

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: On-site Inspection**

N116067111

<b>FACILITY:</b> National Energy of McBain LLC		<b>SRN / ID:</b> N1160
<b>LOCATION:</b> 6751 W. Gerwoude Dr., MCBAIN		<b>DISTRICT:</b> Gaylord
<b>CITY:</b> MCBAIN		<b>COUNTY:</b> MISSAUKEE
<b>CONTACT:</b> Matt Doolittle , Plant Manager		<b>ACTIVITY DATE:</b> 04/13/2023
<b>STAFF:</b> David Bowman	<b>COMPLIANCE STATUS:</b> Compliance	<b>SOURCE CLASS:</b> MAJOR
<b>SUBJECT:</b> Scheduled Inspection for compliance evaluation FY 23		
<b>RESOLVED COMPLAINTS:</b>		

On 13 April 2023 I, David Bowman MI EGLE AQD, conducted a scheduled inspection and records review of National Energy of McBain LLC operating under the conditions of renewable operating permit (ROP) MI-ROP-N1160-2018b. The source is located at 6751 Gerwoude Dr, McBain, MI in Missaukee County. The source is easily found by turning West on Gerwoude Dr from Michigan 66 (approximately 0.5 miles north of McBain) and traveling for approximately 0.4 miles. The source is seen from the road.

Weather conditions at the time of inspection was 40 degrees F, winds 7 MPH from the south, and mostly sunny.

There were no observable odors on or near the facility. There was no VE from any stack on the source property and the steam plume from the cooling towers was very light.

National Energy of McBain, LLC. is a wood fired boiler electric utility plant located within the McBain city limits. Virgin wood, tire derived fuel, particleboard and plywood, construction and demolition wood, and creosote treated wood are used as fuels in the boiler. The fuel is delivered to the site by truck and/or train and stored on-site in piles that are managed to control fugitive dust. The fuels are fed through handling systems to the boiler which uses the heat from combustion to produce steam. The steam is used to drive a generator that produces approximately 17 megawatts of electricity at full capacity. Air emissions from the boiler are controlled by a multiple cyclonic collector and an electrostatic precipitator. Ash from the boiler is collected, treated with water, and transported to a landfill for disposal.

Source is a true minor for hazardous air pollutants (HAP). Source is subject to MACTs for Boilers and engines. In February 2022 permit to install (PTI) 69-22 was issued for a minor modification and rolled into the ROP. All conditions of the PTI are incorporated into this evaluation as part of the requirements of MI-ROP-N1160-2018b.

The ROP covers:

Source Wide Conditions

Emission Units (EU) EURMHANDLING, EUBOILER, EUASHHANDLING, EUGENERATOR, and EUCLDCLNR.

Flexible Group (FG) FGCOLDCLEANERS.

Source Wide Conditions:

### III. Process/Operational Restrictions

1. Permittee shall implement and maintain a program for fugitive emissions...

Discussion of plan – See MACES>Compliance Activity report CA\_N116067085

2. Permittee shall implement and maintain a malfunction abatement plan (MAP)

Discussion of Plan – See MACES>Compliance Activity report CA\_N116067089

3. In the MAP fails to address or inadequately addresses an event that meets the characteristics of a malfunction... has 45 days to revise the MAP...

**Discussion – During the inspection there was no noted actions that would require MAP updates. We did discuss the process for any updates if one was required.**

#### **VI. Monitoring/Recordkeeping**

**1. Permittee shall maintain records of activities associated with the fugitive emissions control plan.**

**Discussion: See MACES>Compliance Activity report CA\_N116067085.**

#### **VII. Reporting**

**1. Prompt reporting of deviations pursuant to general conditions 21 and 22 of Part A.**

**Discussion – See MACES>reports received for any information relating to this requirement.**

**2. Semiannual reporting of monitoring and deviations pursuant to general condition 23 of part A...**

**Discussion – See MACES>reports received for any information relating to this requirement.**

**3. Annual certification of compliance pursuant to general conditions 19 and 20 of Part A...**

**Discussion – See MACES>reports received for any information relating to this requirement.**

#### **EURMHANDLING**

**Raw material handling equipment, including the primary and secondary screens, radial stacker, raw material pile, two hoppers to chip raw material, and several conveyors. The conveyors move the raw material to feed the boiler. With no pollution control equipment.**

