

N6631
MAWILA

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

N663130919

FACILITY: DEARBORN INDUSTRIAL GENERATION		SRN / ID: N6631
LOCATION: 2400 MILLER RD, DEARBORN		DISTRICT: Detroit
CITY: DEARBORN		COUNTY: WAYNE
CONTACT: Thomas Andreski, EHS & Compliance Coordinator		ACTIVITY DATE: 08/19/2015
STAFF: Jonathan Lamb	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Compliance inspection, FY 2015		
RESOLVED COMPLAINTS:		

INSPECTED BY: Jonathan Lamb, MDEQ-AQD
PERSONNEL PRESENT: Tom Andreski, EHS & Compliance Manager
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FACILITY BACKGROUND:

Dearborn Industrial Generation, LLC ("DIG") is a fossil fuel electrical power generation facility operating in a heavy industrial area in Dearborn since 1999; the facility is adjacent to Double Eagle Steel and across Miller Road from AK Steel. The facility has maximum capacity to produce 750 MW of electricity instantaneously. 16-17.5 MW is used for power on site while the rest goes to the grid. The facility also produces steam which is sold to AK Steel and Double Eagle Steel.

The facility is an existing PSD source and subject to the Title V program. The facility is also subject to 40 CFR Part 75 (Acid Rain) and 40 CFR Part 97 (CAIR).

The facility operates 24 hours per day/7 days per week and has 27 employees.

COMPLAINT/COMPLIANCE HISTORY:

There have been no complaints against the facility or violations issued since the last full compliance inspection in August 2013.

PROCESS DESCRIPTION/EQUIPMENT:

DIG has three boilers which power a 250 MW steam turbine to generate electricity. The boilers can run on either 100% natural gas or a blend of natural gas and blast furnace gas from AK Steel, usually at a ratio of 95% natural/5% blast furnace gas. The facility usually operates two boilers at a time. The boilers are subject to 40 CFR Part 60, Subparts A and Db - NSPS for Industrial-Commercial-Institutional Steam Generating Units.

There are three natural gas-fired turbines – two combined cycle turbines and one single cycle turbine. The three turbines are subject to 40 CFR Part 60, Subparts A and GG – NSPS for Stationary Gas Turbines.

There are two diesel-fired emergency generators. The generators have not been used for any extensive period of time, but are tested weekly to make sure they are operating properly.

There are two flares located on AK Steel's property but are owned by DIG. These flares burn blast furnace gas produced at AK Steel in excess of what can be burned as fuel in the boilers.

APPLICABLE RULES/ PERMIT CONDITIONS:

DIG operates under Renewable Operating Permit (ROP) No. MI-ROP-N6631-2012, renewed on March 28, 2012. The facility was issued a permit modification, Permit to Install (PTI) No. 72-15, on August 12, 2015, to upgrade the hardware and software of the turbines to increase the performance and capacity of the units.

However, for the purpose of this compliance inspection, only ROP No. MI-ROP-N6631-2012 was evaluated to determine compliance.

Emission and production records from January 2013 through July 2015 were evaluated to determine compliance during this inspection. These records can be found in the orange facility file.

ROP No. MI-ROP-N6631-2012; applicable permit conditions:

B. SOURCE-WIDE CONDITIONS

I. Emission Limits

1. IN COMPLIANCE. 12- month rolling total formaldehyde emissions are below the permit limit of 9.9 tons per 12-month rolling time period. Highest 12-month total since January 2012 was 3.83 tons in July 2015.

V. Testing/Sampling

1. IN COMPLIANCE. Testing for formaldehyde emission rates was performed from August 27-30, 2012. Results were reported to AQD on October 26, 2012.

2. IN COMPLIANCE. A test plan was submitted to AQD on July 13, 2012, more than 30 days prior to testing.

VI. Monitoring/Recordkeeping

1. IN COMPLIANCE. Monthly and 12-month rolling total records of formaldehyde emissions are maintained for each boiler and turbine, in accordance with the "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP-MI-N6637-2004", dated May 31, 2011.

