



GRETCHEN WHITMER  
GOVERNOR

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



PHILLIP D. ROOS  
DIRECTOR

September 23, 2024

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

SRN: N6767, Van Buren County

Dear Norman Kapala:

**VIOLATION NOTICE**

On September 13, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received the July 15-16, 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 <sub>10</sub> and PM <sub>2.5</sub> emission rate of 18.1 pph (pounds per hour), while the permitted limit is 10.7 pph of PM <sub>10</sub> and PM <sub>2.5</sub> .
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 <sub>10</sub> and PM <sub>2.5</sub> emission rate of 11.3 pph, while the permitted limit is 10.7 pph of PM <sub>10</sub> and PM <sub>2.5</sub> .

On July 15-16, 2024, stack tests were 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).

The allowed maximum emission rate of PM<sub>10</sub> and PM<sub>2.5</sub> is 10.7 pounds of particulate matter per hour. However, actual emissions were recorded to 18.1 and 11.3 pounds of PM<sub>10</sub> and PM<sub>2.5</sub> per hour of exhaust gas for Units 1 and 3 respectively.

Covert Generating Station has included a preliminary explanation concerning the July 15-16, 2024 stack test results in their August 28, 2024 response to the August 7, 2024 Violation Notice from the Air Quality Division. The facility has also indicated that their additional testing has provided more reliable results, which showed the units to be

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Covert Generating Station  
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operating within permit requirements. A response to this violation notice is not required, however, if Covert Generating Station wishes to provide a response to this violation notice, please submit a written response to this Violation Notice by October 14, 2024 (which coincides with 21 calendar days from the date of this letter). We look forward to receiving the additional, new test result report(s) by the required deadline(s).

If Covert Generating Station chooses to provide an optional response to this Violation Notice, please submit the written response to Mariah Scott at EGLE, AQD, Kalamazoo District, at 7953 Adobe Rd, Kalamazoo, Michigan 49009 or [scottm29@michigan.gov](mailto: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,

A handwritten signature in black ink that reads "Mariah Scott". The signature is written in a cursive, flowing style.

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