#### **1. Emission Limits**

<b>Pollutant</b>	<b>Limit</b>	<b>Time period</b>	<b>Monitoring method</b>
<b>Visible Emission (VE)</b>	<b>5%</b>	<b>6-minute average</b>	<b>SC V.1</b>

**See SC V.1 for data relating to this requirement.**

**No VE was observed on the day of the inspection.**

#### **III. Process/Operational Restrictions**

**1. If VE exceed 5% permittee shall immediately shut down the process...**

**Discussion – During the records review there was no recorded VE over 5%. The requirement to shut down is known and part of the daily operating plan.**

#### **V. Testing/Sampling**

**1. Permittee shall observe VE and record VE once per calendar day.**

**Discussion: This is occurring daily as required.**

#### **VI. Monitoring/Recordkeeping**

**1. records of the daily VE shall be made available upon request by AQD...**

Discussion: I chose four dates at random to check records -- 12 Mar 22 Zero; 21 May 2022 Zero; 4 July 2022 Zero; 25 Feb 2023 Zero.

VII. Reporting

1. Prompt reporting of deviations pursuant to general conditions 21 and 22 of Part A.

Discussion – See MACES>reports received for any information relating to this requirement.

2. Semiannual reporting of monitoring and deviations pursuant to general condition 23 of part A...

Discussion – See MACES>reports received for any information relating to this requirement.

3. Annual certification of compliance pursuant to general conditions 19 and 20 of Part A...

Discussion – See MACES>reports received for any information relating to this requirement.

EUBOILER

230 million BTU per hour spreader-stoker boiler. It burns wood and tire derived fuel (TDF) to generate steam to power an electrical generator of 18 MW nameplate capacity. Natural gas is used to fire during startup of the boiler. The boiler is subject to MACT JJJJJ. Pollution control equipment for the boiler is a multiple cyclonic collector and electrostatic precipitator.

1. Emission limits-

Month/Emission	Sulfur Acid	VOC	Lead	Benzo(a)pyrene	PM-10	Dioxins/Furans (TEQ)	Mercury	Ars
Jan-22	3.00	1.08	0.016	3.87E-06	13.20	1.05E-08	0.00037	0.0
Feb-22	2.93	1.06	0.016	4.03E-06	12.91	1.05E-08	0.00034	0.0
Mar-22	2.84	1.02	0.016	4.15E-06	12.49	1.03E-08	0.00032	0.0
Apr-22	2.79	1.00	0.017	4.34E-06	12.27	1.03E-08	0.00030	0.0
May-22	2.68	0.97	0.017	4.40E-06	11.81	1.00E-08	0.00027	0.0
Jun-22	2.65	0.95	0.017	4.52E-06	11.68	1.00E-08	0.00026	0.0
Jul-22	2.61	0.94	0.017	4.69E-06	11.47	1.00E-08	0.00024	0.0
Aug-22	2.55	0.92	0.018	4.85E-06	11.24	9.99E-09	0.00022	0.0
Sep-22	2.49	0.90	0.018	5.00E-06	10.97	9.93E-09	0.00020	0.0

Oct-22	2.45	0.88	0.018	4.91E-06	10.77	9.75E-09	0.00019	0.0
Nov-22	2.41	0.87	0.017	4.83E-06	10.59	9.59E-09	0.00019	0.0
Dec-22	2.34	0.84	0.017	4.69E-06	10.29	9.32E-09	0.00019	0.0
Limit	33.3 tpy	19.1 tpy	0.5 tpy	8.40E-06	98.9 tpy	2.9E-08 tpy	0.0014 tpy	0.0

All emissions are in rolling 12-month tpy.

