

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : St. Marys Cement, Inc. (U.S.)	SRN : B1559
Location : 16000 BELLS BAY RD	District : Cadillac
	County : CHARLEVOIX
City : CHARLEVOIX State: MI Zip Code : 49720	Compliance Status : Compliance
Source Class : MAJOR	Staff : Rob Dickman
FCE Begin Date : 10/1/2017	FCE Completion Date : 9/21/2018
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/21/2018	ROP Other	Compliance	Request for Stack Testing Extension. The facility notified the AQD of commencement of operation on September 4, 2018, began required stack testing on September 17, 2018, and is anticipated to complete it on September 21, 2018.
09/21/2018	ROP Semi 1 Cert	Compliance	This report details multiple events all associated with the reconstruction and commencement of operation of this facility. The facility began tying in and testing newly reconstructed equipment in late April of 2018 and experienced several issues from that time until they notified the AQD of commencement of full operation September 4, 2018. This issues listed in the report were reconciled in a timely manner, no further action is recommended.

Activity Date	Activity Type	Compliance Status	Comments
09/21/2018	Rule 912	Compliance	Written follow up to report of excess opacity. This report was not certified by the responsible official. A request to receive this certification was sent on 9/21/18. Initial report sent via email on 9/10/18. Exceedance was 168 minutes in duration. The facility attributes this to roller mill downtime and defective bags in the baghouse. The facility is continuing to replace these bags. There has been improvement in the duration of these exceedances. Since the facility is actively working on this issue no further action is recommended.
09/21/2018	Rule 912	Compliance	Written follow up to report of excess opacity. This report was not certified by the responsible official. A request to receive this certification was sent on 9/21/18. Initial report sent via email on 9/6/18. Exceedance was 396 minutes in duration. The facility attributes this to roller mill downtime and defective bags in the baghouse. The facility is continuing to replace these bags. Since the facility is actively working on this issue no further action is recommended.
09/21/2018	Rule 912	Compliance	Written follow up to report of excess opacity. This report was not certified by the responsible official. A request to receive this certification was sent on 9/21/18. Initial report sent via email on 9/4/18. Exceedance was 456 minutes in duration. The facility attributes this to roller mill downtime and defective bags in the baghouse. The facility is systematically replacing the nearly 6000 bags in the Main Stack baghouse. Since the facility is actively working on this issue , no further action is recommended at this time.
08/30/2018	Scheduled Inspection	Compliance	Scheduled inspection of this major source.
08/27/2018	CAM Excursions/Exceedances	Compliance	Excursions and Monitor Downtime contained within the same report. Report is ok. Opacity excursions due to incorrect bags installed in baghouse. Bags were replaced.

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08/27/2018	CAM monitor downtime	Compliance	Excursions and Monitor Downtime contained within the same report. Report is ok. Pre maintenance work ahead of a long planned outage led to several downtime incidents which were corrected in a timely manner.
08/27/2018	MACT (Part 63)	Compliance	2018 First Semi Annual PC MACT Report for MI-ROP-B1559-2014. Deviations are daily VE readings that did not pass. Appropriate actions were taken to address excess VE. Also included was reporting regard engines under Subpart ZZZZ. No deviations reported for this. Report was timely and certified. Report satisfactorily addresses the requirements of 63.1354(b)(9).
07/30/2018	Excess Emissions (CEM)	Compliance	Second Quarter 2018 EER. Facility did not operate for much of the quarter due to retrofiting of new equipment including the kiln. Excess emissions and excess monitor downtime for all monitors was less than 1% of the total source operating time.
07/30/2018	Excess Emissions (CEM)	Compliance	Second Quarter 2018 Visibility Protection Report. This plant was down for new retrofiting during most of this quarter. No NOx or SO2 excess emissions were noted. Downtime for these CEMS was less than 1%.
06/01/2018	ROP R215 Notification	Compliance	Notification Rule 215 (5) - Randy Prior No Longer works for the Company. Celso Martini (Randy's Boss) has assumed Temporary Responsibility of the Charlevoix Operations.
05/17/2018	Excess Emissions (CEM)	Compliance	1st Quarter 2018 EER. Monitoring system downtime and excess emissions typical for this source.
05/17/2018	Excess Emissions (CEM)	Compliance	First Quarter 2018 Visibility Protection Report. This report is required under 40 CFR 52.1183. Excess emissions and monitoring system downtime were typical for this source.

