

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

N357048887

FACILITY: GENESEE POWER STATION LIMITED PARTNERSHIP		SRN / ID: N3570
LOCATION: G 5310 NORTH DORT HIGHWAY, FLINT		DISTRICT: Lansing
CITY: FLINT		COUNTY: GENESEE
CONTACT: Kenneth DesJardins , General Plant Manager		ACTIVITY DATE: 05/16/2019
STAFF: Julie Brunner	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Compliance inspection as part of an FCE.		
RESOLVED COMPLAINTS:		

On May 16, 2019, I conducted a scheduled inspection of Genesee Power Station (N3570). This inspection is part of a Full Compliance Evaluation (FCE). This facility was last inspected on May 24, 2017.

Contacts:

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Facility Description:

The Genesee Power Station (GPS) is a 35 Megawatt (MW) electric generating facility consisting of one spreader-stoker boiler with a maximum heat input rating of 523 MMBtu/hr, steam turbine(s), and associated electrical equipment. GPS is owned and operated by Consumers Energy (CMS).

GPS is a dispatch plant. The power plant is on all the time but dispatched at either 10 MW or 35 MW depending on demand. When called on, the plant has approximately one (1) hour (minimum of two (2) hours to stabilize) to get up to load. When brought up, the boiler generally stays up for 8 hours (or 4 – 6 hours). A dispatch plant is rare (based on the power purchase agreement), but CMS has a few.

The boiler is permitted to fire wood-waste including demolition wood, natural gas (for startup), and tire derived fuel (TDF). The facility was permitted to combust animal bedding but has not combusted animal bedding as a fuel since December 3, 2013. References to it were removed from the Renewable Operating Permit (ROP) with the 2018 renewal. Also, GPS has not fired any type of demolition wood since September 23, 2000.

Emissions from combustion of the solid fuels are controlled by a multi-cyclone separator, an electrostatic precipitator (ESP) and a selective non-catalytic reduction system (SNCR). Emissions of carbon monoxide (CO), nitrogen oxides (NO<sub>x</sub>), and sulfur dioxide (SO<sub>2</sub>) are monitored using continuous emission monitoring systems (CEMS). Opacity is monitored using a continuous opacity monitoring system (COMS).

Ancillary equipment include fuel and fly-ash handling systems and storage, a diesel fuel-fired emergency generator, a diesel fuel-fired emergency fire pump, and a parts washer.

The wood-waste fuel which primarily consists of brush and tree trimmings is stored uncovered on seven (7) acres with a six-foot deep clay liner underneath, and is managed in a two-pile system to minimize any potential odors. Bulldozers are used to move the pile of fuel to be processed and fed to the boiler.

The power plant is located in the Dort Carpenter Industrial Park, Genesee Township, Flint. The industrial park is joined by commercial and industrial property at its western boundary. To the north and east is agricultural and residential property. On the southern boundary begins the City of Flint which is urban residential.

Regulatory Overview:

Genesee Power (GP) is a major source of NO<sub>x</sub>, CO, and hazardous air pollutants (HAPs). It is considered a major 40 CFR 70 source and is operating per the conditions contained in Renewable Operational Permit (ROP) No. MI-ROP-N3570-2018.

EU-BOILER at the stationary source is subject to the National Emission Standard for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters promulgated in 40 CFR 63, Subparts A and DDDDD as an existing source. The effective date of the regulation was January 31, 2016.

EUEMERGGEN and EUFIREPUMP at the stationary source are subject to the National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines (RICE) promulgated in 40 CFR Part 63, Subparts A and ZZZZ. This subpart establishes national emission limitations and operating limitations for HAPs emitted from stationary RICE located at major and area sources of HAP emissions. 40 CFR 63, Subpart ZZZZ applies to the RICE located at GPS which is a major source of HAPs.

