B2132
MANUAL

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

B213250067

FACILITY: WYANDOTTE DEPT MUNI POWER PLANT		**SRN / ID:** B2132
LOCATION: 2555 VAN ALSTYNE, WYANDOTTE		**DISTRICT:** Detroit
CITY: WYANDOTTE		**COUNTY:** WAYNE
CONTACT: Kim Agee , Environmental Coordinator		**ACTIVITY DATE:** 07/25/2019
STAFF: Stephen Weis	**COMPLIANCE STATUS:** Compliance	**SOURCE CLASS:** MAJOR
SUBJECT: Compliance inspection of the Wyandotte Department of Municipal Services Power Plant facility in Wyandotte. The facility is scheduled for inspection in FY 2019.		
RESOLVED COMPLAINTS:		

Location:
Wyandotte Department of Municipal Services
Power Plant (SRN B2132)
2555 Van Alstyne
Wyandotte

Date of Activity:
Thursday, July 25, 2019

Personnel Present:

Steve Weis, EGLE-AQD Detroit Office
Kim Agee, Environmental Coordinator, Wyandotte
Nicholas Hansen, Barr Engineering Company

Purpose of Activity

A self-initiated inspection of the City of Wyandotte Department of Municipal Services ("WMS") Power Plant facility (hereinafter "WMS", "Wyandotte" or "power plant") was conducted on Thursday, July 25, 2019. The Wyandotte facility was on my list of sources targeted for an inspection during FY 2019. The purpose of this inspection was to determine compliance of operations at the Wyandotte facility with applicable rules, regulations and standards as promulgated by Public Act 451 of 1994 (NREPA, Part 55 Air Pollution Control), and Federal standards. The facility is also subject to the terms and conditions of Renewable Operating Permit (ROP) No. MI-ROP-B2132-2017a.

Facility Site Description

The WMS is a municipal entity, owned and operated by the City of Wyandotte, that provides electricity, water, telephone, internet and cable television services to the residents of and businesses located in Wyandotte. The electricity is generated by the City of Wyandotte's Municipal Power Plant. The power plant is located on the western shore of the Detroit River, just north and east of the downtown area of Wyandotte. The facility is bounded by the Detroit River to the east; to the north by Henry Ford Wyandotte Hospital, a small marina and some residences along the marina; to the south by Bishop Park; and to the west and southwest by an area that is primarily a mix of residential types of properties (houses, condominiums, a senior apartment complex) as well as one of the City of Wyandotte's Bacon memorial District Library.

In addition to the power plant property, Wyandotte operates three diesel-fired compression ignition engine generators that provide back-up power to the power plant. These generators are located approximately ½ mile north of the power plant on James DeSana Drive. The parcel of property on which the generators are located lies to the north of the Henry Ford Wyandotte Hospital, and it borders the southern portion of the BASF complex property.

Facility Operations

The Wyandotte facility, as a municipal utility, operates 24 hours per day, 7 days per week, and every day of the

year. According to the facility's 2018 MAERS report, there are 20 employees at the power plant.

The power plant currently has two natural gas-fired utility boilers operating on site, identified as Unit 5 and Unit 7. Unit 5 (identified in the facility's ROP as EUUNIT5BLR) is a 22.5 MW steam and electric generator that uses exclusively natural gas as a fuel, and the boiler has a maximum rated heat input capacity of 260 MMBTU/hour. Unit 7 (EUUNIT7BLR) is a 32.5 MW steam and electric generator with a maximum rated heat input capacity of 467.3 MMBTU/hour that is currently capable of firing only natural gas. Unit 7 is equipped with low NOx burners and separated over-fire air.

The boilers are used to power turbines to generate electricity for WMS's electrical customers, and to generate and provide steam to meet the steam needs of WMS contract customers. Unit 7 used to fire coal, but it was converted to burn only natural gas in the first quarter of 2012. Another solid fuel-fired boiler used to operate at the facility, Unit 8. Unit 8 was a fluidized bed boiler that was capable of firing coal, untreated virgin wood chip waste and tire-derived fuel (TDF). Unit 8 was permanently retired on June 30, 2016. Boilers 5 and 7 are located and operate in buildings on the northern part of the power plant property. The southern portion of the power plant property was formerly used to store the solid fuels that were fired in boiler Units 7 and 8. This area, which is roughly two acres in size, used to contain coal piles, an area to store tire-derived fuel (TDF) and wood, and an area close to the river that was used to store limestone. With the removal of Unit 8 from service and the conversion of Unit 7 from burning solid fuels to natural gas, the fuel and limestone that was stored on site was removed, and the area that was formerly used to store the solid fuels and limestone is now an open area.

