

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
Source Class : MAJOR		Staff : Michelle Luplow
FCE Begin Date : 6/23/15		FCE Completion Date : 7/22/2016
Comments :		

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
06/23/2016	Scheduled Inspection	Non Compliance	Scheduled compliance inspection to determine compliance with LBWL Erickson Station's MI-ROP-B4001-2015.
04/26/2016	Telephone Notes		Mark called to notify AQD that a computer hack has occurred at LBWL. The hack occurred at approximately 4:00 AM, April 25, 2016. This effects the data collection systems for the CEMS at Eckert, REO Town, and Erickson. At the time of the notification, Eckert boiler #4, REO Town turbines #1 and #2, and Erickson boiler 1 were operating. All units are operating normally according to the monitors. The hourly average CEMS data is being manually recorded. Performing daily calibrations of the analyzers and the CEMS is operating properly. But electronic recording of the data and downloading it to the DAS is a problem and looking for alternatives to downloading and storing the data. Right now unsure of extent and duration of the problem, but keep us appraised of the situation. Method 9 opacity readings taken every 6 minutes per S. Pemberton.

Activity Date	Activity Type	Compliance Status	Comments
04/26/2016	Sample Results Review	Compliance	Sample Results Review from sample taken 4/6/16 for fallout on trucks at complainant's business adjacent to LBWL fly ash handling facility.
04/22/2016	Excess Emissions (CEM)		First Quarter 2016 Excess Emissions and Monitoring Systems Performance Report - Opacity Exceedance Events (quarterly) and Opacity Downtime Events (quarterly). Exceeded Opacity 0.03% of the total operating time for the quarter. The 2 opacity exceedances were associated with taking the unit offline for NERC testing on 3/21/16. Highest opacity was of the 2 occurrences was 37%. There were no opacity monitor downtime events report. Downtime minutes reported were for Daily Req'd Calibrations only.
04/22/2016	ROP Other	Compliance	First Quarter 2016 Quarterly Daily SO2 compliance for reporting period 1/1/2016 - 3/31/2016. Highest SO2 emission was 0.54 lbs SO2/MMBTU on 3/16/16 The limit is 1.67 lbs SO2/MMBTU, fuel was coal. Invalid data was generated from 3/23/16 - 3/31/16 because the unit was offline. Mark Matus certified as the responsible official.
04/22/2016	ROP Qrtly Cert	Compliance	First Quarter 2016. 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). 1 deviation reported.

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04/07/2016	ROP Annual Cert	Compliance	2015 Annual Certification, responsible official Mark Matus. 19 deviations reported for 2015. Original certs rec'd 3/15/16. I requested resubmittal of annual cert forms so that LBWL was certifying under both the new and old ROPs (only cert under new ROP had been submitted): MI-ROP-B4001-2010 (1/1/2015 - 12/7/2015); MI-ROP-B4001-2015 (12/8/2015 - 12/31/2015). Resubmitted certs rec'd 3/31/2016.
04/07/2016	CAM Excursions/Exceedances	Compliance	EU001 CAM exceedances for opacity are reported in the deviation reporting forms. There were 4 opacity exceedances during this reporting period. There were no CAM exceedances/excursions for FGASHHANDLING. Cert originally received 3/15/16. I had LBWL resubmit the semi-annual cert to certify under both the new and old ROP: MI-ROP-B4001-2010, 7/1/2015 - 12/7/2015; MI-ROP-B4001-2015, 12/8/2015 - 12/31/2015. Resubmitted cert rec'd 3/31/16. Mark Matus signed as Responsible Official.
04/07/2016	CAM monitor downtime	Compliance	For EU001 there were 9 CAM opacity monitor downtime events reported for semi-annual reporting period 7/1/2015 - 12/31/2015. There was no CAM opacity monitor downtime reported for FGASHHANDLING. Cert originally received 3/15/16. I had LBWL resubmit the semi-annual cert to certify under both the new and old ROP: MI-ROP-B4001-2010, 7/1/2015 - 12/7/2015; MI-ROP-B4001-2015, 12/8/2015 - 12/31/2015. Resubmitted cert rec'd 3/31/16. Mark Matus signed as Responsible Official.

