

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

N238826987

FACILITY: GRAYLING GENERATING STATION LTD PTNR		SRN / ID: N2388
LOCATION: 4400 W FOUR MILE RD, GRAYLING		DISTRICT: Gaylord
CITY: GRAYLING		COUNTY: CRAWFORD
CONTACT: Mr. Philip E. Lewis , Former Plant Manager		ACTIVITY DATE: 09/18/2014
STAFF: Becky Radulski	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: scheduled inspection and records review		
RESOLVED COMPLAINTS:		

Grayling Generating, N2388 is a ROP source located in Crawford County. The facility was targeted for a scheduled inspection and full compliance evaluation for the 2014 fiscal year. Becky Radulski of the Gaylord Field Office inspected this facility on September 18, 2014. The purpose of the inspection was to determine compliance with ROP-N2388-2014. AQD Staff arrived on site at approximately 9 am. Mr. Phil Lewis, Plant Manager met with and took me on a site tour. I also met with Tim Porter, Operations Supervisor, who took the place of Hal, and Mike Kramer, Maintenance Supervisor, and Mike Bean, CMS Enterprises Asset Manager. Dave (Computer Tech) reviewed the CEMs and COMs operation. Doug Yanniello was present in the Control Room.

FACILITY DESCRIPTION: Grayling Generating is an electric utility facility, equipped with a wood and tire derived fuel (TDF) boiler with natural gas auxillary burners. The facility typically operates at 36 megawatts at high load and 10 megawatts at low load. During low load the facility does not typically process TDF as it burns too hot to use during low load. If the wood pile is wet however, TDF may be used.

Typically the facility has two scheduled outages per year. The fall outage is scheduled for October 20-22.

During the inspection several semis delivered wood to the facility. The wood pile is currently at around 50 day pile, meaning the current pile would last 50 days if no more wood was added. Typically for winter months they like to have a 80 day pile.

B. SOURCE-WIDE CONDITIONS

III. PROCESS/OPERATIONAL RESTRICTIONS

The facility maintains an approved fugitive dust plan dated September 27, 1991. The facility owns a street sweeper and the records are maintained and were viewed in Tim's office (off control room). The roads are swept approximately 1-2 times per week during Spring-Fall. Most recent were 9/17/14. During winter months the roads are plowed.

The facility maintains an approved Preventative Maintenance/Malfunction Abatement Plan (PM-MAP) dated August 2011.

VI. MONITORING/RECORDKEEPING

Records were reviewed at the facility, no objections.

C. EMISSION UNIT CONDITIONS

EUBOILER – This is a water lined boiler. Inside the boiler there is a urea injection spray to control NOx. The existing flyash goes thru an overpass where larger pieces of char fall out and are sent back to the boiler. Next is a multiclone dust collector that separates char/fly ash from sand/dirt. The sand and dirt is disposed of at a landfill. The recovered char/fly ash is blown back into the boiler. There is an ESP for control of particulate matter.

III. PROCESS/OPERATIONAL RESTRICTIONS

The facility typically has 2 shutdown periods for the year. Additional shutdowns take place as needed for repair. Start up takes approximately 5 hours. The first 3 hours are natural gas, then they start adding wood fuel.

V. TESTING/SAMPLING

Stack testing has been completed. Testing took place on July 14 and 15, 2010 and did not pass sulfuric acid mist permit limits. Repeat testing for sulfuric acid mist took place on June 14, 2011, and passed permit limits.

VI. MONITORING/RECORDKEEPING

The facility utilizes CEMS to record NOx, CO2, exhaust flow rate, CO, SO2 on a continuous basis. The CEMS computer readout from September 14, 2014 was received and is attached.

The facility utilizes COMS to monitor and record the visible emissions. The COMS is automatically calibrated on a daily basis.

The facility performs cylinder gas audits as part of their quality assurance procedures. O2 monitors were removed as the facility now uses CO2 to dilute.

The facility monitors and reports the amounts of TDF, wood and natural gas fired in EUBOILER. The facility calculates the annual capacity for natural gas, wood and TDF. Records have been reviewed, no objections.

The facility calculates emissions within 7 days of the end of each calendar month. Records were received, no objections. The facility uses CEMS, COMS, Stack Tests and Appendix 7 to calculate emissions.

EUEMERGENERATOR – There is one diesel-fired reciprocating internal combustion engine use to provide electricity to the facility on an emergency basis.

IV. MONITORING/RECORDKEEPING

The facility maintains records via purchase records as to which grade of diesel was received. The generator is tested weekly. The unit has a non-resettable hours monitor.

D. FLEXIBLE GROUP CONDITIONS

FGMATLHDLG – Consists of ash and raw material handling.

III. PROCESS/OPERATIONAL RESTRICTIONS

The ash is mixed with water before leaving the facility. It is then collected and stored in a building prior to disposal at a landfill. While onsite a semi truck hauled a load of ash to the landfill.

At the time of our inspection, there were frequent deliveries of wood chips being unloaded to the wood chip fuel pile. Semis back onto a hydraulic deck and the whole semi is hydraulically tilted up to empty the load to the chip pile. The facility fuel pile is monitored for temperature to ensure the pile does not combust. The wood chip pile is managed to use the oldest part of the fuel pile first.

Records of fuel handing and inspections were viewed at the facility. No objections.

FGCIRICEMACT - EUEMERGENERATOR and EUFIREPUMP are subject to RICE MACT ZZZZ. The ROP contains special conditions provided by Grayling Generating Station. The AQD is not delegated the regulatory authority for this area source MACT, therefore these special conditions were not reviews in the inspection.

CONCLUSION: Based on the on-site inspection and records review, this facility appears to be in compliance with ROP-N2388-2014.

NAME Bedry Radulski DATE 9/18/14 SUPERVISOR SN