

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

FCE Summary Report

Facility : Michigan Sugar Company, Caro Factory	SRN : B2875
Location : 819 Peninsular St.	District : Saginaw Bay
	County : TUSCOLA
City : CARO State: MI Zip Code : 48723	Compliance Status : Non Compliance
Source Class : MAJOR	Staff : Meg Sheehan
FCE Begin Date : 10/14/2016	FCE Completion Date : 11/5/2018
Comments : Facility is non-compliant due to a violation of recordkeeping condition VI.1 for EU-PACKAGEBOILER3.	

List of Partial Compliance Evaluations :

Activity Date	Activity Type	Compliance Status	Comments
11/02/2018	Excess Emissions (CEM)	Compliance	Cylinder Gas Audit Report for Boiler #4 conducted on September 19, 2017 by Network Environmental, Inc. The average accuracy for the NOx CEM was -5.56%. The average accuracy for the O2 CEM was -2.83%. Processed by M. Sheehan.
11/02/2018	Excess Emissions (CEM)	Compliance	2017 Third Quarter Summary Report for Gaseous Excess Emission and Monitoring System. One hour of CEM downtime due to unknown causes was reported (0.11% CEM system downtime). No excess emissions were reported. Processed by M. Sheehan
11/02/2018	Stack Test	Compliance	Pulp Dryer Compliance Emission Testing. The permit limit is 0.10 lb PM/1,000 lb actual and 27.7 pph PM. The test result was 0.088 lb PM and 22.866 pph PM. Processed by M. Sheehan.
11/02/2018	CEM RATA	Compliance	Boiler #4 RATA performed on December 19, 2017, by Network Environmental, Inc. The relative accuracy was 5.25% of the mean of the reference method. Processed by M. Sheehan.
11/02/2018	CAM Excursions/Exceedances	Compliance	No CAM excursions or exceedances were reported. Processed by M. Sheehan.
11/02/2018	CAM monitor downtime	Compliance	No downtime was reported. Processed by M. Sheehan.

Activity Date	Activity Type	Compliance Status	Comments
11/02/2018	ROP SEMI 2 CERT	Compliance	No deviations were reported. Processed by M. Sheehan
11/02/2018	ROP Annual Cert	Unknown	The source indicated there was a deviation(s) on the ROP report certification, however no deviations were reported on the semi 1 or semi 2 certifications. A deviation report also was not included with the annual certification. Contact with the company has been made to clarify. Processed by M. Sheehan
11/02/2018	Excess Emissions (CEM)	Compliance	Cylinder Gas Audit for #4 Boiler performed on September 26, 2018 by Network Environmental, Inc., and CEM Summary Report and Operating Report. No excess emissions or CEM downtime were reported. The average accuracy for the NOx CEM was -6.64%. The average accuracy for the O2 CEM was -1.25%. MS
11/01/2018	Excess Emissions (CEM)	Compliance	Cylinder Gas Audit for Boiler #4 CEM conducted on March 20, 2018 by Network Environmental, Inc. Average accuracy for NOx monitor was -1.52%. Average accuracy for O2 monitor was -2.01%. Processed by M. Sheehan.
10/31/2018	MAERS	Compliance	Hard copy report certification processed by M. Sheehan.
10/31/2018	Excess Emissions (CEM)	Compliance	2018 First Quarter Summary Report for Gaseous Excess Emission and Monitoring System Performance. No CEMS downtime or excessive emissions were reported. EUBOILER4 was shut-down for summer on March 2, 2018. Processed by M. Sheehan
10/09/2018	Excess Emissions (CEM)	Compliance	Fourth quarter summary report for gaseous excess emission and monitoring system performance. No excess emissions or CEM downtime were reported. Processed by M. Sheehan
10/09/2018	ROP Other	Compliance	Updated CAM Plan for ROP renewal
10/09/2018	Malfunction Abatement Plan	Compliance	Updated MAP for ROP renewal

