

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

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| 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 : 7/1/2021 | FCE Completion Date : 9/15/2022 |
| Comments : | |

List of Partial Compliance Evaluations :

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|------------------------|-------------------|---|
| 08/30/2022 | ROP Other | Compliance | CEDRI Reporting |
| 08/19/2022 | ROP Other | Compliance | Visible emissions testing protocol for testing of FGINISHMILLS and EUSOLIDFUELSYSTEM. Protocol is OK and was submitted in a timely manner. Testing to take place the week of September 12, 2022. |
| 07/28/2022 | On-site Inspection | Compliance | Scheduled inspection of this major source. |
| 07/21/2022 | Excess Emissions (CEM) | Compliance | NOx, SO2, and CPMS excess emission reporting in two documents. Excess emissions and monitoring system downtime less than 1% of the total source operating time for all monitors. |
| 07/21/2022 | Excess Emissions (CEM) | Compliance | Visibility Protection Report, 2nd quarter 2022 Visibility Protection Report. This report is required under 40 CFR 52.1183. Report OK. All excess emissions and monitoring system downtime were below 1% of the source operating time. |
| 07/20/2022 | ROP Other | Compliance | PM Test Protocol, testing is scheduled for the week of 8/29/22. Report submitted in a timely manner and RO certification was included. Testing for PM on the Main and Cooler stacks to determine SSOL and compliance with PM/PM10/PM2.5 limits. Report is OK. |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|------------------------|-------------------|--|
| 07/20/2022 | CEM RATA | Compliance | Annual RATA on CEMS installed on Main and Clinker Cooler Stacks. See staff activity report for review. |
| 07/01/2022 | Other | Compliance | Review of RATA report. |
| 05/13/2022 | Excess Emissions (CEM) | Compliance | 1st quarter 2022 EER. Report OK. No excess emissions or monitoring system downtime greater than 1% of the total source operating time is listed. Clinker production and CEMS QA procedures are included and are acceptable. |
| 05/13/2022 | Excess Emissions (CEM) | Compliance | Visibility Protection Report, 1st quarter 2022 Visibility Protection Report. This report is required under 40 CFR 52.1183. Report OK. All excess emissions and monitoring system downtime were below 1% of the source operating time. |
| 05/13/2022 | CO/CJ | Compliance | 4th Qtr reporting, last per CO 2021-09. Certification of FEP records, BLDS data for EUSOLIDFUELSYSTEM, EER for HCl and THC. Report OK. No excess HCl and THC emissions and monitor downtime less than 5% of total source operating time. |
| 05/03/2022 | CEMS Test Observation | Compliance | RATA on Main Kiln Stack |
| 04/05/2022 | MAERS | Compliance | See MAERS for further info. |
| 03/24/2022 | ROP Annual Cert | Compliance | Multiple Reports in one document. Annual report for 2021. Specific deviations are addressed in the Semi 1 and 2 report reviews. All deviations were addressed properly by the facility. |
| 03/24/2022 | ROP SEMI 2 CERT | Compliance | Multiple reports in one document. Semi 2 deviation reporting. Report OK. Deviations include exceedance of baghouse inlet temp, CGA issue with HCl monitor, Method 9 testing. Deviations reported appeared addressed in a timely manner. |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|------------------------|-------------------|---|
| 03/24/2022 | MACT (Part 63) | Compliance | Multiple reports in one document. Notification of work practice, parametric monitoring, and emissions monitoring deviations per PC-MACT requirements. All work practice deviations were addressed, parametric monitoring deviations, such as baghouse inlet temp, were minimal, emissions monitoring was previously reported. |
| 03/24/2022 | Excess Emissions (CEM) | Compliance | Multiple reports in one document. EER for Main CPMS, HCl, THC, and Hg CEMS and for Clinker Cooler CPMS. Reporting is semi annual. No system downtime or excess emissions above 3% of source operating time. |
| 03/08/2022 | ROP Other | Compliance | CEDRI Reporting |
| 03/07/2022 | Excess Emissions (CEM) | Compliance | Semi Annual Excess Emissions Report for the Clinker Cooler CPMS (Particulate CEMS). Report OK. Excess Emissions and System Downtime less than 1% of the total source operating time. |
| 02/03/2022 | CO/CJ | Compliance | Reporting per CO 2021-09. Certification of FEP records, BLDS data for EUSOLIDFUELSYSTEM, excess HCl emissions, excess THC emissions, and downtime for HCl and THC monitors. Report OK. No excess HCl and THC emissions and monitor downtime less than 5% of total source operating time. Received Via Paper 2-5-22. |
| 02/01/2022 | Excess Emissions (CEM) | Compliance | Visibility Protection Report, 4th quarter 2021 Visibility Protection Report. This report is required under 40 CFR 52.1183. Report OK. All excess emissions and monitoring system downtime were below 3% of the source operating time. |
| 02/01/2022 | Excess Emissions (CEM) | Compliance | 4th quarter 2021 EER. Report OK. No excess emissions or monitoring system downtime greater than 3% of the total source operating time is listed. Clinker production and CEMS QA procedures are included and are acceptable. |
| 12/22/2021 | Rule 912 | Compliance | SOx Exceedance, see associated activity report. CA B155961224 |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|-------------------------|-------------------|---|
| 12/21/2021 | Other | Compliance | Rule 912 SO2 exceedance review. |