2. IN COMPLIANCE. No amendments have been made to the "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP-MI-N6637-2004" since the May 31, 2011, submittal.

VII. Reporting

1, 2, and 3. IN COMPLIANCE. Annual and Semi-Annual Deviation Reports are submitted in a timely manner.

C. EMISSION UNIT CONDITIONS

EUCTG1 – one simple cycle GE Model PG7241 natural-gas fired combustion turbine

1. Emission Limits

Pollutant	Limit	Highest Actual	Compliance Status
1. NOx as NO2	9 ppmv	7.56 ppmv (March 2015 RATA)	IN COMPLIANCE
2. NOx as NO2	60 pph; monthly average	27.9 pph (Feb. 2015)	IN COMPLIANCE
3. CO	9 ppmv	Data Not Available	NOT EVALUATED
4. CO	30 pph; monthly average	1.1 pph (Jan. 2014)	IN COMPLIANCE
5. VOC	2.8 pph; monthly average	0.26 pph (Feb. 2015)	IN COMPLIANCE
6. PM10	9 pph; monthly average	2.2 pph (Feb. 2015)	IN COMPLIANCE

V. Testing/Sampling

1. IN COMPLIANCE. Testing to verify PM10 and VOC emission rates was performed from August 27-30, 2012. Results were received by AQD on October 26, 2012. The PM10 test was not valid, so a second test was performed from November 5-10, 2012, with results reported to AQD on December 10, 2012.

2. IN COMPLIANCE. A test plan was submitted to AQD on July 13, 2012, more than 30 days prior to testing.

VI. Monitoring/Recordkeeping

1. IN COMPLIANCE. Natural gas usage rate is monitored and recorded on an hourly and daily basis. Natural gas is sampled monthly to determine heating value.

2. IN COMPLIANCE. Facility uses a PEMS to monitor NOx emissions on a continuous basis.

3. IN COMPLIANCE. Facility uses a PEMS to monitor CO emissions on a continuous basis.

4. IN COMPLIANCE. Facility maintains all emission and operational records required by this condition.

5. IN COMPLIANCE. Facility follows the procedures contained in the document titled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP-MI-N6637-2004", dated May 31, 2011.

6. IN COMPLIANCE. No amendments have been made to the "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP-MI-N6637-2004" since the May 31, 2011, submittal.

VII. Reporting

1, 2, and 3. IN COMPLIANCE. Annual and Semi-Annual Deviation Reports are submitted in a timely manner.

VIII. Stack/Vent Restrictions

1. IN COMPLIANCE. Stack dimensions appear to meet permit specifications.

IX. Other Requirements

1. IN COMPLIANCE. Facility follows the protocol delineated in in the EPA's April 5, 2006, approval letter for the use of a PEMS to monitor NOx emissions.

2. IN COMPLIANCE. Facility follows the protocol delineated in Performance Specification 16 in Appendix B of 40 CFR Part 60.

EUCTG2 – one combined cycle GE Model PG7241 natural gas-fired combustion turbine

1. Emission Limits

Pollutant	Limit	Highest Actual	Compliance Status
1. NOx as NO2	9 ppmv	7.88 ppmv (March 2015 RATA)	IN COMPLIANCE
2. NOx as NO2	63 pph; monthly average	46.3 pph (Feb. 2015)	IN COMPLIANCE
3. CO	9 ppmv	1.2 ppmv (March 2015 RATA)	IN COMPLIANCE
4. CO	31 pph; monthly average	4.2 pph (Feb. 2015)	IN COMPLIANCE
VOC	2.8 pph; monthly average	0.26 pph (Feb. 2015)	IN COMPLIANCE
PM10	9 pph; monthly average	1.8 pph (Feb. 2015)	IN COMPLIANCE

V. Testing/Sampling

1. IN COMPLIANCE. Testing to verify PM10 and VOC emission rates was performed from August 27-30, 2012. Results were received by AQD on October 26, 2012. The PM10 test was not valid, so a second test was performed from November 5-10, 2012, with results reported to AQD on December 10, 2012.

