

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 : April Lazzaro
FCE Begin Date : 9/30/2023	FCE Completion Date : 9/30/2024
Comments : Full Compliance Evaluation	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/30/2024	MACT (Part 63)	Compliance	2nd Quarter 2024 MATS report pursuant to 40 CFR 63 Subpart UUUUU. Results indicate compliance, downtime less than 5.5% for all units.
09/30/2024	CEM RATA	Compliance	CEM RATA for Unit 1. The facility notes the hard copy was submitted to the district late as an oversight, electronic data was submitted as part of the EDR timely (prior to July 30, 2024). SO ₂ , NO _X and CO ₂ data were = 10% which indicates passing performance.
09/30/2024	CEM RATA	Compliance	CEM RATA for Unit 2. Results accurate within 7.37% or 0.057 ug/scm.
09/30/2024	ROP Semi 1 Cert	Compliance	Postmarked 9/13/24. No deviations were reported which aligns with compliance inspection.
09/30/2024	CAM Excursions/Exceedances	Compliance	Postmarked 9/13/24. No excursions or exceedances reported which aligns with compliance inspection.
09/30/2024	CAM monitor downtime	Compliance	Postmarked 9/13/24. No monitor downtime reported.
09/10/2024	On-site Inspection	Compliance	Unannounced, scheduled inspection.

Activity Date	Activity Type	Compliance Status	Comments
07/31/2024	MACT (Part 63)	Compliance	1st Quarter 2024 Compliance Report pursuant to 40 CFR 63 Subpart UUUUU/Quarterly MATS report. No periods of deviations from MATS limits are reported. Unit 1 & 2 had no CEMS downtime, while Unit 3 had a small amount of CEMS downtime which will be reviewed by TPU for compliance.
07/31/2024	ROP Other	Compliance	Unit 1 Particulate Matter Test Report. Test results indicate compliance with permit limit, and shows that Unit 1 continues to qualify for biennial testing. Test report has not been reviewed/validated by TPU.
07/31/2024	ROP Other	Compliance	2nd Quarter 2024 Fugitive Dust Report
07/31/2024	Excess Emissions (CEM)	Compliance	2nd Quarter 2024 Excess Emissions and Opacity Monitor Assessment Reports. None of the EGU's had excess emissions, there was some minimal downtime that TPU will assess for compliance.
07/31/2024	CEM RATA	Compliance	Report states the alternative RATA result indicates compliance.
05/08/2024	Other	Compliance	1st Quarter Excess Emission Reports Units 1, 2, 3.
05/07/2024	ROP Other	Compliance	1st Quarter 2024 Fugitive Dust Report
05/07/2024	Excess Emissions (CEM)	Compliance	Review of the Semiannual Emission Guideline Excess Emission Report for the reporting period of January-March 2024. The submittal was timely and was made in accordance with MI-ROP-B2835-2020b and includes Unit 1, 2 and 3. See Other Report for additional details.
04/30/2024	Other	Compliance	Stack test observation and Partial Compliance Evaluation.
04/05/2024	MACT (Part 63)	Compliance	Semiannual Compliance Report pursuant to 40 CFR 63 Subpart UUUUU. No deviations from the MATS/UUUUU were identified during the reporting period.

Activity Date	Activity Type	Compliance Status	Comments
04/05/2024	ROP SEMI 2 CERT	Compliance	Postmarked 3/15/24. The company identified that two vents were found to be one inch in diameter than the permit required. The company replaced the vents with the correct diameter vent in an expeditious manner. No further action necessary.
04/05/2024	ROP Annual Cert	Compliance	Postmarked 3/15/24. The company identified that two vents were found to be one inch in diameter than the permit required. The company replaced the vents with the correct diameter vent in an expeditious manner. No further action necessary.
04/05/2024	CAM Excursions/Exceedances	Compliance	Postmarked 3/15/24. No excursions/exceedances were identified during the reporting period.
04/05/2024	CAM monitor downtime	Compliance	Postmarked 3/15/24. The COMS report indicated that Units 1 & 2 had no downtime, Unit 3 had 0.79% downtime. No further action needed.
04/05/2024	Annual Emissions Report (or MAERS)	Compliance	Postmarked 3/15/24. Report Certification verifying submittal of MAERS. Review found that the attachment was for Covert, not JH Campbell. Requested and received correct attachment from company.
02/20/2024	Excess Emissions (CEM)	Compliance	4th Quarter 2023 Excess Emissions Report for Units 1, 2, and 3 as well as Quarterly Opacity Monitor Assessment for Unit 3. Unit 1 & 2 had no downtime or excess emissions. Unit 3 had no excess emissions but 14 hours of downtime (0.79%) Opacity audit passed.
02/20/2024	MACT (Part 63)	Compliance	4th Quarter 2023 MATS PM CEMS quarterly report pursuant to 40 CFR 63 Subpart UUUUU. Facility reports continuous compliance with the 30-day rolling average limit.
01/16/2024	ROP Other	Compliance	4th Quarter 2023 Fugitive Dust Report. No action needed.

