

DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

**FCE Summary Report**

<b>Facility :</b> ADA COGENERATION LIMITED PARTNERSHIP	<b>SRN :</b> N1784
<b>Location :</b> 7575 FULTON STREET EAST BLDG 74-1A	<b>District :</b> Grand Rapids
	<b>County :</b> KENT
<b>City :</b> ADA <b>State:</b> MI <b>Zip Code :</b> 49355	<b>Compliance Status :</b> Compliance
<b>Source Class :</b> MAJOR	<b>Staff :</b> Kaitlyn DeVries
<b>FCE Begin Date :</b> 1/16/2018	<b>FCE Completion Date :</b> 1/15/2019
<b>Comments :</b> Fiscal Year 2019 Full Compliance Evaluation	

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
01/09/2019	MAERS	Compliance	ROP Certification form for MAERS received 2/20/18
01/09/2019	Scheduled Inspection	Compliance	The purpose of this inspection was to determine compliance with MI-ROP-N1784-2015.
10/22/2018	Telephone Notes	Compliance	Telephone Notes about the scheduled shutdown.
08/02/2018	ROP Semi 1 Cert	Compliance	The semi-annual report pursuant to MI-ROP-N1784-2015 was received on time and complete. A total of five (5) deviations were reported. All of the deviations were fore EUTURBINE, and all were called in to AQD on the same day of the occurrence. Three (3) of the deviations were during a trip of the steam turbine (the steam turbine was off-line), water was being injected, but the load could not be verified. The other two (2) deviations were during normal start-up of the turbine, the system didn't allow water to be injected for a short period of time. Manufacturers guidelines were followed during this startup. The facility does not think that any of these instances resulted in excess emissions, and appropriate action was taken to correct the issues. No further action is required at this time.

Activity Date	Activity Type	Compliance Status	Comments
08/02/2018	Excess Emissions (CEM)	Compliance	<p>The 2nd Quarter Excess Emissions Report pursuant to MI-ROP-N1784-2015 for NOx and SO2 due to Ice fog abatement and emergency fuel use, was received on time and complete. A total of 0.34% CMS downtime, resulting in the same percentage of excess emissions. The excess emissions were due to NOx water being injected at an unknown load. However, the approach used to identify periods of excess emissions is conservative, and are based upon water-fuel injection rates and equipment design.</p>
05/07/2018	ROP Annual Cert	Compliance	<p>The annual certification pursuant to MI-ROP-N1784-2015 was received on time and complete. The annual reports two (2) deviations that was previously reported for the first semi-annual report, and one (1) for the second semi-annual report. The first deviation from April 2017 was for EUTRUBINE, and the control logic sequence not allowing for NOx water to be injected into the gas turbine. This deviation lasted for 1 hour 3 minutes, and occurred during start-up. The facility followed the turbine manufacturers guidelines and introduced water injection at the earliest time allowed for safe and proper operation. The unit is not designed to have water injection during start-up. The second previously reported deviation occurred on the same day in April and occurred on the same day and lasted for 4 hours 50 minutes. It was also related to the control logic sequence injecting water, but at a load that was not verified. Corrective action was taken in both instances to return back to normal operation. The other four (4) deviations for the second semi-annual report were for the same type of instances, occurring in September, and in October. Again, corrective action was taken to return the turbine back to normal operation. Additionally, all time of possible excess emissions were properly reported.</p>

Activity Date	Activity Type	Compliance Status	Comments
05/07/2018	ROP SEMI 2 CERT	Compliance	The semi-annual report pursuant to MI-ROP-N1784-2015 was received on time and complete. A total of four (4) deviations were reported for the reporting period. All of the deviations were for EUTRUBINE, with two (2) specifically for the control logic sequence not allowing for NOx water to be injected into the gas turbine. The facility followed the turbine manufacturers guidelines and introduced water injection at the earliest time allowed for safe and proper operation. The unit is not designed to have water injection during start-up. The other two (2) deviations were also related to the control logic sequence injecting water, but at a load that was not verified. The deviations occurred in September and October. Corrective action was taken in both instances to return back to normal operation.
05/07/2018	Excess Emissions (CEM)	Compliance	The 1st Quarter Excess Emissions Report pursuant to MI-ROP-N1784-2015 for NOx, SO2, Ice fog and emergency fuel was received on time and complete. A total of 0.32% CMS downtime, resulting in the same percentage of excess emissions. The excess emissions were due to NOx water being injected at an unknown load. However, the approach used to identify periods of excess emissions is conservative, and are based upon water-fuel injection rates and equipment design.
03/21/2018	Excess Emissions (CEM)	Compliance	The 4th Quarter Excess Emissions report pursuant to MI-ROP-N1784-2015 was received on time and complete. The facility notes a total of 0.31% monitor downtime, resulting in the same amount of excess emissions during the 1,931.1 hours of operation during the is reporting period. The cause of the downtime and excess emissions, were due to start-up and NOx water injection issues. The facility does state that the reported excess emissions were not true excess emissions due to Ice Fog abatement or NOx due to Emergency Fuel use.

Name: Karolyndis Date: 1/15/2019 Supervisor: [Signature]