Emission Unit (EU) Descriptions:

EU-BOILER	The 35 MW electric generation group consists of the wood waste boiler, a selective non-catalytic reduction (SNCR) system, a mechanical multi-cyclone separator (MMS), and an electrostatic precipitator (ESP). The boiler has a spreader-stoker design and is rated at 523 MMBtu/hr, and able to produce 345,000 pounds steam/hr.
EUPARTSWASHER	Parts washer with an air / vapor interface of not more than 10 square feet.
EUFIREPUMP	Emergency diesel fuel-fired engine for backup power to a fire pump (265 hp, 7.0 liters/cylinder) located at a major source of HAP emissions, existing emergency, combustion ignition (CI) reciprocating internal combustion engine (RICE) less than 500 brake hp.
EUEMERGGEN	500 kW emergency backup generator (750 HP) located at a major source of HAP emissions, existing emergency, combustion ignition (CI) reciprocating internal combustion engine (RICE) greater than 500 brake hp.

**Michigan Air Emission Reporting System (MAERS):**

The facility reports to MAERS. It is considered a Category I source and is fee subject. The 2018 MAERS reporting was audited and the following emissions were reported:

Pollutant	Tons per Year (tpy) or Pounds per Year (ppy)
CO	104.2 tpy
Lead (Pb)	9.5 ppy
NO <sub>x</sub>	65.9 tpy
PM10*	3.2 tpy
SO <sub>2</sub>	21.0 tpy
Volatile Organic Compounds (VOC)	4.0 tpy
Hydrogen Chloride (HCl)	4.4 tpy
Mercury (Hg)	0.38 ppy

\* Particulate matter (PM) that has an aerodynamic diameter less than or equal to a nominal 10 micrometers. Number reported is PM only.

Inspection:

Arrived: 9:10 am

Departed: 12:40 pm

Weather: 57°F, SSE @ 8 MPH, UV Index 2

When I arrived, I detected no odors around the facility. There were no visible emissions from any exhaust stack vents.

I was met by Ms. Kathryn Cunningham, Mr. Ken Desjardins, and Mr. George Eurich. We discussed the purpose of my visit and I gave a brief overview of the inspection process. EU-BOILER was currently off-line. There had been a boiler tube leak Tuesday night (May 14<sup>th</sup>) and they were working on the repair. The boiler had been off-line from 1/17/2018 to 7/8/2018 for a steam turbine repair the previous year. The regular spring outage was in April and this had just been completed. This year they have been running a lot at 10 MW due to the market. In May, there have been a few operating hours at higher load (35 MW). If the boiler is operating with an output of 35 MW (high load) then more TDF is in the fuel mix.

**EU-BOILER -**

The boiler is a shaker-stoker where wood is feed from the top at the end of the boiler, and air is added to feed the combustion process. A shaker screen moves off the ash that falls to the bottom. CO spikes when the screen is shaking. The boiler actually hangs from the ceiling. This is to allow for expansion in the boiler due to heat. Two (2) steam turbines used to generate electricity are located right across from the boiler.

A multi-clone separator (MMS) followed by a 3-field ESP is used for particulate control. A programmable logic controller (PLC) is used to continuously monitor ESP performance. Air flow was set at 35-36 scfm (fans still on) and the ESP was energized to control any dust even though the boiler was off-line. The following information was collected during the May 24, 2017 inspection from the screen readouts in the ESP control room when the boiler was operating at that time:

Field #1 (collects 85% of the ash*)	Primary: 123 - 200 amps Secondary: 0.57 - 0.76 amps Response: 47 - 51 sparks/min
Field #2	Primary: 207 - 220 amps Secondary: 0.79 - 0.83 amps Response: 39 - 42 sparks/min
Field #3	Primary: 290 amps Secondary: 1.39 amps Response: 1 - 2 sparks/min

\* Fields can be switched if there is an operating problem with any field.

An operator checks on the ESP performance as part of the plant operator PO rounds once per day (generally at noon). Copies of operator logs for 4/10/2019 to 4/14/2019 show all the systems checked on the PO rounds and documents the rounds. The spring outage is noted as starting on 4/14/2019.

Continuous Monitoring Systems - The continuous monitoring systems measure NOx, SO<sub>2</sub>, and flow per 40 CFR Part 75, and CO and opacity per 40 CFR Part 60. The CEMS were installed in 2010 replacing a previous system. For opacity and flow, new monitors were installed in 2015. Monitoring Solutions is the Data Acquisition System (DAS) provider. They also QA/QC the data before it goes to the Clean Air Markets Division (CAMD). The system provider comes up for review soon. The annual Relative Accuracy Test Audit (RATA) for the CEMS is scheduled for July 16<sup>th</sup> and 17<sup>th</sup>.

