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NEW COVERT GENERATING
AN EASTERN GENERATION COMPANY

EASTERN GENERATION LLC

May 22, 2019

Ms. Amanda Chapel
Environmental Quality Analyst
Air Quality Division
Michigan Department of Environment, Great Lakes, and Energy
7953 Adobe Road
Kalamazoo, Michigan 49009

RECEIVED
MAY 23 2019
AQD-KALAMAZOO

Subject: Response to May 8, 2019 Violation Notice
New Covert Generating Company, LLC
Renewable Operating Permit No. MI-ROP-N6767-2014c

Dear Ms. Chapel,

New Covert Generating Company, LLC ("Covert") submitted the first quarter 2019 excess emission report to the Michigan Department of Environment, Great Lakes, and Energy ("EGLE") on April 26, 2019. In that report, we identified one deviation, which occurred on January 21-22, 2019, and in which carbon monoxide ("CO") emissions from Unit 1 were above our Renewable Operating Permit ("ROP") limit of 33.7 pounds per hour ("lb/hr"), based on a 24-hour rolling average for a period of 26 hours ("the Event"). On May 8, 2019, EGLE issued a Violation Notice ("VN") related to the Event. The VN requires a response by May 29, 2019. With this correspondence, we are requesting that EGLE rescind the VN. In the event that EGLE does not rescind the VN, this correspondence constitutes Covert's required response to the VN.

Covert believes that the Event does not constitute noncompliance because the 33.7 lb/hr emission limit did not apply during the Event. There are two exemptions from this limit in the approved ROP, for both of which the facility qualifies.

Description of Event and Associated Emissions

On Monday, January 21, 2019 at 0626, Unit 1 Fuel Gas Heater Bypass Valve malfunctioned as a result of the -17 deg F ambient temperature, causing the natural gas fuel to be below acceptable temperatures for full load operation. This, in turn caused Unit1 gas turbine to have a "Run Back" to 125 MW. A runback is a protective mechanism designed into the control system in order to prevent damage to the turbine, and consists of an automatic (i.e., non-discretionary) reduction in load to a reduced level, from which the operator can decide whether to complete a shutdown of the equipment, or to return to normal operations. In this case, the runback lasted for approximately 2.8 hours while maintenance staff investigated and resolved the malfunctioning Fuel Gas Heater Bypass Valve issue. At loads below about 60%, CO emissions increase. At 0917 Unit 1 Fuel Gas Heater Bypass Valve was restored and the unit ramped to normal operating loads with CO in normal range. The CO average for the 2.8 hour runback period was 885.3 lb/hr. Hourly emissions data was provided to EGLE by email on May 7, 2019.

Unit 1 was returned to service when heat trace and insulation was added to the Fuel Gas Heater Bypass Valve, thawing the valve and allowing it to operate normally. The ambient temperature design range is -8 deg F to 93 deg F, and the extreme cold weather outside of these conditions (-17 deg F) caused this malfunction. The other two units did not experience the same issue, despite receiving similar maintenance. In order to prevent recurrence and despite the fact that neither unit experienced similar issues, both Units 2 & 3 had heat trace and insulation installed.

The Entire Event Constitutes a Malfunction Under R336.1912(1)

R336.1912(1) states, *"The owner or operator of a source ... shall, to the extent reasonably possible, operate a source ... in a manner consistent with good air pollution control practices for minimizing emissions during periods of abnormal conditions, start-up, shutdown, and malfunctions."*

Based on the description presented above, on January 21, 2019, a malfunction occurred on Unit 1 and Covert operated it in a manner consistent with good air pollution control practice for minimizing emissions. Covert requests that EGLE accept the description above as evidence to support that conclusion.

The Runback Should be Considered A Shutdown

As described above, a runback consists of a nondiscretionary load reduction initiated by the turbine control system to a point below normal operations, essentially initiating a shutdown with the ability to interrupt before the unit is offline. In this case, Covert opted to interrupt the operation and attempted to online diagnose and repair the malfunction as quickly as possible before completion of the shutdown.