Date/Emission	CO pph	CO MMBtu	NOx pph	NOx MMBtu	SO2 pph	SO2 MMBtu	Highest opacity
2/25/2022	13.53	0.0757	42.67	0.2385	39.51	0.2201	11.74%
3/12/2022	16.62	0.0924	37.91	0.2108	43.16	0.2395	22.03%
5/21/2022	14.42	0.0846	37.61	0.2206	40.72	0.2384	12.21%
7/4/2022	9.61	0.0473	41.66	0.2051	46.34	0.2279	13.87%
Limits	57.5 pph	0.25/MMBtu	57.5 pph	0.25/MMBtu	100 pph	0.25/MMBtu	See Note

Note: opacity limit 20%, except for one single 6 min average of no more than 27%. No exceedances reported meeting this criteria.

**II. Material Limits**

See MACES>Compliance Activity>Report CA\_N116067084 for information regarding the fuel received and burned in the boiler.

1. Permittee shall not operate EUBOILER for more than 8600 (358.3333 days) hours per 12-month calendar time period.

Discussion – total operating hours for CY 22 8230 hours

2. Permittee shall not operate EUBOILER unless the cyclonic collector and ESP are operating correctly.

Discussion – ESP and multicyclone were in proper operation during my inspection. The records indicate that proper operation has been consistent while operating. The control room operator has displays and warning indicators if

any part of the cyclone or ESP stop operating properly. If that occurs the operator follows the instructions in the PM/MAP to correct.

The Multicyclone collector utilizes a rotary valve to remove the particulate matter.

The ESP is a 3-field device that raps to clean the plates. The readings on the device at time of inspection:

	Pri Voltage	2nd Voltage	Pri Amps	2nd Amps	Spark Rate
Section 1	200 V	3,000 V	8 Amp	100 Amp	51
Section 2	200 V	3,000 V	20 Amp	100 Amp	150
Section 3	200 V	3,000 V	15 Amp	50 Amp	150

Both of the control devices are in good condition and appear to be well maintained.

3. The permittee shall properly maintain the monitoring system, including keeping spare parts on hand.

Discussion – I reviewed the PM/MAP with management at the site. (See MACES>Compliance Activity report CA\_N116067089). Source uses an electronic tracking system for all maintenance and has sufficient parts onsite for repairs.

4. Permittee must tune boiler biennially...

Discussion – Records indicate that this is being performed. Source maintains the records onsite using the E-Maint electronic system and record of statement of compliance.

5. Boilers with O2 trim system that maintains an optimum air to fuel rations would otherwise be subject to biennial tune up must conduct a tune up of boiler every 5 years...

Discussion – Records indicate that this is occurring.

6. Boiler shall comply with the definition of the biomass category...

Discussion – The only fuels used at the facility conform to this definition.

#### IV. Design/Equipment Parameters

1. Permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record NOx and SO2 concentration (CEMS)...

Discussion – There is a CEMS that monitors these emissions. It is calibrated as required. There is a CEMS that monitors these emissions. It is calibrated as required.

2. Permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record CO concentration (CEMS)...

Discussion – There is a CEMS that monitors this emission. It is calibrated as required.

3. Permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record O2 concentration (CEMS)...

Discussion – There is a CEMS that monitors this emission. It is calibrated as required.

4. Permittee shall install, calibrate, maintain, and operate in a satisfactory manner a device to monitor and record visible emission (COMS)...

Discussion – There is an opacity monitor (COMS) that monitors this emission. It is calibrated as required.

5. Performance Spec 1 shall be used for installation, initial eval, and operation of the COMS...

Discussion – This was completed when the device was first installed at the facility.

6. Performance Spec 2 shall be used for the installation, initial eval, and operation of the NOx and SO2 CEMS...

Discussion-- This was completed when the device was first installed at the facility.

