

DEPARTMENT OF ENVIRONMENTAL QUALITY  
 AIR QUALITY DIVISION  
 ACTIVITY REPORT: Sample Results Review

B155927479

FACILITY: St. Marys Cement, Inc. (U.S.)		SRN / ID: B1559
LOCATION: 16000 BELLS BAY RD, CHARLEVOIX		DISTRICT: Cadillac
CITY: CHARLEVOIX		COUNTY: CHARLEVOIX
CONTACT:		ACTIVITY DATE: 10/14/2014
STAFF: Kurt Childs	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Reveiw of stack test results from April 2014 D/F test.		
RESOLVED COMPLAINTS:		

AQD received a copy of the Dioxin and Furan test results on June 23, 2014. This test was for Dioxin/Furan emissions pursuant to a PC MACT requirement included in MI-ROP-B1559-2008. The testing took place April 22 through 25, 2014. The test report indicates that the D/F emissions are in compliance with the 1.7 x 10<sup>-10</sup> gr/dscf@ 7% Oxygen limit specified in the ROP.

The test report has been reviewed by Jeremy Howe, AQD - TPU. Numerous problems with the report and actual testing were identified in his report but the test report was determined to be acceptable with reservations and the results were approved for use in determining compliance with emission limits. My review focused on the operating data provided with the report.

At the time of the test I was present on 4/23/14 and observed and obtained operating data during the D/F roller mill up second test run. The data I received at that time was representative of normal maximum operation and was the same as the data provided in the test report for the same time period.

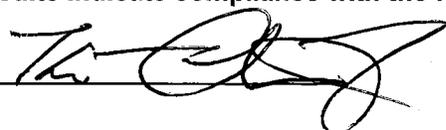
The test report includes process operational data that was recorded during each of the D/F and PM test runs. Additional data was also collected in between breaks in run 3 of the roller mill up test. I recalculated the averages for this test run after deleting the data collected outside the test period. The test report also contained duplicate data for D/F roller mill up runs 1, 2 and 3. Additional data was also provided for a time period not relevant to the test but this data was not used in calculating process operating averages.

Data collected for the D/F test included Opacity, raw material feed rates, Kiln and calciner fuel feed rates, main and bypass baghouse inlet temperature, and clinker production rate. Clinker production rates averaged 164.3 tons per hour during the raw mill up test and 170.1 during the raw mill down test. These production rates are typical for maximum normal operating rate and were consistent with my observations during the test. Average bypass inlet temperature averaged 341.3 during the raw mill up test and 342.8 during the raw mill down test(new compliance limit, raw mill operation not required). This temperature is significantly lower than the last test (408.9 degrees).

Data collected for the PM test included opacity, kiln feed (297.7 tons per hour), clinker production (162.25 tons per hour), and fuel feed rates including alternative fuel (plastics). The data provided again indicates that the process was operating at normal maximum rates during the test.

The D/F and PM test results are compliant with the emission limits in place at the time of the test. Since that time the Renewable Operating Permit (ROP) has been renewed and EUKILN at this source is not currently subject to the PC MACT but will be subject to the Standards of Performance for Emissions Guidelines and Compliance Times for Commercial and Industrial Solid Waste Incineration Units promulgated in 40 CFR, Part 60, Subparts A, and DDDD. As a result there is not currently a D/F limit in the ROP and further testing for D/F is not currently required.

It appears that the test was generally conducted as required, relevant operating data was collected, and the results indicate compliance with the ROP D/F and PM emission limits applicable at the time of the test.

NAME  DATE 10-14-14 SUPERVISOR 