

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

N662626873

FACILITY: Jackson Power Company, LLC		SRN / ID: N6626
LOCATION: 2219 CHAPIN ST, JACKSON		DISTRICT: Jackson
CITY: JACKSON		COUNTY: JACKSON
CONTACT:		ACTIVITY DATE: 09/16/2014
STAFF: Brian Carley	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled inspection		
RESOLVED COMPLAINTS:		

I arrived at the facility and met with Wayne Frey, Doug Mallory, and Jason Ricketts. I gave them the Environmental Inspection pamphlet and quickly went over the inspection procedure. We then discussed the current status of the plant and they currently were not operating any of the turbines at this time. After discussing some future regulations, I then went with Doug and Jason to conduct my inspection of the facility.

We then went to the control room to review the records that they are required to keep. I first reviewed the requirements of Table EUEDG(an emergency/stand-by diesel fired generator). They are required to monitor and record the hours of operation for this unit, for the current 12 month rolling time period, they operated 117.7 hours, which is well below their limit of 800 hours (S.C. III.1 and VI.1). I did not review their records to verify compliance with 40 CFR Part 63, Subpart ZZZZ for Area Sources. I did remind them that they do need to make sure that they are in compliance with that Subpart if EPA decides to audit them.

For Table FGLMDB1-6, which covers Units 1 through 6 natural gas-fired turbines, steam injection, and duct burners. I first reviewed their records to determine compliance with their emission limits for this table. They are well under their limits specified in S.C. I.1 though 7 (see attached). We then talked about their startup and shutdown procedures. They are still following the manufacturer's recommendations and using steam injection except during periods startup or shutdown (S.C. III.1 and 2). They have only been in startup or shutdown in the last 12 months for 564.4 hours, which is well below their limit of 4,380 hours (S.C. III.3). The last time they conducted a stack test to verify VOC and PM mass emission limit was in June 2010. They are planning on conducting another stack test for PM and VOC sometime in 2015 (S.C. V.1 and 2). They demonstrate compliance with the NOx ppm limits and mass emission limits and CO mass emission limits in this table using CEMS. These CEMS were last certified during the week of June 9, 2014 (S.C. VI.1 and 2). I determined that they are in compliance with this table.

For Table FGEADB7, which covers Unit 7EA natural gas-fired turbine, dry low-NOx burner, and duct burner. I first reviewed their records to determine compliance with their emission limits for this table. They are well under their limits specified in S.C. I.1 though 6 (see attached). We then talked about their startup and shutdown procedures. They have only been in startup or shutdown in the last 12 months for 170.5 hours, which is well below their limit of 1,040 hours (S.C. IV.1). They are using the dry low-NOx combustion technology when they are operating except during times of startup or shutdown (S.C. IV.2). They demonstrate compliance with the NOx ppm limits and mass emission limits and CO mass emission limits in this table using CEMS. These CEMS were last certified during the week of June 9, 2014 (S.C. VI.1 and 2). I determined that they are in compliance with this table.

For Table FGCTDB1-7, this table covers all seven units. I first reviewed their records to determine compliance with their emission limits for this table. They are well under their limits specified in S.C. I.1 though 4 (see attached). They were not operating today, so I did not do a visible emission reading (S.C. I.5). They are firing only natural gas when running and they are monitoring and recording the sulfur content of the fuel. The sulfur content of the natural gas is 0.073 grains per 100 scf, which is well below their limit of 20 grains per 100 scf (S.C. III.1 and VI.4). I asked about their startup/shutdown/malfunction plan that they submitted March 15, 2002. I found out that it was not the most current version. They gave me a copy of their current plan for our files and put in their procedures to send AQD a copy for our files when they update it. They are still following the manufacturer's recommendations and using steam injection except during periods startup or shutdown (S.C. III.2 and 3). The last time that they conducted a stack test to determine compliance with the formaldehyde annual mass emission limit, VOC mass emission limit, and the PM-10 mass emission limit was in June 2010. They are planning on conducting another stack test in 2015 (S.C. V.1 through 3). They demonstrate compliance with the NOx ppm limits

and mass emission limits and CO mass emission limits in this table using CEMS. These CEMS were last certified during the week of June 9, 2014 (S.C. VI.1 and 6). They are monitoring and recording the heat input in mmBtu on a continuous basis in accordance with 40 CFR Part 75 (S.C. VI.2). They are monitoring, recording, and reporting emissions and operating information per 40 CFR Part 60, Subpart GG. They are not claiming an allowance for fuel bound nitrogen that is allowed per Subpart GG (S.C. VI.3 and 5). They are in compliance with their Acid Rain and CAIR permits that are attached to their ROP as appendices (S.C. IX.1 through 8). Based on the information from this inspection they are meeting the requirements of the PSD regulations, 40 CFR 52.21 (S.C. IX.9). I have determined that they are in compliance with this table.

For Table FGCOLDCLEANERS, this table covers all parts cleaners on site. They are using a Safety-Kleen parts cleaner with Stoddard solvents. They showed me the specs of their parts cleaner and it was 4.9 square foot air-to-vapor interface area and is exempt per Rule 285 (r). The Stoddard solvent that they use has a Reid vapor pressure of .0116 psia (S.C. VI.2). I was able to see the written operating instructions on the wall above the parts cleaner, which had its lid closed at that time (S.C. VI.3). I determined that they are in compliance with this table.

When then went back to Wayne's office to discuss what I had determined their compliance status was from this inspection. Based on the findings of this inspection, their MAERS submittal, and the annual and semi-annual reports, I have determined that they are in compliance with their permit.

NAME Brian Carley DATE 9/22/14 SUPERVISOR [Signature]