In addition, in the time since my last inspection on July 13, 2017, much of the process equipment involved with either handling solid fuels or disposing of the resultant residue (such as ash), and with handling the particulate/fly ash produced during the combustion of the solid fuel, has been physically dismantled and removed from the facility. This equipment, which used to be included in the FGMATVENTS Flexible Group in the ROP, was located at the north end of the facility, on the north side of the boiler buildings where Units 7 and 8 are located. This equipment included the fly ash silo and the fly ash truck loadout process for Unit 8, and the Unit 8 baghouse.

The three engine generators that are owned and operated by WMS and located to the north of the power plant are each 1,825 kW standby compression ignition diesel-fired engine generators. Emissions from each of the engines are controlled by a catalytic oxidation emission control system.

In June of 2018, WMS and their consultant sent a technical memorandum that provided an air regulatory evaluation for the proposed installation of two natural gas-fired package boilers. The two boilers are to have a maximum rated heat input capacity of 48 MMBTU per hour each. After reviewing the information provided about the boilers in the technical memorandum, it was determined that these boilers would be exempt from AQD permitting requirements. I was told during this site visit that the foundation work for one of the boilers has been completed, and that the boiler is being delivered to the facility for installation soon. The boiler is to be located on the south side of the existing boiler buildings, bear the Unit 7 and Unit 5 buildings. These boilers will be discussed further in the "Permits/Orders/Regulations" section of this report.

Inspection Narrative

I arrived at the Wyandotte power plant at 10:15am. I checked in at the security gate, and I walked to the Unit 8 building towards the office of Kim Agee, WMS's Environmental Coordinator. I met Kim and Nick Hansen of Barr in the building, and we continued to Kim's office.

We began the visit discussing the current operations at the facility, and what has changed since my last visit to the facility in 2017. I was told that the transformer for the Unit 8 boiler had been decommissioned and sold. An outside contractor was hired to haul the transformer from the facility, and some fuel from the transformer leaked while it was being drained from the transformer. I was told that the leaked fuel went into the facility's on-site wet well. There are currently several mobile storage tanks in the lot to the south of the boiler buildings. It was explained to me that stormwater is being pumped into these tanks and being sampled until verification samples come back that allow WMS to discharge as permitted. I was told that all proper notifications of the spill were sent to EGLE, and that staff from EGLE's Water Division have been to the facility in response to the issue.

Kim and Nick told me that the Amended Consent Decree (No. 11-cv-12181) between WMS and US EPA was terminated on March 14, 2019. They said that a Minor Modification request for the purpose of removing conditions and references to the Consent Decree from the facility's ROP was being prepared. The Minor Modification was submitted to Caryn Owens of the EGLE-AQD's Cadillac District Office via correspondence dated July 29, 2019.

We discussed upcoming compliance testing at the facility. We discussed the upcoming RATA (Relative Accuracy Test Audit) certifications for Units 5 and 7. The facility is planning to perform the RATAs in October of this year. Kim and Nick said that Unit 7 has not operated much since the last RATA was performed in the 4th quarter of 2018, and that there are no plans to operate the boiler for the remainder of 2019. We discussed the requirements in 40 CFR Part 75. Nick talked about how a RATA is required every 4 QA (quality assured) operating quarters on the current schedule for the boilers, and Appendix B.2.3.1 of Part 75 allows the RATA to be deferred to being performed no longer than 8 calendar quarters since the last RATA when a boiler has limited operation. I told Kim and Nick that I would discuss their question with AQD Technical Programs Unit (TPU) staff. On August 7, WMS sent correspondence to EGLE-AQD that presented their understanding of the Part 75 requirements and requested that the RATA for Unit 7 be deferred in accordance with Part 75 language. EGLE-AQD replied via correspondence dated August 12, 2019 that the request to defer the RATA from the 4th quarter of 2019 is approved. The correspondence between WMS and AQD can be found in the facility file.

