

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : LBWL, Erickson Station		SRN : B4001
Location : 3725 South Canal Road		District : Lansing
		County : EATON
City : LANSING	State: MI	Zip Code : 48917
Source Class : MAJOR		Staff : Michelle Luplow
FCE Begin Date : 8/29/18		FCE Completion Date : 9/27/2019
Compliance Status : Compliance		
Comments :		

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/17/2019	MACT (Part 63)	Compliance	Semi-annual Mercury and Air Toxics Standards (MATS) Compliance Report with Mercury excess emissions and sorbent trap monitoring downtime summaries. The third quarter test results for PM met the LEE emission limits. 4th quarter MATS testing was not conducted because EU001 was down for maintenance during the entire 4th quarter. No excess emissions reported for the Hg limit of 1.2 lbs/TBtu, 2 hours of downtime (sorbent trap changeout) reported equivalent to 0.09% of the total operating time for the 3rd and 4th quarters.
09/17/2019	Stack Test	Compliance	Updated Erickson Mercury and Air Toxics Standard PM and HCl Emissions test report for errors found in HCl report for test conducted on 6/28/18. See the 8/13/18 report entry for original results. Test consultant used incorrect stack area for calculating flow for HCl, yet used correct area for PM. This doesn't effect the emissions for HCl in lbs/MMBtu in the original report and thus will not be identified as a deviation.

Activity Date	Activity Type	Compliance Status	Comments
09/17/2019	Stack Test	Compliance	First Quarter Mercury & Air Toxics Standard (MATS) PM & HCl Emissions test report. Test conducted 6/25/19 - 6/26/19 as a first quarter test under 40 CFR 63.10006(f)(3)(i) in lieu of missing the first quarter testing during the first quarter. PM is limited to less than/equal to 0.030 lb/MMBtu, the LEE limit is less than/equal to 0.015 lb/MMBtu. Actual PM emissions were 0.004 lb/MMBtu. HCl is limited to less than/equal to 0.002 lb/MMBtu, the LEE limit is less than/equal to 0.001 lb/MMBtu. Actual HCl emissions were 0.001 lb/MMBtu. Both pollutants met MATS emission limits and LEE designation limits. Testing conducted by Mostardi Platt. Lori Myott signed as RO.
09/17/2019	MACT (Part 63)	Compliance	Semi-annual Mercury and Air Toxics Standards (MATS) Compliance Report with Mercury excess emissions and sorbent trap monitoring downtime summaries. First quarter testing was missed during the first quarter, but completed in the second quarter as allowed under 63.10006(f)(3)(i). The 2 quarterly test results for PM and HCl met the LEE emission limits. No excess emissions reported for the Hg limit of 1.2 lbs/TBtu, 2 types of downtime events reported for a downtime of 5.11% of the total operating time for 1st and 2nd quarters. The majority of the downtime was caused by failure of Sorbent Trap Analysis QA/QC testing.
09/17/2019	CAM monitor downtime	Compliance	CAM Opacity Monitor Downtime for semi-annual reporting period 1/1/2019 - 6/30/2019. For EU001 15 monitor downtime events reported. No CAM monitor downtime events reported for FGASHHANDLING.
09/17/2019	CAM Excursions/Exceedances	Compliance	For EU001 COMS there were 4 instances of opacity exceedances reported. For FGASHHANDLING, no excursions or exceedances were reported.

Activity Date	Activity Type	Compliance Status	Comments
09/06/2019	ROP Semi 1 Cert	Compliance	Lori Myott signed as Responsible Official for MI-ROP-B4001-2015. 19 deviations reported for semi-annual reporting period: 5 for opacity exceedances, 14 for COMs downtime. See CAM Excursion/Exceedance and CAM Monitor Downtime entries for CAM-related details.
08/30/2019	Excess Emissions (CEM)	Compliance	First Quarter Excess Emissions and Monitoring Systems Performance Report: Quarterly Opacity Exceedance Report and Quarterly Opacity Performance Summary. Exceeded Opacity 0.42% of the total operating time for the quarter due to boiler startup/shutdown and BWL attributes this to not having enough of a dust cake on the ESP fields to achieve proper ESP functioning. COMS downtime events report noted downtime of 1.06% of the operating time and occurred during 12 events for daily required calibrations and boiler startup/shutdown processes.
08/30/2019	ROP Other	Compliance	1st Quarter Daily SO2 compliance for reporting period 1/1/2019 - 3/31/2019. Highest SO2 emission was 0.46 lbs SO2/MMBTU on 2/26/19 - 2/28/19. The limit is 1.67 lbs SO2/MMBTU, fuel was coal with fuel oil used upon startup. Lori Myott certified as the responsible official. Invalid data associated with EU001 being offline.
08/30/2019	Stack Test	Compliance	Second Quarter Mercury & Air Toxics Standard (MATS) PM & HCl Emissions test report. Test conducted 5/29/19. PM limited to less than/equal to 0.030 lb/MMBtu, LEE limit is less than/equal to 0.015 lb/MMBtu. Actual emissions were 0.0031 lb/MMBtu. HCL limited to less than/equal to 0.002 lb/MMBtu, LEE limit is less than/equal to 0.001 lb/MMBtu. Actual emissions were 0.0007 lb/MMBtu. Testing conducted by Mostardi Platt. Lori Myott signed as RO.
08/30/2019	CEM RATA	Compliance	CEM RATA Test Protocol Received 6/17/19 for testing to be completed the week of 8/12/19

