

m

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : LBWL, Erickson Station	SRN : B4001
Location : 3725 South Canal Road	District : Lansing
	County : EATON
City : LANSING State: MI Zip Code : 48917	Compliance Status : Compliance
Source Class : MAJOR	Staff : Michelle Luplow
FCE Begin Date : 4/1/2014	FCE Completion Date : 7/15/2015
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
06/12/2015	ROP Qrtly Cert	Compliance	Certified by Mark Matus, responsible official. Included with the ROP report certification are the following: Daily SO2 Compliance (Quarterly); Excess Emissions and Monitoring Systems Performance Report - Opacity Exceedance (Quarterly); Summary Report - Opacity Performance Summary (Quarterly). 6 deviations reported.
06/12/2015	ROP Other	Compliance	Quarterly Daily SO2 compliance for reporting period 1/1/201 - 3/31/2015. Highest SO2 emission was 0.61 lbs SO2/MMBTU on 1/31/15. The limit is 1.67 lbs SO2/MMTBU, fuel was coal. Invalid data was generated from 2/1/15 - 2/17/15. S. Whiton said during this period of invalid data EU001 was offline, and provided me with data showing such. Mark Matus certified as the responsible official.

Activity Date	Activity Type	Compliance Status	Comments
06/12/2015	Excess Emissions (CEM)	Compliance	Excess Emissions and Monitoring Systems Performance Report - Opacity Exceedance (quarterly) and Summary Report - Opacity Performance Summary (quarterly). Exceeded Opacity 0.08% of the total operating time for the quarter. Opacity exceedances were associated with boiler startup/shutdown and boiler upsets. Highest opacity was 64% on 3/3 due to a boiler upset, . Opacity downtime events report noted downtime of 0.27% of the operating time - and occurred during 3 episodes: 1/1/15 was the longest episode at 4 hours, 6 mins.
06/09/2015	Scheduled Inspection	Compliance	Conducted an unannounced, scheduled inspection to determine compliance with MI-ROP-B4001-2010, all state and federal regulations, and to discuss the fugitive dust from the facility's coal pile and ash handling units.
06/04/2015	ROP Tech Review Notes		ROP Renewal Technical Review Notes for 2015 renewal
05/26/2015	Visible Emissions Evaluation	Compliance	Coal pile loadout VE observations.
05/12/2015	Visible Emissions Evaluation	Compliance	Spoke with complainant John Pemberton who wanted to make sure we received a copy of his letter he sent to BWL containing photographs of MSU's covering over their biofuel pile. He also said that there is still coal dust on his property. I told him AQD acknowledges there is a problem and will continue working on the current fugitive dust management plan until improvements are seen. I drove passed the coal pile around 6 pm. According to weather underground the winds were 18 mph out of the west. There was no opacity being blown from the coal pile at these wind speeds, which suggests that the coal dust is predominantly generated during loadouts and is where AQD should focus their efforts.
04/24/2015	Complaint Investigation	Pending	Investigation of fallout complaint of coal dust, downwind of coal pile.