I asked about the cold cleaner, and I was told that the status of the unit hasn't changed since my last site visit. The unit will be addressed in the discussion for FGCOLDCLEANERS in the next section of this report.

We discussed the fugitive dust plan for the facility. The facility is subject to the requirements of Consent Order SIP No. 34-1993, which serves as a fugitive dust plan that was entered as an Order as part of the State of Michigan's State Implementation Plan (SIP) for PM-10 attainment. The facility submitted revisions to the Order in an effort to update the requirements of the Order and its associated fugitive dust plan to reflect the current operations and dust control measures at the facility. During my last site visit in 2017, I was told that WMS and their consultant had spoken with staff from AQD's SIP Unit regarding the Order, and the procedure for revising and/or rescinding the Order. WMS submitted two pieces of correspondence dated August 8, 2017 relating to the fugitive dust SIP Order – a letter to my attention that contains a request that the fugitive dust control plan under SIP No. 34-1993 be revised, and a letter to AQD's SIP Unit through which WMS requests that Consent Order SIP No. 34-1993 be rescinded. WMS has not heard back regarding the status of their request to revise/rescind the Order. They said that they are planning to contact the AQD SIP Unit to request an update.

Kim provided some updates regarding the processes that have been removed from the facility since my last site visit. She told me that the Unit 8 baghouse and stack, the ash silo for Unit 8, and the ash transfer points and mixing pits for Units 7 and 8 have all been demolished and removed from the facility.

We then proceeded to discuss the compliance status of the power plant with the terms and conditions of the ROP. During the course of our discussion, we reviewed records (both paper and electronic).

After some discussion summarizing the site visit, I left the facility at just after 12:00pm.

Permits/Orders/Regulations

Permits

The primary source for the regulatory air requirements that are currently applicable to the Wyandotte facility is the facility's current Renewable Operating Permit No. **MI-ROP-B2132-2017a**, which has an effective date of November 22, 2017. As previously mentioned, WMS submitted a minor modification request via correspondence dated July 29, 2019 to have the conditions and references to the terminated Amended Consent Decree removed from the ROP.

The following paragraphs provide a summary of the compliance of the operations at the Wyandotte power plant with the terms and conditions put forth by the ROP, with the headings representing the sections of the ROP.

Source-Wide Conditions

The Source-Wide Conditions table contains one Special Condition (SC) – SC IX.1, which states that the conditions in the remainder of the ROP for which a Consent Decree is the only identified underlying applicable requirement will be considered null and void upon the effective date of the termination of the Consent Decree. As mentioned previously in this report, the Consent Decree that was in effect when the ROP was finalized was terminated on March 14, 2019. WMS submitted a Minor Modification to the ROP to request that SCs that contain requirements from the Consent Decree be removed from the ROP.

EUUNIT5BLR

This Emission Unit covers the requirements for boiler Unit 5. There are no emission limits associated with this Emission Unit in ROP, so the section of the Emission Unit table titled "I. Emission Limits" is blank.

II. Material Limits

SC II.1 limits Unit 5 to firing only natural gas. The facility is in compliance with this requirement.

III. Process/Operational Restrictions

There are no process/operational restrictions in the ROP.

IV. Design/Operational Restrictions

Wyandotte is **in compliance** with the two Special Conditions (S.C.) in this section. In accordance with the requirements of SC IV.1, the maximum heat input to Unit 5 does not exceed 260 MMBTU/hour, as this is a design limit for the boiler. Devices to monitor NOx, CO_2 and flow from the Unit 5 boiler are calibrated, maintained and operated properly, in compliance with SC IV.2.

V. Testing/Sampling

There are no testing and sampling requirements put forth for Unit 5 in the ROP.

VI. Monitoring/Recordkeeping

Wyandotte is **in compliance** with the requirements in this section. NO_X, CO_2 and stack gas flow are continuously monitored and recorded (SC VI.1); WMS keeps records of all measurements, and the continuous monitoring systems' performance evaluations, calibration checks, and records of adjustments and maintenance (SC VI.2); SO_2 emissions are calculated and recorded (SC VI.3). I was told that these requirements are considered inherent to the monitoring system.