2. IN COMPLIANCE. A test plan was submitted to AQD on July 13, 2012, more than 30 days prior to testing.

VI. Monitoring/Recordkeeping

1. IN COMPLIANCE. Natural gas usage rate is monitored and recorded on an hourly and daily basis. Natural gas is sampled monthly to determine heating value.

2. IN COMPLIANCE. Facility uses a PEMS to monitor NOx emissions on a continuous basis.

3. IN COMPLIANCE. Facility uses a PEMS to monitor CO emissions on a continuous basis.

4. IN COMPLIANCE. Facility uses a PEMS to monitor O2 concentration on a continuous basis.

5. IN COMPLIANCE. Facility maintains all emission and operational records required by this condition.

6. IN COMPLIANCE. Facility follows the procedures contained in the document titled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP-MI-N6637-2004", dated May 31, 2011.

7. IN COMPLIANCE. No amendments have been made to the "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP-MI-N6637-2004" since the May 31, 2011, submittal.

VII. Reporting

1, 2, and 3. IN COMPLIANCE. Annual and Semi-Annual Deviation Reports are submitted in a timely manner.

VIII. Stack/Vent Restrictions

1. IN COMPLIANCE. Stack dimensions appear to meet permit specifications.

EUCTG3 – one combined cycle GE Model PG7241 natural gas-fired combustion turbine

1. Emission Limits

Pollutant	Limit	Highest Actual	Compliance Status
1. NOx as NO2	9 ppmv; monthly average	8.23 ppmv (March 2015 RATA)	IN COMPLIANCE
2. NOx as NO2	63 pph; monthly average	52.8 pph (Feb. 2015)	IN COMPLIANCE
3. CO	9 ppmv	1.2 ppmv (March 2015 RATA)	IN COMPLIANCE
4. CO	31 pph; monthly average	3.9 pph (Feb. 2015)	IN COMPLIANCE
5. VOC	2.8 pph; monthly average	0.91 pph (Feb. 2015)	IN COMPLIANCE
6. PM10	9 pph; monthly average	1.8 pph (Feb. 2015)	IN COMPLIANCE

V. Testing/Sampling

1. IN COMPLIANCE. Testing to verify PM10 and VOC emission rates was performed from August 27-30, 2012. Results were received by AQD on October 26, 2012. The PM10 test was not valid, so a second test was performed from November 5-10, 2012, with results reported to AQD on December 10, 2012.
2. IN COMPLIANCE. A test plan was submitted to AQD on July 13, 2012, more than 30 days prior to testing.

VI. Monitoring/Recordkeeping

1. IN COMPLIANCE. Natural gas usage rate is monitored and recorded on an hourly and daily basis. Natural gas is sampled monthly to determine heating value.
2. IN COMPLIANCE. Facility uses a PEMS to monitor NOx emissions on a continuous basis.
3. IN COMPLIANCE. Facility uses a PEMS to monitor CO emissions on a continuous basis.
4. IN COMPLIANCE. Facility uses a PEMS to monitor O2 concentration on a continuous basis.
5. IN COMPLIANCE. Facility maintains all emission and operational records required by this condition.
6. IN COMPLIANCE. Facility follows the procedures contained in the document titled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP-MI-N6637-2004", dated May 31, 2011.
7. IN COMPLIANCE. No amendments have been made to the "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP-MI-N6637-2004" since the May 31, 2011, submittal.

VII. Reporting

- 1, 2, and 3. IN COMPLIANCE. Annual and Semi-Annual Deviation Reports are submitted in a timely manner.

VIII. Stack/Vent Restrictions

1. IN COMPLIANCE. Stack dimensions appear to meet permit specifications.

D. FLEXIBLE GROUP CONDITIONS

FGTURBINES (EUCTG1, EUCTG2, and EUCTG3)

I. Emission Limits

Pollutant	Limit (12-month rolling total)	Highest Actual (12-month rolling total)	Compliance Status
1. NOx as NO2	815 tpy	325 tpy (July 2015)	IN COMPLIANCE
2. CO	403 tpy	25 tpy (July 2015)	IN COMPLIANCE
3. VOC	36 tpy	4 tpy (July 2015)	IN COMPLIANCE
4. PM10	118 tpy	14 tpy (July 2015)	IN COMPLIANCE

