

JUN 22 2017

DEQ violation response

June 12-2017

In response to the violations that were cited that have occurred since the new install date in 2011 and have been ongoing until March of 2017. Below are the procedures we have taken to be in conformity to our Permit requirements. These procedures have been put in place as of March of 2017. March of 2018 we will have established a full year of records, logs and readings the will put us in full compliance. We are working to alter the permit for the generator to assure that the brake horsepower issues will no longer be an issue.

1

Process Description	Rule/Permit Condition Violated	Comments
EUENGINE1	PTI 156-10A SC IV.2	Nameplate capacity exceeds 1,662 brake horsepower.
EUENGINE1	PTI 156-10A SC VI.5	NO <sub>x</sub> emissions were not calculated.
FGTURB/HRSG1 FGTURB/HRSG2	PTI 156-10A SC VI.2	Visible emission readings were not documented.
FGTURB/HRSG1 FGTURB/HRSG2	PTI 156-10A SC VI.3	Monthly log of hours of operation were not kept.

During the inspection, it was determined that EUENGINE1 had a nameplate capacity of 1645 KW, which is equivalent to 2,206 brake horsepower. This is a violation of Special Condition IV.2 of PTI number 156-10A, which requires that the brake horsepower not exceed a nameplate capacity of 1,662 brake horsepower.

Initial permit requirements for the generator concerning the KW in operation with the brake horsepower were exceeded and we are in the process of submitting for a new permit to cover the increased size of the nameplate capacity. We are setting for a tentative date of Sept 15<sup>th</sup> to have this process completed and in compliance with the permit requirements.

2

Additionally, DTMB Energy was unable to produce NO<sub>x</sub> emission calculations records for EUENGINE1. This is a violation of the recordkeeping limitations specified in Special Condition number VI.5 of PTI number 156-10A which requires that 12-month rolling time period NO<sub>x</sub> emission calculation records be kept.

A formula for the necessary calculations of the NO<sub>x</sub> emissions has been created and implemented in a spreadsheet to capture the monthly log of run hours, run times, run purpose, any down time for repairs, monthly maintenance records and any emergency run times. It was started from March of 2017. It will give us monthly and yearly data going forward to be in compliance.

3

- Records of the non-certified visible emissions observations, the United States Environmental Protection Agency Method 9 observations, the reason for any visible emissions observed, and any corrective actions taken as a result of observing visible emissions. (SC VI.2)

A monthly visual inspection of the emissions from the stacks has been added to the monthly log of rounds and inspections to check for any excessive emissions. An area has also been added to the log to document and report on out of the ordinary visuals from the stacks.

4

Written log of the monthly hours of operation of FGTURB/HRSG1 and FGTURB/HRSG2 kept in a satisfactory manner. While logs of start and stop times appear to be recorded, these are not considered sufficient for recording hours operated. (SC VI.3)

A new excel spreadsheet has been created to conform to the permit requirements. It captures daily and weekly hours of operation including daily run time, maintenance stop times and restarts, weekly and monthly tests for safety features. It captures scheduled inspection times and emergency down times and then starting up time. This spread sheet was created and starting being logged from March of 2017 to be in compliance with violation.

This also includes gas meter reading entered weekly from the main outside gas pressure gages.

## Luplow, Michelle (DEQ)

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**From:** Davis, Scott (DTMB)  
**Sent:** Thursday, June 22, 2017 8:24 AM  
**To:** Luplow, Michelle (DEQ)  
**Cc:** Miller, Heath (DTMB); Scates, Larry (DTMB); Uphaus, Jamie (DTMB); Droste, Kerri (DTMB); Turnquist, Michael (DTMB)  
**Subject:** DEQ Violation Notice Response  
**Attachments:** DEQ violation response June 12 2017 (002).pdf; EC DEQ Violation Notice 060917.pdf

Good morning Michelle,

Please consider this email our DTMB written response to the Violation Notice from June 6, 2017. I have attached written documentation to support the dates of violation, cause and duration, and a summary of actions taken to correct the violations. As you will see in the attached, we have taken corrective action on 3 of the 4 violations and are in the process of updating the PTI number 156-10A for EUENGINE1 to correct the discrepancy of the brake horsepower rating, which I believe should resolve the 4<sup>th</sup> condition violated. Please let me know if you feel this response to be inadequate or if there is any other information we can provide.

Thank you,

SCOTT DAVIS  
517.636.0520



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**From:** Miller, Heath (DTMB)  
**Sent:** Wednesday, June 21, 2017 11:11 AM  
**To:** Davis, Scott (DTMB) <[DavisS2@michigan.gov](mailto:DavisS2@michigan.gov)>  
**Subject:** FW: response letter

From Michelle,

Heath Miller  
(517) 636-4871  
(517) 202-1560



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**From:** Luplow, Michelle (DEQ)  
**Sent:** Wednesday, June 21, 2017 11:10 AM  
**To:** Miller, Heath (DTMB) <[MillerH11@michigan.gov](mailto:MillerH11@michigan.gov)>  
**Subject:** RE: response letter

Hi Heath,

Good question. Email is okay.

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**From:** Miller, Heath (DTMB)  
**Sent:** Tuesday, June 20, 2017 12:29 PM  
**To:** Luplow, Michelle (DEQ)  
**Subject:** response letter

Good afternoon Michelle,

Quick question. Can we email the response letter or does it need to be sent in the mail?

Thank you

Heath Miller  
(517) 636-4871  
(517) 202-1560

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