

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : Michigan Sugar Company - Sebewaing Factory	SRN : B2873
Location : 763 N Beck St	District : Saginaw Bay
	County : HURON
City : SEBEWAING State: MI Zip Code : 48759	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Kathy Brewer
FCE Begin Date : 10/1/2016	FCE Completion Date : 9/28/2018
Comments : Biennial ROP compliance evaluation	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
09/25/2018	ROP SEMI 2 CERT	Compliance	(1). On 4 dates, VE method 9 Lime Kiln observations not performed after VEs greater than normal observed. Shift observations each day of higher than normal VE indicated normal VE levels. Provided additional training to operators. (2.) 10 days Pulpdryer #1, 7 days Pulpdryer#2; Multiclone dP exceeded briefly each day. No Excess emissions. Plan to modify MAP & CAM to allow for new operating limit. (3) 10 days FG-BOILERS pressure drop low for wet scrubber venture. plugging & moisture in pressure sensor lines cited as cause. cleaning resolved issue. CAM report states pressure drop did not occur during period of incorrect readings

Activity Date	Activity Type	Compliance Status	Comments
09/25/2018	ROP Annual Cert	Compliance	(1). On 4 dates, VE method 9 Lime Kiln observations not performed after VEs greater than normal observed. Shift observations each day of higher than normal VE indicated normal VE levels. Provided additional training to operators. (2.) 10 days Pulpdryer #1, 7 days Pulpdryer#2; Multiclone dP exceeded briefly each day. No Excess emissions. Plan to modify MAP & CAM to allow for new operating limit. (3) 10 days FG-BOILERS pressure drop low for wet scrubber venture. plugging & moisture in pressure sensor lines cited as cause. cleaning resolved issue. CAM report states pressure drop did not occur during period of incorrect readings
09/25/2018	CAM Excursions/Exceedances	Compliance	No Exceedances. 10 days FG-BOILERS pressure drop low for wet scrubber venture. plugging & moisture in pressure sensor lines cited as cause. cleaning resolved issue. CAM report states pressure drop did not occur during period of incorrect readings
09/25/2018	CAM monitor downtime	Compliance	10 days FG-BOILERS pressure drop low for wet scrubber venture. plugging & moisture in pressure sensor lines cited as cause. cleaning resolved issue. CAM report states pressure drop did not occur during period of incorrect readings
09/25/2018	CAM Excursions/Exceedances	Compliance	No CAM Exceedances reported. MDEQ is in discussions w/facility re: insufficient CAM plan
09/25/2018	CAM monitor downtime	Compliance	No CAM downtime reported. MDEQ is in discussions w/facility re: insufficient CAM plan

Activity Date	Activity Type	Compliance Status	Comments
09/25/2018	ROP Semi 1 Cert	Compliance	The first form (EQP 5736), second box, has #2 selected which indicates deviations occurred and are described in the following attachment. The report submitted has no deviations documented on the attached forms for the air ROP deviation report. No additional information was provided so unclear if the forms were left blank in error or intentionally. Resp Official contacted and verified he intended to submit "No Deviations during reporting period". No CAM exceedances.
09/13/2018	Scheduled Inspection	Non Compliance	Inspection for compliance with ROP conditions. NOV sent for VE and Fugitive dust plan non compliance. Discussions w/company re: CAM/MAPs/MACT implementation are ongoing.
05/24/2018	MAERS	Compliance	
05/11/2018	Stack Test	Compliance	Boiler MACT Emission Sampling - West ESP Exhaust. Compliant with CO and PM emission limits.
03/16/2018	MACT (Part 63)	Compliance	Boiler MACT Compliance Report. States no deviations or malfunctions, no new fuels for boiler #2 & #3. Reported annual total Fuel use of bituminous coal. Annual tune dates for Boilers # 2, 3
02/08/2018	Stack Test Observation	Compliance	BOILER MACT emission testing for CO & PM