Activity Date	Activity Type	Compliance Status	Comments
10/09/2018	Excess Emissions (CEM)	Compliance	Second Quarter Summary Report for Gaseous Excess Emission and Monitoring System Performance (Boiler #4). The boiler did not operate during this quarter, which is to be expected for this time period. MS
10/03/2018	Scheduled Inspection	Non Compliance	Scheduled site inspection for FY19
09/24/2018	ROP Semi 1 Cert	Compliance	No deviations were reported. MS
09/24/2018	CAM Excursions/Exceedances	Compliance	No excursions or exceedances were reported. MS
09/24/2018	CAM monitor downtime	Compliance	No monitor downtime was reported. MS
09/19/2017	ROP Semi 1 Cert	Compliance	The facility reported no deviations for the period. sgl
09/19/2017	CAM Excursions/Exceedances	Compliance	No CAM excursions or exceedances were reported for the facility for the period.
09/19/2017	CAM monitor downtime	Compliance	No CAM Excursions, exceedances or monitor downtime was reported to have occurred for the period.
08/07/2017	Excess Emissions (CEM)	Compliance	2017 Second Quarter CEM Report - The facility reported that Boiler #4 (AKA the Reilly Boiler) did not operate for the quarter. This is not unexpected as the boiler is used during the beet campaign, which ended before April 1st, and will not resume till the end of August / first week of September. The CGA will be conducted when the Boiler operation begins again for the beet campaign. sgl
04/19/2017	Excess Emissions (CEM)	Compliance	2017 First Quarter Summary Report for Gaseous Emission and Monitoring System Performance - The facility reported no excess emissions for the period, and reported a total of 9 hours of downtime (0.44%) for the period. The facility reported that a cylinder gas audit was completed on 2/16/2017 and was reported to the AQD on 3/13/2017. An original cert form with appropriate signature was submitted with report. sgl
03/30/2017	MAERS	Compliance	MAERS Cert form received by District on 2/21/2017

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03/20/2017	ROP Other	Compliance	First Quarter 2017 Cylinder Gas Audit for Boiler #4. The CGA was conducted on February 16, 2017 and included both the NOx and O2 CEMS for the referenced boiler. The control limit for CGA Accuracy is plus or minus 15% of the average audit value or plus or minus 5 ppm whichever is greater. The CGA reported average accuracies for both CEMs of <4%. sgl
03/16/2017	ROP Annual Cert	Compliance	Facility reported one deviation from the ROP. The 2cnd quarter cylinder gas audit was conducted less than 60-days from the previous CGA. This deviation was the result of the length of the facilities beet slice campaigns, after which the boiler is shut down until the following fall. This deviation has been approved by AQD TPU staff prior to this occurrence. sgl
03/16/2017	ROP SEMI 2 CERT	Compliance	No deviations were reported for the 2cnd semi annual period for 2016. sgl
03/16/2017	CAM Excursions/Exceedances	Compliance	The facility reports no CAM excursions, deviations, exceedances or downtime for the calendar year 2016.
03/16/2017	CAM monitor downtime	Compliance	The facility reports no CAM excursions, deviations, exceedances or downtime for the calendar year 2016.
03/16/2017	Excess Emissions (CEM)	Compliance	The facility reports no CAM excursions, deviations, exceedances or downtime for the calendar year 2016.
03/15/2017	MACT (Part 63)	Compliance	Electronic copy of 2016 Boiler MACT Compliance Submittal for two NG fired boilers with O2 trim. Tune-ups are required every 5 years, the most recent tune-ups for the two boilers onsite was reported to have been conducted in 2014.

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01/10/2017	Excess Emissions (CEM)	Compliance	<p>2017 4th quarter CEMS summary report indicated that for the Riley Boiler (#4) that there were no excess emissions for the quarter, and that the CEMS was down for a total of 64 hours (2.9% of boiler operating time) and that the bulk of the downtime was due to QA calibrations. RATA testing was completed on 12/7/2016. Clarification regarding the dates and events has been requested and will be put in the district files. sgl</p>
01/10/2017	CEM RATA	Compliance	<p>Michigan Sugar Company submitted a copy of the 2016 Relative Accuracy Test for NOx and O2 CEMS for NG-fired Boiler #4. Testing was conducted on December 7, 2016, by Network Environmental.</p> <p>At the time of testing, Boiler #4 was operating at approximately 68 % of capacity based on gas flow. Capacity for the referenced boiler is 146.5 MMBTU/Hr (maximum gas flow of 132K SCFH) and a steam output of 120K per hour.</p> <p>A review of the document indicated that a total of 9 test runs were completed with instrumentation calibration checks being conducted both before and after each run. Results were reported within acceptable ranges. sgl</p>
10/28/2016	ROP Other	Compliance	<p>Cylinder Gas Audit for the NOx and O2 CEMS associated with Boiler #4 were conducted on September 30, 2016. The previous quarterly CGA was conducted on March 3, 2016.</p> <p>Data collected during the September 30, 2016 CGA reported NOx average accuracies for three test runs of 1.33% and O2 average accuracies for three test runs of -2.09%. These are well below the allowed 15% average.</p> <p>The facility started up for the present 2016-2017 campaign on August 26, 2016. sgl</p>

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10/28/2016	Excess Emissions (CEM)	Compliance	Third Quarter Operating Report and CEM Summary Report for #4 Boiler reported no excess emissions and no monitor downtime for the third quarter of 2016. sgl

Name: Meg Sheehan Date: 11/5/18 Supervisor: C. Haire
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