Activity Date	Activity Type	Compliance Status	Comments
08/30/2019	ROP Qrtly Cert	Compliance	Quarter 2 reports Certified by Lori Myott, Responsible Official. Certification form certifies the following documents: Daily SO2 Compliance (Quarterly); Excess Emissions and Monitoring Systems Performance Report - Opacity Exceedance (Quarterly); Summary Report - Opacity Performance Summary (Quarterly).
08/30/2019	ROP Qrtly Cert	Compliance	Quarter 1 reports Certified by Lori Myott, Responsible Official. Certification form certifies the following documents: Daily SO2 Compliance (Quarterly); Excess Emissions and Monitoring Systems Performance Report - Opacity Exceedance (Quarterly); Summary Report - Opacity Performance Summary (Quarterly).
08/30/2019	ROP Other	Compliance	2nd Quarter 2019 Daily SO2 compliance for reporting period 4/1/2019 - 6/30/201. Highest SO2 emission was 0.50 lbs SO2/MMBTU on 4/29/19. The limit is 1.67 lbs SO2/MMBTU, fuel was coal maintaining heat and coal/fuel oil for startup. Lori Myott certified as the responsible official. Invalid data associated with EU001 being offline.
08/30/2019	Excess Emissions (CEM)	Compliance	Second Quarter 2019 Excess Emissions and Monitoring Systems Performance Report: Quarterly Opacity Exceedance Report and Quarterly Opacity Performance Summary. Exceeded Opacity 0.01% of the total operating time for the quarter due to boiler startup/shutdown. COMS downtime events report noted downtime of 0.02% of the operating time and occurred during 3 6-minute events.
08/29/2019	Scheduled Inspection	Compliance	Scheduled, unannounced inspection to determine compliance with MI-ROP-B4001-2015

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02/22/2019	ROP Annual Cert	Compliance	2018 Annual Certification, certified by responsible official Lori Myott under MI-ROP-B4001-2015. 7 total deviations reported for 2018. 5 deviations in first half reporting period, 2 in second half. Certified by Lori Myott, Responsible Official.
02/22/2019	ROP SEMI 2 CERT	Compliance	Lori Myott signed as Responsible Official for MI-ROP-B4001-2015. 2 deviations reported for semi-annual reporting period, 1 for opacity exceedance, 1 for COMs downtime. See CAM Excursion/Exceedance and CAM Monitor Downtime entries for CAM -semi-annual report related details.
02/22/2019	CAM Excursions/Exceedances	Compliance	For EU001 COMS there were no excursions or exceedances for the 2nd semi-annual reporting period. For FGASHHANDLING, no excursions or exceedances were reported for the 2nd semi-annual reporting period.
02/22/2019	CAM monitor downtime	Compliance	CAM Opacity Monitor Downtime for 2nd semi-annual reporting period of 2018. For EU001 1 monitor downtime incident was reported (1 6-minute event). For FGASHHANDLING, no downtime reported.
02/21/2019	MAERS	Compliance	2018 MAERS, check MAERS for any review comments.
01/18/2019	ROP Qrtly Cert	Compliance	Certified by Lori Myott, Responsible Official. Certification form certifies the following documents: Daily SO2 Compliance (Quarterly); Excess Emissions and Monitoring Systems Performance Report - Opacity Exceedance (Quarterly); Summary Report - Opacity Performance Summary (Quarterly).
01/18/2019	Excess Emissions (CEM)	Compliance	Fourth Quarter Excess Emissions and Monitoring Systems Performance Report: Quarterly Opacity Exceedance Report and Quarterly Opacity Performance Summary. No opacity exceedances during fourth quarter. There were no COMs downtime events during fourth quarter.