The ROP defines allowable emissions for Unit 1 in the Table in Section I of the FG-TURB/DB1-3 Flexible Group Conditions. That table contains a note immediately after the tabular listing of limits, which states, "Limits do not include startup, shutdown, or malfunction situations." Condition III.3 of that same section contains operating restrictions limiting operation during startup and shutdown, and defines shutdown as, "…that period of time from the *initial lowering* of the turbine output, with the intent to shutdown, until the point at which the combustion process has stopped." (italics added) The runback was the initial lowering of the turbine output with the intent to shutdown the turbine, meaning that the numerical limits did not apply. In this case, that means that emissions are excluded from 0621 until it was determined that the unit could safely return to service rather than completing a shutdown. This decision was made at 0916, as noted above. When this data is excluded, emissions are in compliance with the 33.7 lb/hr 24-hour rolling average CO limit at all times. See Attachment A for emissions details.

The Permit Contains Explicit Language Exempting Malfunctions

The ROP defines allowable emissions for Unit 1 in the Table in Section I of the FG-TURB/DB1-3 Flexible Group Conditions. That table contains a note immediately after the tabular listing of limits, which states, "Limits do not include startup, shutdown, or malfunction situations." This statement alone is sufficient to exclude the emissions throughout the entire Event. As

demonstrated in Attachment A, Unit 1 is in compliance with the 24-hour rolling average CO emission limit if these emissions are excluded.

Covert submits that the provisions of the permit noted above provide independent and valid justifications for excluding the excess emissions data. When the permit was issued, EGLE anticipated that malfunctions could happen, and encouraged Covert to take prompt and responsible action to minimize emissions and provided regulatory protection for such situations as long as the operator is diligent. We have demonstrated that this language is present in the permit, that Covert qualifies for such treatment, and that, when analyzed in this way; there were no excess emissions during the Event.

Additional Considerations

In the event that EGLE does not agree with the arguments presented above, there are additional regulatory requirements to consider in regard to the Event.

Requirements of R336.1915

R336.1915 authorizes EGLE to employ enforcement discretion in the event certain demonstrations are made. Specifically, R336.1915 states,

(1) In determining whether the department will pursue enforcement against a person, the department shall consider evidence that the emission violations resulted from a malfunction, start-up, or shutdown. [emphasis added]

(2) If the department determines that the emission violations resulted from a malfunction, start-up, or shutdown, then the department may use enforcement discretion when resolving the emission violations based upon subrules (3) and (4) of this rule, as applicable.

The VN notes that emissions were over the limit in the ROP, and does not specify how EGLE considered the evidence presented in this correspondence. Accordingly, we respectfully request that EGLE honor the letter and spirit of this regulation and consider both the evidence presented above, which clearly demonstrates that a malfunction did occur, and also the following demonstrations.

(3) A person may submit evidence to the department for its consideration in determining that the emission violations resulted from a malfunction. The evidence shall demonstrate all of the following, as applicable

(a) The excess emissions were a result of a sudden and unavoidable breakdown of process or control equipment, beyond the reasonable control of the person.

As described above, the malfunction of the gas heater valve could not reasonably be anticipated or avoided. Other gas heater valves at the site, with similar maintenance practices, experiencing the same atmospheric conditions, did not suffer similar malfunctions.

(b) The air pollution control equipment, process equipment, and processes were maintained and operated in a manner consistent with good practice for minimizing emissions, to the maximum extent practicable.

Repair work was completed as promptly as possible, and the gas turbine was returned to a lower-emitting operating mode as soon as it was possible to do so.

(c) The excess emissions caused by a bypass (an intentional diversion of control equipment) were unavoidable to prevent loss of life, personal injury, or severe property damage.

Not applicable. There was no bypass of control equipment.

(d) Repairs were made in an expeditious fashion when the person knew or should have known that applicable emission limitations were being exceeded. To the extent practicable, off-shift labor and overtime shall have been utilized to ensure that the repairs were made expeditiously.