During the unexpected outage for 6-months in 2018, the linearity audit for the O<sub>2</sub> CEMS was missed resulting in significant monitor downtime (24-25%) being reported for the monitoring of NOx, SO<sub>2</sub>, and CO. A violation notice (VN) was sent by TPU, and the VN was resolved by correcting the monitor downtime. Also, the DAS was reprogrammed during the unplanned 2018 outage and codes were not being properly flagged by the system (start-up/shutdown, excess emissions, etc.). The DAS programming has been corrected. The CEMS and COMS are operating properly as required by Special Condition (SC) VI.2 and SC VI.3.

In the control room, three (3) operators are at any one time overseeing the boiler operations. There is a controls operator, a fuel operator, and a yard operator. Mr. Dennis Leese, Operations Manager is in the control room at various times and his office is right off the control room. Dennis will be moving to the Maintenance Manager and the Operations Manager position will be posted soon.

Since the boiler was off-line, the following is information obtained during the May 24, 2017 inspection - A screen shot of the operations screen was obtained showing stack flow, load, boiler operating parameters, CEMS output, and calculations. At 10:15 am, the readout in the control room showed that the boiler output was 34.9 MW. The

following 24-hour rolling averages were calculated by the monitoring system at the time of the May 24, 2017 inspection:

Pollutant	Permit Limit	Monitor Results
NOx	0.20 lb/MMBtu (24-hr rolling average)	0.16 lb/MMBtu (24-hr rolling average)
NOx	104.6 lb/hr (24-hr rolling average)	34.3 lb/hr (24-hr rolling average)
CO	0.35 lb/MMBtu (24-hr rolling average)	0.26 lb/MMBtu (24-hr rolling average)
CO	183.1 lb/hr (24-hr rolling average)	59.8 lb/hr (24-hr rolling average)
SO <sub>2</sub>	35.4 lb/hr (24-hr rolling average)	10.7 lb/hr (24-hr rolling average)
Opacity	10% (6-min average)	1.1% (6-min average)

Notes: TDF flow was set at 0.5 ton/hr, and floated between 0 tons/hr to 2.5 tons/hr.

**SNCR -**

For NOx control, urea is injected into the boiler at 3 injection points or levels using a total of 12 lances. The injection points are feed from a urea tank that sits outside the plant wall. Operations staff determine the amount of urea to feed by watching the NOx CEMS and adjust the injection as necessary.

**Emission Limits (Section I) –**

In addition to emission limits for NOx, CO, SO<sub>2</sub>, and opacity which are monitored continuously, there are a number of emission limits (PM, VOC, HCl, and toxic air contaminants) where stack testing is used to demonstrate compliance. Stack testing will be completed at least once during the term of the ROP for regulated pollutants that are not monitored continuously.

There have been no exceedances of the emission limits with the exception of CO and opacity since the last inspection. They have reported excess emissions of CO due to start-up and boiler feed problems after the unexpected outage for 6-months in 2018. They have reported opacity exceedances due to control card problems which tripped the ESP in the fourth quarter of 2018. In the first quarter of 2019, there were opacity exceedances because an inverter/rectifier failed causing the unit to come off-line and tripped the ESP. Opacity exceedances also count as Compliance Assurance Monitoring (CAM) excursions as discussed below. Corrective actions were taken to address exceedances appropriately.

The emission limitations for PM and opacity (as an indicator of compliance with the mass emission limit for PM) from EU-BOILER are subject to the federal CAM regulation under 40 CFR Part 64. Monitoring included in 40 CFR Part 63, Subpart DDDDD is considered to be presumptively acceptable monitoring for the PM emission rate and mass emission limit, and is included in the ROP in FGMACTDDDDDD. The presumptively acceptable monitoring for CAM is as follows:

Pollutant	PTI 265-06C Emission Limits	Boiler MACT Limits	Monitoring Method
PM	3.0 x 10 <sup>-2</sup> lb/MMBtu heat input / 15.7 pph	3.7 x 10 <sup>-2</sup> lb/MMBtu heat input	Performance testing

Pollutant	PTI 265-06C Emission Limits	Boiler MACT Limits	Monitoring Method
Opacity	10% Opacity (6-minute average except one 6-minute average per hour of not more than 20%)	Operating limit of 10% opacity (6-minute average) or less as measured continuously	COMS

#### Fuel Handling and Procurement -

The fuel yard is clay-lined, 5 to 7-acres and is a two-pile system. The stack out pile is the in-coming wood fuel, and the feed pile is the oldest pile. A road divides the two piles. The facility moves the stack out pile to the feed pile within 48-hours to minimize odors. The piles are moved with dozers. The wood piles feed to the clarification building where large chunks of wood are screened out. The large chunks go down a chute, are piled up, and a grinder is bought in later.