III. Process/Operational Restrictions

1. IN COMPLIANCE. Turbines are only fueled with natural gas.

VI. Monitoring/Recordkeeping

1. IN COMPLIANCE. Records of PM10, CO, VOC, and NOx emissions are maintained on a 12-month rolling time period, as required.
2. IN COMPLIANCE. Facility follows the procedures contained in the document titled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP-MI-N6637-2004", dated May 31, 2011.
3. IN COMPLIANCE. No amendments have been made to the "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP-MI-N6637-2004" since the May 31, 2011, submittal.

VII. Reporting

- 1, 2, and 3. IN COMPLIANCE. Annual and Semi-Annual Deviation Reports are submitted in a timely manner.

VIII. Stack/Vent Restrictions

1. IN COMPLIANCE. Stack dimensions of all turbines appear to meet permit specifications.

IX. Other Requirements

NOT EVALUATED. FGTURBINES is subject to the federal Acid Rain Program, CAIR annual nitrogen oxide budget program, CAIR ozone nitrogen oxide budget, and CAIR sulfur dioxide budget programs, which are included in ROP No. MI-ROP-N6631-2102, Appendix 9 through Appendix 12. Conditions IX. 1 through IX. 8

require compliance with the conditions of these programs. Compliance with these programs is determined at the federal level. In determining compliance for this inspection, AQD has not verified DIG's compliance status with these programs.

FGBOILERS (EUBOILER1, EUBOILER2, and EUBOILER3)

I. Emission Limits

Pollutant	Limit	Highest Actual	Compliance Status
1. PM10	22.3 pph; monthly average for each boiler	Boiler 1: 4.5 pph (July '15) Boiler 2: 5.3 pph (May '15) Boiler 3: 5.8 pph (May '15)	IN COMPLIANCE IN COMPLIANCE IN COMPLIANCE
2. NOx	0.10 lb/MMBtu; 30-day rolling average for each boiler	Boiler 1: 0.064 lb/MMBtu (May '15) Boiler 2: 0.022 lb/MMBtu (July '14) Boiler 3: 0.033 lb/MMBtu (March '15)	IN COMPLIANCE IN COMPLIANCE IN COMPLIANCE
3. NOx	76.3 pph; 30-day rolling average for each boiler	Boiler 1: 9.56 pph (July '14) Boiler 2: 12.26 pph (July '14) Boiler 3: 12.51 pph (Sept. '14)	IN COMPLIANCE IN COMPLIANCE IN COMPLIANCE
4. SO2	420 pph; combined daily average of all three boilers	214 pph (March 2014)	IN COMPLIANCE
5. SO2	1839.6 tpy; combined 12-month rolling total of all three boilers	69.1 tpy (February 2015)	IN COMPLIANCE
6. CO	64.1 pph; 30-day rolling average for each boiler	Boiler 1: 0.48 pph (Jan. '14) Boiler 2: 0.71 pph (Sept. '14) Boiler 3: 1.02 pph (Sept. '14)	IN COMPLIANCE IN COMPLIANCE IN COMPLIANCE
7. VOC	7.5 pph; monthly average for each boiler	Boiler 1: 0.1 pph (Jan. '14) Boiler 2: 0.2 pph (Dec. '14) Boiler 3: 0.7 pph (Dec. '14)	IN COMPLIANCE IN COMPLIANCE IN COMPLIANCE
8. VOC	84 tpy; combined 12-month rolling total for all three boilers	0.85 tpy (June 2015)	IN COMPLIANCE

Note: Records were provided on a monthly basis, not 30-day rolling average. Since actual emissions were far below permitted limits, monthly averages were determined to be sufficient for the purpose of determining compliance during this inspection.

III. Process/Operational Restrictions

1. IN COMPLIANCE. Boilers in FGBOILERS are fueled with natural gas only.

V. Testing/Sampling

1. IN COMPLIANCE. Testing to verify PM10 and VOC emission rates was performed from August 27-30, 2012. Results were received by AQD on October 26, 2012.

