

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> LBWL, Erickson Station	<b>SRN :</b> B4001
<b>Location :</b> 3725 South Canal Road	<b>District :</b> Lansing
	<b>County :</b> EATON
<b>City :</b> LANSING <b>State:</b> MI <b>Zip Code :</b> 48917	<b>Compliance Status :</b> Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Julie Brunner
<b>FCE Begin Date :</b> 8/24/2020	<b>FCE Completion Date :</b> 8/24/2021
<b>Comments :</b>	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
07/30/2021	ROP Semi 1 Cert	Compliance	<p>Semi-Annual Report Certification for MI-ROP B4001-2015. Includes MATS, CAM, FGASHHANDLING &amp; CAFO Compliance Report. Lori Myott RO - Deviations, CAM Ash Handling and COMS downtime. No deviations reported. FGASHHANDLING - CAM excursion/exceedances for EUASHDC1, 4, and 5 but no VEs observed (maintenance or other resolution) and no monitor downtime. No CAM excursion/exceedances for EU001. *hard copy received 8-6-21*</p> <p>CAFO - System-wide 1 Semi-2021 emissions report: 401.4 tons NOx &amp; 1395.4 tons SO2 both below annual limits. Highest NOx emission was 0.161 lbs SO2/MMBTU(30-day rolling) &lt;0.170 lb/MMBTU. Highest SO2 emission was 0.572 lbs/MMBTU (30-day rolling average). Per the CAFO signed on 9-30-2019 and PTI 43-20, the SO2 limit of 0.749 lbs/MMTBU (30-day rolling average) applies.</p>

Activity Date	Activity Type	Compliance Status	Comments
07/30/2021	MACT (Part 63)	Compliance	Semi-Annual, 2021 MATS report for Erickson Station (EU001) with Mercury excess emissions and sorbent trap monitoring downtime summaries. No new fuel burned, and last boiler tune-up completed September 16, 2020. Quarterly testing results for HCl (PM is LEE status as of October 2019). No deviations from the Hg emission limit of 1.2 lbs/TBtu. Hg monitor downtime of 14.63 hrs (0.40%).
07/29/2021	ROP Qrtly Cert	Compliance	2nd Quarter Excess Emissions and Monitoring Systems Performance Report and Daily SO2 Compliance - Erickson Boiler COMS reports for ROP No. MI-ROP-B4001-2015. Lori Myott RO. No excess emissions and monitor downtime for the COMS. Highest daily SO2 emission was 0.682 lbs SO2/MMBTU and average daily for the quarter was 0.538 lbs/MMBTU . Per the CAFO signed on 9-30-2019, the SO2 limit of 0.749 lbs/MMBTU (30-day rolling average) applies. *hard copy received 8-6-21*
07/29/2021	Stack Test	Compliance	EUCOAL Visible Emissions Test Report for Erickson Station. PTI 43-20 EUCOAL Special Condition V.1. Testing was completed on 6/29/2021 at the belt transfer house and on 7/14/2021 at the rail dumper station and coal pile drop chute. At the belt transfer house, the highest 6-minute average opacity observed was 0%. At the rail dumper station, the highest 6-minute average opacity observed was 1.0%. At the coal pile drop chute, the highest 6-minute average opacity observed was 3.8%. *hard copy received 8-6-21*
07/01/2021	Other Non ROP	Compliance	Notification of completion of installation and the trial operation for the EUEMGD per PTI 74-18A per Special Condition VII.1. Installation of the EUEMGD was completed April 21, 2021. The trial operation of EUEMGD was completed on April 21, 2021. Notification was supposed to be completed within 30-days so this is a little late.

Activity Date	Activity Type	Compliance Status	Comments
07/01/2021	Other Non ROP	Compliance	Notification of completion of installation and the trial operation for the EUFPRICE per PTI 74-18A per Special Condition VII.1. Installation of the EUFPRICE was completed April 6, 2021. The trial operation of EUFPRICE was completed on April 6, 2021. Notification was supposed to be completed within 30-days so this is a little late.
07/01/2021	MACT (Part 63)	Compliance	EUEMGD initial notification for 40 CFR 63, Subpart ZZZZ - per 63.9 (b)(iii) & 63.6645(f) the application for PTI 74-18A serves as the initial notification.
06/29/2021	On-site Inspection	Compliance	On-site compliance inspection of Lansing Board of Water and Light (LBWL) – Erickson Power Station as part of a Full Compliance Evaluation (FCE).
06/23/2021	Other Non ROP	Compliance	Notification of completion of construction and actual startup date of EUCTGSC1, EUCTGHRSC1 (simple cycle mode only), and EUCTGHRSC2 (simple cycle mode only) per PTI 74-18A - SCs VII.1, VI.3, and IX.1 - 5. Actual startup date of EUCTGSC1 was May 27, 2021, EUCTGHRSC1 (simple cycle mode only) was May 27, 2021, and EUCTGHRSC2 (simple cycle mode only) was May 28, 2021.
06/23/2021	NSPS (Part 60)	Compliance	Subpart A and TTTT, Notification of Construction and Startup for EUCTGSC1, EUCTGHRSC1 (simple cycle mode only), and EUCTGHRSC2 (simple cycle mode only).
06/23/2021	MACT (Part 63)	Compliance	Subpart A and YYY, Initial Notification for EUCTGSC1, EUCTGHRSC1, and EUCTGHRSC2
06/08/2021	Stack Test	Compliance	2021 Second Quarter MATS testing report (for HCI only due to PM LEE status). HCI = 0.0013 lb/MMBTU

