



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
GRAND RAPIDS DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

May 23, 2017

Mr. David Walters, General Manager
Grand Haven Board of Light and Power - J.B. Sims Generating Station
1231 North Third Street
Grand Haven, Michigan 49417

SRN: B1976, Ottawa County

Dear Mr. Walters:

VIOLATION NOTICE

On April 28, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received the first (1st) quarter stack test results, including the quarterly PM results and the inlet CEMS data and reports from Grand Haven Board of Light and Power – J.B. Sims Generating Station (J.B. Sims) located at 1231 North Third Street, Grand Haven, Michigan. The reports were used to determine J.B. Sims' 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 40 CFR Part 63, Subpart UUUUU for Coal – and Oil – Fired Electric Utility Generating Units (Mercury and Air Toxics Standards (MATS)).

Upon reviewing the report staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
Coal Fired Boiler #3	40 CFR 63.10021(a), 40 CFR 63.10021(d)(1), 40 CFR 63.10021(d)(2), and Table 7(4)	Failure to conduct stack testing to show compliance with the Mercury and Air Toxics Standards (MATS)

J.B. Sims is subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coal – and Oil – Fired Electric Utility Steam Generating Units. These standards are found in 40 CFR Part 63, Subpart UUUUU. This subpart requires quarterly performance testing be conducted to show compliance with the Mercury and Air Toxics Standards, which J.B. Sims did not conduct. Additionally, no formal notification was submitted to request use of an alternative method of compliance as allowed under 40 CFR 63.10030(e)(7)(iii)(A), including the use of a Part 75 Certified SO₂ CEMS.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by June 13, 2017 (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.

If J.B. Sims 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 your cooperation in the matter. 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,



Kaitlyn DeVries
Environmental Quality Analyst
Air Quality Division
616-356-0003

cc: Ms. Heidi Hollenbach, DEQ
cc/via e-mail: Ms. Lynn Fiedler, DEQ
Ms. Mary Ann Dolehanty, DEQ
Mr. Chris Ethridge, DEQ
Mr. Thomas Hess, DEQ