2. IN COMPLIANCE. A test plan was submitted to AQD on July 13, 2012, more than 30 days prior to testing.

VI. Monitoring/Recordkeeping

1. IN COMPLIANCE. Facility follows the procedures contained in the document titled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP-MI-N6637-2004", dated May 31, 2011.

2. IN COMPLIANCE. Facility uses a PEMS to monitor NOx emissions on a continuous basis in accordance with the EPA's approved protocol.

3. IN COMPLIANCE. Facility uses a PEMS to monitor CO emissions on a continuous basis in accordance with the EPA's approved protocol.

4. IN COMPLIANCE. Facility uses a PEMS to monitor SO2 concentration on a continuous basis in accordance with the EPA's approved protocol.

5. IN COMPLIANCE. Hourly and daily SO2 emission rates are calculated and recorded, as required.

6. IN COMPLIANCE. Facility uses a PEMS to monitor O2 concentration on a continuous basis.

7. IN COMPLIANCE. Natural gas usage rate in FGBOILERS is recorded on a continuous basis. Natural gas is sampled monthly and tested to determine heating value.

8. IN COMPLIANCE. Blast furnace gas usage rate in FGBOILERS is recorded on a daily basis. Blast furnace gas is sampled monthly and tested to determine heating value.

9. IN COMPLIANCE. The records listed in this condition are calculated and recorded, as required.
10. IN COMPLIANCE. No amendments have been made to the "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP-MI-N6637-2004" since the May 31, 2011, submittal.

VII. Reporting

- 1, 2, and 3. IN COMPLIANCE. Annual and Semi-Annual Deviation Reports are submitted in a timely manner.

VIII. Stack/Vent Restrictions

- 1, 2, and 3. Stack dimensions for all three boilers appear to meet permit specifications.

IX. Other Requirements

NOT EVALUATED. FGBOILERS is subject to the federal CAIR annual nitrogen oxide budget program, CAIR ozone nitrogen oxide budget, and CAIR sulfur dioxide budget programs, which are included in ROP No. MI-ROP-N6631-2102, Appendix 10 through Appendix 12. Conditions IX. 1 through IX. 6 require compliance with the conditions of these programs. Compliance with these programs is determined at the federal level. In determining compliance for this inspection, AQD has not verified DIG's compliance status with these programs.

FGBFGFLARES (EUBFGFLARE1 and EUBFGFLARE2)

1. Emission Limits

Pollutant	Limit	Highest Actual	Compliance Status
1. CO	301.2 pph; monthly average	89.3 pph (Aug. 2013)	IN COMPLIANCE
2. NOx	96.6 pph; monthly average	30.4 pph (Aug. 2013)	IN COMPLIANCE
3. PM	7.4 pph; monthly average	1.1 pph (Aug. 2013)	IN COMPLIANCE

IV. Design/Equipment Parameters

1. IN COMPLIANCE. Both flares in FGBFGFLARES are equipped with an automatic ignition system and are operated and maintained such that blast furnace gas is continuously combusted whenever blast furnace gas is sent to the flares.

VI. Monitoring/Recordkeeping

1. IN COMPLIANCE. Blast furnace gas usage rate of each flare is monitored and recorded on a daily basis. Blast furnace gas is sampled monthly and tested to determine heating value.
2. IN COMPLIANCE. Facility follows the procedures contained in the document titled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP-MI-N6637-2004", dated May 31, 2011.
3. IN COMPLIANCE. The amount of blast furnace gas combusted in each flare is recorded on a monthly basis.
4. IN COMPLIANCE. Facility maintains records of average monthly NOx, CO, and PM emission calculations in accordance with the procedures contained in the document titled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP-MI-N6637-2004", dated May 31, 2011.
5. IN COMPLIANCE. No amendments have been made to the "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP-MI-N6637-2004" since the May 31, 2011, submittal.

VII. Reporting

- 1, 2, and 3. IN COMPLIANCE. Annual and Semi-Annual Deviation Reports are submitted in a timely manner.

