

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 : 8/24/2016		FCE Completion Date :	9/22/2017
Comments :			

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
08/31/2017	ROP Qrtly Cert	Compliance	Certified by Lori Myott, 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).
08/31/2017	Stack Test	Compliance	Second Quarter 2017 Mercury and Air Toxics Standard (MATS) PM and HCl emissions test report. Testing conducted 6/20-6/21/2017. MATS filterable particulate matter has a limit of less than or equal to 0.030 lb/mmBtu, and MATS HCl has a limit of less than or equal to 0.002 lb/mmBtu. Results indicate that emission rates were 0.0060 lb/mmBtu and 0.0012 lb/mmBtu, respectively. PM emissions meet LEE status for this quarter. The Erickson Station is meeting the MATS emission rates. Certified by Lori Myott, Responsible Official.

Activity Date	Activity Type	Compliance Status	Comments
08/31/2017	ROP Other	Compliance	Quarterly Daily SO2 compliance for reporting period 4/1/2017 - 6/30/2017. Highest SO2 emission was 0.62 lbs SO2/MMBTU on 4/24/17. The limit is 1.67 lbs SO2/MMBTU, fuel was coal. Lori Myott certified as the responsible official.
08/31/2017	Excess Emissions (CEM)	Compliance	Second Quarter Excess Emissions and Monitoring Systems Performance Report - Quarterly Opacity Exceedance and Summary Report and Quarterly Opacity Performance Summary. Exceeded Opacity 0.00% of the total operating time for the quarter (no excess emissions). There were no COMS downtime events.
08/24/2017	Scheduled Inspection	Compliance	Scheduled, announced inspection of the Erickson fly ash handling facility; scheduled, unannounced inspection of the Erickson Power Plant.
06/21/2017	Stack Test Observation	Compliance	Stack test observation for PM testing required by the Utility MACT (40 CFR 63 Subpart UUUUU, MATS).
05/17/2017	MAERS	Compliance	MAERS report submitted 3/10/17, certification received on 03/14/17 for MI-ROP-B4001-2015. Check MAERS for any review comments. Certified by Lori Myott, Responsible Official.
05/09/2017	Excess Emissions (CEM)	Compliance	Excess Emissions and Monitoring Systems Performance Report - Quarterly Opacity Exceedance and Summary Report and Quarterly Opacity Performance Summary. Exceeded Opacity 0.00% of the total operating time for the quarter. Opacity downtime events report noted downtime of 0.14% of the operating time - and occurred during 15 events, which included recalibrating the analyzer, repairing the analyzer and equipment malfunctions.
05/09/2017	ROP Other	Compliance	Quarterly Daily SO2 compliance for reporting period 1/1/2017 - 3/31/2017. Highest SO2 emission was 0.58 lbs SO2/MMBTU on 1/11/17. The limit is 1.67 lbs SO2/MMBTU, fuel was coal. Lori Myott certified as the responsible official.

Activity Date	Activity Type	Compliance Status	Comments
05/09/2017	ROP Qrtly Cert	Compliance	Certified by Lori Myott, 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).
05/09/2017	ROP R215 Notification	Compliance	Rule 215(3) Notification of Change to replace the permitted dust collector, EUASHDC3, with an improved model under exempt Rule 285(2)(f). Exemption demonstration was submitted and found acceptable. Certified by Lori Myott, responsible official.
05/03/2017	Stack Test	Compliance	First Quarter 2017 Mercury and Air Toxics Standard PM and HCl emissions test report. MATS filterable particulate matter has a limit of less than or equal to 0.030 lb/mmBtu, and MATS HCl has a limit of less than or equal to 0.002 lb/mmBtu. Results indicate that emission rates were 0.0037 lb/mmBtu and 0.0011 lb/mmBtu, respectively. The Erickson Station is meeting the MATS emission rates. Certified by Lori Myott, Responsible Official.
04/20/2017	CEM RATA	Compliance	Test Protocol Received. Annual CEM RATA to be conducted 9/11 - 9/14/17.
03/28/2017	CAM monitor downtime	Compliance	CAM Opacity Monitor Downtime for semi-annual reporting period 7/1/2016 - 12/31/2016. For EU001 6 monitor downtime incidences reported (5 6-minute events, 1 12-minute event). For FGASHHANDLING, no downtime reported.
03/28/2017	MACT (Part 63)	Compliance	Utility MACT (MATS) Subpart UUUUU. Reported the following: monthly coal and fuel oil #2 usage, most recent boiler tune-up, PM and HCl performance test results. Met LEE emission limits (50% of the PM and HCl limits for 4th quarter testing (Oct 4-5 2016)).

