

DEPARTMENT OF ENVIRONMENTAL QUALITY

AIR QUALITY DIVISION

**FCE Summary Report**

Facility : GENESEE POWER STATION LIMITED PARTNERSHIP		SRN : N3570
Location : G 5310 NORTH DORT HIGHWAY		District : Lansing
		County : GENESEE
City : FLINT	State: MI	Zip Code : 48505
Compliance Status :		Compliance
Source Class : MAJOR	Staff : Julie Brunner	
FCE Begin Date : 8/1/2015	FCE Completion Date :	8/30/2016
Comments :		

**List of Partial Compliance Evaluations :**

Activity Date	Activity Type	Compliance Status	Comments
08/26/2016	MACT (Part 63)	Compliance	Notification of Compliance Status - Boiler MACT pursuant to 40 CFR 63.7545(e). Performance test on 5/18 -19/2016 combusting 100% biomass at a heat input rate of 281.5 MMBtu/hr to 529.9 MMBtu/hr. PM results: 0.00131 lb/MMBtu HCl results: 0.0134 lb/MMBtu Hg results: 2.87E-7 lb/MMBtu

Activity Date	Activity Type	Compliance Status	Comments
08/26/2016	ROP Qrtly Cert	Compliance	<p>ROP No. MI-ROP-N3570-2012. Resp. Official is Kenneth A. DesJardins. 2nd quarter 2016 deviation report, excess emissions and emission monitoring summary report for EUBOILER. Deviations: CEMS out of service (4/12/2016 - 8hrs) due to 2nd quarter audit and linearity testing. SO2 analyzer calibration failures (4/18/2016 - 34 mins) due to analyzer drifting high from dirty inlet filter; spanned, recalibrated, and returned to normal operation. Moisture in sampling line (4/25/2016, 4/26/2016 - 25 mins) cleared moisture and changed filters then put system back in operation. O2 leak in stack sampling line (5/29/2016 - 2 hrs, 58 mins); CEM out of service while repairing line leak then returned to service. CO analyzer sampling pump failure (6/15/16 - 1 hr), replaced pump, spanned, re-calibrated, and put back in service. No excess emissions were reported. Total SO2 CEMS downtime was 0.55% of operating time. Total NOx CEMS downtime was 0.52% of operating time. Total CO CEMS downtime was 0.56% of operating time. Total Opacity CEMS downtime was 0.37% of operating time.</p>
08/26/2016	ROP Semi 1 Cert	Compliance	<p>ROP No. MI-ROP-N3570-2012. Resp. Official is Kenneth A. DesJardins. Deviation report of the first 6-months of 2016. All information previously submitted on the quarterly reports.</p>
06/28/2016	Other	Compliance	<p>Re-test for Genesee Power Station (ROP No. MI-ROP-N3570-2012) for Boiler MACT, 40 CFR 63, Subpart DDDDD. Justification for worse-case fuel reviewed.</p>

Activity Date	Activity Type	Compliance Status	Comments
06/13/2016	ROP Qrtly Cert	Compliance	MI-ROP-N3570-2012. Resp. Official is Kenneth A. DesJardins. First quarter 2016 emission monitoring and summary report for the boiler. CEMS downtime (2/3/2016 - 3hr, 46 minutes) due to 1st quarter audit calibrations. CEMS downtime (1/23 to 3/30/2016 - 1 hr, 15 min) for auto calibration failures during the quarter. NOx analyzer had plugged internal sampling line. SO2, NOx, CO, and opacity - Downtime of 0.20 to 0.24% includes 3.46 hours of downtime for quarterly audit calibrations, 1.42 hours of morning calibration failure due to NOx analyzer plugged internal sampling line. Cleaned, re-spanned, re-calibrated, passed, and put back in operation.
05/18/2016	Scheduled Inspection	Compliance	Partial inspection in coordination with an observation of a stack test for Genesee Power Station (ROP No. MI-ROP-N3570-2012)
05/18/2016	Stack Test Observation	Compliance	Observation of a stack test for Genesee Power Station (ROP No. MI-ROP-N3570-2012) see inspection report on 05/18/2016 for details.
04/14/2016	ROP Other	Compliance	ROP Other Certification for ROP No. MI-ROP-N3570-2012, Responsible Official: Kenneth A. DesJardine. Test protocol to measure HCl, Hg, and PM emission rates on a heat input basis and mass hourly per ROP No. MI-ROP-N3570-2012 and 40 CFR 63, Subpart DDDDD. Testing is tentatively scheduled for May 18 and 19, 2016.
03/22/2016	ROP Annual Cert	Compliance	MI-ROP-N3570-2012. Resp. Official is Kenneth A. DesJardins. All deviations previously reported on quarterly reports.

