

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Michigan Sugar Company, Croswell Factory	SRN : B2876
Location : 159 S Howard Ave	District : Saginaw Bay
	County : SANILAC
City : CROSWELL State: MI Zip Code : 48422	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Benjamin Witkopp
FCE Begin Date : 3/29/2017	FCE Completion Date : 3/29/2018
Comments : Facility has problems exceeding ranges found in the pulp dryer CAM plan and MAP for pressure drop and gas recirculation rates. The Sept 19, 2017 stack test for the pulp dryer failed and the report was late.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
03/29/2018	MACT (Part 63)	Compliance	Boiler MACT Compliance Report Blr 3 latest tune up was stated as 8-28-17 and is to be annual. Blr 4 has O2 trim with latest tune up stated as 12-16-15 and is to be every 5 years.
03/15/2018	ROP Annual Cert	Non Compliance	Failed stack test, report late, Pulp dryer pressure drop and gas recirc outside of CAM and MAP specs multiple hours over many days.
03/15/2018	ROP SEMI 2 CERT	Non Compliance	Failed stack test, report late, Pulp dryer pressure drop and gas recirc outside of CAM and MAP specs multiple hours over many days.
03/15/2018	CAM Excursions/Exceedances	Non Compliance	CAM ranges for pressure drops and gas recirc rates exceeded multiple hours for many days.
03/15/2018	CAM monitor downtime	Non Compliance	No downtime reported but data, through record review, indicates otherwise as gas recirc meter pegged out.
02/16/2018	Scheduled Inspection	Non Compliance	Inspection of facility
02/12/2018	ROP Tech Review Notes	Unknown	Email response to questions raised during technical review process.
02/12/2018	ROP Tech Review Notes	Unknown	Technical Review Notes for 2018 renewal. Incorporates PTI 21-15B and boiler MACT requirements. Removal of coal fired boilers.
01/25/2018	Excess Emissions (CEM)	Compliance	Fourth Quarter summary report for gaseous excess emission and monitoring system. No monitor down time reported.

Activity Date	Activity Type	Compliance Status	Comments
01/25/2018	CEM RATA	Compliance	Boiler #4 RATA for NOx results showed 4.49% of the mean reference method samples. This is below the 20% allowed in 40 CFR Part 60 appendix B performance specification 2.
01/11/2018	ROP Other	Compliance	Cylinder Gas Audit Report for Boiler #4 NOx and O2 The average audit value for NOx was -7.95% while O2 was -2.42%. Both are below the control limit of +/- 15%.
01/11/2018	Excess Emissions (CEM)	Compliance	2017 third quarter summary report for gaseous excess emission and monitoring system performance. A total of 6 hrs down time. This equates to 0.63% down time.
01/05/2018	Stack Test	Compliance	Pulp Dryer Emission Testing Report for 2nd test after failed 9-19-17 test. These results had 0.068 #/1,000 pounds of stack gas. The results are below the limit of 0.10 pounds.
12/01/2017	Stack Test	Non Compliance	Pulp Dryer Stack Test - Co submitted the data pages for Sept 19, 2017 test. Their consultant Jeff Pfof verbally told AQD (Chris Hare and Ben Witkopp) on Nov 8, 2017 the test failed and results were basically 2x the limit.

Activity Date	Activity Type	Compliance Status	Comments
09/19/2017	ROP Semi 1 Cert	Non Compliance	<p>Facility reported that for the first 6 months of 2017 that the following deviations for the pellet cooler and pup dryer had occurred; EUPELLETCOOLER was reported to have had three different events in which the differential pressure readings indicated possible issues with baghouse operation. The facility reports that it is still investigating the accuracy of the readings.</p> <p>With reference to EUPULPDRYER, on 27 different dates between January 1 and March 25, 2017 the facility reported that the flue gas recirculation rate fell below the acceptable operational range. The company further reports that some operational issues occur if they operated at a higher rate. The facility reports that the instrumentation is going to be checked asap,</p> <p>An update on the status was requested electronically, and a copy of the response may be found in the District Files.</p>
09/19/2017	CAM Excursions/Exceedances	Compliance	The facility reported that no CAM exceedances or excursions occurred for the facility within the period.
09/19/2017	CAM monitor downtime	Compliance	The facility reports no CAM monitor downtime within the period.
09/19/2017	Stack Test Observation	Compliance	PM stack test observations for EUPULPDRYER. Testing activities are required under the existing ROP.

Activity Date	Activity Type	Compliance Status	Comments
08/07/2017	Excess Emissions (CEM)	Compliance	<p>2017 Second Quarter CEM Report - Facility reported that Boiler # 4 (AKA the reilly Boiler) did not run for quarter. This is not unexpected as the facility normally finishes up the beet campaign the end of march and will not start up again until end of august, first week of September.</p> <p>No cylinder gas audit was completed as the EU did not operate, required CEMS testing will be initiated the quarter the EU begins operation for the campaign. sgl</p>
04/19/2017	Excess Emissions (CEM)	Compliance	<p>First Quarter Summary Report for Gaseous Excess Emission and Monitoring System Performance - The facility reported that the Riley Boiler (Boiler #4) had no excess emissions or CEMS system downtime for the first quarter of 2017. The Rata for the facility was conducted on 2/16/2017 and was submitted to the agency on March 13, 2017. Cert form with appropriate signature was submitted with report.</p>
04/03/2017	MAERS	Compliance	MAERS Cert form received by District on 2/21/2017

Name: *M. Z...*

Date: 9-27-18

Supervisor: *C. Rose*