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05/18/2021	ROP Qrtly Cert	Compliance	1st Quarter Excess Emissions and Monitoring Systems Performance Report and Daily SO2 Compliance - Erickson Boiler COMS reports for ROP No. MI-ROP-B4001-2015. Lori Myott RO. No excess emissions and monitor downtime for the COMS. Highest SO2 emission was 0.648 lbs SO2/MMBTU and average for the quarter was 0.498 lbs/MMBTU . The SO2 limit is 1.67 lbs/MMBTU (24-hour period). Per the CAFO signed on 9-30-2019, the SO2 limit of 0.749 lbs/MMBTU (30-day rolling average) applies.
05/18/2021	MAERS	Compliance	2020 MAERS received electronically. Hard copy cert MAERS and SCT received 3/19/2021 and resent and received 5/7/2021 because couldn't find original. Audited
04/15/2021	Stack Test	Compliance	2021 1st QTR MATS testing report (for HCl only due to PM LEE status). HCl = 0.0012 lb/MMBTU
03/16/2021	ROP Annual Cert	Compliance	*Electronic* ROP No. MI-ROP-B4001-2015, Lori Myott RO, see semi-annual and quarterly reports. *hard copy received 3-19-21*

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03/16/2021	ROP SEMI 2 CERT	Compliance	<p>*Electronic* 2nd Semi Annual 2020 report for ROP MI-ROP-B4001-2015. Includes MATS, CAM, FGASHHANDLING &amp; CAFO Compliance Report. Lori Myott RO - Deviations, CAM Ash Handling and COMS downtime. Deviations reported include missing records for differential pressure for the week of 12/13/20 - 12/19/20 on EUASHDC5 and COMS(CAM) downtime, 11 separate, 6-min events for EU001.</p> <p>FGASHHANDLING - CAM excursion/exceedances for EUASHDC1 from 12/16 to 12/30/20 (maintenance 1/12/2021) and no monitor downtime. No CAM excursion/exceedances for EU001. *hard copy received 3-19-21*</p> <p>CAFO - System-wide 2020 emissions report: 587.4 tons NOx &amp; 1829.5 tons SO2 both below annual limits. Highest NOx emission was 0.158 lbs SO2/MMBTU(30-day rolling) &lt;0.170 lb/MMBTU. Highest SO2 emission was 0.640 lbs SO2/MMBTU (daily) and 0.538 lbs/MMBTU (30-day rolling average). The SO2 limit is 1.67 lbs/MMBTU (24-hour period) and per the CAFO signed on 9-30-2019, the SO2 limit of 0.749 lbs/MMBTU (30-day rolling average) applies.</p>