Activity Date	Activity Type	Compliance Status	Comments
03/22/2016	ROP Qrtly Cert	Compliance	MI-ROP-N3570-2012. Resp. Official is Kenneth A. DesJardins. Fourth quarter 2015 emission monitoring and summary report for the boiler. SO2 - Downtime of 0.58% includes over 7 hours of downtime while doing 4th quarter PM's on the CEMDAS Unit, and downtime for monthly maintenance, and analyzer morning calibration failures. NOx - Downtime of 0.48% includes over 7 hours of downtime while doing 4th quarter PM's on the CEMDAS Unit, and downtime for monthly maintenance, and analyzer morning calibration failures. CO - Downtime of 0.47% includes over 7 hours of downtime while doing 4th quarter PM's on the CEMDAS Unit, and downtime for monthly maintenance, and analyzer morning calibration failures. Opacity - Downtime of 1.84% includes over 7 hours of downtime while doing 4th quarter PM's , and 33.5 hours due to stack inter liner dropping 4" causing misalignment of the opacity ports. Temporary repairs made with permanent repairs scheduled during spring 2016 outage.
03/18/2016	ROP SEMI 2 CERT	Compliance	MI-ROP-N3570-2012. Resp. Official is Kenneth A. DesJardins. Four deviations reported for EUBOILER. SO2 failed auto calibration - 7/7 & 9/6, 2 hrs 32 mins re-spanned, recalibrated and put back in service; 10/9 & 12/11, 2 hrs 25 mins re-spanned, recalibrated and put back in service. On 8/13, numerous opacity spikes during 15-hr RATA test due to tester equipment movement. On 8/13 & 10/27, analyzer downtime of 16 hrs 48 mins for quarterly CEMS PM. On 11/10, opacity analyzer out of service due to slippage of stack inter liner which caused the opacity ports to shift misaligning the transceiver to the reflective lens. Manually took opacity reading during repair and notified AQD of issue.

Activity Date	Activity Type	Compliance Status	Comments
03/18/2016	MAERS	Compliance	Electronic received in on 3/9/16. ROP cert received 3/14/16. Audited.
03/18/2016	ROP Qrtly Cert	Compliance	4Q 2015MI-ROP-N3570-2012. Resp. Official is Kenneth A. DesJardins. Three deviations reported for EUBOILER. On 11/10, opacity analyzer out of service 33 hrs 5 min due to slippage of stack inter liner which caused the opacity ports to shift misaligning the transceiver to the reflective lens. Manually took opacity reading during repair and notified AQD of issue. 10/9 & 12/11, 2 hrs 25 mins monitor out of control for NOx, SO2, and CO due to failed calibration. On 10/27, analyzer downtime of 8 hrs 37 mins for quarterly CEMS PM.
02/08/2016	Other		ROP No. MI-ROP-N3570-2012 - Received a revised Fuel Procurement and Monitoring Plan with the removal of references to animal bedding. Animal bedding has not been used as a fuel since December 3, 2013.
01/04/2016	ROP Qrtly Cert	Compliance	MI-ROP-N3570-2012. Resp. Official is Kenneth A. DesJardins. Third quarter 2015 emission monitoring and summary report for the boiler. Replaced opacity and flow analyzers, 8/2&4/2015. SO2 - Downtime of 1.30% includes 1.28 hours of spanning and recalibrating SO2 analyzer due to various morning calibration failures, start-ups, shutdowns, and RATAs. NOx - Downtime of 1.39% includes 1.28 hours of spanning and recalibrating due to various morning calibration failures, start-ups, shutdowns, and RATAs. CO - Downtime of 1.40% includes 1.28 hours of spanning and recalibrating due to various morning calibration failures, start-ups, shutdowns, and RATAs. Opacity - Downtime of 5.04% includes 1.28 hours of spanning and recalibrating due to various morning calibration failures, start-ups, shutdowns, and RATAs.