Activity Date	Activity Type	Compliance Status	Comments
09/18/2017	ROP Semi 1 Cert	Non Compliance	<p>Facility submitted first semi-annual reporting package for 2017. Package included the Boiler MACT status report, Deviation reports and CAM excursion/exceedance and downtime reports for the facility. Note that the facility has indicated that as it is subject to the Boiler MACT it is no longer subject to CAM.</p> <p>The referenced package indicted that issues with low readings for the venture wet scrubber pressure gauge on 8 different dates for periods of 1-13 hours each. The facility reported correction of the problem which was the result of plugged line due to freezing and/or dirt. The referenced control device is associated with FGBOILERS onsite.</p>
09/18/2017	CAM Excursions/Exceedances	Non Compliance	<p>Facility submitted first semi-annual reporting package for 2017. Package included the Boiler MACT status report, Deviation reports and CAM excursion/exceedance and downtime reports for the facility. Note that the facility has indicated that as it is subject to the Boiler MACT it is no longer subject to CAM.</p> <p>The referenced package indicted that issues with low readings for the venture wet scrubber pressure gauge on 8 different dates for periods of 1-13 hours each. The facility reported correction of the problem which was the result of plugged line due to freezing and/or dirt. The referenced control device is associated with FGBOILERS onsite.</p> <p>The facility reports that from experience before and after that the pressure drop did not change during the incorrect reading incidents. No exceedances of emissions were reported for the 8 dates.</p>

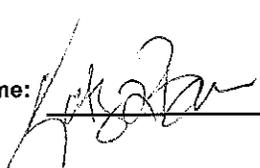
Activity Date	Activity Type	Compliance Status	Comments
09/18/2017	CAM monitor downtime	Non Compliance	<p>Facility submitted first semi-annual reporting package for 2017. Package included the Boiler MACT status report, Deviation reports and CAM excursion/exceedance and downtime reports for the facility. Note that the facility has indicated that as it is subject to the Boiler MACT it is no longer subject to CAM.</p> <p>The referenced package indicted that issues with low readings for the venture wet scrubber pressure gauge on 8 different dates for periods of 1-13 hours each. The facility reported correction of the problem which was the result of plugged line due to freezing and/or dirt. The referenced control device is associated with FGBOILERS onsite.</p>
09/18/2017	MACT (Part 63)	Compliance	<p>Facility submitted first semi-annual reporting package for 2017. Package included the Boiler MACT status report, Deviation reports and CAM excursion/exceedance and downtime reports for the facility. Note that the facility has indicated that as it is subject to the Boiler MACT it is no longer subject to CAM.</p> <p>The boiler MACT status report indicates that there have been no deviations for any emission limits, operating limits, or work practice standards for boilers #2 or #3 (AKA FGBOILERS) for the period.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/25/2017	MACT (Part 63)	Non Compliance	<p>Electronic copy of 2016 Boiler MACT Compliance Report submitted to EPA. Document reports three boilers; two wickes coal fired boilers, and a NG fired boiler</p> <p>The facility reports that fuel was commercially available coal, not a waste material and that there have been no changes to operation that could increase emissions since the last performance test. The two wickes boilers had performance testing conducted on March 16-18, 2016. The NG fired boiler was last tested on 10/16/2015.</p> <p>Report indicated that there should be an attached table documenting startup and shutdown activities. No such table was included, and the company was notified.</p> <p>No deviations from any emission limits, operating limits or work practice standards for the wickes boilers were reported to have occurred during the calendar year.</p> <p>Annual Boiler MACT Compliance report submitted to EPA. Submittal did not include referenced table. Copy of table was requested on March 15, April 27 and May 4th, 2017. Table was finally received from company May 8th, 2017.</p> <p>Completion of review noted that Responsible Official for the facility was not the signature of the cert form. The Signer is the Factory manager for a different MSC Facility in the thumb. This was brought to the company's attention on May 8, 2017. No replacement form received as of May 25, 2017.</p> <p>Based on failure to submit an appropriate cert form for the document, it has been determined that the status is non-compliant. sgl</p>
04/03/2017	MAERS	Compliance	MAERS Cert form received by District on 2/21/2017

Activity Date	Activity Type	Compliance Status	Comments
03/20/2017	Stack Test	Compliance	<p>Compliance Emissions Testing for Pulp Dryers 1, 2 and 3. Note that Pulp dryers #1 & 2 make up FG-PULPDRYERS. Stack testing by Network Environmental for the referenced units were conducted on February 1 and 2, 2017 to meet ROP requirements I.1 for EU-DRYER#3 and FG-PULPDRYERS. PM limits for the EU and FG were 0.10 lbs/1000 lbs of exhaust gases and 0.10 lbs/1000 lbs of exhaust gas for each of the two dryers...</p> <p>The report indicated that the EU-PULPDRYER#3 test average was 0.065 lb/1000 lb exhaust gases, well below the limit of 0.10 lbs/1000 lbs of exhaust gases.</p> <p>The report indicated that FG-PULPDRYERS had a test average of 0.016 lbs/1000 lbs exhaust gases. Evaluation of the value reported indicated that the value was well below the ROP limit of 0.10 lbs/1000 lbs of exhaust gases for each of the two dryers (0.20 lb/1000 lbs exhaust gas combined).</p>