The malfunction was observed, diagnosed, and repaired in less than 3 hours during some of the coldest weather experienced in the winter of 2018-2019.

(e) The amount and duration of excess emissions, including any bypass, were minimized to the maximum extent practicable during periods of the emissions.

Repair work was completed promptly, and the gas turbine was returned to a lower-emitting operating mode as soon as it was possible to do so.

(f) All reasonably possible steps were taken to minimize the impact of the excess emissions on ambient air quality.

Repair work was completed promptly, and the gas turbine was returned to a lower-emitting operating mode as soon as it was possible to do so.

(g) The excess emissions resulting from the malfunction were not part of a recurring pattern indicative of inadequate design, operation, or maintenance.

This malfunction has not been previously experienced, nor has it recurred. As noted above, Covert took preventative action to avoid recurrence on other units.

(h) The malfunction was an infrequent event and was not reasonably preventable.

As described above, the malfunction of the gas heater valve could not reasonably be anticipated or avoided. Other gas heater valves at the site, with similar maintenance practices, experiencing the same atmospheric conditions, did not suffer similar malfunctions.

(i) All emission monitoring systems were kept in operation if at all possible.

All emission monitoring systems were kept in operation during the Event, and data was provided to EGLE.

(j) The person responsible for operating the source of air contaminants has a malfunction abatement plan, consistent with the requirements set forth in R 336.1911(2) and with both of the following provisions:

(i) Any malfunction abatement plan developed in accordance with R 336.1911(2) shall be maintained onsite and available for inspection, upon request, by the department for the life of the emission unit or units. The department may require that the person responsible for the malfunction abatement plan make revisions to the plan. The person shall revise the malfunction abatement plan within 45 days after a request by department. The revised malfunction abatement plan shall be developed in accordance with R 336.1911(2).

Covert has a malfunction abatement plan ("MAP"), maintains a copy at the site, follows the plan, and has provided it to EGLE. An updated MAP was submitted to EGLE as part of the recent ROP renewal application.

(ii) If the malfunction abatement plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction at the time the plan is initially developed, then the person shall revise the malfunction abatement plan within 45 days after the event occurs. The revised malfunction abatement plan shall be developed in accordance with R 336.1911(2).

Covert believes that the MAP was sufficient to respond to this malfunction successfully.

(k) The excess emissions presenting an imminent threat to human health, safety, or the environment were reported to the department as soon as possible. Unless otherwise specified in the facility's permit, other excess emissions were reported as provided in R 336.1912. If requested by the department, a person shall submit a full written report that includes the known causes, the corrective actions taken, and the preventive measures to be taken to minimize or eliminate the chance of recurrence.

The Event was reported in the quarterly Excess Emission Report, as required, and which was submitted timely. In addition verbal notification was provided on January 23, 2019.

(l) The actions during the period of excess emissions were documented by contemporaneous operating logs or other relevant evidence as provided by R 336.1912.

Operating logs and other records were used to provide the explanations provided in the Excess Emission Report and in this correspondence

(m) Any information submitted to the department under this subrule shall be properly certified in accordance with the provisions of R 336.1912.

This correspondence is certified, as required.

Conclusion

Covert has established that a malfunction occurred, resulting in the Event, and demonstrated that during the entire Event, the numeric emission limits of the ROP did not apply due to the unit being in an extended shutdown while repairs were made, and also because the ROP contains an

explicit exclusion for emissions during malfunction. Unit 1 was in compliance when emissions during the Event are excluded, and the VN should be rescinded.

If EGLE disagrees that this Event qualifies for those exclusions, it is still factual that a malfunction occurred. We believe that Covert has made sufficient demonstration and request that EGLE employ enforcement discretion to withdraw the Violation Notice issued in this case.

Should you have any questions, please contact Mr. Chris Head, Operations Manager, at (269) 764-3805 or chead@camsops.com or Mr. Andrew Oliver at (315) 433-1371 or aoliver@easterngen.com.