Activity Date	Activity Type	Compliance Status	Comments
03/28/2017	ROP Annual Cert	Compliance	2016 Annual Certification, responsible official Lori Myott. 10 deviations reported for 2016. Certified under MI-ROP-B4001-2015. 3 deviations in first half reporting period, 7 in second half.
03/27/2017	ROP SEMI 2 CERT	Compliance	See CAM Excursion/Exceedance and CAM Monitor Downtime entries for CAM details. Lori Myott signed as Responsible Official for MI-ROP-B4001-2015. 7 deviations reported for semi-annual reporting period. Deviations associated with daily recordkeeping for FGASHHANDLING, COMS downtime, and opacity exceedances.
03/27/2017	CAM Excursions/Exceedances	Compliance	For EU001 COMS there were no excursions or exceedances reported. For FGASHHANDLING, although reported in the deviation forms, not in the CAM form, excursions of pressure drop monitoring were reported and were already addressed in a violation notice.
02/13/2017	Reg. Applicability Determination	Compliance	Exemption demonstration sent via email 2/13/17 for the installation of a new baghouse (EUASHDC3) under Rule 285(2)(f). Demonstration suggests installation of equipment would be exempt per this exemption. Reminder was sent to T. Gregorski to submit M-001 form for the change, 7 days prior to installation.
02/09/2017	Excess Emissions (CEM)	Compliance	Excess Emissions and Monitoring Systems Performance Report - Quarterly Opacity Exceedance and Summary Report and Quarterly Opacity Performance Summary. Exceeded Opacity 0.01% of the total operating time for the quarter: a total of 6 minutes due to precip trouble. Opacity downtime events report noted downtime of 0.001% of the operating time - and occurred during 4 6-minute events and 1 12-minute event.

Activity Date	Activity Type	Compliance Status	Comments
02/09/2017	ROP Other	Compliance	Quarterly Daily SO2 compliance for reporting period 10/1/2016 - 12/31/2016. Highest SO2 emission was 0.58 lbs SO2/MMBTU on 10/9/16. The limit is 1.67 lbs SO2/MMBTU, fuel was coal. Invalid data was generated from 10/22/16 - 12/11/16 and from 12/24/16-12/30/16 because the unit was offline. Lori Myott certified as the responsible official.
02/09/2017	ROP Qrtly Cert	Compliance	Certified by Lori Myott, 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).
12/16/2016	Stack Test	Compliance	4th Quarter Mercury and Air Toxics Standard PM and HCl emissions test report. MATS filterable particulate matter has a limit of less than or equal to 0.030 lb/mmBtu, and MATS HCl has a limit of less than or equal to 0.002 lb/mmBtu. Results indicate that emission rates were 0.0068 lb/mmBtu and 0.0009 lb/mmBtu, respectively. The Erickson Station is meeting the MATS emission rates. Certified by Mark Matus, Responsible Official.
12/12/2016	Telephone Notes	Compliance	Called J. Pemberton to inform him of the progress being done to control fugitive fly ash from the Erickson Station's fly ash handling facility. He said the coal dust on his vehicles has declined in recent months, and attributes this to the coal pile being kept at a lower height. His business will move by January 2017 and new owners will be coming in.