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04/07/2016	MAERS	Compliance	Electronic rec'd on 3-15-16. Check MAERS for any review comments. Certified by Mark Matus, Responsible Official. Original hard copy certs rec'd 3/16/16 for MI-ROP-B4001-2015. I had LBWL redo and resubmit the MAERS cert to include both the old and new ROPs: MI-ROP-B4001-2010, 1/1/15 - 12/7/15; MI-ROP-B4001-2015, 12/8/15 - 12/31/15. Resubmitted certs rec'd 3/31/16.
04/07/2016	ROP SEMI 2 CERT	Compliance	See CAM Excursion/Exceedance and Monitor Downtime reports for additional details. Mark Matus signed as Responsible Official. 12 deviations reported for semi-annual reporting period. Cert originally received 3/15/16. I had LBWL resubmit the semi-annual cert to certify under both the new and old ROP: MI-ROP-B4001-2010, 7/1/2015 - 12/7/2015; MI-ROP-B4001-2015, 12/8/2015 - 12/31/2015. Resubmitted cert rec'd 3/31/16.
04/06/2016	Complaint Investigation	Compliance	Complaint investigation in response to a complaint received from complainant on 4/5/16 for alleged coal dust deposits on his vehicle and inside his business's garage.
03/08/2016	MACT (Part 63)	Compliance	40 CFR Part 63 Subpart DDDDD. Notification of Compliance Status for EUAUXBLR, classified as a limited use boiler per PTI 71-15. Certified that the required initial tune-up was conducted November 5, 2015 per the requirements in 40 CFR 63.7540(a)(10)(i-vi). EUAUXBLR fires No 2 fuel oil, and LPG for start-up.
02/26/2016	Other	Compliance	Inspection of complainant's property after a heavy snow to determine if fallout could be observed over a period of 2 days. No dust was observed on the snow. Therefore, no cumulative deposition/fallout over the 2-day period.

Activity Date	Activity Type	Compliance Status	Comments
02/12/2016	Excess Emissions (CEM)	Compliance	Fourth Quarter Excess Emissions and Monitoring Systems Performance Report - Opacity Exceedance Events(quarterly) and Opacity Downtime Events (quarterly). Exceeded Opacity 0.06% of the total operating time for the quarter. Opacity exceedances were associated with boiler startup/shutdown (10/16/15 & 10/17/15). Highest opacity was 33% on 10/16/15. Opacity monitor downtime events report noted downtime of 0.49% of the operating time.
02/12/2016	ROP Qrtly Cert	Compliance	Fourth Quarter. 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). 8 deviations reported.
02/12/2016	ROP Other	Compliance	Fourth Quarter Quarterly Daily SO2 compliance for reporting period 10/1/2015 - 12/31/2015. Highest SO2 emission was 0.82 lbs SO2/MMBTU on 10/1/15. The limit is 1.67 lbs SO2/MMBTU, fuel was coal. Invalid data was generated from 10/17/15 -11/1/15 because the unit was offline. Mark Matus certified as the responsible official.
12/01/2015	Sample Results Review	Compliance	Review of sample results from samples taken from 10/19/2015 - 11/4/2015 on complainant's property to visualize quantity of desposition over a period of time, as well as to see if sample results indicate that fly ash is being controlled/not leaving the LBWL property.
12/01/2015	Other	Compliance	Sue Pemberton sent copies of photographs indicating that trees have been planted between the coal pile burm and the fly ash handling site in order to create a wind break. The goal of the wind break is to decrease wind speeds enough that fugitive coal dust and fly ash will no longer blow onto neighboring properties.