| 12/20/2021 | CO/CJ | Compliance | SO2 Management Plan per Consent Order - Filed in CM and Web under Plans. This document was received but was missed being logged in. It was followed up in December 2021, after talking with the company, it was found in our filing. |
| 12/16/2021 | ROP Other | Compliance | Letter detailing issues with resolution of an expired CGA gas for the HCl monitor. See associated activity report CA_B155961159. |
| 12/13/2021 | Other | Compliance | Letter regarding expired Cylinder Gas Audit (CGA) calibration gas. |
| 12/09/2021 | Complaint Investigation | Compliance | Complaint of strong odors from this facility the morning of 12/8/2021. |
| 12/09/2021 | Other | Compliance | Notification of noticeable odors at the complainants place of work. |
| 11/04/2021 | Complaint Investigation | Compliance | Complaint of odors possibly from this facility at the complainant's residence. |
| 11/01/2021 | Excess Emissions (CEM) | Compliance | 3rd QTR - via email, Via Paper on 10-21-21.Third Quarter Excess Emission Reporting. Report OK. No excess emissions or monitoring system downtime greater than 1% of the total source operating time is listed. |
| 11/01/2021 | Excess Emissions (CEM) | Compliance | Visibility Protection Via Email, Third quarter 2021 Visibility Protection Report. This report is required under 40 CFR 52.1183. Report OK. All excess emissions and monitoring system downtime were below 1% of the source operating time. Via paper on 10-21-21. |
| 11/01/2021 | Stack Test | Compliance | Method 9 evaluation on Finish Mill Stacks 1-4 and Pet Coke Mill pursuant to PT1140-15B and the current ROP. Testing was performed on 9/22/21. Reader was Method 9 certified in April 2021. Average results for all sources was zero percent opacity. Received Via Paper 10-21-21. |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|-------------------------|-------------------|---|
| 11/01/2021 | CO/CJ | Compliance | Via Email 10-25-21, Via Mail 10-28-21. Reporting per CO 2021-09. Certification of FEP records, BLDS data for EUSOLIDFUELSYSTEM, excess HCl emissions, excess THC emissions, and downtime for HCl and THC monitors. Report OK. No excess HCl and THC emissions and monitor downtime less than 2% of total source operating time. |
| 09/30/2021 | Stack Test | Compliance | PM emissions testing on kiln and clinker cooler. Results demonstrate compliance. Results were: FPM- Main, mill on 0.015#/ton, mill off 0.004#/ton; PM10/2.5 mill on 0.324#/ton, mill off 1.479#/ton; FPM-Clinker 0.003#/ton. All below permitted limits where applicable. |
| 09/29/2021 | Complaint Investigation | Compliance | Complaint of strong odors from this facility. |
| 09/22/2021 | ROP Semi 1 Cert | Compliance | Multiple reports in one document. Semi 2 deviation reporting. Report OK. Deviations reported appeared addressed in a timely manner. Source reported deviation relating to Kiln PM10/2.5 emissions, this is being addressed by enforcement. Deviation regarding SNCR and subsequent NOx exceedance, exceedance for Hg, and D/F temp on baghouse. |
| 09/22/2021 | MACT (Part 63) | Compliance | PC MACT compliance report. Several reports in one submission. Notification of work practice, parametric monitoring, and emissions monitoring deviations per PC-MACT requirements. All work practice deviations were addressed, parametric monitoring deviations, such as baghouse inlet temp, were minimal, emissions monitoring was previously reported. |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|-------------------------|-------------------|--|
| 09/22/2021 | Excess Emissions (CEM) | Compliance | Multiple reports in one document. EER for Main CPMS, HCI, THC, and Hg CEMS and for Clinker Cooler CPMS. Reporting is semi annual. No system downtime or excess emissions above 5% of source operating time. This reporting is required by PC-MACT, facility also reporting these values quarterly on a temporary basis as part of a consent order. |
| 09/22/2021 | ROP Other | Compliance | CEDRI - Part 63 NESHAP LLL |
| 09/15/2021 | ROP Qrtly Cert | Compliance | Consent Order 2021-19 - 2nd Qtr Reporting. Report submitted in a timely manner and certified. Certification of FEP records and BLDS records for EUSOLIDFUELSYSTEM. EER for HCI and THC monitors. No EE's reported, system downtime less than 5% for each. |
| 09/15/2021 | ROP Other | Compliance | Method 9 Emissions Test Plan. Protocol is OK. Testing to take place the week of September 20. |
| 08/30/2021 | CEM RATA | Compliance | 2021 RATA Test Report, Report OK. All monitored pollutants within the prescribed relative accuracy criteria per the appropriate performance specification. |
| 08/12/2021 | Excess Emissions (CEM) | Compliance | Visibility Protection Via Email, Via paper 7/28/21. Second quarter 2021 Visibility Protection Report. This report is required under 40 CFR 52.1183. Report OK. All excess emissions and monitoring system downtime were below 3% of the source operating time. |
| 08/12/2021 | Excess Emissions (CEM) | Compliance | Excess Emissions Via Email - 7/28 via Paper, Second Quarter Excess Emission Reporting. Report OK. No excess emissions or monitoring system downtime greater than 3% of the total source operating time is listed. |
| 08/10/2021 | Stack Test Observation | Compliance | Testing for PM/PM10/PM2.5 on the kiln. |
| 08/04/2021 | Complaint Investigation | Compliance | Complaint of strong sulfur odor from this source. |
| 07/19/2021 | ROP Other | Compliance | PM Test Protocol for Kiln / Main & Clinker Cooler Stack. Report OK, testing is schedule to begin the week of August 9, 2021 |

Name: *Ral Erickson*

Date: _____

Supervisor: _____