



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
KALAMAZOO DISTRICT OFFICE



C. HEIDI GRETHER
DIRECTOR

December 12, 2018

Mr. John Reese
Eastern Generation
300 Atlantic Street 5th Floor
Stanford, Connecticut 06901

SRN: N6767, Van Buren County

Dear Mr. Reese:

VIOLATION NOTICE

On September 15, 2018, the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD), observed stack testing at New Covert Generating (Facility), located at 26000 77th Street, Covert, Michigan. The testing was to determine the Facility'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) MI-ROP-N6767-2014c.

During the inspection, staff of the AQD observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FG-TURB/DB1-3	MI-ROP-N6767-2014c, Emission Limits I.9	Facility showed non-compliance on Unit 2 and Unit 3 with the ammonia limit during testing on September 15-17, 2018. Facility failed to shutdown Unit 2 at the earliest possible time and allowed it to run with the overage from September 15 to September 23; and September 29 to September 30, 2018.

The testing results provided to the MDEQ demonstrate that actual emissions of ammonia from Unit 2 and Unit 3 in FG-TURB/DB1-3 process equipment were 10.4 ppmvd and 11.7 ppmvd, respectively. The conditions of ROP MI-ROP-N6767-2014c limit the emissions of ammonia to 10 ppmvd.

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According to the attachments provided in the semi-annual ROP certification, the Facility allowed Unit 2 and Unit 3 to continue to operate with the ammonia overages. Unit 3 was taken down on September 22, 2018, to perform tuning to bring the ammonia emissions back into compliance. Additional testing was done on September 24, 2018, on Unit 3 to demonstrate it was in compliance with the 10 ppmvd limit. The Facility will not be receiving a Violation Notice for Unit 3.

Unit 2 continued running without being tuned. It was brought down on September 23, 2018, and then brought back on-line, without being tuned to address the overage, to run on September 29 and 30, 2018. It was then brought off-line and upgrades began on the turbine. Because of this, the Facility is receiving a Violation Notice for Unit 2.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by January 2, 2019 (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.

Please submit the written response to the DEQ, AQD, 7953 Adobe Road, Kalamazoo, Michigan 49009-5025; and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If the Facility 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. If you have any questions regarding the violation or the actions necessary to bring this Facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Amanda Chapel
Environmental Quality Analyst
Air Quality Division
269-910-2109

AC:CF

cc: Mr. Chris Head, New Covert Generating
Ms. Mary Ann Dolehanty, MDEQ
Dr. Eduardo Olaguer, MDEQ
Mr. Christopher Ethridge, MDEQ
Ms. Jenine Camilleri, MDEQ
Ms. Mary Douglas, MDEQ