

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : TES Filer City Station	SRN : N1685
Location : 700 Mee Street	District : Cadillac
	County : MANISTEE
City : FILER CITY State: MI Zip Code : 49634	Compliance Status : Compliance
Source Class : MAJOR	Staff : Caryn Owens
FCE Begin Date : 02/14/2022	FCE Completion Date : 2/14/2023
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
02/14/2023	On-site Inspection	Compliance	On-site Inspection & Records Request
02/03/2023	Excess Emissions (CEM)	Compliance	4th Qtr EER - Boilers 1 & 2 EER, Rcvd Via Paper on 1-30-23 - Boilers 1 & 2 had no excess emissions reported during the 4th qtr, There was some Monitoring downtime reported, which TPU will address.
01/27/2023	Stack Test	Compliance	Unit 1: 0.03 lb/TBtu & 0.1 lb/yr (30 boiler op days), Unit 2: 0.06 lb/TBtu & 0.2 lb/yr. Qualifies MATS LEE status since Hg CEMS is less than 10% standard or Hg rate is in compliance w/ stnd. Boilers are compliant w/ 1.2 lb/TBtu & less than 29.0 lbs/yr, and meet LEE Status. TPU will rvw.
01/11/2023	ROP Other	Compliance	CEDRI Reporting for MATS
01/06/2023	Excess Emissions (CEM)	Compliance	3rd Qtr EER, via Mail 10-31-22 - CGA was not included since RATA was done this qtr, Boilers 1 & 2 had no excess emissions reported during the 3rd qtr, There was some Monitoring downtime reported, which TPU will address.
10/14/2022	CEM RATA	Compliance	vol. airflow, CO2, NOx, SO, & CO CEMS RA results indicate the CEMS pass the annual RA frequency standards in 40 CFR 75, Appendix A and the CEMS meet the applicable RATA requirements of 40 CFR Part 60.

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10/05/2022	Stack Test	Compliance	PM MATS and NMHC for ROP 2022 Stack Test, (Rcvd paper 9-22-22). Testing passed, Unit 1: PM -0.0018 lb/MMBtu & 0.72 pph, NMHC-0.39 pph; Unit 2: PM-0.0021 lb/MMBtu & 0.88 pph, NMHC-0.08 pph. in Compliance w/ emission limits.
10/05/2022	ROP Other	Compliance	CEDRI Reporting
09/26/2022	ROP Other	Compliance	CEDRI Reports for MATS - 9/14/22 & 9/21/22
09/16/2022	ROP Semi 1 Cert	Compliance	via email 9-13-21; 1 deviation, which was previously reported. Exceedance of VEs limit of 10% opacity, based on 6-minute average. 4 exceedances from Unit 1 and 2 4 exceedances from Unit 2. Corrective actions were taken, and followed Maintenance Plan. Received in paper 9-15-22.
09/16/2022	MACT (Part 63)	Compliance	rcvd via email 9-13-22; MATS semi-annual Compliance; compliance with the heat input based emission limits for all MATS pollutants, last tune-up conducted 6/23/21 for both Units. See Review under the compliance tab. Received in paper 9-15-22.
09/16/2022	Site Review	Compliance	Review of MATS Semi-Annual Compliance Report
09/16/2022	CAM monitor downtime	Compliance	7 incidents of monitoring downtime to COMS that occurred during the reporting period. Time span of COMS downtime ranged from 0.2 hrs to 1 hrs. Incidents previously reported in quarterly rpt.
09/16/2022	CAM Excursions/Exceedances	Compliance	No Excursions. There were 3 non-consecutive hourly average opacity values above 7%, at between 7.97% and 33.71% in Unit 1, and 2 non-consecutive hourly average opacity values above 7%, at 42.14% and 50.20% in Unit 2.
08/19/2022	Excess Emissions (CEM)	Compliance	2nd Quarter, 2022 EER. Rcvd via paper 8-1-22. - Boiler 1 had 0.02 % excess emissions due to a switch, ID Fan, & broken boiler tube, MMP was followed & incidents corrected in a timely manner. Boiler 2 had no excess emissions.
07/27/2022	Stack Test Observation	Compliance	Stack Test Observation of Boiler 1.

Activity Date	Activity Type	Compliance Status	Comments
07/19/2022	ROP Other	Compliance	Test Protocol - CEMS RATA EUBoilers01 & 02. In Paper and Via E Submittal. RATA Approval ltr emailed to company on 7/19/22.
07/11/2022	ROP Other	Compliance	Test Protocol for PM & Non Methane Hydrocarbons EUBoiler 01 & 02, Test Approval ltr emailed to company on July 11, 2022.
05/13/2022	Excess Emissions (CEM)	Compliance	1st qtr 2022 EER. Boiler 1 and 2 had no excess emissions reported.
04/29/2022	MAERS	Compliance	MAERS ROP Cert Form Received. SCT is in MAERS Rpt. See MAERS for further information. Checked ERAU Audit, Company uses stack test emission factors for VOCs & toxics, where spray dry absorbers help control HCl & other toxics which isn't taken into account in the AQD calculated emissions. Checked SCC codes, and verified reported emissions were below permitted limits.
03/21/2022	ROP Annual Cert	Compliance	4 Deviations reported for the year. Company's actions were adequate, corrective actions were taken, and the Maintenance Plan was followed.
03/21/2022	ROP SEMI 2 CERT	Compliance	2nd Semi-annual Cert, 1 deviation; previously reported, due opacity exceeding 10% in Unit 1. Bypassed baghouse due to high temps of Unit 1 & extended period flow CEMS invalid for Unit 1. Corrective actions were taken, and the Maintenance Plan was followed.
03/21/2022	CAM Excursions/Exceedances	Compliance	No CAM excursions/exceedances occurred in FGBOILERS during the 2nd Semi-annual rpt of 2021
03/21/2022	CAM monitor downtime	Compliance	5 incidents of monitoring downtime to COMS that occurred during the reporting period. Time span of COMS downtime ranged from 0.2 hours to 2.3 hours. Incidents previously reported in quarterly rpts.

Activity Date	Activity Type	Compliance Status	Comments
03/18/2022	MACT (Part 63)	Compliance	MATS semi-annual Compliance; compliance with the heat input based emission limits for all MATS pollutants, last tune-up conducted 6/23/21 for both Units. No deviations or malfunctions during reporting period. Unit 1 had 5 hrs of SO2 downtime, and Unit 2 had 9 hrs SO2 downtime.
03/16/2022	ROP Other	Compliance	CEDRI

Name: *Caryn Owens* Date: 11-6-2023

Supervisor: *Shane Nixon*