VII. Reporting

Wyandotte is in compliance with the requirements in this section, as all required reports are submitted to EGLE-AQD.

VIII. Stack/Vent Restrictions

The stack dimensions were not discussed during the site visit. The facility's MAERS report provides an inside stack diameter of 97 inches, and a stack height above grade of 198 feet.

IX. Other Requirements

The Special Conditions in this section put forth the requirements of the Federal Acid Rain program, and the Cross-State Air Pollution Control Rule (CSAPR) programs. The CSAPR requirements that apply to Unit 5 are the Transport Rule NOx Annual Trading Program (40 CFR Part 97, Subpart AAAAA), the Transport Rule NOx Ozone Trading Program (40 CFR Part 97, Subpart EEEEE), and the Transport Rule SO2 Group 1 Trading Program (40 CFR Part 97, Subpart CCCCC). Wyandotte demonstrates compliance with these programs to US EPA through the submittal of required reports (e.g. quarterly ECMPS reporting). The facility looks to be **in compliance** with these requirements.

EUUNIT7BLR

This Emission Unit puts forth the permit and regulatory requirements for boiler Unit 7.

I. Emission Limits

Special Conditions I.1 puts forth the NOx emission limit from 40 CFR Part 60, Subpart D (Standards of Performance for Fossil Fuel Fired Steam Generators) that is associated with a natural gas fired boiler unit. The NOx emission limit of 0.20 lb/MMBTU input is effective per Subpart D, as well as per the requirements of the afore-mentioned Consent Decree that was entered into between WMS and US EPA, and that was terminated on March 14, 2019.

WMS continuously monitors NO_X emissions from Unit 7 using a CEMS. Based on recent quarterly excess emission reports, Unit 7 is **in compliance** with the emission limit.

II. Material Limits

SC II.1 limits Unit 7 to firing only natural gas. The facility is in compliance with this requirement.

III. Process/Operational Restrictions

SC III.1 – WMS submitted revisions to the Malfunction Abatement Plan and a Maintenance Procedures and Schedules Plan to AQD on September 6, 2017 to update these plans to reflect that Unit 7 no longer burns coal, and fires exclusively natural gas. The plans address the updated control equipment associated with firing natural gas (low NOx burners, separated over-fire air). AQD sent correspondence to WMS accepting the revised plans. Compliance.

SC III.2 - WMS stated that Unit 7 operates only if the low NOx burners and separated over-fire air are installed, maintained and continuously operated. Compliance.

IV. Design/Equipment Parameter

SCs IV.1 and 2 – The SCs require that WMS operates and maintains continuous monitors on Unit 7 for NOx emissions (and oxygen, or carbon dioxide, per SC IV.2). The requirements to monitor NOx are the same, with SC IV.1 citing the Consent Decree as the UAR, and SC IV.2 citing 40 CFR Part 60 Subpart D and Part 75. The facility is meeting the requirements of these SCs. In the Minor Modification submittal, WMS is requesting that SC IV.1 be removed from the ROP.

SC IV.3 – the SC puts forth an acceptable span value for a NOx CEMS. WMS staff told me that they are complying with this requirement, and they said that the span value is set according to Part 75, based on historic results.

V. Testing/Sampling

There are no Testing/Sampling requirements for Unit 7 in the ROP.

VI. Monitoring/Recordkeeping

SC VI.1 – **Compliance**. Wyandotte continuously monitors and records the required information (e.g. NOx emissions).

SC VI.2 – This condition puts forth document and record retention requirements put forth in paragraphs 65 and 66 of the Consent Decree. The Decree was terminated on March 14, 2019, but the requirements of these conditions extend beyond the termination date; paragraph 65 begins by stating "Until five (5) years after the termination of this Amended Consent Decree…". I was told that WMS is complying with the record and information retention requirements of this SC.

VII. Reporting

Wyandotte is **in compliance** with the applicable provisions of the reporting requirements in this section. SCs VII.2 and 3 address the ROP compliance reports, and SCs VII.4 and 5 address the excess emission and monitoring system performance reports. These two conditions contain provisions that cite 40 CFR Part 60 and the Consent Decree as the underlying applicable requirements.

