

DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

FCE Summary Report

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| Facility : Holland BPW, 48th Street Peaking Station | | SRN : | N2586 |
| Location : 491 E 48th St | | District : | Kalamazoo |
| | | County : | ALLEGAN |
| City : | HOLLAND | State: | MI Zip Code : 49423 |
| | | Compliance Status : | Compliance |
| Source Class : | MAJOR | Staff : | Cody Yazzie |
| FCE Begin Date : | 7/13/2020 | FCE Completion Date : | 7/13/2021 |
| Comments : | The facility has appeared to be in compliance during their most recent inspection. The facility has also been submitting Annual and Semi-Annual ROP certs. Along with Excess emission and CEMS downtime reports. | | |

List of Partial Compliance Evaluations :

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|--------------------|-------------------|---|
| 07/13/2021 | On-site Inspection | Compliance | On-Site Inspection |
| 05/12/2021 | MAERS | Compliance | the facility submitted their MAERS report electronically. |
| 02/09/2021 | ROP Annual Cert | Compliance | There was on deviation that was reported. The deviation was previously reported on the ROP Semi 1 Cert for 2020. The deviation was an exceedance of the 22 ppm operating limit for EUTURBINE9. It occurred due to the unit operating in 'lean-lean' mode the unit was shutdown to stop it from operating in the 'lean-lean' mode. |
| 02/09/2021 | ROP SEMI 2 CERT | Compliance | No deviations were reported. |

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| 02/09/2021 | Excess Emissions (CEM) | Compliance | <p>Part 60 Continuous Emissions Monitoring System Summary Reports. Downtime Events - Duration Report Quality Assurance Testing Linearity Tests</p> <p>The facility submitted excess emissions and monitor downtime reports. The facility reported 0.00 hours of excess emission for UNIT7, UNIT8, and UNIT9. UNIT7 reported 0.92 hours of CEMS monitor downtime. This amount of downtime was 0.39% of the total time the unit was operated. UNIT8 reported 2.38 hours of CEMS monitor downtime. This amount of downtime was 35.42% of the total time the unit was operated. The facility reported that the cause of the downtime was due to the turbine being unable to successfully be started between the dates of 11/24/2020 through 12/15/2020. The facility explained that the plant operators attempted to start the turbine 6 separate times to determine the cause of the problem. In each of the starts the operators were unsuccessful, so the turbine never ran long enough for an online CEMS calibration to be completed. The facility has determined that the generator couldn't produce voltage due to a failed excitation control card. The facility indicated that the necessary repairs are being made and do not foresee further excess downtime due to the issue. UNIT9 reported 0.00 hours of CEMS monitor downtime. This amount of downtime was 0.00% of the total time the unit was operated. The facility did experience a large percentage of operating downtime on Unit 8, however the facility the total time was only 2.38 hours and was due to a non-monitor equipment malfunction that the facility recognized and tried to diagnose. The facility appears to have made the necessary corrections. Staff does not think it is necessary to send a Violation Notice at this time, but may be warranted in the future if the facility has similar issues</p> |
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| 09/29/2020 | CEM RATA | Compliance | <p>2020 CEMS Relative Accuracy Test Audit for Units 7,8, and 9. The facility submitted RATA testing results for Units 7-9. A summary of the testing results are as follows:</p> <p>Unit 9 Relative Accuracy Determination (Lbs/MMBTU) had a Mean difference of 0.00511 and a Relative Accuracy of 14.89%. To pass the Relative Accuracy needs to be less than or equal to 10% or have mean difference of less than or equal to 0.020. Unit 9 passed on the mean of the differences value. Unit 9 Relative Accuracy Determination (PPM @ 15% O₂) had a Relative Accuracy of 13.79% of the mean of the reference method. To pass the Relative Accuracy needs to be less than or equal to 20% of the mean of the reference method or be less than or equal to 10% of the emission limit. Unit 9 appeared to pass on having a Relative Accuracy that was less than 20% the mean of the reference method.</p> <p>Unit 8 Relative Accuracy Determination (Lbs/MMBTU) had a Mean difference of 0.00856 and a Relative Accuracy of 8.12%. To pass the Relative Accuracy needs to be less than or equal to 10% or have mean difference of less than or equal to 0.020. Unit 8 appears to passed on both the mean of the differences value and Relative Accuracy. Unit 8 Relative Accuracy Determination (PPM @ 15% O₂) had a Relative Accuracy of 7.88% of the mean of the reference method. To pass the Relative Accuracy needs to be less than or equal to 20% of the mean of the reference method or be less than or equal to 10% of the emission limit. Unit 8 appeared to pass on having a Relative Accuracy that was less than 20% the mean of the reference method.</p> <p>Unit 7 Relative Accuracy Determination (Lbs/MMBTU) had a Mean difference of 0.12600 and a Relative Accuracy of 4.83%. To pass the Relative Accuracy needs to be less than or equal to 10% or have mean difference of less than or equal to 0.020. Unit 7 appears to passed on Relative Accuracy. Unit 7 Relative Accuracy Determination (PPM @ 15% O₂)</p> |
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| 09/29/2020 | CEM RATA | Compliance | had a Relative Accuracy of 4.90% of the mean of the reference method. To pass the Relative Accuracy needs to be less than or equal to 20% of the mean of the reference method or be less than or equal to 10% of the emission limit. Unit 7 appeared to pass on having a Relative Accuracy that was less than 20% the mean of the reference method. |
| 09/29/2020 | Stack Test | Compliance | Unit 9 - Carbon Monoxide Emissions Test Report: The Stack test results showed that the CO lb/hour emission rate was 2.99 lb/hour of CO emissions. The Facility has a 125 pound per hour limit in the ROP. The facility appears to be in compliance. |
| 09/29/2020 | ROP Semi 1 Cert | Compliance | The facility reported one deviation in which the facility exceeded the 22 ppmv on a dry gas basis at 15% O2 limit specified in Special Condition 1.1 of the ROP under EUTURBINE9. The facility indicated that the exceedance only lasted 1 hour. The reason for the exceedance was due to the unit starting to operate in 'lean-lean' mode, the operators quickly realized this, but had trouble shifting the unit from that operating load while running. The turbine was shut down to stop operating in 'lean-lean' mode. The exceedance was short term only lasting an hour. Staff believes the issue appears to be resolved with the facility taking action shutting down the turbine and getting it operating properly. |

| Activity Date | Activity Type | Compliance Status | Comments |
|---------------|------------------------|-------------------|--|
| 09/29/2020 | Excess Emissions (CEM) | Compliance | <p>The facility submitted excess emissions and monitor downtime reports. The facility reported 0.00 hours of excess emission for UNIT7 and UNIT8. The facility did report 1.00 hours of excess emissions on UNIT9. This was roughly 0.17 of the total UNIT9 operating time. UNIT7 reported 1.55 hours of CEMS monitor downtime. This amount of downtime was 2.37% of the total time the unit was operated. UNIT8 reported 1.23 hours of CEMS monitor downtime. This amount of downtime was 1.59% of the total time the unit was operated. UNIT9 reported 1.75 hours of CEMS monitor downtime. This amount of downtime was 0.30% of the total time the unit was operated. The monitors did have some down time but the amount of time was minimal in which they never exceed 2.37% of a monitors single operating time.</p> |

Name: Cody Young

Date: 9/17/21

Supervisor: RIL 9/22/21