

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

N676731428

FACILITY: New Covert Generating Company, LLC		SRN / ID: N6767
LOCATION: 26000 77th Street, COVERT		DISTRICT: Kalamazoo
CITY: COVERT		COUNTY: VAN BUREN
CONTACT: Chris Head, Operations Manager		ACTIVITY DATE: 09/25/2015
STAFF: Dennis Dunlap	COMPLIANCE STATUS: Compliance	SOURCE CLASS: MAJOR
SUBJECT: Scheduled inspection.		
RESOLVED COMPLAINTS:		

This was not an announced inspection. The inspection brochure was handed out. Chris Head is the contact person. Units 2 & 3 were operating. The last stack test was August 6-13, 2013. A RATA was performed in August, 2015.

The SCR catalyst for Unit 2 was sampled on 1/15/15. The results indicated good activity. Samples are in the lab to be tested for Units 1 & 3.

EU-AUXBOIL- The 12-month rolling time period hours of operation for August was 442.31. The permit limit is 1,600 hours. This equipment is subject to the boiler MACT and will be subject to some permit conditions after Jan. 30, 2016.

EU-GASHEATER- This equipment has not been used since 2004.

FG-DUCTBURNERS- The 12-month rolling time period hours of operation as of August were: #1, 276 hrs.; #2, 218 hrs.; #3, 286 hrs. The permit limit is 4,000 hours per 12-month rolling time period for each ductburner.

FG-TURB/DB1-3- visible emission readings are required once per quarter. Records are being kept for these. The last reading was done on 7/13/15. The startup and shutdown hours are being kept and the facility is in compliance with the 724 hours per turbine per 12-month rolling time period permit limit. Hourly heat input records are being kept (MMBtu/hr). The facility has an SSM Plan. The inlet temperature to the SCR was reading 613 degrees F for Unit #3 and 636 degrees F for Unit #2. There is an alarm if this temperature goes out of range. The ammonia feed rate was 0.42 gpm for Unit #3 and 0.68 gpm for Unit #2. The ammonia is stored in a 60,000 gallon tank. There are cooling towers for each turbine. No visible emissions were observed.

The facility is in compliance with the tons per year 12-month rolling time period limits for NOx, CO, VOC, PM10, and formaldehyde.

In the control room the following records were viewed: NOx ppm 24-hour rolling average as determined each hour; CO, lb/hr.; VOC, lb/hr.; and PM10, lb/hr. The facility was in compliance with the permit limits. The facility uses the CEMS NOx and CO calculations. Emission factors are used for VOC, PM10, and formaldehyde emission calculations.

The emission factors for VOC, PM10 and formaldehyde were checked. These should be based on the last stack test. Some of the factors were slightly different from AQD calculations. They were changed to reflect AQD values. AQD calculations based on the 2013 stack test are as follows, given in the order of 75% load, 100% load, and 100% load with duct burners and in the order PM10, VOC, formaldehyde:

Unit #1: 0.0022; 0.0022; 0.0019; 0.0013; 0.0015; 0.0019; 0.0008; 0.0007; 0.00041.

Unit #2: 0.003; 0.001; 0.002; 0.002; 0.002; 0.001; 0; 0; 0.

Unit #3: 0.002; 0.002; 0.002; 0.003; 0.002; 0.003; 0.001; 0; 0.

**FG-EMERGENCY-** There is one emergency generator and one diesel-fired fire pump. These engines are subject to 40 CFR Part 63 Subpart ZZZZ. Both units have an annual inspection which involves an oil change, and an inspection of the air filters, hoses, and belts. This was last done on 11/4/14. Over the last 12 months the generator was operated for 126 hours, 116 hours of these were non-maintenance. The fire pump was operated for 33 hours with 2 hours non-maintenance. The engines have a weekly maintenance check. The facility tested the oil on 5/21/15. The results came back 0.0015% sulfur (15 ppm). This is in compliance with the permit limit of 15 ppm. The facility keeps SDS for each delivery of fuel oil. The SDS for the last delivery specified that the sulfur content was not above 15 ppm.

**FG-COLDCLEANERS-** There is one cold cleaner. The lid was closed and the rules were posted.

There is a large well water tank and deionized water tank on site.

NAME Dennis Durlap DATE 9/28/15 SUPERVISOR MO 9/28/2015