type	Compliance Status	Comments
09/30/2020	ROP Semi 1 Cert	Compliance	The semi-annual ROP Certification report pursuant to MI-ROP-B2835-2013 and MI-ROP-B2835-2020 (Postmarked 9-15-20) was received on time and complete. One (1) deviation was reported for the reporting period. The deviation was for EUBOILER1 and some excess emissions that occurred in Q2 as a result of an upset during routine maintenance on the unit. Corrective actions were take to update operating procedures to alarm early in in this type of event. This exceedance was reported in the Q2 EER. No further action is necessary at this time.
09/30/2020	CAM Excursions/Exceedances	Compliance	The CAM excursion/exceedance report was received on time and complete (Postmarked 9-15-20). No excursions or exceedances were reported for the reporting period.
09/30/2020	CAM monitor downtime	Compliance	The CAM Monitor downtime report was received on time and complete (Postmarked 9-15-20). Downtime was only reported for EUBOILER3 for COMS monitor downtime. The downtime was due to various AQ activities throughout the semi-annual period. No further action is required at this time.

Name: Kaitlyn Dorn

Date: 9/29/2021

Supervisor: HH