



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

August 3, 2021

Mr. Kenneth A. DesJardins, General Plant Manager
Genesee Power Station Limited Partnership
G-5310 North Dort Highway
Flint, Michigan 48505

SRN: N3570, Genesee County

Dear Mr. DesJardins:

VIOLATION NOTICE

On July 15, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a Rule 912(3) notification of an excess emissions event from the Genesee Power Station (GPS) located at 5315 Energy Drive, Flint, Michigan. GPS is installed and operating per the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451); the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-N3570-2018.

On July 15, 2021, staff was informed of the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-BOILER	Special Condition (SC) I.8	Exceeded the CO emission limit of 0.35 lb/MMBtu based on a 24-hour rolling average on July 14, 2021.

According to the Carbon Monoxide (CO) Exceedance report received electronically on July 21, 2021 (signed hard copy received July 30, 2021), the exceedance was from 10:00 a.m. to 12:59 p.m. on July 14, 2021. During this time, the highest emission rate of CO from EU-BOILER was 0.379 lb/MMBtu (24-hour rolling average). This is a violation of the applicable requirements in ROP No. MI-ROP-N3570-2018 for EU-BOILER, SC I.8.

The investigation conducted, contributes the exceedance to higher than normal moisture content in the biomass wood fuel, clogging in the feeder grate, and miscommunication between the control room operator and a maintenance vendor. Quarterly preventive maintenance of the continuous emission monitoring system (CEMS) was being conducted.

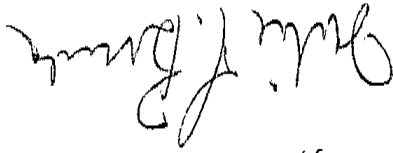
The control room operator thought the entire system was in maintenance mode and did not understand that the CEMS warnings and alarms were real, and that corrective action was needed. Once it was realized the alarms were real, corrective action was taken to minimize emissions and regain compliance by reducing the load from 40 MW-gross to 37 MW-gross. Adjustments were also made in the auxiliary air fan damper. Actions taken to prevent a reoccurrence include creation of a maintenance job plan and updating standard operating procedures (SOPs) with response guidelines and action steps when the boiler is approaching an emission exceedance. The CO Exceedance report includes all the items required by Rule 912(5) and (6).

The actions taken to correct the cited violation and updating SOPs and QA/QC Plans appear appropriate to bring this facility back into compliance.

If you believe the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Julie L. Brunner, P.E.
Environmental Quality Specialist
Air Quality Division
517-275-0415

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olague, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Bradley Myott, EGLE