Sincerely,

John P. Reese
Senior Vice President
New Covert Generating Company, LLC

Attachment A

cc: Mr. Ken Tomaski
Mr. Chris Head
Electronic Copy

Ms. Jenine Camilleri
Enforcement Unit Supervisor
Air Quality District
Michigan Department of Environment, Great Lakes, and Energy
P.O. Box 30260
Lansing, Michigan 48909-7760
(w/attachment)

Attachment A

CO Emissions Data

Emissions data prior to and after the Event demonstrates compliance with the ROP limit of 33.7 lb/hr CO on a 24-hour rolling average. Covert extracted data from the CEMS data acquisition and handling system. That data, presented on the following pages, shows 1-minute CO lb/hr and ppm values, as well as unit load and unit percent load, in the minutes prior to and following the Event, which began at 0626 and ended at 0916. The data shows CO 1-minute values below 33.7 lb/hr throughout. If the 1-minute values are below 33.7 lb/hr, the hourly averages will also be below that value, as will the 24-hour rolling averages.

NEW COVERT GENERATING COMPANY, LLC

26000 77TH STREET, COVERT, MI. 49043

***Unit 1**

January 21, 2019

Time	CO lb/hr 1-Min	CO ppm @15% O2 1-Min	CT Megawatts 1-Min	Load % 1-Min
06:00	9.24	1.69	245.9	92.9
06:01	9.00	1.65	246.4	92.9
06:02	8.75	1.61	246.3	92.9
06:03	8.58	1.59	240.4	90.8
06:04	9.24	1.75	239.4	90.4
06:05	9.87	1.82	243.7	92.3
06:06	9.25	1.71	246.5	92.8
06:07	9.23	1.69	245.9	92.9
06:08	9.21	1.69	246.3	93.0
06:09	9.25	1.69	246.4	92.8
06:10	9.24	1.69	246.0	92.8
06:11	9.45	1.76	245.7	92.9
06:12	10.23	1.86	245.7	92.9
06:13	10.59	1.94	244.1	92.2
06:14	10.65	2.01	238.7	90.3
06:15	11.27	2.10	243.0	91.6
06:16	10.89	2.04	240.0	90.5
06:17	11.24	2.11	242.2	91.6
06:18	10.89	2.01	245.7	92.6
06:19	10.21	1.87	245.4	92.9
06:20	10.15	1.86	244.9	92.2
06:21	9.96	1.94	232.7	88.1
06:22	11.22	2.29	218.3	82.5
06:23	12.91	2.77	205.8	77.7
06:24	16.15	3.68	192.3	72.1
06:25	24.63	5.72	183.3	69.5
06:26	37.05	8.63	182.6	69.2
06:27	42.74	10.03	181.1	68.2
06:28	48.30	11.85	169.9	64.1
06:29	1243.35	312.04	163.1	61.8
06:30	1478.68	372.08	162.9	61.9
06:31	1474.75	372.11	161.4	61.0
06:32	1439.90	379.17	152.3	57.3
06:33	1472.07	390.91	149.8	56.3
06:34	1476.32	391.50	150.2	56.6
06:35	1470.54	390.84	148.9	56.5
06:36	1467.04	391.52	147.2	55.3
06:37	1423.86	405.41	134.0	50.3
06:38	1453.61	432.31	124.8	47.2
06:39	1470.58	439.45	124.7	47.2
06:40	1475.60	440.25	124.3	47.0
06:41	1476.12	441.11	124.8	47.0
06:42	1478.15	441.04	124.2	46.9
06:43	1485.76	441.87	123.8	46.9
06:44	1481.35	442.66	124.2	46.8
06:45	1483.99	442.75	124.7	47.0
06:46	1486.53	443.51	124.4	47.3
06:47	1483.84	442.74	123.8	46.6
06:48	1483.69	442.68	124.5	47.1
06:49	1478.51	441.83	124.6	46.6
06:50	1479.01	442.66	124.4	47.0
06:51	1483.69	442.66	124.6	46.8
06:52	1481.35	442.68	124.6	47.3
06:53	1479.01	442.70	124.8	46.9
06:54	1476.68	442.68	124.8	46.9
06:55	1483.69	442.66	124.9	47.0
06:56	1481.05	442.59	124.6	46.9
06:57	1481.35	442.66	124.5	47.0
06:58	1479.84	442.66	124.6	47.0
06:59	1480.38	442.63	124.3	47.1

