

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

Facility : L'ANSE WARDEN ELECTRIC COMPANY LLC	SRN : B4260
Location : 157 S MAIN STREET	District : Upper Peninsula
	County : BARAGA
City : LANSE State: MI Zip Code : 49946	Compliance Status : Compliance
Source Class : MAJOR	Staff : Ed Lancaster
FCE Begin Date : 1/19/2016	FCE Completion Date : 1/18/2017
Comments : Company entered Consent Order with AQD signed October 31, 2016, and was issued PTI 67-16 on same date.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
12/07/2016	Scheduled Inspection	Compliance	Scheduled inspection and Consent Order required 3rd quarter HCl emission stack test observation.
10/28/2016	Excess Emissions (CEM)	Compliance	3rd Qtr EER - Six (6) minutes of excess emissions were reported for the opacity monitor during start-up/shutdown operations (0.0045% of operating time) and 17 minutes of CEM downtime (7 for lost power, 9 other known causes (startup), and 1 for unknown causes) or 0.13% of operating time.
09/20/2016	Other Non ROP		LWEC (through their legal council) submitted a Technical Memo to A. Switzer and C. Ethridge detailing the reasons the pneumatically conveyed fuel handling operation was exempt from NSR and didn't apply for a permit when it was installed in 2011. Permit Section has concerns with some assumptions that were used in the calculations. See Correspondence File for copy of letter.

Activity Date	Activity Type	Compliance Status	Comments
09/20/2016	Other	Compliance	Received email from JR Richardson stating LWEC has hired a contractor (FA Industrial) to install the fuel conveyance enclosures. The contractor had already started tearing down the temporary enclosure. Expect completion of enclosure by late fall.
09/19/2016	Other		Jason Wolf and I received separate letters from Ms. Jean Hill. Jason's was dated September 15, 2016, and mine the 16th. Ms. Hill listed several dates (13) and times, from July 22 through September 15, that she observed "toxic smell from the Warden Plant". See file for letters.
09/17/2016	Complaint Investigation	Compliance	Conducted odor survey in the Village of L'Anse in response to PEAS call.
09/06/2016	Other	Compliance	Ms. Linda Zimmer requested a public hearing for proposed permit and consent order.
08/26/2016	Odor Evaluation	Compliance	Conducted an odor survey around the Village of L'Anse in response to a complaint received at 1135.
08/11/2016	Complaint Investigation	Compliance	Follow-up phone call with Mr. Wishart regarding his complaint he made to Office of Environmental Assistance (OEA) on August 9, 2016. (Complaint No. C-16-02079)
08/08/2016	Telephone Notes	Compliance	CO CEMS down time
08/04/2016	Complaint Investigation	Compliance	Follow-up investigation to two PEAS calls (Nos. 15136 and 15137) and e-mail complaints (See Complaint Nos. C-16-02030, C-16-02032, and C-16-02034, respectively).
08/03/2016	ROP Semi 1 Cert	Compliance	Semi-Annual Report Certification from 1/1/2016 to 6/30/2016. NR Company reported no deviations. ELL
08/03/2016	ROP Qrtly Cert	Compliance	Quarterly Report Certification from 4/1/16 to 6/30/2016 No deviations reported. ELL

Activity Date	Activity Type	Compliance Status	Comments
08/03/2016	Excess Emissions (CEM)	Compliance	Company reported no excess emissions for opacity and CO monitors. Opacity monitor had 246 minutes of downtime (0.189% of operation time), CO monitor had 72 minutes of downtime (0.055% of operation time). Made changes to reporting period dates for both monitors and CO CEM percent downtime. ELL 8/22 JR submitted changes to T. Gasoli, showing no downtime as the original submittal had 168 minutes of DT when the boiler wasn't in operation. ELL
08/02/2016	Complaint Investigation	Compliance	Phone conversation with Ms. Fran Whitman regarding several dates she noticed odors from the LWEC facility.
07/19/2016	Complaint Investigation	Unknown	Follow-up conversation with complainant.
07/18/2016	Complaint Investigation	Compliance	Follow-up on PEAS Incident No. 14991.
07/14/2016	Sample Results Review	Compliance	Received sample results, collected on May 17, 2016, from a residence in the Village of L'Anse. Results for the four (4) wipe samples (2-PAH/pentachlorophenol and 2-metals) were all non-detect.
05/26/2016	MAERS	Compliance	MAERS 2015. No changes made to submittal.
05/23/2016	Other Non ROP	Non Compliance	This report, "Cyclone Efficiency Assessment", dated May 20, 2016, and sent via e-mail on Saturday, May 21st, was generated by LWEC's contractor to answer concerns relating to emissions of fugitive dust from the fuel receiving hopper area. The Report describes the efficiencies of LWEC's two cyclones, controlling the dust from the fuel receiving hopper. The Report used generic control efficiencies for the two cyclones.
05/22/2016	Complaint Investigation	Compliance	Area drive through and follow-up phone calls on recent complaints of May 23, 2016.
04/26/2016	Other		Company submitted PTI application (67-16) to remove pentachlorophenol treated railroad ties from their material list.

