



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
SAGINAW BAY DISTRICT OFFICE



DAN WYANT  
DIRECTOR

May 28, 2014

Brian J. Vokal  
Midland Cogeneration Venture  
100 Progress Place  
Midland, MI 48640

SRN: B6527, Midland County

Dear Mr. Vokal:

**VIOLATION NOTICE**

On May 8, 2014, the Michigan Department of Environmental Quality (MDEQ), Air Quality Division (AQD) received notification from Midland Cogeneration Venture (MCV) of a failure to perform an emission test per requirements contained in MI-ROP-B6527-2008b issued to MCV located at 100 Progress Place, Midland, Michigan. MCV failed to comply with the following condition:

Process Description	Rule/Permit Condition Violated	Comments
FG-BOILERS1-6 (Six 370 MMBtu/hr natural gas-fired cycling boilers controlled by low NOx burner technology and flue gas recirculation. Each capable of supplying 250,000 lb/hr steam at 800 psig and 750°F)	FG-BOILERS1-6 Special Condition V. 1. Conduct a performance emission test for PM, PM10 and VOC emission rates once every five years	Not Federally required per NSPS  Rolled into ROP from PTI No.351-07

MCV determined that four of the six boilers were last tested in October 2008. This constitutes a violation of MI-ROP-B6527-2008b, FG-BOILERS1-6, Special Condition V.1., which requires that the facility conduct a performance emission test on the boilers for PM, PM10, and VOC emission rates once every five years.

On May 16, 2014, the AQD received a letter detailing the actions initiated by MCV to correct the cited violation. The written response included a commitment to conduct a performance emission test for PM, PM10, and VOC emission rates on all six boilers. The facility also requested a review of the appropriateness and the authority to require a performance test on natural gas fired boilers for PM, PM10, and VOC once every five years. MCV proposed that the FG-BOILERS1-6 performance emission test be conducted upon written request of the MDEQ AQD.

The AQD files indicate that MCV's PTI application included a demonstration to show emissions would not exceed Prevention of Significant Deterioration (PSD) criteria for PM10, NOx, CO, and VOC. Emissions of PM10, NO2, and CO were modeled and

shown to be in compliance with both National Ambient Air Quality Standards (NAAQS) and PSD increment consumption parameters. Emissions of PM10, CO, and VOC would be expected to remain constant and not vary, as long as good combustion is maintained. The New Source Review (NSR) permit was issued with testing for PM, PM10, and VOC every five years. This requirement was carried forward to the ROP.

The AQD concurs with the proposed testing schedule and change to the testing requirement in your letter received May 16, 2014. No additional response to this Violation Notice is necessary.

If MCV believes the above observations or statements are inaccurate or do not constitute a violation 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 number listed below.

Sincerely,



Kathy L. Brewer  
Environmental Quality Analyst  
Air Quality Division  
(989) 894-6214  
Email: brewerk@michigan.gov

KLB/ai

cc: Ms. Barbara VanderKelen, MCV  
Mr. Chris Hare, DEQ  
cc/via email: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