



STATE OF MICHIGAN
 DEPARTMENT OF
 ENVIRONMENT, GREAT LAKES, AND ENERGY
 LANSING



GRETCHEN WHITMER
 GOVERNOR

LIESL EICHLER CLARK
 DIRECTOR

February 19, 2020

UPS NEXT DAY DELIVERY

Mr. Brian Vokal
 Midland Cogeneration Venture
 100 Progress Place
 Midland, Michigan 48640

SRN: B6527; Midland County

Dear Mr. Vokal:

VIOLATION NOTICE

The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) reviewed the Continuous Emission Monitoring System (CEMS) Certification Test Report submitted by Midland Cogeneration Venture located in Midland, Michigan. The Renewable Operating Permit (ROP) number MI-ROP-B6527-2014a requires the facility to monitor and record Carbon Monoxide (CO) emissions from EU-BOILER3 (Unit 18) on a continuous basis in a manner and with instrumentation acceptable to the AQD.

During the report review, staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-BOILER3	MI-ROP-B6527-2014a FGBOILERS1-6, VI, 5	The permittee shall install, calibrate, maintain and operate in a satisfactory manner a device to monitor and record the NO _x and CO mass and concentration emissions from each boiler of FG-BOILERS1-6 on a continuous basis. The permittee shall operate each CEMS to meet the timelines, requirements and reporting detailed in Appendix 2 and shall use the CEMS data for determining compliance with Special Conditions I.5, I.6, I.7, I.8, and I.9.
EU-BOILER3	MI-ROP-B6527-2014a FGBOILERS1-6, VI, 5	Failure to continuously monitor Carbon Monoxide.

Appendix 2 of MI-ROP-B6527-2014a requires that within 60 days of completion of testing, the permittee shall submit to the AQD two copies of the final report demonstrating that the CO CEMS complies with the requirements of Performance Specification 4A. Performance

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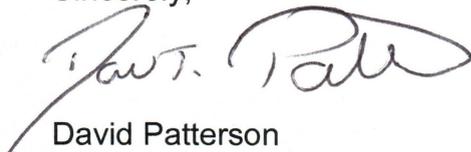
Specification 4A, Section 13.2 requires that the relative accuracy (RA) of the CEMS must be no greater than 10 percent when using the reference method (RM) monitors, 5 percent when using the applicable standard, or within 5 ppmv when the RA is calculated as the absolute difference between the RM and CEMS plus the 2.5 percent confidence coefficient. The Relative Accuracy Test Audit (RATA) was conducted on October 28, 2019. The test report was received November 22, 2019. The relative accuracy of EU-BOILER3 was reported as a 5.82 ppmv difference between the RM and CEMS. The failure of the RATA has resulted in the CO monitors for EU-BOILER3 was out of control from the date of the failure until a new RATA is conducted and the monitor passes Performance Specification 4A. In addition, 2019 fourth quarter excess emission reports indicate an excess period (99.1 percent) of CO monitor downtime for EU-BOILER3.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 11, 2020 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; 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.

If Midland Cogeneration Venture 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. 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,



David Patterson
Environmental Quality Analyst
Air Quality Division
517-256-4388

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Chris Hare, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Ben Witkopp, EGLE