

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

P037526185

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| FACILITY: LOWELL LIGHT & POWER (LL&P) | | SRN / ID: P0375 |
| LOCATION: 625 CHATHAM STREET, LOWELL | | DISTRICT: Grand Rapids |
| CITY: LOWELL | | COUNTY: KENT |
| CONTACT: Greg Pierce, General Manager | | ACTIVITY DATE: 07/31/2014 |
| STAFF: Steve Lachance | COMPLIANCE STATUS: Compliance | SOURCE CLASS: SM OPT OUT |
| SUBJECT: Scheduled Inspection for FY '014 | | |
| RESOLVED COMPLAINTS: | | |

This was an unannounced inspection.

SL arrived in the vicinity of the Lowell Light and Power (LLP) facilities (Broadway Street and Chatham Street) at about 1:30 PM, Thursday July 31, 2014. Weather conditions were calm, clear and about 75 F. SL noted no odors, noise, or visible emissions from either facility; neither appeared to be operating at this time.

SL presented himself to the Board and asked for previous contacts, Mr. Greg Pierce (General Manager) and Mr. Tom Russo (Electric Distribution Manager.) The facilities were represented by Mr. Russo during the inspection; and he brought in Mr. "Barney" Barnes (Generation Supervisor) for turbine discussions and observations. SL announced to Mr. Russo his intention to conduct an inspection and presented DEQ's Environmental Inspections: Rights and Responsibilities" brochure.

The turbines in question (2) were permitted by Permit to Install #112-12 on January 18, 2013. Only EUTURBINE1 (the Solar Centaur turbine.) has been fully installed and is operational. It was not operating at the time of the inspection and has not operated since performance testing in May based on economic considerations. Commissioning of EUTURBINE2 (The Rolls Royce turbine with water injection requirements) proceeds, but lags. EUTURBINE2 should be available in 2015.

SL reviewed PTI #112-12 with both Mr. Russo and Mr. Barnes. Key items reviewed and discussed included:

- confirmation of turbine design and fuels (natural gas only for EUTURBINE1; observed nameplate capacity = 3725 kW);
- accepted fuel restrictions (Any changes to these would require permitting action);
- applicability of 40 CFR 60, Subpart GG, which is the source of many of the details within the permit;
- successful testing and reporting in May 2014 for EUTURBINE1;
- preparation and submittal of Startup/Shutdown/Malfunction (SSM) Plans and Malfunction Abatement Plans (MAP) prior to operation of the turbines;
- future notification of startup for EUTURBINE2;
- required monitoring of operation and fuel use;
- required performance testing, including notification and reporting (Completed for EUTURBINE1);
- 12-month rolling records of fuel use and emissions; and
- maintenance and availability of all these records.

During the 2013 inspection (prior to turbine operations), SL had outlined what a records spreadsheet might look like, including the provision for 12-month rolling time periods. These discussions had been incorporated into existing records (attached); and requested records were readily available.

SL observed the EUTURBINE1 gas meter; and the reading corresponded to the supplied records. Units on this meter are x100cf.

SL had worked with Mr. Barnes for MAERS reporting in EI2013, and Mr. Barnes is aware of the fuel usage records requirements and how this will interface with MAERS for future reporting.

At the conclusion of the inspection, SL let Mr. Russo know that he considered the facility to be in compliance; and that a copy of the report would be forthcoming.

Attachment; Solar Operation Log for 5/30/14

NAME



DATE

8-1-14

SUPERVISOR