Excluded

NEW COVERT GENERATING COMPANY, LLC

26000 77TH STREET, COVERT, MI. 49043

***Unit 1**

January 21, 2019

Time	CO lb/hr 1-Min	CO ppm @15% O2 1-Min	CT Megawatts 1-Min	Load % 1-Min
07:00	1480.73	443.43	123.8	46.6
07:01	1478.13	443.39	125.0	46.9
07:02	1483.07	443.43	124.8	47.1
07:03	1488.26	444.27	124.1	47.0
07:04	1482.51	441.88	124.7	47.1
07:05	1474.17	441.91	125.6	47.3
07:06	Cal	Cal	125.1	47.1
07:07	Cal	Cal	124.4	47.0
07:08	Cal	Cal	124.7	47.1
07:09	Cal	Cal	125.1	47.3
07:10	Cal	Cal	125.8	47.3
07:11	Cal	Cal	125.3	47.3
07:12	Cal	Cal	124.7	47.1
07:13	Cal	Cal	125.0	46.9
07:14	Cal	Cal	124.9	47.2
07:15	Cal	Cal	125.0	47.0
07:16	Cal	Cal	124.8	47.1
07:17	Cal	Cal	125.5	47.5
07:18	Cal	Cal	125.1	47.1
07:19	Cal	Cal	124.6	47.3
07:20	Cal	Cal	125.0	47.4
07:21	Cal	Cal	125.3	47.0
07:22	Cal	Cal	125.3	47.3
07:23	Cal	Cal	125.0	47.3
07:24	Cal	Cal	125.5	47.4
07:25	Cal	Cal	125.1	47.1
07:26	Cal	Cal	124.5	47.3
07:27	Cal	Cal	124.4	47.1
07:28	Cal	Cal	125.5	47.1
07:29	Cal	Cal	125.0	47.3
07:30	Cal	Cal	125.3	47.3
07:31	Cal	Cal	124.7	47.3
07:32	Cal	Cal	125.8	47.2
07:33	Cal	Cal	124.9	47.1
07:34	1535.40	456.54	124.5	47.2
07:35	1525.89	455.77	124.8	47.0
07:36	1535.51	455.73	124.9	47.5
07:37	1528.15	455.73	125.4	47.2
07:38	1533.27	456.54	124.4	47.3
07:39	1530.57	455.73	124.6	47.3
07:40	1522.88	454.83	124.9	47.2
07:41	1525.44	454.83	125.2	47.2
07:42	1522.89	454.05	125.1	47.1
07:43	1517.64	453.24	124.9	47.3
07:44	1513.00	454.04	124.4	47.0
07:45	1525.59	454.88	125.0	47.3
07:46	1523.18	454.89	124.8	47.1
07:47	1526.03	454.94	125.1	47.2
07:48	1516.12	454.91	124.6	47.0
07:49	1523.47	454.91	124.9	47.2
07:50	1523.18	454.10	125.1	47.2
07:51	1523.33	454.15	125.2	47.3
07:52	1518.23	453.35	125.1	47.2
07:53	1526.32	455.00	125.2	47.3
07:54	1523.76	454.99	125.0	47.2
07:55	1523.47	454.16	125.0	47.1
07:56	1520.91	454.10	125.2	47.2
07:57	1531.14	455.02	126.0	47.5
07:58	1557.22	448.40	132.6	50.1
07:59	1579.11	428.88	145.2	55.0