Mid-Michigan Recycling (MMR) provides the fuel. (They have staff on-site.) MMR gets waste-wood from Livonia and other mid-Michigan collection centers where utilities and residents can bring in brush and tree trimmings to the MMR yards.

Beside the wood piles is a TDF bunker. A backhoe is used to feed a hopper which feeds / blends 2% tire chips with the wood. The system automatically shuts down when the 20 tons per calendar day permit limit is reached. The TDF is pre-sized and contains some sidewall wires. Not all metal can be removed from the tires in processing. The TDF has a higher Btu content than wood, and will cause spikes in CO. So, the feed rate of TDF is closely controlled and monitored.

#### Fuel Procurement and Monitoring Plan (FPMP) –

The FPMP current revision is dated 1/11/2016. The facility has not accepted demolition wood since September of 2000 but the procedures for inspection and sorting are still in place and maintained in the plan. The FPMP is fully implemented as required by SC III.2.

I collected samples of wood-waste and tire derived fuel (TDF) during my inspection on May 24, 2017. An analysis of the fuel parameters, proximate and ultimate analysis, metals and chlorine was done. The lab results are summarized in an attachment. Sampling results from Spurt Industries and Brink Wood Products (both fuel suppliers to GPS) are included for comparison. They provide scrap wood from cabinet and furniture manufacturers that could include particle wood and wood laminates containing glues, binders or resins, pressed board or any other wood product mixed with glue or filler and not treated with creosol or pentachlorophenol.

#### Material Handling Systems –

The bottom ash (wet) removed from the boiler and fly ash from the ESP and MMS ash go to separate bunkers. The fly ash is conveyed through covered conveyors to a fly ash “house”. Fly ash is mixed/sprayed with water and dropped into a trailer below the mixing system in the fly ash “house”. The ash is moved to a separate covered storage building where all ash is mixed. A backhoe is used to move the ash between the bunkers and storage building. If the ash gets dry it becomes concrete like. A waste hauler empties the ash out of the building. If the boiler is producing 35 MW, ash is hauled 2 to 3 times a week, 4 to 6 truckloads. There were no ash piles or visible emissions in the yard observed during the inspection. The program for continuous fugitive emission control for material handling operations required by SC III.4 is fully implemented.

#### Preventative Maintenance and Malfunction Abatement Plan (PM/MAP) –

The PM/MAP current revision is dated 4/30/2019. Outages are scheduled twice a year in the spring and in the fall. They had just completed the spring outage right before this inspection.

A copy of the memo for “March 2019 Derates” shows that the plant was taken out of service on 3/4/2019, 3/5/2019, and 3/9/2019, and the reason why. This is all part of the PM/MAP required for EU-BOILER in SC III.3 and the monitoring/recordkeeping required in SC VI.6.

#### Emergency Generators Exempt per Rule 285(2)(g) –

The engines are exempt from Rule 201(Permit to Install) but are subject to the ROP program per Rule 212(4).

EUFIREPUMP - The diesel fuel-fired fire pump generator sits in the main plant building.

EUEMERGGEN – The diesel fuel-fired emergency backup generator sits on the east side of the main plant building in its own housing.

The following is a list of specifics for each generator:

Generator	Unit / Engine	Operating Hours	Notes
EUFIREPUMP - diesel fuel-fired	Detroit Diesel, 265 HP, Type #8100, 10x8x17 F size Model # 7064-7312, Serial # 6VA07/289, Pump # 951-95430-01-1	361.7 hours	Horizontal exhaust vent, 7.1 hours year to date (YTD) for maintenance checks.
EUEMERGGEN - diesel fuel-fired, Manf. 04/1995	Cummins Onan Power, 750 BHP, Model # KTTOA19G2, Serial # 62056	2249.7 hours	Vertical exhaust vent. (Not original engine to the facility.) 137.8 hrs YTD - 2.0 hrs maintenance checks; 135.8 hrs emergency use during transformer repairs that put the plant in Black Plant condition. These repairs were executed during the April outage, with the plant returning to line power on 4/21/19.

