



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
KALAMAZOO DISTRICT OFFICE



PHILLIP D. ROOS
DIRECTOR

August 7, 2024

Norman Kapala
Covert Generating Station
26000 77th Street
Covert, MI 49043

SRN: N6767, Van Buren County

Dear Norman Kapala:

VIOLATION NOTICE

On July 20, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received the May 21-22, 2024 Covert EU-TURBINE1/EU-DB1 (Unit 1) and EU-TURBINE3/EU-DB3 (Unit 3) stack test results of Covert Generating Station located at 26000 77th Street, Covert, Michigan. Based on a review of this report, AQD staff noted the following violations:

Process Description	Rule/Permit Condition Violated	Comments
FG-TURB/DB1-3: EU-TURBINE1 and EU-DB1 (Unit 1)	MI-ROP-N6767-2020a, Special Conditions I. 11. and 12.	Stack test results indicated an average PM ₁₀ and PM _{2.5} emission rate of 20.0 pph (pounds per hour), while the permitted limit is 10.7 pph of PM ₁₀ and PM _{2.5} .
FG-TURB/DB1-3: EU-TURBINE3 and EU-DB3 (Unit 3)	MI-ROP-N6767-2020a Special Conditions I. 11. and 12.	Stack test results indicated an average PM ₁₀ and PM _{2.5} emission rate of 16.7 pph, while the permitted limit is 10.7 pph of PM ₁₀ and PM _{2.5} .
FG-TURB/DB1-3: EU-TURBINE1 and EU-DB1 (Unit 1)	MI-ROP-N6767-2020a Special Condition I. 14.	Stack test results indicated an average H ₂ SO ₄ emission rate of 1.4 pph, while the permitted limit is 1.0 pph of H ₂ SO ₄ .
FG-TURB/DB1-3: EU-TURBINE3 and EU-DB3 (Unit 3)	MI-ROP-N6767-2020a Special Condition I. 14.	Stack test results indicated an average H ₂ SO ₄ emission rate of 2.4 pph, while the permitted limit is 1.0 pph of H ₂ SO ₄ .

On May 21-22, 2024, a stack test was conducted which indicated that emissions from the company's Unit 1 and Unit 3 exceeded the allowable emission rate specified in Special Conditions I. 11, 12, and 14 of MI-ROP-N6767-2020a).

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The allowed maximum emission rate of PM₁₀ and PM_{2.5} is 10.7 pounds of particulate matter per hour. However, actual emissions were recorded to 20.0 and 16.7 pounds of PM₁₀ and PM_{2.5} per hour of exhaust gas for Units 1 and 3 respectively.

Additionally, the allowed maximum emission rate of sulfuric acid (H₂SO₄) is 1.0 pounds of sulfuric acid per hour. However, actual emissions were recorded to be 1.4 and 2.4 pounds of sulfuric acid per hour of exhaust gas for Units 1 and 3 respectively. Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 28, 2024 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the stack test occurred; an explanation of the causes of the violations; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to Mariah Scott at EGLE, AQD, Kalamazoo District, at 7953 Adobe Rd, Kalamazoo, Michigan 49009 or scottm29@michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Covert Generating Station believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of Covert Generating Station. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Mariah Scott
Environmental Quality Analyst
Air Quality Division
517-899-3519

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Monica Brothers, EGLE