



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

April 18, 2024

VIA EMAIL

Thomas A. Clift, Plant Manager
Genesee Power Station Limited Partnership
G-5310 North Dort Highway
Flint Michigan 48505

SRN: N3570, Genesee County

Dear Thomas Clift:

VIOLATION NOTICE

On April 3, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Genesee Power Station located at G-5310 N. Dort Highway, Flint, Michigan. The purpose of this inspection was to determine Genesee Power Station's compliance with 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-N3570-2023.

During the records review following the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUBOILER	Special Condition (SC) I.6 / R 336.2810, 40 CFR 52.21(j)	Exceeded the NOx emission limit of 0.20 lb/MMBtu based on a 24-hour rolling average on February 27 and 28, 2024.
EUBOILER	Rule 912/General Condition 25	Failure to provide notice of the emission limit exceedance within 2 days and provide a 10 day follow up report.

Following the inspection, records were requested for February and March 2024, to show compliance with EUBOILER SC VI.4, which requires keeping 24-hour rolling average nitrogen oxides (NOx) emission records. According to the information presented in attachment EUBOILER_4_a.b.c.d.e_1hr and 24hr.pdf, on February 27, 2024, starting at 10:00 until February 28, 2024, at 3:00, the facility exceeded the EUBOILER SC I.6 NOx emission limit of 0.20 lb/MMBtu. During this time, the highest recorded NOx emission was 0.212 lb/MMBtu.

In addition, no notice or written report was submitted following the requirements of R 336.1912 "Rule 912" which requires notice and a written report for any abnormal condition, start-up or shutdown or malfunction that results in emissions in excess of an emission standard. Notices are required within 2 business days after the discovery of abnormal conditions or malfunction. The written report is required within 10 days after the abnormal condition or malfunction has been corrected.

Thomas A. Clift
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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by Thursday, May 9th, 2024, (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Additionally, we would like to request additional records pursuant to MI-ROP-N3570-2023 EUBOILER SC VI.4 for NOx hourly and 24-hour rolling average emissions in lb/MMbtu and pph from April 11, 2022, (the date of the last compliance inspection) to February 1, 2024, (the start of the most recent records request).

Please submit the written response to Matt Karl at EGLE, AQD, Lansing District Office, at KarlM@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If GPS believes 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 and for the cooperation that was extended to me during my inspection of GPS. 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,



Matt Karl
Senior Environmental Quality Analyst
Air Quality Division
517-282-2126

Enclosures

cc: Roxanna Woodard, Genesee Power Station
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Bob Byrnes, EGLE

24 Hour Emissions Average

Plant: GENESEE POWER STATION LP

Interval: 24 Hour

Report Period: 02/01/2024 00:00 Through 03/31/2024 23:59

Time Online Criteria: 1 minute(s)

Date	Time	CO#/HR (LB/HR)	CO#/MM (LB/MMBTU)	NOX#/H60 (LB/HR)	NOX#/MM60 (LB/MMBTU)	SO2#/H60 (LB/HR)
02/26/24	12:00	38.5	0.197	37.1	0.194	10.0
02/26/24	13:00	37.4	0.191	37.1	0.194	9.9
02/26/24	14:00	37.8	0.193	36.9	0.193	9.9
02/26/24	15:00	36.9	0.189	36.7	0.192	9.8
02/26/24	16:00	36.8	0.189	36.6	0.192	9.7
02/26/24	17:00	38.8	0.198	36.6	0.191	9.7
02/26/24	18:00	39.2	0.200	36.6	0.191	9.5
02/26/24	19:00	39.3	0.201	36.6	0.191	9.2
02/26/24	20:00	39.5	0.202	36.8	0.192	8.9
02/26/24	21:00	39.8	0.204	36.9	0.193	8.4
02/26/24	22:00	40.1	0.205	37.1	0.194	8.1
02/26/24	23:00	40.0	0.204	37.2	0.194	7.6
02/27/24	00:00	40.1	0.204	37.2	0.194	7.2
02/27/24	01:00	40.5	0.206	37.2	0.193	6.9
02/27/24	02:00	41.1	0.209	37.2	0.193	6.5
02/27/24	03:00	41.7	0.211	37.2	0.193	6.0
02/27/24	04:00	42.4	0.215	37.2	0.193	5.4
02/27/24	05:00	42.5	0.215	37.4	0.194	5.0
02/27/24	06:00	46.3	0.224	38.3	0.194	4.9
02/27/24	07:00	56.8	0.241	42.0	0.198	4.7
02/27/24	08:00	66.9	0.258	45.3	0.201	4.3
02/27/24	09:00	78.8	0.280	48.8	0.204	4.0
02/27/24	10:00	86.4	0.295	51.5	0.207	3.5
02/27/24	11:00	91.1	0.304	53.2	0.207	3.3
02/27/24	12:00	95.9	0.314	55.0	0.208	3.0
02/27/24	13:00	101.2	0.325	56.8	0.209	2.7
02/27/24	14:00	104.9	0.331	58.6	0.210	2.4
02/27/24	15:00	108.9	0.339	60.4	0.212	2.0
02/27/24	16:00	110.0	0.341	61.3	0.212	1.7
02/27/24	17:00	109.2	0.338	61.2	0.212	1.3
02/27/24	18:00	109.1	0.337	61.1	0.211	1.2
02/27/24	19:00	109.0	0.336	61.0	0.210	1.2
02/27/24	20:00	108.9	0.335	60.8	0.208	1.1
02/27/24	21:00	108.3	0.332	60.6	0.208	1.1
02/27/24	22:00	108.0	0.330	60.5	0.207	1.1
02/27/24	23:00	107.9	0.329	60.4	0.206	1.0