Activity Date	Activity Type	Compliance Status	Comments
11/22/2016	ROP Qrtly Cert	Compliance	Certified by Lori Myott, 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.
11/22/2016	Excess Emissions (CEM)	Compliance	Excess Emissions and Monitoring Systems Performance Report - Quarterly Opacity Exceedance and Summary Report and Quarterly Opacity Performance Summary. Exceeded Opacity 0.03% of the total operating time for the quarter: a total of 42 minutes due to boiler startup/shutdown. Opacity downtime events report noted downtime of 0.00005% of the operating time - and occurred during a 6-minute downtime event to conduct the quality assurance calibrations.
11/22/2016	ROP Other	Compliance	Quarterly Daily SO2 compliance for reporting period 7/1/2016 - 9/30/2016. Highest SO2 emission was 0.59 lbs SO2/MMBTU on 8/17/16. The limit is 1.67 lbs SO2/MMBTU, fuel was coal. Invalid data was generated from 9/16/16 - 9/24/16 because the unit was offline. Lori Myott certified as the responsible official.
10/11/2016	CAM Excursions/Exceedances	Compliance	For EU001 there were no excursions or exceedances reported for semi-annual reporting period 1/1/16 - 6/30/16. For FGASHHANDLING, specifically EUASHDC4 there were 384 hours of excursion reported (2/15/16-3/1/16): ash collector pressure drop was outside the operating range of 1-5"H2O. No VE's observed during this time period.
10/11/2016	CAM monitor downtime	Compliance	CAM Opacity Monitor Downtime for semi-annual reporting period 1/1/2016 - 6/30/2016. For EU001 no monitor downtime reported. For FGASHHANDLING, no downtime reported.

Activity Date	Activity Type	Compliance Status	Comments
10/11/2016	Stack Test	Compliance	Stack testing conducted for determination of HCl (8/3-8/4) and PM emissions (8/4). Compliance determined against both federal (Utility MACT) and state (MI-ROP-B4001-2015) PM emission limits. ROP PM results: 0.01 lb/1000 lb exhaust gas (0.17 lb/1b exhaust gas limit). Utility MACT PM results: 0.011 lb/mmBtu (<0.030 lb/mmBtu limit). Utility MACT HCl results: 0.001 lb/mmBtu (<0.002 lb/mmBtu limit). Mark Matus certified as RO. D. Patterson, via interoffice memo, found PM (lb/1000lb), PM (lb/MMBtu/hr) and HCl emission results to be acceptable
10/11/2016	CEM RATA	Compliance	Required RATA to demonstrate compliance with ROP and 40 CFR 75 conditions and Mercury RATA to demonstrate compliance with the Utility MACT. RA Results (RA%) were all in compliance with the RATA acceptance criteria for CO2, SO2, and NOx & CEMS exhaust flow rate. Hg RATA results indicate compliance with the RATA acceptance criteria of +/- 0.5 ug/dscm (0.22 ug/dscm). Certified by Mark Matus, Responsible Official.
10/10/2016	ROP Qrtly Cert	Compliance	Second Quarter 2016. Certified by George Stojic, 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.
10/10/2016	ROP Other	Compliance	Second Quarter 2016 Quarterly Daily SO2 compliance for reporting period 4/1/2016 - 6/30/2016. Highest SO2 emission was 0.54 lbs SO2/MMBTU on 6/15/16. The limit is 1.67 lbs SO2/MMTBU, fuel was coal. Invalid data was generated from 4/25/16 - 5/7/16 because the unit was offline. George Stojic certified as the responsible official.

Activity Date	Activity Type	Compliance Status	Comments
10/10/2016	Excess Emissions (CEM)	Compliance	Second Quarter 2016 Excess Emissions and Monitoring Systems Performance Report - Opacity Exceedance Events (quarterly) and Opacity Downtime Events (quarterly). Exceeded Opacity 0.0% of the total operating time for the quarter. There were no opacity monitor downtime events report. Downtime minutes reported were for Daily Req'd Calibrations only.
10/10/2016	ROP Semi 1 Cert	Compliance	See Excursion/Exceedance/Monitor Downtime CAM reports. Mark Matus, Responsible Official. 1 deviation previously reported during the first quarter, 3 deviations total reported for semi-annual.

Name:

Michelle Lopez

Date:

9/28/17

Supervisor:

Julie P. Brown