VIII. Stack/Vent Restrictions

The stack dimensions were not discussed during the site visit. The facility's MAERS report provides an inside stack diameter of 110 inches, and a stack height above grade of 197 feet.

IX. Other Requirements

SC IX.1 requires WMS to comply with the requirements of 40 CFR Part 60 Subpart D. The remaining Special Conditions in this section (SCs IX.2 through 5) put forth the requirements of the Federal Acid Rain program, and the Cross-State Air Pollution Control Rule (CSAPR) programs. The CSAPR requirements that apply to Unit 7 are

the Transport Rule NOx Annual Trading Program (40 CFR Part 97, Subpart AAAAA), the Transport Rule NOx Ozone Trading Program (40 CFR Part 97, Subpart EEEEE), and the Transport Rule SO2 Group 1 Trading Program (40 CFR Part 97, Subpart CCCCC). Wyandotte demonstrates compliance with the programs referenced in SCs IX.2 through 5 to US EPA through the submittal of required reports (e.g. quarterly ECMPS reporting). The facility looks to be **in compliance** with these requirements.

FGWMSENGINES

This Flexible Group contains the regulatory requirements for the three standby compression ignition diesel fuel-fired engine generators.

I. Emission Limits

This Flexible Group puts forth an emission limit for NO_X, and a requirement that the CO emissions from the engines be reduced by at least 70% (or meet an emission limit of 23 ppmvd at 15% O_2), which serves as a surrogate/equivalent emission limit to the formaldehyde limit found in 40 CFR Part 63, Subpart ZZZZ (National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines). Wyandotte performs periodic compliance emissions testing of the engines in accordance with Section V. of this Flexible Group.

The last compliance emissions testing that was performed on the engines to measure NOx emissions took place on October 16-17, 2017. NOx was tested for Engine 1, and a three-run average emission rate of 27.83 lbs. of NOx/hour was measured. This number is factored with the actual usage of the engines, in hours, to estimate NO_X emissions. Using this method, for the 2018 calendar year, 1,244.24 lbs. of NOx was estimated to have been emitted in the facility's 2018 MAERS report, which is in compliance with the limit in SC I.1. A copy of the emission calculation sheet for the engines from the 2018 MAERS report is attached for reference.

All three engines were last tested for CO destruction efficiency during testing that took place on October 22-23, 2018. The measured CO destruction efficiencies, based on a three-run average, was 93.97% for Engine 1, 93.90% for Engine 2, and 93.65% for Engine 3. The measured CO destruction efficiencies are all well over 70%, in compliance with SC I.2. A copy of the cover letter from the test report that shows the test results for CO destruction efficiency is attached for reference.

II. Material Limits

SC II.1 - Compliance. WMS monitors the sulfur content of the diesel fuel used in the engines. Corrigan supplies fuel oil (ultra-low sulfur diesel) to the Wyandotte facility, and they provide sampling data/laboratory analysis for each load of fuel that is delivered to the facility. I was shown an analysis provided by Corrigan that shows the sulfur content and Cetane index of the fuel that was delivered. The sulfur content of the ultra-low sulfur diesel fuel is well below the 0.05 percent by weight limit.

III. Process/Operational Restrictions

SC III.1 – WMS maintains a Preventative Maintenance Plan for FGWMSENGINES. A revised and modified plan was submitted to the AQD-Detroit Office on September 6, 2017, and AQD approved the updated plan. Compliance.

SC III.2 – WMS stated that they operate to engines within the normal operating ranges specified by the manufacturer. Compliance.

SC III.3 – The facility is in compliance with the requirements of this SC to maintain the catalytic oxidation systems for the engines. Regarding SC III.3.a, I was told that the manufacturer recommends a chemical cleaning of the catalysts every 8,000-10,000 hours of operation. The CO reduction is tracked via a spreadsheet, and the run time is monitored. Based on this information, it has been 100+ hours since the last catalyst replacement. WMS said that the pressure drop across the catalyst is maintained in accordance with the requirements of SC III.3.b. The catalyst is operated within the temperature range specified in SC III.3.c. Compliance.