7. Performance Spec 3 shall be used for the installation, initial eval, and operation of the O2 CEMS...

Discussion-- This was completed when the device was first installed at the facility.

8. Performance Spec 4 shall be used for the installation, initial eval, and operation of the CO CEMS...

Discussion-- This was completed when the device was first installed at the facility.

9. The span value for the NOx, SO2, CO and O2 CEMS shall be 2.0 times the lowest emission standard or as specified in federal regulations...

Discussion—during the daily calibrations the span value is verified.

10. Span value for COMS shall be between 60% and 80%

Discussion -- COMS span value is checked daily during calibration.

11. Permittee shall calibrate and standardize the COMS in accordance the procedures set forth in App F of 40 CFR Part 60...

Discussion – COMS are calibrated daily as required by the regulation.

12. Boiler shall maintain an O2 trim that maintains an optimum air-to-fuel ratio...

Discussion – This can be done manually or automatically. Normally it is done manually so that the speed and accuracy are maintained limiting any excess emission that may occur as the trim is adjusted.

## V. Testing/Sampling

1. Permittee shall sample each type of fuel burned on an annual basis and have the samples tested for chromium and mercury...

Discussion- last test results on record are dated June 14, 2022. Test samples have been submitted for CY 23 and as of April 12, 2023 the sample is still being tested.

2. The permittee shall verify PM10, PM, VOC, lead, dioxins and furans, mercury, arsenic, total chromium, benzo(a) pyrene, and sulfuric acid rates....

Discussion – this was completed at the last stack test in 2021. See MACES>Emission Measurement>CEMS tests for reports.

3. The permittee shall verify the PM10, PM, VOC, lead, dioxins and furans, mercury, arsenic, total chromium, benzo (a)pyrene, and sulfuric acid emission rates at a minimum once every five years...

Discussion-- See MACES>Emission Measurement>CEMS tests for reports.

**4. Permittee shall perform exhaust gas flow rate testing to determine average flow rate to be used with CEM data to calculate NO<sub>x</sub>, SO<sub>2</sub>, and CO pph emission rates...**

**Discussion-** See MACES>Emission Measurement>CEMS tests for reports.

**5. Permittee verify exhaust gas flow rate, at a minimum on calendar year from the date of the last test.**

**Discussion-** The last test was conducted August 18, 2022. See MACES>Emission Measurement>CEMS tests for reports.

**6. Permittee shall notify the AQD technical program unit supervisor and district supervisor not less than 30 days of the time and place before the tests are conducted.**

**Discussion—** The requirement

## **VI. Monitoring/Record Keeping**

**1. The permittee shall calculate and maintain records of the hourly and annual emission rates for PM<sub>10</sub>, VOCs, lead, dioxins and furans, mercury, arsenic, total chromium, benzo(a)pyrene, and sulfuric acid using emission factors derived from the most recent stack testing data.**

**Discussion –** see above in Emission limits for data, source is meeting requirements of this condition.

**2. The permittee shall calculate and maintain records of SO<sub>2</sub>, NO<sub>x</sub> and CO pound per hour...**

**Discussion –** see above in Emission limits for data, source is meeting requirements of this condition.

**3. The permittee shall calculate and maintain records of the annual emission rates for SO<sub>2</sub>, NO<sub>x</sub>, and CO.**

**Discussion –** see above in Emission limits for data, source is meeting requirements of this condition.

**4. The permittee shall monitor and record the SO<sub>2</sub> emissions from the EUBOILER on a continuous basis in a manner...**

**Discussion –** see above in Emission limits for data, source is meeting requirements of this condition.

**5. The permittee shall monitor and record the CO and NO<sub>x</sub> emissions...**

**Discussion –** see above in Emission limits for data, source is meeting requirements of this condition.

**6. The permittee shall monitor and record the O<sub>2</sub> concentration...**

**Discussion –** see above in Emission limits for data, source is meeting requirements of this condition.

**7. The permittee shall monitor and record the visible emissions...**

**Discussion –** see above in Emission limits for data, source is meeting requirements of this condition.

**8. The permittee shall monitor and record the natural gas usage...**

**Discussion-** Natural gas usage is tracked and monitored.

**9. The permittee shall maintain all emissions records required in Conditions 1 through 8 of this section in a manner acceptable to the AQD...**

**Discussion –** Records were requested for four random days. The provided records met all the requirements of AQD to verify compliance with the limits.

