

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : St Marys Cement Charlevoix Plant	SRN : B1559
Location : 16000 BELLS BAY RD	District : Cadillac
	County : CHARLEVOIX
City : CHARLEVOIX State: MI Zip Code : 49720	Compliance Status : Compliance
Source Class : MAJOR	Staff : Rob Dickman
FCE Begin Date : 8/1/2019	FCE Completion Date : 8/18/2020
Comments :	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
08/18/2020	Scheduled Inspection	Compliance	Scheduled inspection of this major source.
08/12/2020	ROP Other	Compliance	RATA Test Plan for the Main Stack gases and Hg, and for the Clinker Cooler Stack for flow. Protocol appears complete and is compliant with testing deadlines.
08/12/2020	ROP Other	Compliance	KILN & Main Stack Test & Clinker Cooler Test Plan, testing for OHAP and PM 10/2.5. Protocol appears complete and within reporting deadlines.
08/12/2020	Complaint Investigation	Compliance	Complaint investigation of opacity from this facility.
07/20/2020	NSPS (Part 60)	Compliance	Quarterly Opacity Audit and Annual Zero Alignment for the opacity monitor on the main stack. Report appears complete, results demonstrate compliance.
07/13/2020	Excess Emissions (CEM)	Compliance	First Quarter Excess Emission Reporting. Report OK. No excess emissions or monitoring system downtime greater than 5% of the total source operating time is listed.
07/13/2020	Excess Emissions (CEM)	Compliance	First quarter 2020 Visibility Protection Report. This report is required under 40 CFR 52.1183. Report OK. All excess emissions and monitoring system downtime were at acceptable levels.

Activity Date	Activity Type	Compliance Status	Comments
04/28/2020	Rule 912	Compliance	Pursuant to Rule 912, this is the written follow up to an excess NOx emissions event that happened on April 11, 2020. The daily average for NOx emissions is limited to 700 lbs/hr. The daily average for this day was 722.8 lbs/hr. The reason for the exceedance was startup issues after a plant outage. While this appears to be an isolated incident, the facility outlined three items they plan to implement to prevent a reoccurrence of this issue. No further action is recommended.
03/26/2020	ROP Annual Cert	Compliance	Multiple reports in one document. Annual Reporting for the year 2019. Most deviations were previously reported. All were addressed in a timely manner. Facility is continuing to work through issues related to complete plant retrofit.
03/26/2020	MACT (Part 63)	Compliance	Multiple reports in one document. Semi Annual Reporting for PC-MACT. PM, HCl, Hg, and THC monitoring is included. Zero exceedances on PM, Hg, and HCL. OHAP issues previously reported and documented.
03/26/2020	ROP SEMI 2 CERT	Compliance	Multiple reports in one document. Semi- Annual Reporting for the second half of 2019. Most deviations were previously reported. All were addressed in a timely manner. Facility is continuing to work through issues related to complete plant retrofit.
03/16/2020	MAERS	Compliance	See MAERS for Further Info.
02/10/2020	Excess Emissions (CEM)	Compliance	Fourth Quarter 2019 Visibility Protection Report. This report is required under 40 CFR 52.1183. Report OK. All excess emissions and monitoring system downtime were at acceptable levels.
02/10/2020	Excess Emissions (CEM)	Compliance	4th Quarter Excess Emission Reporting. Report OK. No excess emissions or monitoring system downtime greater than 5% of the total source operating time is listed.
12/12/2019	ROP Other	Compliance	HCl Spike Test for Bypass Stack & Main Stack. Report OK, results indicate compliance.

Activity Date	Activity Type	Compliance Status	Comments
11/20/2019	Stack Test	Compliance	Stack testing and CPMS Data. Report OK. Testing not performed for PM10/2.5 on the main kiln pending a permit revision. Results on tested sources indicate compliance. Test sent to TPU staff for technical review.
11/20/2019	CEM RATA	Compliance	2019 RATA. Report good. Results demonstrate compliance.
11/04/2019	Excess Emissions (CEM)	Compliance	3rd Quarter Excess Emission Reporting. Report OK. No excess emissions or monitoring system downtime greater than 5% of the total source operating time is listed.
11/04/2019	Excess Emissions (CEM)	Compliance	Third Quarter 2019 Visibility Protection Report. This report is required under 40 CFR 52.1183. Report OK. All excess emissions and monitoring system downtime were at acceptable levels.
10/29/2019	Rule 912	Compliance	Pursuant to Rule 912, this is the written follow up to an excess NOx emissions event that happened on September 29, 2019.. The daily average for NOx emissions is limited to 700 lbs/hr. The daily average for this day was 701.6 lbs/hr. The reason for the exceedance was not given. The reason plant staff were not notified that an exceedance was possible was attributed to a software issue in the control room. The facility is currently in an escalated enforcement action involving NOx emissions among other issues. No further action is recommended.
10/29/2019	Stack Test	Compliance	VE testing on the solid fuel system and the four finish mills. Testing indicated zero emissions on all four sources. Testing performed by a currently certified visible emissions reader.
10/03/2019	ROP Semi 1 Cert	Compliance	Multiple reports in one document. A total of 20 deviation types are listed. Of these, three have been identified as violations in need of follow up. These will be included in a violation notice to the facility.

Activity Date	Activity Type	Compliance Status	Comments
10/03/2019	MACT (Part 63)	Compliance	Multiple reports in one document. A total of 20 MACT deviations are listed including CEM monitoring system downtime. This reporting will be streamlined in the future. Of these, three have been identified as violations in need of follow up. These will be included in a violation notice to the facility.
10/03/2019	Stack Test	Compliance	Testing protocol for visible emissions testing. Report OK
08/27/2019	ROP Other	Compliance	Test Plan for the Kiln/Main stack, Finish Mill 4 stack, and the Clinker Cooler stack.
08/27/2019	Rule 912	Compliance	Pursuant to Rule 912, this is the written follow up to an excess opacity events that happened on August 13, 2019.. The event was 150 minutes in duration with a maximum opacity of 11%. Causes noted are continued issues with the process and inferior bags in the particulate controls for the Kiln.
08/20/2019	Excess Emissions (CEM)	Compliance	Second quarter 2019 Excess Emission Reporting. Report OK. NOx and SO2 system downtime was >5% of the total source operating time for the quarter. No further action is necessary pending the report for 3rd quarter.

Name: _____

Date: _____

Supervisor: _____