

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : City of Battle Creek Wastewater Treatment Plant	SRN : B6307
Location : 2000 River Rd. W	District : Kalamazoo
	County : CALHOUN
City : BATTLE CREEK State: MI Zip Code : 49037	Compliance Status : Non Compliance
Source Class : SM OPT OUT	Staff : Rex Lane
FCE Begin Date : 3/16/2014	FCE Completion Date : 3/16/2015
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
03/05/2015	Self Initiated Inspection	Non Compliance	Self Initiated Inspection

12/23/2014	Stack Test	Non Compliance	<p>Pulver Dryer Pilot Emission Test: PM, PM-10 and VOC</p> <p>There are two issues related to this emission test. The first issue occurred during sampling for all three test runs, an incorrect pitot tube correction factor was used. Changing the correction factor to the correct value post-testing results in all three test results being super isokinetic (120.1%) which biases the PM results low. The tested value (0.003 lbs./1000 lbs. exhaust gas) is only 3% of the allowable limit, therefore the low bias does not affect the passing status of the results for PM. The second issue relates to the PM-10 emission rate limitation (0.0016 lbs./hour) under temporary PTI No. 110-13. During testing, the air flow rate from the baghouse was 7,000 ft³/min. and if you multiply that times the PM-10 emission limit, it would result in a filter gain weight of 0.08 mg which is well below the filter weight sample error limit of 0.5 mg according to BTEC (stack tester) personnel. The average PM-10 emission rate during testing was 0.10 lbs./hour.</p> <p>PTI No. 110-13 was issued as a temporary permit to allow Battle Creek WWTP to operate a pilot sludge drying process and determine emission rates for PM, PM-10 and VOC. Per Special Condition No. IX.1, the permit shall be terminated once 90 days have elapsed after startup of EU-PulverDryer-Pilot. According to BC WWTP staff, the pilot process commenced operations on 9/8/14. Hence, the PTI is considered to be null and void after 12/8/14 and the permittee would need to obtain another permit in order to continue operation of the pilot process. If the PTI No. 110-13 were still active, AQD would reject this test report for the issues described above and require a re-test and a violation notice would be sent for exceeding the PM-10 emission limit. However, since the permit elapsed before the test report was required to be submitted and the permittee would have to obtain another permit to continue</p>
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12/23/2014	Stack Test	Non Compliance	operation of this equipment, staff will use discretion at this time given the listed circumstances. -RIL
10/27/2014	Telephone Notes	Pending.	Issues related to 10/14/14 Stack Test
10/14/2014	Stack Test Observation	Compliance	PulverDryer Pilot Study - VOC and PM/PM10 Emission Test
10/09/2014	Telephone Notes		Existing Sewage Sludge Incinerators
09/11/2014	NSPS (Part 60)	Non Compliance	<p>40 CFR Part 60, Subpart O Semi-annual excursion report: 1/1/14 - 6/30/14</p> <p>A violation notice will be sent to the facility for filing a late semi-annual report (see 11/21/13 MACES report for further information). Sludge was fired in Incinerator # 1 from 1/7/14 - 4/29/14. Most of the excursions reported occurred under start up conditions and are generally related to low feed rates. Excursions that are reported as "unknown" are generally less than one hour in length. -RIL</p>

Name: RIL

Date: 3/16/15

Supervisor: MAR 31/16/2015