**10. By the fifth calendar day of each month permittee shall record the total usage of natural gas for the previous 12-calendar month time period...**

**Discussion-** For CY 2022 26,806 CCF Natural Gas was used at the facility.

**11. The permittee shall monitor and record the quantity of each of the fuels received during each calendar day in a manner acceptable to the AQD...**

**Discussion –** No deliveries occurred during the inspection. Records reviewed showed that the fuel procurement and handling plan forms are being used at the facility as the plan required.

**12. By the fifth day of each calendar month, permittee shall record the total fuel received for the previous 12 calendar month time period for the creosote treated wood fuel, particle board/plywood fuel, construction/demolition wood, and tire derived fuel.**

**Discussion --** Source is recording the amounts of fuel received. See MACES>Compliance Activity>Report CA\_N116067084 for information regarding totals received by type of fuel.

**13. The permittee shall calculate the total fuel burned for the previous 24-hour period...**

**Discussion –** break down fuel by type and qty burned for four different days.

**14. The permittee shall record and maintain records of the amount of each fuel combusted during each day and calculate the annual capacity factor individually for natural gas and wood...**

**Discussion --** records reviewed during the review of the Fuel Procurement Plan indicate that this occurs. See MACES>Compliance Activity>report CA\_N116067088 for more information.

**15. The permittee shall maintain records of the following information for each steam generating unit operating day...**

**Discussion –** Source maintains the required tracking for daily operations. Records indicate that drift tests and quarterly assessments are being completed.

**16. The permittee shall maintain a log of the hours of operation of EUBOILER...**

**Discussion –** Records indicate that this is tracked for compliance and for MAERS reporting.

**17. The permittee shall utilize COMS recorded opacity as an indicator of the proper functioning of the ESP. The appropriate range of opacity defining proper function of the ESP is 0 – 20% opacity.**

**Discussion—**Opacity is tracked and utilized for this purpose. The CAM plan has stricter values in place to ensure that problems with the ESP are identified and corrected before emission exceedances.

**18. The permittee shall continuously record opacity...**

**Discussion-** records indicate that opacity is always recorded during operation.

**19. An excursion is defined as a 6-minute average opacity greater than 15%. An excursion shall trigger an evaluation of electrostatic precipitator secondary voltage. The secondary voltage must not deviate by more than 20% between fields.**

**Discussion –** Records indicate that this is being utilized for reporting any excursion. See MACES>Report Received for any excursions that have been reported.

**20. Upon detecting an excursion or exceedance...**

**Discussion –** CAM plan and PM/MAP give specific guidance on how to handle excursions and exceedances. See MACES>Report Received for any information regarding reporting related to this requirement.

**21. Except for, as applicable, monitoring malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the owner or operator shall conduct all monitoring in continuous operation...**



**Discussion**—Records indicate that this is being accomplished. PM/MAP give operators guidance on actions to take during malfunction.

**22. The permittee shall maintain written procedures for the opacity monitor quality assurance program, and shall make them available to Federal, State, and Local Air Quality representatives upon request.**

**Discussion** – Source has the required plan. See MACES>Compliance Activity>report CA\_N116067088 for more information on the plan.

**23. The permittee must maintain the records specified in paragraphs (c)(1) through (7) of Section 63.11225...**

**Discussion** – Records indicate that this is occurring. The source maintains certification letters in the onsite records.