IV. Design/Equipment Parameters

SC IV.1 – The engines are equipped with a system that continuously monitors the catalyst inlet

temperature. Compliance.

SSC IV.2 – The engines are equipped with device that monitor and record the pressure drop across the catalyst as required by the SC.

V. Testing/Sampling

SC V.1 – The most recent compliance emissions test to demonstrate compliance with the catalytic system efficiency (CO removal) took place on October 22-23, 2018. As described in section "I. Emission Limits", the test demonstrated compliance. The pressure drop and catalyst inlet temperature was monitored and recorded during the test, as required by this SC.

SC V.2 – Testing for CO and NOx emissions, as required in SCs V.1 and 3, was performed using approved EPA methods. AQD Technical Programs Unit (TPU) staff have reviewed and approved the test protocols for the compliance emissions tests performed on the engines.

SC V.3 – The most recent compliance emissions test to measure a NOx emission rate from one of the engines in the Flexible Group took place on October 16-17, 2017.

There is no compliance emissions testing required for the engines during this calendar year. CO removal testing is required within 3 years of the last test, or within 180 days of the changing of a catalyst. NOx emissions testing is required every 5 years,

VI. Monitoring/Recordkeeping

SCs VI.1 and VI.2 – **Compliance**. WMS monitors the diesel fuel usage rate. During the site visit, I was shown a sample of the "Diesel Generator Operation Tracking Log" report, which monitors and records operating parameters for each engine every 10 minutes while it is running.

SC VI.3 – WMS maintains records of monthly NOx emissions calculations. The information that was submitted with the MAERS report for 2018 is attached for reference.

SC VI.4 – The sulfur content of the fuel used in the engines is tracked by WMS.

SC VI.5 – Compliance. The required calculations are being maintained by WMS staff.

SC VI.6 – WMS maintains catalyst inlet temperature and pressure drop records for each catalyst. The inlet temperature for the two inlets to each catalyst are recorded every 10 minutes that the engine operates. I received a copy of the records for the three engines for June 2019, which are attached to this report for reference.

SC VI.7 – WMS maintains the CPMS for the engines in accordance with the requirements of this SC. An updated site-specific monitoring plan was submitted to AQD in 2017. Compliance.

VII. Reporting

WMS is **in compliance** with the conditions in this section. All of the required records are completed and submitted.

VIII. Stack/Vent Restrictions

The stack dimensions were not discussed during the site visit. There have been no known changes to the stacks for the three engines.

IX. Other Requirements

Based on information presented and discussed, WMS appears to be in substantial compliance with the area source requirements of 40 CFR part 63 Subpart ZZZZ (SC IX.1), and 40 CFR Part 60 Subpart IIII (SC IX.2).

FGMATVENTS

This Flexible Group covers the plant grounds, including the plant yard (EUPLANTYARD) and the roadways (EUROADWAYB) at the power plant facility. The requirements in this Flexible Group address fugitive dust

control at the Wyandotte facility.

I. Emission Limits

There are no emission limits associated with this Flexible Group.

II. Material Limits

There are no material limits associated with this Flexible Group.

III. Process/Operational Restrictions

There are no process/operational restrictions associated with this Flexible Group.

IV. Design/Equipment Parameters

There are no design/equipment parameters associated with this Flexible Group.

V. Testing/Sampling

There are no testing/sampling requirements associated with this Flexible Group.

VI. Monitoring/Recordkeeping

VI12 – **Compliance**. WMS maintains records of the fugitive dust control measures at the facility. Kim told me that facility maintain logs of fugitive dust related activities, and she tracks these logs. There are records kept of weekly inspections, and records and receipts are kept of any dust suppressant applications at the facility.

VII. Reporting

Wyandotte is **in compliance** with the reporting requirements associated with FGMATVENTS. Regarding SC VII.4, I was told that there have been no instances in which an emission limit, operational requirement or recordkeeping requirement specified in the facility's fugitive dust plan has not been met. WMS includes a statement addressing this SC in their Excess Emission Report submittals.

VIII. Stack/Vent Restrictions

There are no stacks/vents associated with this Flexible Group.

