



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



PHILLIP D. ROOS
DIRECTOR

November 4, 2024

VIA E-MAIL AND USPS

Kyle Creason
Grayling Generating Station, LP
4400 West Four Mile Road
Grayling, Michigan 49738

SRN: N2388; Crawford County

Dear Kyle Creason:

VIOLATION NOTICE

A Relative Accuracy Test Audit (RATA) of the high load exhaust gas flow of EUBOILER has been conducted at the Grayling Generating Station, LP (GGS) located at 4400 West Four Mile Road, Grayling, Crawford County on October 15, 2024. The continuous emission monitoring systems (CEMS) are installed in the EUBOILER exhaust to satisfy United States Environmental Protection Agency (USEPA), Title 40 of the Code of Federal Regulations (40 CFR), Part 75, monitoring requirements, the Cross State Air Pollution Rule (CSAPR), and 40 CFR, Part 60, Subpart Db, as specified in State of Michigan Renewable Operating Permit (ROP) MI-ROP-N2388-2014a. The purpose of the exhaust gas flow RATA conducted on October 15, 2024, was to comply with the periodic quality assurance required in the consent order entered by the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) and GGS on July 28, 2022 (EGLE AQD ACO 2022-14).

Renewable operating permit MI-ROP-N2388-2014a requires the facility to calibrate, maintain, and operate the CEMS on EUBOILER in accordance with the procedures set forth in 40 CFR, Part 60.13 and Appendix B, 40 CFR, Part 60, or 40 CFR, Part 75, as appropriate.

The following permit condition has been violated as part of the above referenced high load exhaust gas flow RATA conducted on October 15, 2024:

Process Description	Rule/Permit Condition Violated	Comments
EUBOILER	MI-ROP-N2388-2014a, EUBOILER, IV, 2	The CEMS shall be installed, calibrated, maintained, and operated in accordance with the procedures set forth in 40 CFR 60.13 and Appendix B, 40 CFR, Part 60, or 40 CFR, Part 75, as appropriate.

40 CFR, Part 75.20(b)(3)(vii)(E)(2) requires the average reference method reading and the average CEMS reading for the run differ by no more than $\pm 10\%$ of the average reference method value. Also, 40 CFR, Part 75.20(b)(3)(vii)(F) are required if the results of any RATA run(s) are outside the limits in paragraphs (b)(3)(vii)(E)(1) or (2) of this section or if the CEMS is

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repaired, re-linearized or reprogrammed after the RATA run(s), the run(s) shall be counted as a failed linearity check or RATA attempt.

The first three runs (R1, R2, and R3) were found to differ greater than 10% and therefore the load of EUBOILER was reduced from 310 KLBH to 290 KLBH for R4. Load was reduced again to 280 KLBH for R5-R15 to improve the CEMS and RM relative accuracy. Preliminary RA results yielded a 10.79% RA after R12. Therefore, R1-R3 was considered an aborted RATA and R4-R15 are thus being utilized for the high load exhaust gas flow RATA attempt and will be relabeled as R1-R12 in the test report.

Please initiate actions necessary to correct the cited violation and submit a written response to the Violation Notice by November 29, 2024. The written response should include: the dates of 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 Grayling Generating Station, LP believes the above observations or statements are inaccurate or do not constitute violation(s) of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

The *signed* written response to this violation notice, may be submitted by mail and directed to Jeremy Howe at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. You must also include a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760. The response may be scanned and e-mailed to HoweJ1@Michigan.gov and CamilleriJ@Michigan.gov.

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 or e-mail listed below.

Sincerely,



Trevor Drost
Environmental Quality Analyst
Air Quality Division
517-425-5781
DrostT@Michigan.gov

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jeremy Howe, EGLE
Shane Nixon, EGLE
Jenine Camilleri, EGLE
Rebecca Radulski, EGLE