Activity Date	Activity Type	Compliance Status	Comments
03/23/2015	MAERS	Compliance	Check MAERS for any review comments. Certified by Mark Matus, Responsible Official
02/09/2015	Fugitive Dust Control Plan	Compliance	Meeting to discuss the 12/15/14 complaint investigation and the 1/29/15 complaint investigation sample results to determine next steps of action in updating the current Fugitive Dust Management Plan.
02/09/2015	CAM Excursions/Exceedances	Compliance	There were no opacity excursion/exceedance events, nor any Ash Handling excursion/exceedance events reported for 7/1/2014-12/31/2014
02/09/2015	CAM monitor downtime	Compliance	CAM Opacity Monitor Downtime for reporting period 7/1/2014 - 12/31/2014. Total duration of downtime is 474 minutes. Longest period was on 9/17/2014 at 5 hours and 12 minutes, Downtime primarily associated with equipment window cleaning.
02/06/2015	ROP Qrtly Cert	Compliance	Certified by Mark Matus, responsible official. Included with the ROP report certification are the following: Daily SO2 Compliance (Quarterly); Excess Emissions and Monitoring Systems Performance Report - Opacity Exceedance (Quarterly); Summary Report - Opacity Performance Summary (Quarterly). 4 deviations reported.
02/06/2015	Excess Emissions (CEM)	Compliance	Excess Emissions and Monitoring Systems Performance Report - Opacity Exceedance (quarterly) and Summary Report - Opacity Performance Summary (quarterly). Exceeded Opacity 0.05% of the total operating time for the quarter. Opacity exceedances were associated with boiler startup/shutdown (10/3/14 & 11/26/14). Highest opacity was 32% on 11/26. Opacity downtime events report noted downtime of 0.09% of the operating time - and occurred only during a 12 minute and 54 minute event (2 separate days).

Activity Date	Activity Type	Compliance Status	Comments
02/06/2015	ROP Other	Compliance	Quarterly Daily SO2 compliance for reporting period 10/1/2014 - 12/31/2014. Highest SO2 emission was 0.81 lbs SO2/MMBTU on 10/1/14. The limit is 1.67 lbs SO2/MMBTU, fuel was coal. Invalid data was generated from 10/4/14 - 11/19/14. J. Harbitz said during this period of invalid data EU001 was offline. Mark Matus certified as the responsible official.
02/06/2015	ROP Annual Cert	Compliance	2014 Annual Certification, responsible official Mark Matus. 13 deviations reported for the year (4 deviations not reported previously)
02/06/2015	ROP SEMI 2 CERT	Compliance	See Excursion/Exceedance/Monitor Downtime reports. Mark Matus, Responsible Official. 4 deviations reported for semi-annual.
01/29/2015	Sample Results Review	Compliance	Review of sample results received on December 23, 2014 from the City of Grand Rapids Environmental Services Dept. Samples were taken as a result of the 12/15/14 complaint investigation.
12/15/2014	Complaint Investigation	Compliance	Complaint investigation of fallout at property adjacent to LBWL Erickson coal pile
11/12/2014	ROP Other	Compliance	Quarterly Daily SO2 compliance for reporting period 7/1/2014 - 9/30/2014. Highest SO2 emission was 0.85 lbs SO2/MMBTU on 9/26/14. The limit is 1.67 lbs SO2/MMBTU, fuel was coal. No invalid data were generated during this quarter. Mark Matus certified as the responsible official.
11/10/2014	ROP Qrtly Cert	Compliance	Certified by Mark Matus, responsible official. Included with the ROP report certification are the following: Daily SO2 Compliance (Quarterly); Excess Emissions and Monitoring Systems Performance Report - Opacity Exceedance (Quarterly); Summary Report - Opacity Performance Summary (Quarterly). 3 deviations reported for opacity downtime/COMs maintenance.

Activity Date	Activity Type	Compliance Status	Comments
11/10/2014	Excess Emissions (CEM)	Compliance	Excess Emissions and Monitoring Systems Performance Report - Opacity Exceedance (quarterly) and Summary Report - Opacity Performance Summary (quarterly). Exceeded Opacity 0.00% of the total operating time for the quarter. Opacity downtime events report noted downtime of 0.31% of the operating time - and occurred during 7 events.
09/30/2014	ROP Semi 1 Cert	Compliance	See CAM Excursion/Exceedance/ Monitor Downtime reports. Deviations reported were previously reported during the 2014 1st and 2nd quarterly reports. Mark Matus, Responsible Official
09/30/2014	CAM Excursions/Exceedances	Compliance	8 opacity exceedances between 1/3/14 and 3/3/14. No exceedances/excursions were reported for EUASHHANDLING
09/30/2014	CAM monitor downtime	Compliance	CAM Opacity Monitor Downtime for reporting period 1/1/2014 - 6/30/2014. Total duration of downtime is 432 minutes. Downtime predominately associated with subzero temperatures during winter months.
09/30/2014	CEM RATA	Compliance	Required RATA to demonstrate compliance with ROP and 40 CFR 75 conditions. SO ₂ , NO _x and CO ₂ were measured. Mostardi Platt Consultants S. Burton, C. Trezak, M. Yanz. RATA took place August 19, 2014. RA Results (RA%) were all in compliance with the allowable limits for CO ₂ , SO ₂ , and NO _x & CEMS exhaust flow rate.
08/04/2014	ROP Qrtly Cert	Compliance	Certified by Mark Matus, responsible official. Included with the ROP report certification are the following: Daily SO ₂ Compliance (Quarterly); Excess Emissions and Monitoring Systems Performance Report - Opacity Exceedance (Quarterly); Summary Report - Opacity Performance Summary (Quarterly). 3 deviations reported: 2 for opacity, 1 for COMS maintenance.