**24. The permittee's records must be in a form suitable and readily available for expeditious review...**

**Discussion** – Records are kept electronically and were easily retrieved during the inspection.

**25. The permittee shall maintain records of monitoring data, monitor performance data...**

**Discussion-** Records are maintained electronically and meet the requirements of AQD to determine compliance.

**26. The permittee shall monitor secondary voltage for the electrostatic precipitator.**

**Discussion-** read out in the control room displays the secondary voltage on the ESP and it is monitored by the control room operator.

## **VII. REPORTING**

**1. Prompt reporting of deviations pursuant to general conditions 21 and 22 of Part A.**

**Discussion** – See MACES>reports received for any information relating to this requirement.

**2. Semiannual -- reporting of monitoring and deviations pursuant to general condition 23 of part A...**

**Discussion** – See MACES>reports received for any information relating to this requirement.

**3. Annual certification of compliance pursuant to general conditions 19 and 20 of Part A...**

**Discussion** – See MACES>reports received for any information relating to this requirement.

**4. The permittee shall submit any performance test reports...**

**Discussion** – all performance test reports have been submitted to AQD.

**5. Prior to installation or replacement of any CEMS or COMS, the permittee shall submit a monitoring plan...**

**Discussion** – There is a current monitoring plan and no changes to CEMS/COMS has occurred since it was approved.

**6. In accordance with 40 CFR 60.7(c) and (d) an excess emissions report (EER)....**

**Discussion** – EERs are being submitted as required. See MACES>Report Received for information on individual EERs.

**7. Each semiannual report of monitoring and deviations...**

**Discussion** – these reports are submitted on time, see MACES>Reports Received for more information on them.

**8. Each semiannual report of monitoring and deviations shall include summary information on monitoring downtime...**

**Discussion** – these reports are submitted on time, see MACES>Reports Received for more information.

9. The permittee shall report the results of the quality assurance procedures of the CEMS set ... the quarterly EER for the quarter in which the audit is conducted.

Discussion – Reports have been submitted, see MACES >Reports Received for more information.

10. The permittee shall submit the results of the quality assurance procedures of the COMS...

Discussion -- Reports have been submitted, see MACES >Reports Received for more information.

11. The permittee must prepare, by March 1 of each year, and submit to the delegated authority upon request...

Discussion – This report has not been requested, but it is on file at the source.

12. If the permittee intends to commence or recommence combustion of solid waste...

Discussion – Source does not intend to burn solid waste.

13. If the permittee has switched fuels or made a physical change to the boiler and the fuel switch or change resulted...

Discussion – There have been no change in fuels or physical changes to boiler.

**VIII. Stack/Vent Restriction**

Stack and Vent ID	Max exhaust Diameter	Estimated Diameter	Minimum Stack Height	Estimated Stack Height
SV Boiler	72"	72" by eye	150'	150' by Nikkon Forestry Pro II

**IX. OTHER REQUIREMENT(S)**

1. The permittee shall not burn the alternative wood fuels and tire derived fuel unless the Fuel Procurement and Handling Plan as approved by the District Supervisor has been implemented and maintained.

Discussion – Plan is approved and on file with AQD Gaylord District Field Office.

2. The permittee may burn any alternative fuels simultaneously if stack tests, approved by the AQD, demonstrate that these fuels can be co-fired without exceeding any emission limit specified in this permit.

Discussion – See MACES>Emission Measurement tab for information regarding this and TPU reports on it.

3. The permittee shall not burn the alternative wood fuels and tire derived fuel unless there is an approved Emergency Response Program...

Discussion - This has not been requested by AQD.

4. The permittee shall promptly notify AQD for the need to modify the CAM Plan if the existing plan is found to be inadequate and shall submit a proposed modification to the ROP if necessary.

Discussion - Source reports no need to update the CAM Plan.

5. The permittee shall perform the COMS quality assurance procedure...

Discussion – This was completed when installed.