F = Unit Offline

E = Exceedance

M = Maintenance

T = Out Of Control

C = Calibration

S = Substituted

*** = Suspect**

24 Hour Emissions Average

Plant: GENESEE POWER STATION LP

Interval: 24 Hour

Report Period: 02/01/2024 00:00 Through 03/31/2024 23:59

Time Online Criteria: 1 minute(s)

Date	Time	CO#/HR (LB/HR)	CO#/MM (LB/MMBTU)	NOX#/H60 (LB/HR)	NOX#/MM60 (LB/MMBTU)	SO2#/H60 (LB/HR)
02/28/24	00:00	107.9	0.330	60.4	0.206	1.0
02/28/24	01:00	107.9	0.330	60.4	0.206	1.0
02/28/24	02:00	108.1	0.330	60.3	0.205	1.0
02/28/24	03:00	108.0	0.330	60.2	0.205	1.0
02/28/24	04:00	108.0	0.329	59.9	0.203	1.0
02/28/24	05:00	108.0	0.329	59.5	0.201	1.0
02/28/24	06:00	108.3	0.329	60.3	0.203	0.8
02/28/24	07:00	102.5	0.319	58.9	0.202	0.7
02/28/24	08:00	95.0	0.304	57.7	0.200	0.7
02/28/24	09:00	86.7	0.288	55.9	0.197	0.6
02/28/24	10:00	80.6	0.274	55.2	0.197	0.6
02/28/24	11:00	78.3	0.267	55.0	0.196	0.6
02/28/24	12:00	81.6	0.271	56.0	0.196	0.6
02/28/24	13:00	82.1	0.270	57.3	0.198	0.7
02/28/24	14:00	85.6	0.276	57.8	0.198	0.7
02/28/24	15:00	83.4	0.270	57.5	0.197	0.7
02/28/24	16:00	88.9	0.280	59.5	0.199	0.7
02/28/24	17:00	91.5	0.282	60.8	0.199	0.7
02/28/24	18:00	92.5	0.287	60.6	0.198	0.7
02/28/24	19:00	92.2	0.286	60.7	0.199	0.7
02/28/24	20:00	92.1	0.286	60.7	0.199	0.7
02/28/24	21:00	91.9	0.285	60.6	0.199	0.7
02/28/24	22:00	91.5	0.283	60.6	0.199	0.7
02/28/24	23:00	91.3	0.283	60.5	0.200	0.7
02/29/24	00:00	90.8	0.280	60.5	0.200	0.7
02/29/24	01:00	90.8	0.281	60.4	0.199	0.7
02/29/24	02:00	90.1	0.277	60.4	0.200	0.7
02/29/24	03:00	89.3	0.274	60.4	0.200	0.7
02/29/24	04:00	88.1	0.268	60.5	0.201	0.7
02/29/24	05:00	87.5	0.266	60.7	0.202	0.7
02/29/24	06:00	85.7	0.261	60.0	0.200	0.7
02/29/24	07:00	84.7	0.259	58.9	0.197	0.7
02/29/24	08:00	91.9	0.274	59.0	0.197	0.7
02/29/24	09:00	100.5	0.292	59.4	0.197	0.7
02/29/24	10:00	118.6	0.333	59.0	0.194	0.7
02/29/24	11:00	125.8	0.354	58.2	0.193	0.7

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