

FORTISTAR Biomass Group

Hillman Power Company
750 Progress Street ♦ Hillman, Michigan 49746
Tel. (989) 742-4571 ♦ Fax. (989) 742-3723

RECEIVED DEQ/AQD
JUN 03 2014
MAGES <input type="checkbox"/> MAERS <input type="checkbox"/> CC: _____
FILE: _____

June 2, 2014

Mr. William J. Rogers, Jr.
Environmental Quality Analyst MDEQ AQD
2100 West M-32
Gaylord MI 49735-9282

RE: RESPONSE TO NOTICE OF VIOLATION ("NOV")
SNR: N1266, Montmorency County

Dear Mr. Rogers:

This letter is in response to the violation notice from your office dated April 3, 2014. As you are aware, because the NOV was not received by Hillman Power until May 15, 2014 you approved a revised response submittal date of June 5, 2014. Thank you for your courtesy.

The NOV cites excess emissions of particulate matter in both concentration (grains per dry standard cubic foot) and mass (pounds per hour) emissions. Hillman Power has taken action to address the issue, these actions and the dates they occurred are given below:

Date	Event
February 11-13, 2014	PM stack test performed as required by ROP
March 6, 2014	PM test results received from Network Environmental
March 7, 2014	Reduced steam load of plant to 161,000 lb/hr steam
March 30-April 2, 2014	Plant shut down for maintenance/repair precipitator
April 8-9, 2014	PM tests conducted, 3 different loads
April 21, 2014	Received new PM stack test results

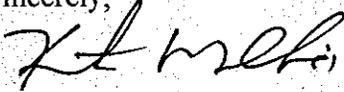
Upon receipt of the results of the stack testing on March 6, 2014, we had a discussion with the testing company, Network Environmental, to satisfy ourselves that the testing was indeed valid. The various testing methods available were discussed. We then made the decision to reduce load on the boiler by operating it at the 161,000 lb/hr steam load because at this load the continuous opacity monitor indicated a significant reduction in average opacity as well as peak opacity that can occur during the rapping cycle on the precipitator.

Hillman Power also immediately scheduled an outage to conduct maintenance on the precipitator and make repairs as necessary and achievable during the 3 days. This outage was overseen by Mr. Todd Campbell of Cameron Services. During this time some electrodes were replaced to improve clearance between the collecting plates and the electrodes.

Hillman Power contracted with Network Environmental to retest for particulate matter the following week after the outage, on April 8 and 9. Testing was conducted at 3 different steaming rates. This stack test was submitted to MDEQ on May 19, 2014. This stack testing indicates compliance with the PM limit in the ROP at 2 of the 3 steam rates tested (155,000 and 165,000 lb/hr). Hillman Power is now operating at the 165,000 lb/hr steam rate and will continue to do so until such a time that a more major overhaul of the precipitator can be completed.

If you have any questions or comments regarding this letter, please contact me at (989)742-4571.

Sincerely,



Keith Mulka
Plant Manager

Cc: James Charles, Fortistar
Tammi Van Til, Madison Consulting