



November 8, 2018

DEQ/AQD Lansing District Office
ATTN: Julie Brunner
Constitution Hall
525 W. Allegan, 1 South
P.O. Box 30242
Lansing, MI 48909

DEQ/AQD Enforcement Supervisor
ATTN: Jenine Camilleri
Constitution Hall
525 W. Allegan, 2 South
P.O. Box 30260
Lansing, MI 48909

**SUBJECT: REO TOWN PLANT EUNGENGINE
RESPONSE TO NOTICE OF VIOLATION**

Dear Mrs. Brunner,

On October 12, 2018, the Lansing Board of Water & Light (BWL) received a Violation Notice for our REO Town Plant emergency engine, EUNGENGINE, for permit limit exceedances of PM2.5 and PM10 during the September 13, 2018 emissions test. The test performed by Mostardi Platt utilized U.S. EPA Method 5/202.

EUNGENGINE is operating under Renewable Operating Permit (ROP) MI-ROP-B2647-2018. The engine is natural gas fired, permitted for emergency use, and has an operational restriction of no more than 100 hours per year as required by 40CFR60 Subpart JJJ and Special Condition III.2. Since commercial operation of the REO Town Plant in July of 2013, EUNGENGINE has operated a total of 150.0 hours as of November 6, 2018.

EUNGENGINE is tested on a weekly basis to ensure unit readiness in the event of utility service interruption. During these tests, the EUNGENGINE generator is run at light or no load. After discussing the test results and troubleshooting the engine with Michigan Caterpillar, we believe this testing protocol



is likely to be the reason for the PM2.5 and PM10 test results. Michigan Caterpillar believes that running the engine at light or no-load status could create negative intake manifold pressure, which may affect the seal on the piston rings and cause oil to be pushed past the rings. The BWL has changed the practice of operating at light or no load to operations of full load during these maintenance testing events. We believe this change will balance the intake manifold pressure to allow for successful testing and operation.

The BWL is currently coordinating with Michigan Caterpillar and Mostardi Platt to reschedule testing in late November to mid-December. We will be in contact with the appropriate DEQ district and Technical Programs Unit personnel to coordinate a test date once availability is determined.

We appreciate the opportunity to respond to your concerns. If you have any questions, please contact Nathan Hude at 517-702-6170.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lori Myott", with a long horizontal flourish extending to the right.

Lori L. Myott
Manager, Environmental Services
1232 Haco Drive
Lansing, Michigan 48901
Lori.Myott@lbwl.com
517-702-6639

cc: Nathan Hude, BWL
Brandie Ekren, BWL
Mark Matus, BWL
Craig Smith, BWL
Roberto Hodge, BWL