6. The permittee shall perform the quarterly quality assurance procedures of the CEMS set forth in Appendix F of 40 CFR Part 60.

Discussion – Records indicate that this is being performed and submitted to AQD.

7. The permittee shall develop and implement a quality control plan and program for the opacity monitor, as specified in 40 CFR Part 60, Appendix F.

Discussion – CAM Plan is on file with AQD Gaylord District Office.

8. If the opacity monitor fails two consecutive annual audits, two consecutive quarterly audits, or five consecutive daily checks...

Discussion – Records indicate this has not failed the required number of audits to require action under this requirement.

9. The permittee shall comply with all applicable requirements of 40 CFR Part 64.

Discussion – Permittee appears to meet the requirements outlined.

10. At all times the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions...

Discussion – Site inspection, records reviewed, and plans reviewed with management indicate that the source is complying with this requirement.

11. If the permittee owns or operates an industrial, commercial, or institutional boiler and would be subject to 40 CFR Part 63, Subpart JJJJJ...

Discussion – records on file with AQD Gaylord District Office indicate that source certified 9 Sep 2011.

12. For affected boilers that ceased burning solid waste consistent with Section 63.11196(d)...

Discussion – Source only burns fuel allowed in ROP and it is not classified as solid waste.

13. For affected boilers that switch fuels or make a physical change to the boiler that results in the applicability of a different subcategory within 40 CFR Part 63, Subpart JJJJJ...

Discussion -- Source certified 9 Sep 2011.

14. Table 8 to 40 CFR Part 63, Subpart JJJJJ, shows which parts of the General Provisions in Sections 63.1 through 63.15 apply to the permittee.

Discussion -- Source Certified 9 Sep 2011.

15. If the permittee identifies a failure to achieve compliance with an emission limitation or standard for which the approved monitoring did not provide an indication of an excursion or exceedance while providing valid data, or the results of compliance or performance testing document a need to modify the existing indicator ranges or designated conditions, the permittee shall promptly notify the AQD and if necessary, submit a proposed modification of the ROP and CAM Plan to address the necessary monitoring changes. Such a modification may include but is not limited to, reestablishing indicator ranges or designated conditions, modifying the frequency of conducting monitoring and collecting data, or the monitoring of additional parameters.

16. The permittee shall comply with all provisions of 40 CFR Part 63, Subpart JJJJJ...

Discussion – source maintains that is in compliance with requirement.

**EUASHHANDLING**

Ash handling equipment. Fly ash and bottom ash is conveyed to a wet rotary unloader where water is added to control fugitive dust. The ash is then transported to an enclosed building where it is stored until trucked offsite. There are no pollution controls on this EU.

#### I. Emission Limit

Pollutant	Limit	Time period	Observed day of inspection
VE	5%	6 minute average	Zero

Discussion – When I arrived there was a truck in the ash house being loaded. There was no VE, no odors.

#### III. Process/Operational limits

1. Permittee shall not operate the ash handling system unless the wetting system is installed...

Discussion—When I arrived onsite the source was loading out ash. It was wetted.

2. If VE exceed 5% Opacity...shall immediately shut down...

Discussion – Records indicate that there has been no VE of 5% or more observed.

#### V. Testing/Sampling

1. Permittee shall observe and record VE once per calendar day...

Discussion – readings from 22 Jan 22 Zero; 15 March 2022 Zero; 6 June 2022 Zero

#### VI. Monitoring/Record Keeping

1. Records of daily VE, repairs and remedial actions performed.....

Discussion- records are kept of the VE monitoring. Any repairs that have been made to the system are tracked in the E-Maintenance software used by the source.

#### VII. Reporting

1. Prompt reporting of deviations pursuant to general conditions 21 and 22 of Part A.

Discussion – See MACES>reports received for any information relating to this requirement.

2. Semiannual reporting of monitoring and deviations pursuant to general condition 23 of part A...

Discussion – See MACES>reports received for any information relating to this requirement.

