

**DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection**

B284626864

FACILITY: J.R. WHITING CO		SRN / ID: B2846
LOCATION: 4525 E. ERIE RD, ERIE		DISTRICT: Jackson
CITY: ERIE		COUNTY: MONROE
CONTACT:		ACTIVITY DATE: 09/11/2014
STAFF: Brian Carley	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled Inspection		
RESOLVED COMPLAINTS:		

Facility Contact: Gerald F. Rand, Jr., Environmental Department
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I arrived and met with Frank Rand, Kate Ross, Stephanie Watkins, and Bob Howell (who was sitting in for Neil Dziedzic) of Consumers Energy. I gave them the Environmental Inspection pamphlet and went over its contents. After an initial discussion concerning the future plans for this facility, Frank conducted a safety orientation that was required before I could enter the rest of the facility. Once the safety orientation was completed, it was decided to do the tour of the facility first to see all the equipment that is currently permitted under their ROP number MI-ROP-B2846-2013 and then review the records that they are required to keep.

All three units were running at the time of the inspection with Unit 1 running at full load, Unit 2 running at ~80 MW, and Unit 3 running at ~90 MW. We first went to the roof to get an overview of what was going on at the plant. They are in the process of closing the ash ponds that are on site. I did not see any fugitive dust from any of the heavy equipment that was being operated in the ash pond or on the coal pile. For the rest of the tour and records review I made the following observations and determinations:

For Tables EU-BOILER1-S1, EU-BOILER2-S1, and EU-BOILER3-S1, they cover the three coal-fired boilers at this facility. I requested that Frank send me the daily SO₂, NO_x, and PM lb/hr for and SO₂ lb/mmBtu summaries for all three units for the time period of 9/7/14 through 9/13/14 (see attached). The data marked invalid for Unit 1 for the time period of 15:00 on 9/10/14 through 06:00 on 9/11/14 was due to a flow monitor malfunction. The data provided shows that they are well below the emission limits for each unit (S.C. I.1 through 4). As stated before, all three units and their associated ESPs were operating at the time of the inspection (S.C.IV.1). They are required to conduct a stack test for PM once every three years from the ROP issue date. They have not done one yet, which means that they will have to do the stack test before July 1, 2016 (S.C. V.1 through 3). They are continuously monitoring opacity, gas flow, SO₂ emissions, and NO_x emissions from each unit and the gas monitors are certified every year per 40 CFR Part 75 (S.C. VI.1 and VI.2). They use the opacity monitor readings to show compliance with CAM requirements and they have not reported any CAM excursions since the last inspection (S.C. VI.3 through 8, VII.7 and 8, and IX.1 and 2). They have been reporting on a quarterly basis monthly excess opacity, SO₂, and NO_x emissions. They have not had any exceedances of the NO_x and SO₂ emission limits and minimal opacity exceedances (<10 exceedances per quarter/unit). I have determined that they are in compliance with these tables.

For Table FG-BOILERS-S1, this table covers the requirements for all three units combined. The three units combined in 2013, according to their MAERS submittal, had emitted 1,175.517 tons PM (limit 1,915 tons), 2,201.447 tons NO_x (limit 10,490 tons), 253 tons CO (limit 400 tons), and 5,732.17 tons SO₂ (limit 16,450 tons). According to their current monthly records for 2014 they have not gone over 1,400 tons for PM, 3,000 tons for NO_x, 202 tons for CO, and 6,300 tons for SO₂, with all based on a 12 month rolling time period. They also have never exceeded the 1.67 lb/mmBtu limit for SO₂ (S.C. I.1 through 5). They have not burned any specification used oil for quite a while (S.C. II.1 and VI.1). The monthly average sulfur content of the coal that they are burning has been running between 0.32 to .37% sulfur, which is below their limit of 1.0% by weight (S.C. II.2). As stated before, the ESPs are operating when the boilers are operating allowing them to burn freeze conditioning and dust suppression agents. I was also able to review work orders and records of ESP maintenance and daily operation (S.C. III.1, IV.1 and 2, VI.6). They have been collecting and analyzing samples of the specification used oil. The results of the analysis have shown that they were below all the limits specified in Appendix 3 of their ROP (S.C. VI.2 and

IX.9). They are calculating the CO emissions on the monthly heat input from the coal analysis and the emission factor of 0.0208 lb CO/mmBtu (S.C. VI.3). They are monitoring gas flow, SO₂, and NO_x emissions using CEMS in accordance with 40 CFR Part 75 (S.C. VI.4). They are monitoring opacity in accordance with 40 CFR Part 60 (S.C. VI.5). They are currently in compliance with the provisions of their Acid Rain and CAIR permits, which are attached as appendices to their ROP (S.C. IX.1 through 8). They are complying with the requirements of 40 CFR Part 63, Subpart UUUUU. They have requested and received an extension of compliance for this regulation that puts their compliance date as April 16, 2016. With 40 CFR Part 63, Subpart UUUUU in effect, the requirements of AQD Rules Part 15 Emission Limitations and Prohibitions – Mercury are not in effect per R 336.2502a (S.C. IX.10 and 11). I determined that they are in compliance with this table.

