

DEPARTMENT OF ENVIRONMENTAL QUALITY
 AIR QUALITY DIVISION
 ACTIVITY REPORT: Scheduled Inspection

B488527173

FACILITY: TILDEN MINING COMPANY LC		SRN / ID: B4885
LOCATION: 1 TILDEN MINE ROAD, ISHPEMING		DISTRICT: Upper Peninsula
CITY: ISHPEMING		COUNTY: MARQUETTE
CONTACT: BRENT KETZENBERGER, AREA MGR - ENVIRONMENTAL		ACTIVITY DATE: 09/23/2014
STAFF: Ed Lancaster	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled compliance inspection and RATA test.		
RESOLVED COMPLAINTS:		

I arrived at the facility and met with Messrs. Brent Ketzenberger and Tom O'Brien. Mr. Tom Gasloli, AQD TPU had already arrived at the site to observe the scheduled RATA of Tilden's new NOx, SO2 and flowrate CEM on the twin stacks of Kiln 1 (EU-KILN1 SC Nos. IV.1 and VI.8). The RATA was being conducted by Interpol on the south stack the day of my inspection, with plans to do the north stack the next day.

As this was my first visit to the facility we began the inspection in a conference room discussing the operations and how the company maintains compliance with their ROP No. MI-ROP-B4885-2008a and PTI No. 148-12A. (The company submitted their renewal application in a timely manner and it is currently going through technical review.) Permit No. 148-12A updates the conditions in the ROP for emission units OREDRYER1, KILN1 and BOILERS1-2.

Reviewing the conditions for the PTI, Mr. O'Brien informed me the company has not burned fuel oil since 2010, and the 1.5 million gallon storage tank's floating roof is near the bottom of the tank. Nearly all of the special conditions for EU-OREDRIYER1 were established for when the unit burns fuel oil. The company's records show no fuel oil has been burned this year and therefore there were no emissions of heavy metals to report (SC No. VI.4). The permittee conducted PM emissions testing on October 2, 2013, to comply with SC No. V.1.

EU-KILN1: Most of the emission limit conditions are related to burning fuel oil (SC Nos. I.1-3 and 6) and so were not applicable at the time of the inspection. The company was burning coal and some natural gas. Mr. O'Brien reported they always burn some natural gas as "trim gas" to keep the kilns operating smoothly. Based on their recordkeeping they are showing compliance with their PM, SO2 and NOx limits in SC Nos. I.8-10 and VI.5 and 7. The ESPs appeared to be operating correctly during the inspection as no VEs were observed from the stacks (SC No. III.1).

The company conducted PM emissions testing on June 19 and 20, 2012 and then again on June 20 and 21, 2012, to meet the requirements of SC No. V.1.

The sulfur content of the coal averages 0.385% on a dry basis (SC No. VI.1). As mentioned above and in the company's semi-annual deviation reports, the company has not used oil as fuel in several years (SC No. VI.2).

The company burns coal during the Ozone Control Period to stay in conformance required by R336.801 (4)(g) and SC No. IX.1.

EU-BOILERS1-2 and EU-BOILER3: All of the conditions for these EUs apply only when the company is using oil as the fuel source.

EU-KILN2: Conditions for this EU in the ROP are nearly identical to EU-KILN1 and at the time of the inspection the company appeared to be complying with their ROP.

NAME 

DATE 10/3/14

SUPERVISOR _____