Excluded

NEW COVERT GENERATING COMPANY, LLC

26000 77TH STREET, COVERT, MI. 49043

***Unit 1**

January 21, 2019

Time	CO lb/hr 1-Min	CO ppm @15% O2 1-Min	CT Megawatts 1-Min	Load % 1-Min
08:00	1567.76	402.30	159.3	60.3
08:01	1562.45	380.00	172.6	65.2
08:02	1538.86	364.28	179.8	67.9
08:03	797.41	189.00	179.9	68.0
08:04	58.34	13.80	180.1	68.0
08:05	56.01	13.29	179.6	67.8
08:06	56.48	13.31	180.4	68.1
08:07	56.55	13.34	180.0	68.1
08:08	55.91	13.19	180.0	68.0
08:09	55.10	12.95	179.9	67.9
08:10	54.27	12.76	180.0	68.0
08:11	53.39	12.58	179.8	68.0
08:12	51.87	12.18	179.6	67.8
08:13	52.10	12.76	170.2	64.2
08:14	1259.66	322.78	158.1	59.7
08:15	1523.59	392.59	156.6	59.1
08:16	1523.59	392.59	156.6	59.1
08:17	1523.91	392.61	156.7	59.1
08:18	1523.91	392.63	156.5	59.1
08:19	1525.73	391.99	156.6	59.1
08:20	1521.48	391.99	156.4	59.1
08:21	1521.22	391.35	156.6	59.1
08:22	1520.69	390.68	156.6	59.1
08:23	1516.97	391.37	155.7	58.8
08:24	1486.29	398.34	147.0	55.4
08:25	1518.34	412.29	144.2	54.4
08:26	1518.46	412.90	144.0	54.4
08:27	1521.09	413.61	144.3	54.5
08:28	1521.50	414.31	144.0	54.4
08:29	1521.66	414.36	144.3	54.5
08:30	1524.19	414.41	144.5	54.5
08:31	1522.25	415.09	144.2	54.5
08:32	1521.82	414.38	144.3	54.5
08:33	1524.45	415.09	144.3	54.5
08:34	1524.61	415.14	144.3	54.5
08:35	1527.40	415.89	144.3	54.5
08:36	1527.66	416.56	144.3	54.5
08:37	1527.66	416.56	144.2	54.4
08:38	1529.87	416.59	144.3	54.5
08:39	1529.87	416.57	144.3	54.5
08:40	1529.84	416.52	144.3	54.5
08:41	1530.15	416.59	144.2	54.5
08:42	1553.78	414.51	148.9	56.2
08:43	1576.22	397.16	162.1	61.3
08:44	1566.42	375.39	175.6	66.3
08:45	1532.24	362.08	179.8	67.9
08:46	553.01	130.20	180.1	68.0
08:47	52.89	12.51	179.9	67.9
08:48	52.27	12.30	180.1	68.0
08:49	46.95	11.03	179.9	67.9
08:50	47.70	11.19	180.3	68.1
08:51	48.65	11.38	180.0	68.0
08:52	48.46	11.37	180.0	68.0
08:53	47.76	11.18	180.1	68.0
08:54	46.94	10.98	179.9	67.9
08:55	46.15	10.90	177.8	67.1
08:56	53.86	13.40	165.4	62.4
08:57	1519.02	385.85	159.1	60.0
08:58	1521.72	387.08	159.0	60.1
08:59	1519.31	387.00	159.1	60.1

