

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Stack Test Observation

B155925023

FACILITY: St. Marys Cement, Inc. (U.S.)		SRN / ID: B1559
LOCATION: 16000 BELLS BAY RD, CHARLEVOIX		DISTRICT: Cadillac
CITY: CHARLEVOIX		COUNTY: CHARLEVOIX
CONTACT: Cortney K. Schmidt, Environmental Engineer		ACTIVITY DATE: 04/23/2014
STAFF: Kurt Childs	COMPLIANCE STATUS:	SOURCE CLASS: MAJOR
SUBJECT: MI-ROP-B1559-2008 PCMACT D/F and PM testing.		
RESOLVED COMPLAINTS:		

SMC conducted air emissions performance testing to demonstrate compliance with Dioxin/Furan (D/F) and PM emission limits from the PC MACT as incorporated into MI-ROP-B1559-2008 on 4/22/14 through 4/25/14. Testing is currently required every 30 months. The previous test was conducted on November 21, 2012. SMC's ROP renewal is currently in process the renewal ROP will not contain PCMACT testing requirements for the kiln, as it will be subject to the CISWI rules as a result of combusting alternative fuels including recycled plastic.

The kiln process includes a main stack controlled by a baghouse and an alkali bypass stack also controlled by a baghouse. During the test each stack is sampled simultaneously and the results of the two samples combined to determine the total emissions for the test.


On 4/22/2014 1 complete D/F test run with the roller mill up was completed along with 2.5 hours of the second D/F roller mill up test run.

I attended testing on 4/23/2014 along with Jeremy Howe during which one D/F test run with the roller mill down was completed as was the completion of the second run with the roller mill up. The third run with the roller mill up was initiated but production problems interrupted this test run. Each D/F test run is three hours long. During the test SMC was monitoring raw material feed rate fuel feed rates, clinker production, baghouse inlet temperatures (D/F test) and baghouse differential pressures (PM test). Data is collected automatically by the plant's computerized control system and tracked on a spreadsheet. SMC will provide data for the test report by pulling the data specified above from the plant spreadsheet into a separate spreadsheet.

During the test I observed the operating data directly and on the spreadsheet and collected the attached spreadsheet as an example from the completion of the second D/F roller mill up test run. The plant was determined to be operating at normal maximum operating conditions. The plant could be run at higher production rates but not for sustainable periods due to various bottlenecks and raw material quality issues. Recycled plastic alternative fuels were burned during the test.

On 4/24/2014 Rob Dickman attended the test and continued process problems again interrupted run 3 of the roller mill up test. The test report eventually would indicate this test run was completed at 1720 on 4/24/14.

The remainder of the testing (Run 3 Main stack, roller mill down) was completed on 4/25/14. Additional test review will take place once the test report is received.

NAME  DATE 10-19-14 SUPERVISOR 