11/16/2015	Telephone Notes	Compliance	<p>Mitchell Hefner (EH &amp; S Technician, Genesee Power Station) called on 11/12 and 11/13 to notify me that the new opacity monitors appeared to have operational issues. Visual emissions were being taken manually while working to identify the problem. Below is the chronology of events from Mitch's 11/16/2015 email:</p> <p>The following is a chain of events for the miss alignment and minor repairs of our 6" Opacity Probe Port.</p> <ul style="list-style-type: none"> <li>• 11/12/2015 @ 0153 Opacity Alarm came in, it went straight to 88.8 %</li> <li>• 11/12/2015 @ 0250 Plant Operator climbing stack to investigate issue. Adrian Monitoring Solution Tech. Rep. on the phone talking Plant Operator thru trouble shooting procedures.</li> <li>• 11/12/2015 @ 0415 Plant Operator off the stack, completed trouble shooting with Monitoring Solution Tech. by phone they found no issues with Opacity Analyzer.</li> <li>• 11/13/2015 @ 0745 Rick from Monitoring Solution's climbing the stack to validate the Opacity Analyzer.</li> <li>• 11/13/2015 @ 0815 Rick came down off the stack, the Opacity Analyzer passed all its Alignment testing. Rick had pictures of the Opacity Probe Port that he believes is the issue.</li> <li>• 11/13/2015 @ 1326 Germain Tech. Rep. from Cadillac Fabrication up the stack to investigate the Opacity Probe Port issue. He confirms that the port has moved 4" downward.</li> <li>• 11/13/2015 @ 1400 Germain is off the stack, Germain and Tim Stillwell making planes for minor repairs to the Opacity Probe Port.</li> <li>• 11/14/2015 @ 0910 Germain is on the stack making minor repairs to the Opacity Probe Port.</li> <li>• 11/14/2015 @ 1048 Germain is off the stack and the minor repairs have been made, currently the Opacity Probe Port was realigned and currently we are reading 1.8% on Opacity.</li> </ul>
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11/16/2015	Telephone Notes	Compliance	Maintained a 15 minute visual on stack during entire time, logging it in the Control Room Log book. All this will be noted in 4th Quarter ROP report for 2015.
10/12/2015	CEM RATA	Compliance	MI-ROP-N3570-2012. Resp. Official is Kenneth A. DesJardins. RATA and ash report.
10/12/2015	CEM RATA	Compliance	MI-ROP-N3570-2012. Resp. Official is Kenneth A. DesJardins. Certification reports for new flow and opacity analyzers which were certified also on high, mid and low flow ranges during the 8/21/2015 Annual Stack RATA testing.
08/28/2015	ROP Qrtly Cert	Compliance	MI-ROP-N3570-2012. Resp. Official is Kenneth A. DesJardins. Second quarter 2015 emission monitoring and summary report for the boiler. 1. CEMS out of service while performing 2nd quarter audit and linearity testing. Duration of deviation was 4 hours and 1 min. 2. On 4/7/15, SO2 internal sample lines and filter plugged off due to some carry over from boiler on line cleaning. Lines cleaned and system returned to normal operation. Duration of deviation was 50 min. Total CEMS downtime of 0.22% for the reporting period.

Activity Date	Activity Type	Compliance Status	Comments
08/25/2015	ROP Semi 1 Cert	Compliance	<p>MI-ROP-N3570-2012. Resp. Official is Kenneth A. DesJardins. Five deviations reported for EUBOILER. 1. There were 94.7 hours of non-monitoring equipment malfunctions between Feb. and March 2015 - stack probes for the opacity analyzer has corrosion and local contractor has made temporary support brackets to get through to the Spring outage when permanent repairs will be made. 2. CEMS system downtime of 9 hours and 5 minutes for 1st Quarter audit calibrations. 3. CEMS DAS unit failed various auto calibrations during Quarter. Checked zero and span, re-ran calibrations and unit passed. Duration of deviation was 1 hour and 5 minutes. 4. CEMS unit out of service while performing 2nd Quarter audit and linearity testing. Duration of deviation was 4 hours and 1 minute. 5. SO2 analyzer calibration failures on 4/7/2015 due to internal sample lines and filters plugging off with some carry over from boiler on line cleaning. Cleaned sample lines and returned system to normal operation.</p>

Name: Julie L. Bauer Date: 8/30/16

Supervisor: B. M.