IX. Other Requirements

The requirements in this section of the ROP relate to fugitive dust management, and they cite **Consent Order SIP No. 34-1993** as an applicable requirement, as well as Michigan's fugitive dust regulations (Section 5524 of Act 451 and Administrative Rules 371 and 372).

For background, the Consent Order is part of the State of Michigan's State Implementation Plan (SIP); this part of the SIP was submitted by the State of Michigan as part of the attainment demonstration for PM-10. The Michigan Department of Natural Resources submitted the PM-10 SIP to EPA on June 11, 1993, and, after a couple of revisions, the nonattainment area PM SIP for Wayne County, Michigan was approved and became effective on February 16, 1995. One element of the SIP was the requirement that facilities with designated standard industrial classifications that are located in the area designated in Table 36 of Michigan Administrative Rule 371 "...develop and implement an approved fugitive dust control operating program and to have the program embodied in a legally enforceable order..." (this quote was taken from the preamble to the Consent Order). Many of the larger facilities in the portion of Wayne County designated in Table 36 were issued Orders as part of the SIP. The Wyandotte power plant was issued the Consent Order referred to as SIP No. 34-1993.

Special Condition IX.1 references the requirements of the Consent Order, and the content of the Order is included as Appendix B to the ROP. As mentioned previously in this report, WMS has been looking to make some changes to the content of the Consent Order to accurately reflect current dust control measures at the facility, and also to account for the fact that most of the activities at the facility that were potential sources of fugitive emissions, including the material storage and handling operations, which were primarily associated with the use of solid fuel at the facility, no longer occurring at the facility. WMS has submitted requests to DEQ-AQD to revise the fugitive dust control plan for the facility, and to rescind Consent Order SIP No. 34-1993.

I feel that the facility is in substantial compliance with the fugitive dust management requirements. Most of the potential sources of fugitive dust that are identified in the Order have been permanently removed from the facility.

FG-COLDCLEANER

I was told that the status of the facility's cold cleaner has not changed. The cold cleaner uses a citrus-based cleaner called Orange Peel, and its contents/ingredients meet the material limit requirements of SC II.1. I was told that the unit is seldom used, and that the lid is closed when the unit is not in use. I was told that a DEQ cold cleaner sticker and instructions addressing the use of the cold cleaner (including keeping the lid closed when the unit is not being used) are displayed on or near the unit. The remaining conditions in the Flexible Group were not discussed in further detail during this site visit.

Consent Orders

As mentioned earlier in this report, the Wyandotte facility's ROP contains references to US EPA Amended Consent Decree number 11-cv-12181, which was entered on June 15, 2016. The decree was terminated on March 14, 2019. Some of the requirements of the Consent Decree will continue to apply after its termination, and these requirements are included in the draft ROP renewal.

Regulations

The WMS is subject to the requirements of some Federal regulations.

Unit 5 is subject to 40 CFR Part 63, Subpart DDDDD (National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers and Process Heaters). WMS requested and was granted an extension until January 31, 2017 by DEQ-AQD to comply with the provisions of this regulation. WMS submitted the required Notification of Compliance Status and Annual Compliance Report prior to the January 31 compliance deadline. The information that was provided by WMS in these submittals indicates that the facility is currently complying with the applicable requirements of Subpart DDDDD. Copies of these submittals can be found in the facility file.

Unit 7 is subject to 40 CFR Part 60, Subpart D ((Standards of Performance for Fossil Fuel Fired Steam Generators).

The three diesel-fired engine generators are subject to 40 CFR Part 63, Subpart ZZZZ (National Emission Standard for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines).

Compliance Determination

Based upon the results of the July 25, 2019 site visit and subsequent records review, including reviews of information from the various reports that were submitted by WMS throughout the year, the Wyandotte Power Plant appears to be **in substantial compliance** with the terms and conditions of Renewable Operating Permit MI-ROP-B2132-2017a and, in turn, applicable State and Federal regulations.

Attachments to this report: a copy of the emission calculation sheet for the three diesel-fired engines from the 2018 MAERS report; a copy of the cover letter from the test report that shows the test results for CO destruction efficiency; copies of the Diesel Generator Operation Tracking Log from June 26, 2019 for the three engines.

NAME _____ DATE 8/26/19 SUPERVISOR JK