

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

<b>Facility :</b> Michigan Sugar Company, Caro Factory		<b>SRN :</b> B2875
<b>Location :</b> 819 Peninsular St.		<b>District :</b> Saginaw Bay
		<b>County :</b> TUSCOLA
<b>City :</b> CARO	<b>State:</b> MI	<b>Zip Code :</b> 48723
<b>Compliance Status :</b>		Non Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Sharon LeBlanc	
<b>FCE Begin Date :</b> 1/1/2015	<b>FCE Completion Date :</b>	10/13/2016
<b>Comments :</b> Only compliance issue appears to be exceedance of restriction in operating limit for FG-PULP by <80 hours. company has received electronic notification, but no response was received at the time of report preparation. sgl		

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
10/13/2016	Scheduled Inspection	Non Compliance	FCE scheduled site inspection for 2017 fiscal year. Company has been electronically notified at the time of report preparation that 2015 annual emissions reported exceedance of 80 hours above the allowed 4000 hours of operation for FG-PULP.
09/27/2016	CAM monitor downtime	Compliance	First Semi Annual Cert for 2016 reported only one deviation, and no CEMS downtime or exceedances. The single deviation was a failure to have 60-days between quarterly CEMS Cylinder Gas Audits for the 1st and second quarters. The deviation occurred due to poor vendor scheduling and end of campaign boiler shutdown activities. The company has committed to better scheduling the events within the campaign. No other deviations, exceedances, excursions or downtime were reported for period.

Activity Date	Activity Type	Compliance Status	Comments
09/27/2016	ROP Semi 1 Cert	Non Compliance	First Semi Annual Cert for 2016 reported only one deviation, and no CEMS downtime or exceedances. The single deviation was a failure to have 60-days between quarterly CEMS Cylinder Gas Audits for the 1st and second quarters. The deviation occurred due to poor vendor scheduling and end of campaign boiler shutdown activities. The company has committed to better scheduling the events within the campaign. No other deviations, exceedances, excursions or downtime were reported for period.
09/20/2016	CAM Excursions/Exceedances	Compliance	First Semi Annual Cert for 2016 reported only one deviation, and no CEMS downtime or exceedances. The single deviation was a failure to have 60-days between quarterly CEMS Cylinder Gas Audits for the 1st and second quarters. The deviation occurred due to poor vendor scheduling and end of campaign boiler shutdown activities. The company has committed to better scheduling the events within the campaign. No other deviations, exceedances, excursions or downtime were reported for period.
08/01/2016	Excess Emissions (CEM)	Compliance	2016 second quarter operating report and CEM summary report for #4 boiler. Note that the cylinder gas audit for the quarter was submitted in advance due to the end of the campaign. No excess emissions or system downtime for the CEMS was reported during the 160 hours of operation. Original signatures were noted. sgl
05/12/2016	MAERS	Compliance	MAERS cert form received 3/14/2016
04/26/2016	ROP Other	Compliance	Cylinder Gas Audit for Boiler #4 - CGA was completed less than 60-days from the previous audit in order to complete the activity before the campaign ended and the boiler was shut down. Data provided indicated a CGA accuracy of less than 2.5 percent, which is significantly below the 15% allowed. sgl

Activity Date	Activity Type	Compliance Status	Comments
04/26/2016	Excess Emissions (CEM)	Compliance	2016 First Quarter Operating Report and CEM Summary Report for Boiler #4- The referenced document reported no monitor downtime or excess emissions for the quarter. sgl.
03/30/2016	ROP Other	Compliance	Cylinder s audit conducted on 3/3/2016 for Boiler #4 CEM. NOx and O2 results reported were within acceptable ranges. sgl
03/15/2016	ROP Annual Cert	Compliance	Facility reports no reporting or recordkeeping deviations/violations for the year 2015.
03/15/2016	ROP SEMI 2 CERT	Compliance	Facility reports no reporting or recordkeeping deviations/violations for the year 2015.
03/15/2016	CAM Excursions/Exceedances	Compliance	Facility reports no CAM excursions/ exceedances, reporting or recordkeeping deviations/violations for the year 2015.
03/15/2016	CAM monitor downtime	Compliance	Facility reports no CAM excursions/ exceedances, reporting or recordkeeping deviations/violations for the year 2015.
02/01/2016	Excess Emissions (CEM)	Non Compliance	4th Quarter quarterly summary report for gaseous excess emission and monitoring system. Facility reported no excess emissions, however, 3.87 hour of monitor downtime due to an alarm in the CEMS was reported, and the issue(s) corrected. sgl
01/14/2016	CEM RATA	Compliance	MSC Caro Plant, annual RATA for Boiler #4 (relocated to the site from Bay City Plant in 2014). Boiler is operated in conjunction with a smaller existing NG fired boiler. During testing the facility reports that Boiler #4 was operated at approximately 57.1 % capacity. Testing results indicated that CEMS units were operating within acceptable ranges.

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10/14/2015	Excess Emissions (CEM)	Compliance	report page indicates that the reporting period is "fourth quarter 2015" which implies calendar quarter of 2015 (September thru December) actually refers to 4th operation quarter for facility for 2014-2015 campaign year (July thru August). Have asked company in future to either use date range for the reporting period or calendar quarter to clarify for parties not familiar with Facilities operational year. Sgl  Note that the company resubmitted a corrected version when submitting the 2015 4th quarterly report. sgl
10/01/2015	ROP Semi 1 Cert	Compliance	Awaiting replacement cert page-wrong ROP No. sgl 9/23/15 Received on 9/29/2015. sgl
10/01/2015	CAM Excursions/Exceedances	Compliance	No excursions or exceedances reported. sgl
10/01/2015	CAM monitor downtime	Compliance	no monitor downtime reported.
09/23/2015	ROP Other	Compliance	Cylinder Gas Audit Report for first quarter of 2015-2016 campaign was conducted 9/2/2015. Report documents readings in compliance with requirements.
07/20/2015	Excess Emissions (CEM)	Compliance	Quarterly boiler summary reports - no operation
05/15/2015	ROP Qrtly Cert	Compliance	CEMS quarterly report was initially submitted electronically on 4/29/2015. But no hard copies were received. The hard copies were requested electronically and received at the district office. The original hard copies were submitted to TPU.
04/01/2015	MAERS	Compliance	MAERS Cert Form submitted 3/16/2015- forms incorrectly reported 2015 as year of deviations, corrected forms received 4/2/2015.
03/30/2015	ROP Annual Cert	Compliance	had to request replacement reporting pages for deviation....dates on originals were for 2015, rather than 2014.
03/30/2015	ROP SEMI 2 CERT	Compliance	
03/30/2015	CAM Excursions/Exceedances	Compliance	requested corrected deviation pages. Submittal dates indicated Sept of 2015 not 2014.

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03/30/2015	CAM monitor downtime	Compliance	requested corrected pages. Submittal reported for sept 2015 rather than 2014.
03/23/2015	ROP Other	Compliance	First Quarter Cylinder Gas Audit of Boiler #4
01/23/2015	CEM RATA	Compliance	CO Emission Testing & RAT - Gas Fired Boiler #4 - Note testing conducted at 58.4% capacity based on steam flow capacity and 62.5% based on natural gas flow. Results reported confirmed compliance with respect to the RATA and CO permit limits. sgl
01/12/2015	Malfunction Abatement Plan	Compliance	Revised MAP and SSP for EUBOILER4 received and reviewed- meets minimal requirements.

Name: Sharon Letstone Date: 12/28/16 Supervisor: C. Kace