The engines can operate in non-emergency situations for up to 50 hours per year, and for EUFIREPUMP it is not to exceed 100 hours per year for maintenance checks and readiness testing. For emergency generators, it is assumed that they will operate no more than 500 hours per year at worse-case. Both engines have non-resettable hour meters as required by SC IV.1.

The emergency generators are tested monthly and PM logs are kept for each engine. Logs of operating hours, fuel deliveries, and maintenance are kept as required in Section VII. Monitoring/Recordkeeping. A copy of the 2018 run hours and fuel deliveries, and some of the recently completed Work Order (PM) logs are attached. There was a deviation reported on the 2<sup>nd</sup> Semi-Annual Deviation Report for 2018 that the annual maintenance for EUFIREPUMP did not get documented in the maintenance system even though it was completed. The system documentation issue has been corrected.

The sulfur content of the fuel oil used in the generators is less than 0.0015% by weight as required by the NRLM diesel fuel standard in 40 CFR 80.510(c) and SC II.1.

The emergency engine and fire pump are subject to 40 CFR Part 63, Subparts A and ZZZZ as existing engines. Michigan does not have delegation to implement and enforce this standard, but sources are still required to comply with this standard. No non-compliance with the requirements for 40 CFR 63, Subpart ZZZZ that are in the ROP were noted.

FGMACTDDDDDD -

EU-BOILER is subject to Boiler MACT (40 CFR 63, Subpart DDDDD) in the existing stoker designed to burn wet biomass/bio-based solid fuel boiler subcategory.

EU-BOILER is subject to the following emission limits per the Boiler MACT:

Pollutant	Limit	Time Period/ Operating Scenario	Underlying Applicable Requirements
1. HCl	2.2 x 10 <sup>-2</sup> lb/MMBtu heat input	Hourly	40 CFR 63.7500 Table 2.1a
2. Hg		Hourly	40 CFR 63.7500

	5.7 x 10 <sup>-6</sup> lb/MMBtu heat input		Table 2.1.b
3. CO	720 ppmvd @ 3% O <sub>2</sub>	30-day rolling average except during periods of startup and shutdown	40 CFR 63.7500 Table 2.7.a
4. Filterable PM	3.7 x 10 <sup>-2</sup> lb/MMBtu heat input	Hourly	40 CFR 63.7500 Table 2.7.b

The Boiler MACT emission limits for Hg and HCl are lower than what was assessed in NSR permitting. The Boiler MACT emission limit for filterable PM is higher than what was assessed in NSR permitting.

There were no reported deviations from the requirements in SC I.5 for start-up/shutdown, and information was provided demonstrating compliance with Table 3 to Subpart DDDDD, No. 5 in the last Boiler MACT Semiannual Compliance Report.

The emission rates for PM, Hg and HCl tested in June 2016 and May 2017 were less than 75% of the emission limit. Testing frequency has been reduced to once every 3 years as allowed per 40 CFR 63.7515(b) and SC V.4. The next testing for PM, Hg and HCl is anticipated to be conducted in May of 2020 by GPS. There have been no operational changes since the last performance that could increase emissions.

CO emissions are monitored using a CEMS and continually demonstrate compliance with the emission limit in SC I.3 and the monitoring requirements in SC VI.2. CO and performance test data is submitted to CEDRI as required by SC VII.11. There was a reported deviation on the 2<sup>nd</sup> Boiler MACT Semiannual Compliance Report from the monitoring requirements for significant monitor downtime from July 14 to August 2, 2018 due to a missed linearity audit as discussed above. The issue has been satisfactorily resolved and compliance with SC VI.4 for monitor operation and quality assurance is demonstrated.

Process and operational restrictions demonstrating that the boiler, associated air pollution control equipment and monitoring equipment is operating in a manner consistent with minimizing emissions per SC III.1 and SC III.3 is verified. The last boiler turn-up was conducted on January 17, 2019 as required by SC III.2.