Activity Date	Activity Type	Compliance Status	Comments
08/04/2014	Excess Emissions (CEM)	Compliance	Excess Emissions and Monitoring Systems Performance Report - Opacity Exceedance (quarterly) and Summary Report - Opacity Performance Summary (quarterly). Exceeded Opacity 0.09% of the total operating time for the quarter. Opacity exceedances were associated with taking the unit offline (4/20 and 4/27) and a boiler upset/load charge (4/29). Highest opacity was 46% on 4/20. Opacity downtime events report noted downtime of 0.16% of the operating time - and occurred only during one 3 hour event.
08/04/2014	ROP Other	Compliance	Quarterly Daily SO2 compliance for reporting period 4/1/2014 - 6/30/2014. Highest SO2 emission was 0.79 lbs SO2/MMBTU on 4/14/14. The limit is 1.67 lbs SO2/MMBTU, fuel was coal. Invalid data were generated 4/20/14 through 4/27/14. Mark Matus certified as the responsible official.
06/11/2014	Other	Compliance	Partial compliance evaluation of dust control chemicals used.
06/04/2014	ROP Qrtly Cert	Compliance	Certified by Mark Matus, responsible official. Included with the ROP report certification are the following: Daily SO2 Compliance (Quarterly); Excess Emissions and Monitoring Systems Performance Report - Opacity Exceedance (Quarterly); Summary Report - Opacity Performance Summary (Quarterly). 6 deviations reported for opacity.

Activity Date	Activity Type	Compliance Status	Comments
06/04/2014	Excess Emissions (CEM)	Compliance	Excess Emissions and Monitoring Systems Performance Report - Opacity Exceedance (quarterly) and Summary Report - Opacity Performance Summary (quarterly). Exceeded Opacity 2.28% of the total operating time for the quarter. January 6-8 and January 27 - 29th opacity exceedances are explained by the sub-zero temperatures in the region at that time and the functionality of the COMs at sub-zero temperatures. This accounts for 1.8% of the 2.28% operating time that opacity appeared to exceed 20%. Approximately 0.4% of the time was not attributed to the sub-zero occurrences, specifically exceedances on January 9th and 10th. Opacity downtime events report was submitted late due to miscommunication between AQD and LBWL.
06/04/2014	ROP Other	Compliance	Quarterly Daily SO2 compliance for reporting period 1/1/2014 - 3/31/2014. Highest SO2 emission was 0.94 lbs SO2/MMBTU on 2/27/14. The limit is 1.67 lbs SO2/MMTBU, fuel was coal. Invalid data were generated 1/10/14 through 1/13/14. Mark Matus certified as the responsible official. This data was submitted to the AQD late because of a miscommunication between AQD and LBWL concerning the reporting deviations.
04/03/2014	MAERS	Compliance	Check MAERS for any review comments. MAERS ROP Report certification received 3-27-14.

Name:

William M. Epler

Date:

7-16-15

Supervisor:

B.M.