Activity Date	Activity Type	Compliance Status	Comments
01/18/2019	ROP Other	Compliance	Fourth Quarter Daily SO2 compliance for reporting period 10/1/2018 - 12/31/2018. Highest SO2 emission was 0.54 lbs SO2/MMBTU on 8/14/18. The limit is 1.67 lbs SO2/MMBTU, fuel was coal. Lori Myott certified as the responsible official. Invalid data associated with EU001 being offline. N. Hude verified that EU001 was offline as a planned outage to clean the boiler and cooling tower units.
01/18/2019	Other	Compliance	Partial Compliance Activity. N. Hude informed me on 1/18/19 that EU001 was offline from October - December 2018 as a planned outage to wash the Boiler, chemically clean the interior of the boiler, and NDE of the boilers tubes (thickness and metallurgy), cooling tower circulating water pump rebuild and coal chute repairs. Return to service is planned for February 4, 2019. BWL is claiming Rule 285(2)(a) exemption for these activities.
11/09/2018	ROP Qrtly Cert	Compliance	Certified by Lori Myott, Responsible Official. Certification form certifies the following documents: Daily SO2 Compliance (Quarterly); Excess Emissions and Monitoring Systems Performance Report - Opacity Exceedance (Quarterly); Summary Report - Opacity Performance Summary (Quarterly).
11/09/2018	Excess Emissions (CEM)	Compliance	Third Quarter Excess Emissions and Monitoring Systems Performance Report: Quarterly Opacity Exceedance Report and Quarterly Opacity Performance Summary. Exceeded Opacity 0.02% of the total operating time (30 mins) for the quarter. There were 1 COMs downtime event, at 6 minutes for Daily required calibrations (0.003% of operating time).

Activity Date	Activity Type	Compliance Status	Comments
11/09/2018	ROP Other	Compliance	3rd Quarter Daily SO2 compliance for reporting period 7/1/2018 - 9/30/2018. Highest SO2 emission was 0.54 lbs SO2/MMBTU on 8/14/18. The limit is 1.67 lbs SO2/MMBTU, fuel was coal. Lori Myott certified as the responsible official. Invalid data associated with EU001 being offline.
11/05/2018	CEM RATA	Compliance	<p>Test Protocol for Mercury CEMs RATA servicing EU001 received 7/16/18.</p> <p>Mercury RATA conducted to demonstrate compliance with the Utility MACT. Hg RATA results indicate compliance with the RATA acceptance criteria of less than 20% of the reference method in ug/dscm. RA results were 5.93% Certified by Lori Myott, Responsible Official.</p>
11/05/2018	Stack Test	Compliance	Third Quarter 2018 Mercury and Air Toxics Standard (MATS) PM and HCl emissions test report. Testing conducted 8/22/18. MATS filterable particulate matter has a limit of less than or equal to 0.030 lb/mmBtu, and MATS HCl has a limit of less than or equal to 0.002 lb/mmBtu. Results indicate that emission rates were 0.00045 lb/mmBtu and 0.0011 lb/mmBtu, respectively. PM emissions and HCl emissions meet LEE status for this quarter. The Erickson Station is meeting the MATS emission rates. Certified by Lori Myott, Responsible Official.
10/05/2018	CEM RATA	Compliance	CEM RATA Test Protocol Received 7/16/18. Annual CEM RATA was conducted 8/20 - 8/21/18. Required RATA to demonstrate compliance with ROP and 40 CFR 75 conditions. RA Results (RA%) were all in compliance with the RATA acceptance criteria for CO2, SO2, and NOx & CEMS exhaust flow rate (at high and low loads)

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08/31/2018	ROP Semi 1 Cert	Compliance	See Excursion/Exceedance/ Monitor Downtime CAM reports. Lori Myott, Responsible Official. Four deviations occurred in the first quarter, 1 deviation occurred during the second quarter. None of these deviations had previously been reported.
08/31/2018	MACT (Part 63)	Compliance	Semi-annual Mercury and Air Toxics Standards (MATS) Compliance Report with Mercury excess emissions and sorbent trap monitoring downtime summaries. First and second quarter test results for PM met the LEE emission limits. No excess emissions reported, 1 downtime events reported at <1% of the operating time.
08/31/2018	CAM Excursions/Exceedan ces	Compliance	For EU001 COMS there were no excursions or exceedances reported. For FGASHHANDLING, no excursions or exceedances were reported.
08/31/2018	CAM monitor downtime	Compliance	CAM Opacity Monitor Downtime for semi-annual reporting period 1/1/2018 - 6/30/2018. For EU001 no monitor downtime events reported. No CAM monitor downtime events reported for FGASHHANDLING.

Name: Miriam Lopez

Date:

9/27/19

Supervisor:

Julie T. Brown