There were no reported deviations to the operating limit of 10% opacity (daily block 6-minute average) as required by Table 4 to Subpart DDDDD, No. 4.a on the last Boiler MACT Semiannual Compliance Report. The COMS is operated in compliance with SC VI.3.

Fuel use as reported on the 2<sup>nd</sup> Boiler MACT Semiannual Compliance Report is as follows:

Biomass – 102,988.83 tons

TDF – 2,188.21 tons

Natural Gas (used in start-up) – 1,663.00 Mcf

All records are kept according to the requirements of Section VI. Monitoring/Recordkeeping.

#### FG-COLD CLEANER (EUPARTSWASHER) –

A small parts washer is located in the maintenance shop. The lid was closed at the time of the inspection and it was not in use. The solvent used is Safety-Kleen Premium Solvent (Virgin and Recycled). According to the Safety Data Sheet (SDS), the solvent contains distillates (petroleum), hydrotreated light (CAS No. 64742-8). The solvent used does not contain any of the materials listed in SC II.1. The parts washer is maintained by Safety-Kleen in compliance with SC III.2. The parts washer meets the applicable requirements in Section IV. Design/Equipment Parameter(s) including an air/vapor interface of no more than ten square feet, emissions only released into the in-plant environment, device for draining parts, and equipped with a cover that shall be closed whenever not in use.

#### Records Review Notes:

All records obtained during the course of this inspection are attached in hard copy to this report.

EU-BOILER -

1. A copy of the record of the monthly and 12-month rolling SO<sub>2</sub> emissions from January-2018 to April-2019 was obtained. The 12-month rolling SO<sub>2</sub> emissions in April-2019 were 28.59 tpy. The highest 12-month rolling SO<sub>2</sub> emissions on this record was 53.56 tons in January-2019 which is below the emission limit of 106 tpy in SC I.4. This record is required to be kept in accordance with SC VI.12 and is satisfactory.
2. A copy of the daily wood burnt/TDF record for 2019 to date was obtained. SC II.2 limits TDF to 20 tons per day. According to the record, the highest amount of TDF combusted was 17.21 tons on 2-18-2019 below the permit limit. The record is kept in accordance with SC VI.8.
3. A copy of the record of the monthly and 12-month rolling Heat Input Capacity By Fuel Type from January-2018 to April-2019 was obtained. The record is kept in accordance with SC VI.8.
  - The annual capacity factor for natural gas as of April-2019 was 0.04%.
  - The annual capacity factor for wood as of April-2019 was 36.76%.
  - The annual capacity factor for TDF as of April-2019 was 2.23%.
4. For March 2019, the following records were obtained, kept in accordance with SC VI.2, SC VI.3, SC VI.4, and SC VI.6:
  - Opacity – Hourly and 24-hour block (calendar day)
  - CO - Hourly and 24-hour rolling average in lb/MMBtu and pph
  - CO – 30-day rolling average in ppmvd @ 3% O<sub>2</sub>
  - NOx - Hourly and 24-hour rolling average in lb/MMBtu and pph
  - SO<sub>2</sub> - Hourly and 24-hour rolling average in pph

I also obtained copies of the Operations Daily Report for MW produced, capacity, urea usage, NO<sub>x</sub>, CO, SO<sub>2</sub>, and opacity for March 2019 and April 2019. For March, the capacity was 30.97% and for April, the capacity was 13.49%. Up to 5 years of operating data is kept in Mitch's old office and then moved to storage. Compliance with the requirements of Section VI for EU-BOILER was demonstrated.

Quarterly reporting of "Excess Emissions and Monitoring Systems Performance" and "Data Assessment Report", semi-annual reporting of monitoring deviations and annual certification of compliance per the requirements of Section VII for EU-BOILER is all submitted in a timely and acceptable manner.

ROP Other Report - Annual ash testing results for 2018 were submitted. Ash was last sampled on 8/28/2018 in accordance with SC V.5 of EU-BOILER.

Summary:

The facility was in compliance with the applicable air quality rules and regulations, and ROP No. MI-ROP-N3570-2018. The VN dated January 10, 2019 for monitor downtime was satisfactory resolved on February 15, 2019.

NAME *Gabe L. Brown* DATE *6/20/19* SUPERVISOR *B.M.*