Activity Date	Activity Type	Compliance Status	Comments
04/12/2016	ROP Qrtly Cert	Non Compliance	Quarterly Deviation Report - One deviation report - 1/1/2016 to 3/31/2016 LWEC reporting VN for fugitive dust, company is in dispute with violation.
04/12/2016	Excess Emissions (CEM)	Compliance	Opacity COMs no EEs reported, 246 minutes of downtime reported (185 minutes for QA), 0.189% of operating time. CO CEMS no EEs reported, 13 hours of downtime (12 for malfunction, 1 for QA), 0.59% of operating time.
04/05/2016	Complaint Investigation	Non Compliance	Follow-up investigation to Mr. Ketola's e-mail complaint of same day.
03/21/2016	Self Initiated Inspection	Non Compliance	I received an e-mail with photos from the Ketola's, on Sunday at approximately 9:00 PM, showing that one of the bottom incline conveyor tarps at LWEC had torn loose, prompting my decision to inspect the facility the next morning.
03/14/2016	Telephone Notes		Dark gray plume from L'Anse Warden Electric Company.
03/11/2016	Telephone Notes	Non Compliance	Jeremy Hosking, from US Senator Stabenow's office, called with questions regarding the public hearing for company's ROP renewal.
02/26/2016	ROP Other	Compliance	Compliance with Emission Unit conditions Section VII, Reporting condition #2 from 1/1/2015 to 12/31/2015
02/25/2016	Excess Emissions (CEM)	Compliance	Quarterly Report Certification from 10/1/2015 to 12/31/2015. NR Opacity EE report 49% for 6 minutes during soot blowing, and 334 minutes of CEM downtime. CO no EE, 3 hours of monitor downtime for malfunction (1 hour) and QA (2 hours). ELL

Activity Date	Activity Type	Compliance Status	Comments
02/19/2016	ROP Annual Cert	Non Compliance	Annual Compliance Certification Report from 01/01/2015 to 12/31/2015 Deviation report was not included with submittal. Report returned on February 11th with request for Deviation Report. 2/19/16 Received e-mail from JR Richardson with attached deviation report stating failed HCl hourly emission stack test on 9/24/2015. ELL
02/19/2016	ROP SEMI 2 CERT	Non Compliance	Semi-Annual Report Certification from 07/01/2015 to 12/31/2015 Deviation report was not included with submittal. Report returned on February 11th with request for Deviation Report. 2/09/16 Received e-mail from JR Richardson with attached deviation report stating failed HCl hourly emission stack test on 9/24/2015. ELL
02/11/2016	Meeting Notes	Non Compliance	Compliance with HCl emission limit and fugitive dust violations.
02/07/2016	Complaint Investigation	Non Compliance	Received three PEAS calls over the weekend, two on Saturday, February 6, and third on Sunday, February 7th, which prompted this complaint investigation.
02/04/2016	Complaint Investigation	Compliance	Received PEAS complaint (incident no: 141614) at 1432 hours. Description of incident was: "Breathing chemicals". I arrived at the complainants street at 1640 and began an odor surveillance log.
02/01/2016	Complaint Investigation	Non Compliance	Response to the Ketola's complaint of recent fugitive dust fallout and a request by US EPA to collect samples for PAH and metals analysis.
01/29/2016	Complaint Investigation	Non Compliance	Follow-up to the Ketola's e-mail complaints.
01/27/2016	Complaint Investigation	Non Compliance	Follow-up to e-mail complaint received on January 25, 2016, from Ms. Ailen Ketola.
01/21/2016	Complaint Investigation	Non Compliance	Complaint investigation after having received several e-mails from the Ketola's over the previous two weeks.

Name:

E. J. Lancaster

Date:

1/18/17

Supervisor:

[Signature]

