

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

N673125650

FACILITY: CMS Generation Kalamazoo River Generating Station		SRN / ID: N6731
LOCATION: 6900 EAST MICHIGAN AVENUE, COMSTOCK TWP		DISTRICT: Kalamazoo
CITY: COMSTOCK TWP		COUNTY: KALAMAZOO
CONTACT: Timothy Morrison , Plant operator		ACTIVITY DATE: 06/25/2014
STAFF: Dorothy Bohn	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: announced inspection		
RESOLVED COMPLAINTS:		

This was an announced inspection to ensure that someone would be at the facility. I contacted the company the morning before and scheduled the inspection for the next afternoon. I arrived at 1:15 and met with Tim Morrison, facility operator. I gave Tim a copy of the inspection brochure.

The plant was not operating but AQD staff had observed its operation in March during stack testing. Tim said that installation of a new software system was completed this spring and that they have been doing alot of maintenance. Records show that the unit has fired for 41.8 hours so far in 2014 and generating 1947.9 MW. Most of this was for testing purposes and most was in February. The last times the unit was fired was on June 3rd (to purge the gas line after Consumers Energy (CE) did some cleaning of their gas line) and on May 12th. Tim said that they pre-tested prior to the March test so they could tune-up if needed but they did not need to.

EUCOMBTURB01: A good description of the process is in the 7/13/12 inspection report. The unit is only capable of firing nat. gas. Testing was performed on 3/13/14 and the results were received on 5/1/14 and they showed compliance with the emission limits.

The most recent lab report (DTE Lab) for gas sampling was dated 9/9/13. Tim said they took a sample at the March test but he has not received a report yet. The 9/9/13 report stated 0.0002%S and 0.066 grains S/100 ft3. Methane was 96.934 mol% and the Btus were 1001 & 1006 per dscf. The same report dated 10/16/12 did not have data for sulfur on it, methane was 91.384 mol% and Btus was 944 & 949 Btu/dscf. This sample was taken on 4/16/12. A RTI lab report dated 5/13/12 showed 0.2-2.0 %S.

Tim also showed me monthly records of the gas Btu value, MMBtu of fuel burned (both received from CE), and the hours of firing. These last 2 are submitted with their MAERs each year. The monthly Btus are usually around 1011-1014. The gas flow meter is CE's and serves only the CMS plant. CE calibrates the flow meter usually 2 times a year. I observed calibration reports dated 3/13 and 9/13.

The quarterly EDR report contains the SO2 emissions. At the inspection, I observed one for the 1st quarter of 2014 and all of 2013. On 6/26 Tim emailed me EDR's for 2011-2013 (attached). The data for 2011-2013 is attached. The 1st quarter of 2014 was: 50 hours operation/firing and 38.4 hours of the 50 the breaker was closed (not generating electricity for the grid). They had 0.044 MMBtu of heat input and generated (in tons) 0.0 SO2, 1,651.8 CO2 and 0.6 NOx. Tim showed me annual reports for 2012 and 2013 for Greenhouse gas emissions. For 2012 the total CO2e was 4.513 tons. For 2013 it was 2.381 tons.

Tim said that the inputs for the data acquisition system (DAS) were updated by the company as soon as the results of the March test were received. The company is computing the capacity factor weekly. Year-to-date the current factor is 0.8%. Per 40 CFR, part 75, appendix E, it must be below 10% on a 3 year average and below 20% for any given calendar year or the company must install a NOx CEMS on the turbine.

The designated representative for the Acid Rain (AR) CAIR permits are Jimmy Chong (primary) and Tom Andreski (alternate). In 2013, for AR and CAIR SO2 they used 0 allowances and have a balance of 39 credits. For CAIR NOx and CAIR NOx Ozone season they used 1 credit and the ending balance is 42 for ozone and 105 for annual.

I left at 2:45. The facility seems to be in compliance with its requirements.

NAME Dorothy Bohn DATE 6/26/14 SUPERVISOR N673125650