3. Annual certification of compliance pursuant to general conditions 19 and 20 of Part A...

Discussion – See MACES>reports received for any information relating to this requirement.

#### EUGENERATOR

#### III. Process/Operational Restrictions

1. Permittee shall not operate the standby diesel Generator more than 100 hours/year...

Discussion - Current hour reading 350 hours total use in CY 2022 0.6 hours

2. Permittee shall operate and maintain in manner consistent with safety and good air pollution control rules...

Discussion— the EMaint system tracks all the required maintenance items for EUGENERATOR.

3. Permittee may operate for any combination of following purposes...no more than 100 hours/year...

Discussion – Only used for 0.6 hours during CY 2022. This was all for maintenance purposes.

4. Permittee may operate for up to 50 hours per year in nonemergency situations....

Discussion – see break down of hours in SC III.3

#### IV. Design/Equipment Parameters

1. Shall have a non-resettable hour meter...

Discussion – The hour meter is non-resettable.

#### VI. Monitoring/Record Keeping

1. Permittee shall maintain records of hours of operation per calendar year..

Discussion – Records are maintained.

2. Permittee shall maintain records of sulfur content and heat value of the diesel fuel...

Discussion – This break down comes standard on all the fuel delivery invoices for the source.

#### VII. Reporting

1. Prompt reporting of deviations pursuant to general conditions 21 and 22 of Part A.

Discussion – See MACES>reports received for any information relating to this requirement.

2. Semiannual reporting of monitoring and deviations pursuant to general condition 23 of part A...

Discussion – See MACES>reports received for any information relating to this requirement.

3. Annual certification of compliance pursuant to general conditions 19 and 20 of Part A...

Discussion – See MACES>reports received for any information relating to this requirement.

#### IX. Other requirements

1. Must meet requirement of 40 CFR Part 63 Sub ZZZZ (RICE MACT)...

Discussion – Oil change last Jan 5, 2023; Plug inspection Jan 5, 2023; belts/hose inspection Jan 5, 2023

#### FGCOLDCLEANERS

Cold Cleaners used for parts washing and falling under exemptions of rules.

#### II. Material Limits

1. permittee shall not use cleaning solvents containing more than 5% by weight of....

Discussion – what product is used at the facility? SDS?

#### III. Process/Operational Restrictions

1. Cleaned parts shall drain for no less than 15 seconds...

Discussion – The drain is present and when used the operator lets the parts drip prior to removing from the cleaner.

**2. routine maintenance as required my manufacturer...**

Discussion – Source has contracted maintenance of the cleaners to Safety Kleen.

**IV. Design/Equipment Parameters****1. Cold cleaner must meet one of the following...**

Discussion- In plant emissions only.

**2. shall be equipped with a device for draining clean parts...**

Discussion – there is a basket used for draining parts prior to removing from the cleaner.

**3. has a cover and is closed when not in use...**

Discussion – always closed unless in use. Was closed when inspected.

**4. If REID vapor of solvent more than 0.3 PSIA must have lid close assist....**

Discussion - SDS indicates that the PSIA is less than 0.3 PSIA

**5. Reid Vapor of solvent greater than 0.6 PSIA, heated above 120F....**

Discussion – SDS indicates that the PSIA is less than 0.6 PSIA and it is not heated.

**VI. MONITORING/RECORDKEEPING****1. For each new cold cleaner in which the solvent is heated, the solvent temperature shall be monitored and recorded at least once each calendar week during routine operating conditions.**

Discussion—Solvent not heated.

**2. The permittee shall maintain the following information on file for each cold cleaner...**

Discussion – All pertinent information is on the cleaner.

**3. The permittee shall maintain written operating procedures for each cold cleaner...**

Discussion there are instructions on the cleaner.

**4. As noted in Rule 611(2)(c) and Rule 707(3)(c)...**

Discussion – SDS indicates that this is not a hazard.

NAME

DATE 4-18-23

SUPERVISOR