For Table EU-ASHHAND-S1, the dry fly ash evacuation system was not operating at the time of the inspection, but they showed me the meters where they take their pressure readings for the control equipment (S.C. IV.1). The dry fly ash transfer system, fly ash silo, and the pneumatic truck loading station fabric filter collectors were operating at the time of the inspection (S.C. IV.2 and IV.3). They were working on the rotary silo unloader and truck unloading chute at the time of the inspection (S.C. IV.4). They were currently working on ash pond #6, which will be finished sometime after the facility stops operation in 2016 (S.C. IV.5). I reviewed their records of the daily non-certified visible opacity observations and the records have shown that they have not had a CAM excursion (S.C. VI.1 through 4 and IX.1 and 2). I have determined that they are in compliance with this table.

For Table EU-COALHAND-S1, they told me that the Rotary Car Dumper was down for repairs so the dust collector for that operation was also not operating. I was able to observe bulldozers working on the coal pile during my inspection and did not see any fugitive emissions coming from there (S.C. III.2). I also did not see any opacity from the exhaust of the any of the fabric filter dust collectors associated with the coal handling operation (S.C. I.2, IV.1, and IV.2). I reviewed their records of the amount of coal that was burned in Boilers 1, 2, and 3 and this year the monthly totals were less than or equal to 1,102,748 tons of coal burned. For 2013, according to their MAERS submittal, they burned 1,012,399 tons of coal, which is under their limit of 1.6 million tons (S.C. II.1 and VI.5). I asked about the status of their current MAP and they told me that they review annually and there have not been any changes to the approved plan that is on record (S.C. III.1). They showed where they are continuously monitoring the fabric filter leak detectors for the ones associated with this emission unit. They were showed me that they were operating according to their MAP (S.C. IV.1 and IV.2). They showed me the meters that they monitor the differential pressure across the fabric filter baghouses for this emission unit. The meters showed that the fabric filters were in their approved range of 0 to 6 inches of water pressure (S.C. VI.1). I reviewed their records of the daily non-certified visible opacity observations and differential pressure readings. The records have shown that they have not exceeded the proper operating range for differential pressure or had a CAM excursion (S.C. VI.2 through 8 and IX.1 and 2). I have determined that they are in compliance with this table.

For Table EU-DC-GEN-NEW-S1, we then went to the room where their DC generator is located. Per S.C. II.1 they can only burn fuel oil with a sulfur content of no more than 15 ppm. I was able to verify with fuel purchase orders that they were meeting the 15 ppm limit. They are required to operate this unit no more than 100 hrs/yr for maintenance checks and readiness testing. According to the log kept at the unit, for this year, they have only run for 5 hours for unit testing (S.C. III.1 and VI.2). They provided records showing the maintenance being done on this unit, which complies with S.C. III.2 and VI.3. This unit is equipped with a non-resettable hour meter as per S.C. IV.1. They have all the information required by S.C. VI.1 recorded (size, installation date, sulfur content of fuel). They showed me the certification from the manufacturer that this unit meets the emission standards for all pollutants. I have determined that they are in compliance with this table.

For Table EU-AC-GEN-S1, we then went to where their AC generator is located. According to the logs kept at this unit, they have only run this unit for 4 hours this year to test the unit, which is well below their limit of 100 hrs/yr (S.C. III.1, III.5, and VI.2). They were able to provide maintenance logs showing what maintenance was done on the unit and when it occurred (S.C. III.2, III.4, and VI.3). At the time of the inspection, they have not had an emergency situation this year which required the unit to operate and therefore were not required to submit semiannual compliance reports (S.C. III.3 and VII.4). This unit also has a non-resettable hour meter installed required by S.C. IV.1. They have all the information required by S.C. VI.1 recorded (size, installation date, sulfur content of fuel). I have determined that they are in compliance with this table.

For Table EU-FH-HT-BLR-S1, they showed me where the small boiler was located. This unit has used 5,990 gallons of fuel (distillate oil) so far this year. This boiler is subject to 40 CFR Part 63, Subpart DDDDD, which does not go into effect for this unit until January 31, 2016 (40 CFR 63.7495). I have determined that they are in compliance with this table.

For FG-PARTSCLEANERS-S1, they have four portable and two standalone parts cleaners. All of the parts cleaners were not being used at the time of the inspection and all the lids were closed. The written operating procedures were posted in a conspicuous location for each unit. They were able to provide the information required by S.C. VI.2, which included the identifier for each unit, date each one was installed, the air/vapor interface area for each one, applicable Rule 201 exemption, and the Reid vapor pressure of the solvent used. I have determined that they are in compliance with this table.

I then asked about the combustion turbine that is the only unit in Section 2 of their ROP. Frank verified that EU-COMBTURB-S2 is not operational and the tank that supplied it the diesel fuel had been emptied. This unit has not run in many years. I determined that they are in compliance with the requirements of this section.

We then sat down with Neil Dziedzic, the Responsible Official for this facility, to go over my findings from this inspection. Based on my inspection, their MAERS submittal, annual and semi-annual certifications and reports, and quarterly excess emission reports submitted I have determined that they are in compliance with their permit.

NAME Ben Cady

DATE 9/23/14

SUPERVISOR 