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03/16/2021	MACT (Part 63)	Non Compliance	*Electronic* 2nd Semi-Annual, 2020 MATS report for Erickson Station (EU001) with Mercury excess emissions and sorbent trap monitoring downtime summaries. No new fuel burned, and last boiler tune-up completed September 16, 2020, Quarterly testing results for HCl (PM is LEE status as of October 2019). Excess emissions reported for over the Hg limit of 1.2 lbs/TBtu for 288 hrs (9.25%), and downtime of 0.61% of the total operating time for 3rd and 4th quarters for other know causes. Exceedance of 30-day rolling average for Hg lasted from 7/8 to 7/19 with highest Hg emissions of 1.3 lb/TBtu. Conducted root cause analysis, plugging of activated feed augers, additional maintenance practices /PM added. VN will be sent for the Hg emission limit exceedances. *hard copy received 3-19-21*
03/16/2021	MACT (Part 63)	Compliance	40 CFR 63, Subpart DDDDD Notification of Compliance Status, 5-year tune-up completion for EUAUXBLR on 10/23/2020. *hard copy received 3-19-21*
01/20/2021	ROP Qrtly Cert	Compliance	*electronic copy* 4th Quarter Excess Emissions and Monitoring Systems Performance Report and Daily SO2 Compliance - Erickson Boiler COMS & CEMS. Reports for ROP No. MI-ROP-B4001-2015. Lori Myott RO. No excess emissions and monitor downtime of 6 min (0.01%) reported for the COMS. Highest SO2 emission was 0.561 lbs SO2/MMBTU and average for the quarter was 0.443 lbs/MMBTU . The SO2 limit is 1.67 lbs/MMBTU (24-hour period). Per the CAFO signed on 9-30-2019, the SO2 limit of 0.749 lbs/MMBTU (30-day rolling average) applies.*hard copy rec'd on 1-29-21*
11/13/2020	Stack Test	Compliance	4th QTR MATS testing report for HCl and PM maintaining PM LEE Status and satisfying CAFO CAA-05-2015-0040 annual PM Testing requirement per paragraph 82. PM = 0.0011 lb/MMBTU, HCl = 0.0011 lb/MMBTU

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10/26/2020	ROP Qrtly Cert	Compliance	*electronic copy* 3rd Quarter Excess Emissions and Monitoring Systems Performance Report and Daily SO2 Compliance - Erickson Boiler COMS & CEMS. Reports for ROP No. MI-ROP-B4001-2015. Lori Myott RO. *hard copy received 10-23-20* No excess emissions and monitor downtime of 60 min (0.05%) reported for the COMS. Highest SO2 emission was 0.641 lbs SO2/MMBTU and average for the quarter was 0.497 lbs/MMBTU . The SO2 limit is 1.67 lbs/MMBTU (24-hour period). Per the CAFO signed on 9-30-2019, the SO2 limit of 0.749 lbs/MMBTU (30-day rolling average) applies.
10/07/2020	Stack Test Observation	Compliance	Utility MACT and CAFO testing of EU001 11/12/20- results: PM 0.0011 lb/MMBtu; HCl 0.0011 lb/ MMBtu. Results are below the emission limits; the PM result is below the LEE limit.
09/24/2020	Malfunction Abatement Plan	Compliance	Updated Mercury Malfunction Abatement and QA/QC Plan per Rule 911.
09/14/2020	CEM RATA	Compliance	Annual Mercury (Hg) RATA on the mercury sorbent trap system and annual Part 75 gas RATA and 5-year 3-load flow RATA. MI-ROP-B4001-2015. *hard copy received 9-11-20* Certified by Lori Myott
09/14/2020	CEM RATA	Compliance	*received via email* Erickson Station Unit 1 Stack. *hard copy received 9-11-20* Annual Part 75 gas RATA and 5-year 3-load flow RATA. All within relative accuracy criteria.
09/14/2020	CEM RATA	Compliance	*received via email* Erickson Station Unit 1 Stack Mercury (Hg) RATA. *hard copy received 9-11-20* All within relative accuracy criteria.

Activity Date	Activity Type	Compliance Status	Comments
09/11/2020	ROP Semi 1 Cert	Compliance	**Electronic copies rec'd 9-1-20** (Hard copy rec'd 9-11-2020) Semi Annual 2020 report for ROP MI-ROP-B4001-2015. Includes MATS, CAM, FGASHANDLING & CAFO Compliance Report. Lori Myott RO - Deviations, CAM Ash Handling and COMS downtime. Deviations reported include missing records for differential pressure for the week of 3/29/20 - 4/4/20 on EUASHDC5 and COMS downtime on 6/18 & 23/2020 for EU001. FGASHHANDLING - No CAM excursion/exceedances and no monitor downtime, updated Fug Dust Plan submitted. No CAM excursion/exceedances for EU001.
09/09/2020	MACT (Part 63)	Compliance	**Electronic copy** 1st Semi-Annual, 2020 MATS report for Erickson Station (EU001) with Mercury excess emissions and sorbent trap monitoring downtime summaries. No new fuel burned, and last boiler tune-up completed September 18, 2018, Quarterly testing results for HCl (PM is LEE status as of October 2019). No excess emissions reported for the Hg limit of 1.2 lbs/TBtu, and downtime of 0.56% of the total operating time for 1st and 2nd quarters for equipment malfunctions, QA calibrations, and other known causes.
09/02/2020	Stack Test	Compliance	3rd QTR MATS testing report (HCl only due to PM LEE qualification) *received via email*. HCl emission rate tested compliant with LEE.

Name: Julie L. Brunner Date: 8/24/2021

Supervisor: HH