03/20/2017	Stack Test	Compliance	<p>Boiler MACT Emissions Testing for Wet ESP Exhaust .</p> <p>The Michigan Sugar Company contracted Network Environmental to conduct stack testing for two coal-fired boilers operated onsite. Testing was conducted February 7-9th, 2017. Testing was conducted to determine compliance with the National Emission Standards for Hazardous Air Pollutants (NESHAP) 40 CFR Part 63 Subpart DDDDD (MACT for Industrial, Commercial, Institutional Boilers and Process Heaters. Parameters tested for included Carbon Monoxide, PM, Mercury and HCL.</p> <p>The resulting report indicated that CO levels of 169 ppm CO @ 3% O2 or 0.0126 lbs CO/MMBTU steam output. The limits of which are 160 ppm at 3%O2, or 0.24 lbs CO/MMBTU of Steam Output. Thus indicating that the facility only passes the limit when using the MMBTU of Steam Output. Which was the issue when tested in 2016.</p> <p>PM results were reported to be 4.23 E-2 lbs/MMBTU Heat input and 4.07E-2 lbs/MMBTU Steam Output. The PM limits per the MACT are 4.0E-2 lb/MMBTU Heat input or 4.2E-2 lbs/MMBTU of steam Output. As with the case of CO, the facility shows compliance only with respect to the Steam Output limit.</p> <p>Test results for Mercury (HG) reported 7.15 E-7 lbs/MMBTU Heat Input and 6.66 E-7 lbs/MMBTU Steam Output. The MACT limits for HG for the facility are 5.7E-6 lb/MMBTU of Heat Input or 6.4 E-6 lbs/MMBTU of Steam Output. Test results reported for Mercury indicate that HG was below both the Heat Input and Steam Output limits under the MACT.</p> <p>With respect to HCL, the Stack Test Report indicated HCL concentrations of 2.99E-4 lbs/MMBTU of Heat input and</p>
------------	------------	------------	--

03/20/2017	Stack Test	Compliance	2.89E-4 lbs/MMBTU Steam Output. The MACT limits for HCL are 2.2E-2 lbs/MMBTU of Heat Input or 2.55E-2 lbs/MMBTU of Steam Output. The reported results well below HCL limits.
03/16/2017	ROP Annual Cert	Non Compliance	2016 calendar year annual report identified a recordkeeping violation for EULIMEKILN. New kiln operators reported "high" VEs on three separate days during the 4th quarter of 2016, and failed to notify staff so Method 9 VEs could be conducted. No other issues were reported for the 2016 calendar year.
03/16/2017	ROP SEMI 2 CERT	Non Compliance	2016 calendar year annual report identified a recordkeeping violation for EULIMEKILN. New kiln operators reported "high" VEs on three separate days during the 4th quarter of 2016, and failed to notify staff so Method 9 VEs could be conducted. No other issues were reported for the 2016 calendar year.
03/16/2017	CAM Excursions/Exceedances	Compliance	No CAM related excursions, exceedances or downtimes were reported for the facility for the 2016 calendar year or the 3rd and 4th quarters of 2016.
03/16/2017	CAM monitor downtime		No CAM related excursions, exceedances or downtimes were reported for the facility for the 2016 calendar year or the 3rd and 4th quarters of 2016.
02/07/2017	Stack Test Observation	Compliance	FG-BOILERS (East and West Wickes coal fired boilers) testing to meet Boiler MACT testing requirements. Testing activities scheduled for 2/7-2/9 2017. Compliance based on completion of testing as required. Test results unknown upon report preparation.
02/01/2017	Stack Test Observation	Compliance	Pulp Dryer PM testing conducted by Network Environmental for three pulp dryers located onsite.

Name: 

Date: 10/19/2019

Supervisor: 