

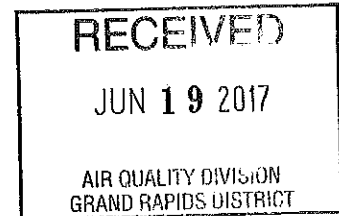
Grand Haven Board of Light & Power 1700 Eaton Drive, Grand Haven, MI 49417



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June 13, 2017

Ms. Kaitlyn Devries
Department of Environmental Quality
Air Quality Division
Grand Rapids District Office
350 Ottawa Ave. NW, Unit 10
Grand Rapids, MI. 49503-2341



Ms. Devries:

SUBJECT: Letter of Violation Response
Designated Name: Grand Haven BLP (J.B. Sims Generating Station) – SRN B1976

This letter is in response to your letter dated May 23, 2017 regarding failure to conduct the appropriate stack tests in accordance with 40 CFR Part 63, Subpart UUUUU. The rule allows SO₂ to be used as a surrogate which appeared feasible and was intended to be used as the compliance option. However, SO₂ emissions did not remain below the surrogate limit which triggered the requirement for quarterly HCl testing which was not conducted due to an administrative error. Secondly the “no formal notification was submitted to request use of an alternative method of compliance...” portion of the violation notice that took place during the fourth quarter of 2016 was a misunderstanding from the plant. Verbal communication took place with MDEQ staff of the intent however there was no written notice.

In the future, to prevent a reoccurrence, the facility intends to perform quarterly HCl testing to demonstrate compliance with the rule. Sampling conducted on June 1, 2016 demonstrated emission levels well below the HCl MATS limits with results of 0.00056 lbs HCl/mmBtu of the allowed 0.0020 lbs HCl/MMBtu. Testing was also conducted on May 31, 2017 and verified compliance with the rule with an average emission rate of 0.0018 lbs HCl/mmBtu.

The Grand Haven Board of Light & Power is taking this notice very seriously and will be conducting quarterly stack tests for HCl to prevent a reoccurrence. If you have any questions please do not hesitate to contact me.

Sincerely,

Paul Cederquist
Paul Cederquist

cc: Jeff Chandler
Erik Booth