FGBFG (EUBFGFLARE1, EUBFGFLARE2, EUBOILER1, EUBOILER2, and EUBOILER3)

1. Emission Limits

Pollutant	Limit	Highest Actual	Compliance Status
1. NOx	1087.1 tpy; 12-month rolling total	123.11 tpy (Jan. 2013)	IN COMPLIANCE
2. CO	1798 tpy; 12-month rolling total	99.5 tpy (May 2014)	IN COMPLIANCE
3. PM	237.1 tpy; 12-month rolling total	44.3 tpy (Dec. 2014)	IN COMPLIANCE
4. SO2	673 pph; daily average	327.8 pph (May 8, 2014)	IN COMPLIANCE
5. SO2	2947.7 tpy; 12-month rolling total	903.9 tpy (Feb. 2015)	IN COMPLIANCE

VI. Monitoring/Recordkeeping

1. IN COMPLIANCE. Facility follows the procedures contained in the document titled "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP-MI-N6637-2004", dated May 31, 2011.

2. IN COMPLIANCE. Facility calculates emission rates for the following pollutants on a 12-month rolling time period basis: PM, CO, NOx, and SO₂. Facility calculates SO₂ emission rate in lb/hour based on a daily averaging period.

3 IN COMPLIANCE. No amendments have been made to the "Protocol for Demonstrating Continuous Compliance with the Emission Limitations of ROP-MI-N6637-2004" since the May 31, 2011, submittal.

VII. Reporting

1, 2, and 3. IN COMPLIANCE. Annual and Semi-Annual Deviation Reports are submitted in a timely manner.

FGEMERGENCYGENS (EU3516GEN1 and EU3516GEN2)

I. Emission Limits

Pollutant	Limits	Highest Actual	Compliance Status
1. NOx	0.0369 lb/kW-hr	NA	NOT EVALUATED
2. NOx	63.1 pph; hourly	62.73 pph, based on manufacturer's specifications	IN COMPLIANCE
3. CO	0.009 lb/kW-hr	NA	NOT EVALUATED
4. CO	15.3 pph; hourly	NA	NOT EVALUATED
5. SO ₂	120 ppmv; 3-hour time period	NA	NOT EVALUATED

II. Material Limits

1. IN COMPLIANCE. Sulfur content of the of the fuel oil burned in FGEMERGENCYGENS is below 0.05% by weight. The last fuel analysis, performed on July 9, 2015, showed a sulfur content of 0.0002%.

III. IN COMPLIANCE. Emergency generators have not been used for any extended period since January 2013. Generators are tested weekly to make sure they are operating properly. Highest 12-month rolling total hours of generator usage was 38.5 hours in the month ending January 2015, well below the permit limit of 1000 hours per 12-month rolling time period.

VI. Monitoring/Recordkeeping

1. IN COMPLIANCE. Daily electrical output (kW-hr) and hours of operation of each emergency generator is recorded on a daily basis.

2. NOT EVALUATED. Daily NOx emission calculations were not provided with the records for FGEMERGENCYGENS; however, due to the limited usage of the emergency generators, NOx emissions are expected to be negligible.

3. NOT EVALUATED. Daily CO emission calculations were not provided with the records for FGEMERGENCYGENS; however, due to the limited usage of the emergency generators, CO emissions are expected to be negligible.

4. IN COMPLIANCE. Facility maintains records of all fuel specs/analysis, including sulfur content, of each delivery of fuel oil.

VII. Reporting

1, 2, and 3. IN COMPLIANCE. Annual and Semi-Annual Deviation Reports are submitted in a timely manner.

VIII. Stack/Vent Restrictions

1 and 2. IN COMPLIANCE. Stack dimensions appear to meet permit specifications.

IX. Other Requirements

1. IN COMPLIANCE. Facility maintains and operates FGEMERGENCYGENS according to the procedures outlined in the preventative maintenance plan recommended by the manufacturer.

FINAL COMPLIANCE DETERMINATION:

At the time of inspection, Dearborn Industrial Generation was determined to be in compliance with ROP No. MI-ROP-N6631-2012, and other State and federal regulations, as evaluated.

NAME Othery

DATE 9-30-15

SUPERVISOR JK