

**GRAYLING GENERATING STATION LIMITED PARTNERSHIP**

4400 West Four Mile Road  
Grayling, Michigan 49738  
(989) 348-4575

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June 25, 2021

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Mr. Jeremy Howe  
Environmental Air Quality Analyst  
Michigan Department of Environment, Energy, and Great Lakes (EGLE)  
Cadillac District Office  
120 West Chapin Street  
Cadillac, MI 49601-2158

**RE: Violation Notice for Flow CEMs, issued June 18, 2021  
Grayling Generating Station Limited Partnership [SRN: N2388]**

Dear Mr. Howe:


The Grayling Generating Station (GGS) is in receipt of the Violation Notice (VN) issued by your department on June 18<sup>th</sup>, 2021. GGS is investigating the allegations presented therein. As the compliance allegations date back four years to 2017, we believe a considerable amount of time is required to conduct an in-depth review and analysis of CEMS data, quality assurance and quality control (QA/QC) activities, stack test and/or Relative Accuracy Test Audit (RATA) reports, as well as potential impacts from fuel and boiler operational fluctuations.

GGS finds the response timeframe (21 days) requested by EGLE to be insufficient to fully address each item in a manner we discussed during our teleconference of 6/23/21. Initially, we had thought that an extension to 30 days would be ample. However, after further internal evaluation, GGS respectfully requests an extension to August 20<sup>th</sup> to align personnel resources past upcoming holiday/vacation time, as well as to recognize workload allocations for second quarter Electronic Data Report (EDR) and Excess Emission/Monitoring Downtime reporting which will occur throughout July.

As indicated in our conference call, GGS and EGLE are in alignment that the corrective action has already been implemented via adjustment of K-factor and other minor changes to the flow monitor configuration. Furthermore, the plant has been operating in compliance with permit limits and monitoring requirements since the probationary calibration on April 29<sup>th</sup> (after the preceding changes were completed) and subsequent passing of the 3-load flow RATA. Once you have completed your review, GGS respectfully requests that EGLE provide written acceptance of the 2021 RATA test report for our records. This will help provide more certainty of the validity of the monitoring data we are currently collecting .

Lastly, in the VN, EGLE presents a table that displays the flow to load ratio over time. GGS will be reviewing the same type of data; however, we suggest that breaking the data out into low and high load bins may be a more appropriate tool for evaluation. This approach would better align with the Part 75 flow-to-load QA/QC check by recognizing that the relationship between exhaust flow and load may vary across the operating range. If you have questions regarding this request, please contact me at (989) 348-4575 ext. 111 or Kathryn Cunningham at 517-375-3043. Thank you for your consideration in this matter.

Sincerely,



Edward A. Going  
Plant Manager

cc: Ms. Karen Kajiya-Mills, AQD  
Mr. Shane Nixon, EGLE - AQD  
Mr. Richard Laur, CMS  
Ms. Kathryn Cunningham