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11/09/2015	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.
11/09/2015	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: 6 minutes due to boiler startup/shutdown, 42 min due to boiler upset. Opacity downtime events report noted downtime of 0.44% of the operating time - and occurred during a 498 minute downtime event to conduct the daily required calibration, and during a 12-minute software update.
11/09/2015	ROP Other	Compliance	Quarterly Daily SO2 compliance for reporting period 7/1/2015 - 9/30/2015. Highest SO2 emission was 0.89 lbs SO2/MMBTU on 7/21/15. The limit is 1.67 lbs SO2/MMTBU, fuel was coal. Invalid data was generated from 7/9/15 - 7/13/15 and 9/5/15 - 9/13/15 because the unit was offline. Mark Matus certified as the responsible official.
10/08/2015	CEM RATA	Compliance	Required RATA to demonstrate compliance with ROP and 40 CFR 75 conditions. SO2, NOx, CO2 and volumetric flow were measured. NOx monitor is a Teledyne T200H (serial # 71), CO2 monitor is a Teledyne T360M (serial # 63), SO2 monitor is a Teledyne T100H (serial # 61), volumetric flow monitor is a Teledyne Ultraflow 150 (serial #1501157). RA Results (RA%) were all in compliance with the allowable limits for CO2, SO2, and NOx & CEMS exhaust flow rate. Certified by Mark Matus, Responsible Official.

Activity Date	Activity Type	Compliance Status	Comments
09/08/2015	ROP Other	Compliance	Quarterly Daily SO2 compliance for reporting period 4/1/2015 - 6/30/2015. Highest SO2 emission was 0.55 lbs SO2/MMBTU on 6/9/15. The limit is 1.67 lbs SO2/MMBTU, fuel was coal. Invalid data was generated from 4/3/15 - 4/11/15 and 5/15/15 - 5/17/15. Mark Matus certified as the responsible official.
09/08/2015	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). 0 deviations reported.
09/08/2015	ROP Semi 1 Cert	Compliance	See Excursion/Exceedance/Monitor Downtime reports. Mark Matus, Responsible Official. 6 deviations previously reported during the first quarter, 6 deviations total reported for semi-annual.
09/08/2015	CAM Excursions/Exceedances	Non Compliance	For EU001 there were no excursions or exceedances reported for semi-annual reporting period 1/1/15 - 6/30/15. For FGASHHANDLING, the FG and performance indicator were listed but no date/time, duration, cause/corrective actions were provided. A VN was sent 9/14/15 for incomplete semi-annual reporting.
09/08/2015	CAM monitor downtime	Non Compliance	CAM Opacity Monitor Downtime for semi-annual reporting period 1/1/2015 - 6/30/2015. For EU001 Total duration of downtime is 306 minutes. Longest period was on 1/1/2015 at 4 hours and 6 minutes, attributed to electric failure in a circuit breaker that connects the monitor to the data logger. For FGASHHANDLING, no date/time, duration, cause, or corrective action was provided. VN sent 9/14/15 for failure to provide complete records.

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09/08/2015	Excess Emissions (CEM)	Pending	Excess Emissions and Monitoring Systems Performance Report - Opacity Exceedance (quarterly) - and Summary Report - Opacity Performance Summary (quarterly). Exceeded Opacity 0% of the total operating time for the quarter. Opacity downtime events report noted downtime of 0.45% of the operating time - and occurred only during a 534 minute downtime event to conduct the daily required calibration.
08/20/2015	Telephone Notes	Compliance	Called complainant on the phone to make him aware of LBWL's plans to control dust (planting trees, coal berm, etc, as documented in the 6/9/15 inspection report). He sent AQD a packet of photos in addition to a note stating the number of cars, trucks and boats that had to be washed in April 2015 due to dust. He said he's noticed some improvement - there is less dust on the cars that they work on in his business's garage. In the near future petri dishes will be placed at complainant's property to determine fallout over a period of time.
08/19/2015	MACT (Part 63)	Compliance	LBWL Erickson Station submitted an "Updated Initial Notification of Applicability" to AQD for 40 CFR 63, Subpart DDDDD (Boiler MACT). Notification demonstrated that the Auxiliary boiler would be considered a limited use boiler because of the restrictions in PTI 71-15.

Name: Mickum Lopez Date: 8/12/16 Supervisor: _____

Peer: Julie C. Brown