



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
KALAMAZOO DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

May 8, 2019

Mr. John Reese
Eastern Generation LLC
300 Atlantic Street, 5th Floor
Stamford, Connecticut 06901

SRN: N6767, Van Buren County

Dear Mr. Reese:

VIOLATION NOTICE

The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) is in receipt of the quarterly air emissions monitoring and deviation report submitted by New Covert Generating (Facility) for their natural gas plant located at 26000 77th St., Covert, Michigan. The report is for January 1, 2019 to March 31, 2019. The report was submitted in order to comply with MI-ROP-N6767-2014C.

Based on a review of the report, staff of the AQD noted the following violation:

Process Description	Rule/Permit Condition Violated	Comments
FG-TURB/DB1-3	MI-ROP-N6767-2014C, Condition I.3	CO emission limit is 33.7 lb/hr for a 24-hour rolling average determined each hour. The reported CO lb/hour 24-hour rolling average on 1/21/19 and 1/22/19 exceeded the 33.7 lb/hr limit.

The report provided demonstrate that actual emissions of CO for the lb/hour 24-hour rolling average limit were as follows:

Hour		CO lb/hr 24-hour rolling (limit 33.7 lb/hr)
1/21/19	06	46.7
	07	109.0
	08	149.8
	09	155.8
	10	155.6
	11	155.6
	12	155.7
	13	155.4
	14	155.2
	15	155.0
	16	154.8
	17	154.9
	18	154.9
	19	154.9
	20	155.0
	21	155.1
	22	155.2
	23	155.3
	1/22/19 00	155.3
	01	155.3
	02	155.3
	03	155.3
	04	155.2
	05	155.2
	06	120.3
	07	56.9
	08	15.3

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 29, 2019 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Please submit the written response to EGLE, AQD, Kalamazoo District, at 7953 Adobe Road, Kalamazoo, Michigan 49009 and submit a copy to Ms. Jenine Camilleri,

Mr. John Reese
Eastern Generation LLC
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Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan
48909-7760.

If the Facility 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 violation cited above. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Amanda Chapel
Environmental Quality Analyst
Air Quality Division
(269)910-2109

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Rex Lane, EGLE
Mr. Chris Head, New Covert Generating