Excluded

NEW COVERT GENERATING COMPANY, LLC

26000 77TH STREET, COVERT, MI. 49043

***Unit 1**

January 21, 2019

Time	CO lb/hr 1-Min	CO ppm @15% O2 1-Min	CT Megawatts 1-Min	Load % 1-Min
09:00	1523.59	387.04	159.1	60.1
09:01	1523.42	387.00	159.0	60.1
09:02	1542.09	386.44	162.0	61.3
09:03	1564.96	373.60	174.1	65.8
09:04	1540.56	359.93	180.0	68.0
09:05	49.61	11.60	179.8	67.9
09:06	38.02	8.90	180.0	67.9
09:07	37.78	8.87	179.9	67.9
09:08	38.59	9.01	180.0	67.9
09:09	39.93	9.36	180.0	68.0
09:10	41.27	9.67	180.0	68.0
09:11	41.84	9.79	179.9	67.9
09:12	39.55	9.27	180.1	68.0
09:13	37.11	8.66	180.0	68.0
09:14	35.01	8.18	180.0	68.0
09:15	33.66	7.78	183.0	69.1
09:16	29.11	6.40	195.5	73.9
09:17	16.68	3.47	208.8	78.9
09:18	10.86	2.19	218.6	82.6
09:19	9.36	1.86	219.9	83.0
09:20	9.13	1.84	219.9	83.0
09:21	9.15	1.84	220.3	83.2
09:22	9.13	1.84	220.3	83.2
09:23	9.10	1.82	220.1	83.1
09:24	8.89	1.80	220.1	83.0
09:25	9.12	1.84	220.1	83.0
09:26	8.88	1.79	220.0	83.1
09:27	8.66	1.76	220.2	83.1
09:28	8.66	1.76	220.0	83.1
09:29	8.89	1.77	220.0	83.1
09:30	8.67	1.76	220.0	83.1
09:31	8.67	1.76	219.9	83.1
09:32	8.66	1.76	220.0	83.1
09:33	8.66	1.75	220.1	83.1
09:34	8.66	1.76	220.0	83.1
09:35	8.63	1.76	219.1	82.8
09:36	9.08	1.82	219.5	82.9
09:37	9.15	1.83	221.1	83.5
09:38	8.92	1.75	227.5	86.0
09:39	8.68	1.70	227.8	86.0
09:40	9.12	1.77	227.2	85.7
09:41	9.34	1.83	226.6	85.5
09:42	9.57	1.86	226.3	85.5
09:43	9.55	1.86	226.0	85.4
09:44	9.76	1.92	226.2	85.4
09:45	9.55	1.90	226.1	85.4
09:46	9.78	1.92	226.2	85.4
09:47	9.77	1.94	226.1	85.4
09:48	9.75	1.94	226.3	85.4
09:49	9.77	1.94	226.4	85.5
09:50	10.06	1.91	233.7	88.3
09:51	9.64	1.78	241.6	91.2
09:52	9.28	1.69	245.3	92.6
09:53	9.30	1.68	245.9	92.9
09:54	9.31	1.68	245.9	92.9
09:55	9.07	1.64	246.1	92.8
09:56	9.30	1.68	246.2	92.9
09:57	9.30	1.69	245.9	92.9
09:58	9.29	1.68	245.9	92.9
09:59	9.30	1.68	246.2	92.9

Excluded

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

RENEWABLE OPERATING PERMIT
REPORT CERTIFICATION

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division upon request.

Source Name: New Covert Generating Company, LLC — County: Van Buren

Source Address: 26000 77th Street — City: Covert

AQD Source ID (SRN): N6767 — ROP No.: MI-ROP-N6767-2014c — ROP Section No.: N/A

Please check the appropriate box(es):

☐ **Annual Compliance Certification (Pursuant to Rule 213(4)(c))**

Reporting period (provide inclusive dates): From _____ To _____

☐ 1. During the entire reporting period, this source was in compliance with **ALL** terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the ROP.

☐ 2. During the entire reporting period this source was in compliance with all terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference, **EXCEPT** for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the ROP, unless otherwise indicated and described on the enclosed deviation report(s).

☐ **Semi-Annual (or More Frequent) Report Certification (Pursuant to Rule 213(3)(c))**

Reporting period (provide inclusive dates): From _____ To _____

☐ 1. During the entire reporting period, **ALL** monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.

☐ 2. During the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred, **EXCEPT** for the deviations identified on the enclosed deviation report(s).

☒ **Other Report Certification**

Reporting period (provide inclusive dates): From 5/22/2019 To 5/22/2019

Additional monitoring reports or other applicable documents required by the ROP are attached as described:

Response to Violation Notice dated May 8, 2019

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete

John Reese	SR. Vice President	(212) 792-0897
Name of Responsible Official (print or type)	Title	Phone Number
Signature of Responsible Official		Date 5/22/19

* Photocopy this form as needed.

EQP 5736 (Rev 11-04)