Activity Date	Activity Type	Compliance Status	Comments
04/05/2018	Rule 912	Compliance	Report detailing an excess opacity event on 3/13/18. This event was first reported via email on 3/14/18. Opacity on the main stack was out of compliance for 468 minutes. The facility believes holes in some of the baghouse bags had developed and ultimately replaced 17 of them. They initiated corrective actions promptly. No further action is recommended.
04/05/2018	Rule 912	Compliance	Report detailing an excess opacity event on 3/21/18. This event was first reported via email on 3/22/18. Opacity on the main stack was out of compliance for 168 minutes. The facility believes holes in one or more of the baghouse bags had developed. They have committed to replacing all of the bags as they believe the current ones are faulty and failing. They initiated corrective actions promptly. No further action is recommended.
03/22/2018	Meeting Notes	Compliance	Site visit
03/22/2018	Complaint Investigation	Compliance	Complaint of strong sulfur odors and opacity from the facility.
03/16/2018	MAERS	Compliance	See MAERS for further info.
03/15/2018	Rule 912	Compliance	Report detailing an excess opacity event on 2/24/18. This event was first reported via email on 2/24/18. Opacity on the main stack was out of compliance for 192 minutes. The facility believes holes in one of the baghouse bags had developed. They initiated corrective actions promptly. No further action is recommended.
03/14/2018	Complaint Investigation	Compliance	Complaint of strong odors from this facility.
02/20/2018	Stack Test	Compliance	Particulate Testing on the secondary crusher baghouse vent. Testing required by 40 CFR 60 Subpart OOO. Emissions were 0.002 gr/dscf, limit per OOO are 0.014 gr/dscf. Report appears complete, results demonstrate compliance.
01/30/2018	ROP SEMI 2 CERT	Compliance	Report OK. All deviations reported are excess emissions or CEMS downtime as reported in required Excess Emissions Reporting. No further action is recommended.

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01/30/2018	ROP Annual Cert	Compliance	Report OK. All deviations reported are excess emissions or CEMS downtime as reported in required Excess Emissions Reporting. No further action is recommended.
01/18/2018	Excess Emissions (CEM)	Compliance	4th Quarter 2017 EER. Opacity system downtime for both stacks excess emissions from the Main Stack were higher than normal. The facility previously reported these issues and took corrective action. Other monitor systems were good. No further action is recommended until data from next quarter is submitted and compared to this quarter.
01/12/2018	Rule 912	Compliance	Report detailing an excess opacity event on 12/27/17. This event was first reported via email on 12/28/17. Opacity on the main stack was out of compliance for 192 minutes. The facility initiated corrective actions but did not find the cause of the issue. No further action is recommended.
01/12/2018	Excess Emissions (CEM)	Compliance	Fourth Quarter 2017 Visibility Protection Report. This report is required under 40 CFR 52.1183. Excess emissions and monitoring system downtime were both less than 1% of the total source operating time with the exception of SO2 on the Main Stack which had system downtime of 2.11%. No further action is recommended.
01/12/2018	CAM Excursions/Exceedances	Compliance	Excursions and Monitor Downtime contained within the same report. Report is ok. Opacity excursions on the main stack opacity. Facility unable to determine reason but initiated corrective action.
01/12/2018	CAM monitor downtime	Compliance	Excursions and Monitor Downtime contained within the same report. Report is ok. Data acquisition system failed during a heavy rain event. Installed backup.

Activity Date	Activity Type	Compliance Status	Comments
01/12/2018	MACT (Part 63)	Compliance	2017 Second Semi Annual PC MACT Report for MI-ROP-B1559-2014. Deviations are daily VE readings that did not pass. Appropriate actions were taken to address excess VE. Also included was reporting regard engines under Subpart ZZZZ. No deviations reported for this. Report was timely and certified. Report satisfactorily addresses the requirements of 63.1354(b)(9).
01/02/2018	ROP Other	Compliance	Request for Extension of Testing EUCLINKERCOOL and EUINLINEKILN. Request to EPA Region IV. Compliance testing per the MACT would be due October 7, 2018. Commissioning of the finish mill is not scheduled until October 5, 2018. Facility is asking for a date that they approximate will be no later than January 2019.
12/14/2017	ROP Other	Compliance	Revised Fugitive Dust Plant, Approved, sent letter of approval on 12/14/17.
12/14/2017	CEM RATA	Compliance	2017 RATA on Main and Bypass Stack CEMS. Report indicates passing quality assurance results.
12/14/2017	NSPS (Part 60)	Compliance	Notification per 40 CFR 60 Subpart A and OOO regarding replacement of a subject conveyor. Notification appears complete.
10/24/2017	Excess Emissions (CEM)	Compliance	Third Quarter 2017 EER. Report OK. All excess emissions and monitoring system downtime reported was less than 1% of the total source operating time.
10/24/2017	Excess Emissions (CEM)	Compliance	Third Quarter 2017 Visibility Protection Report. This report is required under 40 CFR 52.1183. Excess emissions and monitoring system downtime were both less than 1% of the total source operating time.
10/09/2017	Complaint Investigation	Compliance	Complaint investigation of fugitive emissions from this source.
10/05/2017	Complaint Investigation	Compliance	Complaint of opacity from this source
10/04/2017	Other	Compliance	EPA inspection of this major source

Name:



Date:

9/21/18

Supervisor:

