

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION
ACTIVITY REPORT: Scheduled Inspection

B661130177

FACILITY: MI SO CENTRAL POWER AGENCY		SRN / ID: B6611
LOCATION: 720 HERRING RD., LITCHFIELD		DISTRICT: Jackson
CITY: LITCHFIELD		COUNTY: HILLSDALE
CONTACT: Matt Burk		ACTIVITY DATE: 06/23/2015
STAFF: Brian Carley	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled inspection		
RESOLVED COMPLAINTS:		

Facility contact: Matt Burk, Director of Environmental Compliance
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Zack Durham and I arrived at the facility and met with Matt Burk with the purpose of determining compliance with their Renewable Operating Permit (ROP) #MI-ROP-B6611-2010a. After giving him a copy of the environmental inspection pamphlet, we discussed the consent order that they recently signed with EPA. There is the possibility that the facility will be permanently closed by April 16, 2016. Matt said that there will be a formal announcement this coming Friday (6/26/15). We then discussed the status of CSAPR and the stakeholder workgroup. I then requested that they review their current malfunction abatement plans (MAP) and fugitive dust plans to see if they need to be updated. I told him that I would like them to review the MAP and the fugitive dust plans and update them as necessary. I also requested that they send me any revised plan(s) for our approval. Matt did not think that would be a problem and would let me know if there any changes to the MAP and fugitive dust plans.

We then went over the records that they are required to keep that they are not required to include in their quarterly reports. The compliance determination of their SO₂, NO_x, PM, and PM₁₀ emissions and pounds of steam per hour limit has been done in the quarterly excess emission report reviews (see reports in MACES).

For Table EU-UNIT-1, I asked if they had used any petroleum coke in their unit and they said that they have not used petroleum coke in over 4 years. I then asked to see the results of the lab analysis of the sulfur content of the fuel that they using covering this year. The report summary on his computer shows that they are meeting the sulfur limit of 5.14% in the fuel. I asked Matt to bring up on his computer what their DAHS were recording as their current emissions. They were emitting SO₂ at 0.217 lb/mmBtu and NO_x at 0.217 lb/mmBtu, both of which were well below their limits of 0.85 lb/mmBtu and 0.46 lb/mmBtu, respectively. They currently were showing a 95% SO₂ removal efficiency with their FGD. The coal handling is enclosed and the coal storage pile is being maintained under the fugitive dust program. They are operating the control equipment as required by the ROP. They last time that they did a stack test for PM was in May, 2012. This testing was part of the baseline (without TDF) and actual emissions (with TDF) testing that is required in Table FG-ATO. They had last done an audit of their COMS in December, 2014, which the COMS met the requirements of PS1 (see EER for 4th quarter 2014). They are maintaining the records as required in S.C. VI.15 for the NO_x, SO₂, PM, and PM₁₀ emissions. We then went out into the facility and saw that they had been watering the roadways and there were no fugitive dust because of that. We stopped in the maintenance supervisor's office to review their fugitive dust logs. They are maintaining those logs to my satisfaction and the supervisor is the one that signs off on any fugitive dust prevention procedure that is done on site. They have not had an excursion of their CAM criteria since they resolved their NOV for excessive CAM excursion in March, 2014. Based on my inspection and the information provided, I determined that they are in compliance with this table.

For Table EU-TDFF, the tire fractionalization was not in operation today as they were in the process of modifying the bottom hatch of the tower to minimize air flow into the tower. I asked to see the records of the amount of tires that they had used in this process. They showed me on their log that shows how much, by weight in tons, in tires that they burned each day in the previous 30 calendar days. I determined that they are meeting all the Process/Operational Restrictions and Design/Equipment Parameters in this table. They informed me that they have not had any flare events this year. However, I did determine that they need to submit a revised MAP for this process because of all modifications they have done with the operation of this process since their last submittal. Based on my inspection and the information provided, I determined that they are in compliance with this table.

For Table EU-STARTUP-BLR, this is a 12.3 mmBtu/hr natural gas fired steam generator. They can only burn natural gas in this unit and they are keeping records of the amount of natural gas used. They do not have a limit

on the amount of natural gas that they can use. They submitted the required notification of the date of construction and the actual startup of this unit in January, 2014. Based on my inspection and the information provided, I determined that they are in compliance with this table.

For Table FGCOLDCLEANERS, they are using mineral spirits in their parts washer. He showed me on his computer the recordkeeping information required in this table. They only have one parts washer at this facility and the lid was closed and the instructions were posted on its lid. I determined that they are in compliance with this table.

For Table FGENGINES, they have completely removed the engines and the fuel storage tank from the facility in 2012. They have requested that this table be removed from their ROP in their ROP renewal application submitted on February 3, 2015. I determined that they are in compliance with this table.

For Table FG-ATOA, I verified that they were keeping track of the annual emissions as required by this table and that they were using the formulas found in Appendix 7 of their ROP. The emissions were below the baseline, so therefore they did not need to submit this information to AQD for 2012 emissions. I determined that they are in compliance with this table.

Based on my inspection and the MAERS, excess emission, annual, and semi-annual reports received, I determined that they are in compliance with their ROP.

On June 26, 2015, it was announced that the facility will be closing and the scheduled decommissioning date for the plant is June 1, 2016.

NAME Brian Lalley

DATE 7/14/15

SUPERVISOR 