Activity Date	Activity Type	Compliance Status	Comments
12/28/2023	Excess Emissions (CEM)	Compliance	3rd Quarter 2023 Excess Emissions report for Units 1, 2, and 3, as well as the annual Opacity Monitor Assessments for Units 1 and 2, and Quarterly Opacity Monitor Assessment for Unit 3. No monitor downtime or excess emissions were reported, as such an additional report has not been written for the file. COMS calibration error check passed on all three units.
11/27/2023	CEM RATA	Compliance	Uncertainties in the report led to a request for TPU review. TPU review was completed on 11/27/23, and the review indicates that the RATA found the CEMS
11/21/2023	MACT (Part 63)	Compliance	3rd Quarter 2023 MATS PM CEMS quarterly report pursuant to 40 CFR 63 Subpart UUUUU The data provided indicates compliance with the 30-boiler operating day rolling average limit of 0.030 lb/mmBtu.
11/21/2023	CEM RATA	Compliance	Unit 3 Mercury CEMS RATA for MATS Subpart UUUUU The report states that Unit 3 mercury CEMS met the acceptance criteria of the MATS rule.
11/21/2023	MACT (Part 63)	Compliance	Unit 3 annual PM Relative Response Audit (RRA) for 40 CFR Part 63 Subpart UUUUU and PS QAR for PM CEMS 40 CFR Part 60 Appendix F The data indicates passing results.
10/17/2023	ROP Other	Compliance	2nd Quarter 2023 Fugitive Dust Report
10/17/2023	MACT (Part 63)	Compliance	2nd Quarter 2023 MATS PM CEMS Quarterly Report pursuant to 40 CFR 63 Subpart UUUUU Facility certified to continuous compliance with the 30-boiler operating day rolling average limit of 0.030 lb/mmBtu during the period.

Activity Date	Activity Type	Compliance Status	Comments
10/17/2023	Excess Emissions (CEM)	Compliance	2nd Quarter 20233 Excess Emission Reports for Units 1, 2, and 3 as well as Opacity Monitor Assessment for Unit 3. A correction to the 2nd Quarter 2023 Excess Emissions Report for Unit 3 was received on 3/4/24. 3/6/24 AL- The corrected report states that additional COMS downtime was identified due to the fact that the quarterly calibrations did not originally get reported. No further action needed as a result of the updated report.
10/17/2023	CEM RATA	Compliance	The report results indicate that the Quality Assurance Test requirements of Subpart UUUUU were met.
10/17/2023	MACT (Part 63)	Compliance	Semiannual Compliance Report pursuant to 40 CFR 63 Subpart UUUUU. No deviations from MATS emission limits, operating limits, or work practice standards were identified during the reporting period. There were time periods where the requirement to continuously monitor emissions was not met due to CEMS downtime. In all cases, system trouble shooting, followed by appropriate action was taken. Notably, Unit 1 Hg CEMS had 21 hours of downtime on 6/24/23 and Unit 2 Hg CEMS had 32 hours of downtime on 2/28/23-3/1/23.
10/17/2023	ROP Semi 1 Cert	Compliance	No deviations were identified for the reporting period.
10/17/2023	CAM Excursions/Exceedances	Compliance	No CAM related monitoring excursions/exceedances were identified during the reporting period.
10/17/2023	CAM monitor downtime	Compliance	There were time periods where the requirement to continuously monitor emissions was not met due to CEMS downtime. In all cases, system trouble shooting, followed by appropriate action was taken. Notably, Unit 1 Hg CEMS had 21 hours of downtime on 6/24/23 and Unit 2 Hg CEMS had 32 hours of downtime on 2/28/23-3/1/23.
10/17/2023	ROP Other	Compliance	3rd Quarter 2023 Fugitive Dust Report

Activity Date	Activity Type	Compliance Status	Comments
10/17/2023	Other	Compliance	Quarterly Excess Emission Report and Opacity Monitor Assessment 2nd Quarter 2023.

Name: April Lazzaro Date: 09/30/2024 Supervisor: HH