



25 July 2014

Brad Myott
Michigan Department of Environmental Quality
Air Quality Division, Lansing District Office
P.O. Box 30242
Lansing, MI 48909

Dear Mr. Myott:

On February 18-21, 2014, the BWL performed the winter load testing of initial performance verification for REO Town Cogeneration Facility EUTURBINE1, EUTURBINE2, FGTURB/HRSG1, and FGTURB/HRSG2. This testing was conducted to determine compliance with the emission limits of renewable operating permit (ROP) number MI-ROP-B2647-2012. This letter is in response to your July 2, 2014 Notice of Violation regarding the February testing, specifically the particulate matter (PM), particulate less than 10 micros (PM10), and particulate less than 2.5 microns (PM2.5) test results.

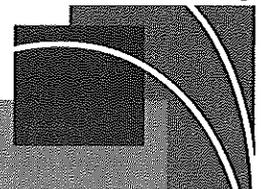
I. Actions Take to Correct the Condition

As previously discussed in our cover letter accompanying the Bureau Veritas test report dated May 2, 2014, several issues were encountered during the February 18-21, 2014 testing event that lead us to conclude that the test results for PM, PM10, and PM2.5 should be invalidated. These issues include: the post-test leak checks for FGTURB/HRSG2 Run 1 and EUTURBINE2 Run 1 were above the method criterion, the high-temperature tape for the probe melted, and field blank results were not within acceptable limits. While we cannot be certain what caused the inconsistency of the test results, we have serious doubts that the test results accurately characterize PM emissions from the units.

Furthermore, since this testing event, two additional PM tests have been conducted showing compliance with the associated PM permit limits. The first additional test conducted on May 8-9, 2014, for informational purposes by a different stack testing company, TRC, showed EUTURBINE1, EUTURBINE2, FGTURB/HRSG1, and FGTURB/HRSG2 in compliance with PM, PM10 and PM2.5 permit limits. Copies of these test results are attached. The second additional test was conducted by Bureau Veritas on June 11 and 13, 2014, for summer load testing of initial performance verification for FGTURB/HRSG1 and FGTURB/HRSG2. It should be noted that Bureau Veritas took multiple steps to improve their performance of the PM test method. These changes included, among others, using an integrated probe and nozzle, higher quality reagents, and EPA-certified sample bottles. These test results again showed both FGTURB/HRSG1 and FGTURB/HRSG2 in compliance with the PM permit limits. Furthermore, as previously reported, summer load testing of initial performance verification for EUTURBINE1 & EUTURBINE2 on July 20-August 1, 2013, by NTH Consultants showed compliance with the applicable PM permit limits.

II. Actions Take to Prevent Reoccurrence

As outlined above, we continue to believe the February 18-21, 2014 test results do not accurately characterize PM emissions from EUTURBINE1, EUTURBINE2, FGTURB/HRSG1, and FGTURB/HRSG2. Coupled with issues identified with the testing event, test results from both before and after the February 18-21, 2014 testing





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show the sources in compliance with the applicable PM permit limits. That said, routine inspections and maintenance continue to be performed by General Electric and BWL staff to maintain optimal performance. Lastly, the BWL will repeat the winter initial PM, PM10 and PM 2.5 compliance test at the earliest opportunity.

If you have any questions concerning these reports please contact Shannon Whiton of our Environmental Services Department at (517) 702-6003.

A handwritten signature in black ink, appearing to read "Mark Matus". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Mark Matus
Manager, Environmental Services Department
1201 S Washington Ave.
Lansing, Michigan 48912
mwm@lbwl.com
517-702-6153

Attachment

cc: Michael McClellan, MDEQ (electronic submittal)

