



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

October 1, 2019

Ms. Lori Myott, Manager, Environmental Services
Lansing Board of Water and Light
1232 Haco Drive
Lansing, Michigan 48910

SRN: B2647, Ingham County

Dear Ms. Myott:

VIOLATION NOTICE

On August 21, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a stack test report on emissions of particulate matter (PM) and hydrogen chloride (HCl) from EUBOILER4. The testing was performed on July 16, 2019, at the Lansing Board of Water and Light (LBWL), Eckert Station located at 601 Island Drive, Lansing. The purpose of the test was to determine compliance with the emission limits in Renewable Operating Permit (ROP) number MI-ROP-B2647-2018.

The following was indicated:

Process Description	Rule/Permit Condition Violated	Comments
EUBOILER4 - 807 MMBtu/hr Babcock and Wilcox pulverized coal-fired boiler with No. 2 fuel oil for startup and flame stabilization located at Eckert Station. Controlled with LNB, OFA, ESP, and ACI.	FGMATS - Special Conditions (SC) V.1 and V.2 per 40 CFR Part 63, Subpart UUUUU.	SC V.1 and V.2 contain the requirements for quarterly testing of PM and HCl if not a LEE unit. The quarterly testing appears to not to have been completed per the requirements of 40 CFR 63.10006(f)(3).

This process is subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP): Coal- and Oil-Fired Electric Utility Steam Generating Units. These standards are found in 40 CFR Part 63, Subpart UUUUU, and are otherwise known as the Mercury and Air Toxics Standards (MATS).

MATS contains the following requirement under 40 CFR 63.10006(f)(3):

- (3) If your EGU misses a performance test deadline due to being inoperative and if 168 or more boiler operating hours occur in the next test period, you **must** (*emphasis added*) complete an additional performance test in that period as follows:
 - (i) At least 15 calendar days must separate two performance tests conducted in the same quarter.

MATS testing on EUBOILER4 was not completed in the 4th quarter of 2018 because of a boiler malfunction.

Ms. Lori Myott, Manager
Lansing Board of Water and Light
Page 2
October 1, 2019

If a performance test is missed due to the EGU being inoperable, and if 168 or more boiler operating hours occur in the next test period, additional performance tests must be completed as required in 40 CFR 63.10006(f)(3). EUBOILER4 was operated from March 17, 2019, until April 12, 2019. It operated for a total of 339 hours for the 1st quarter of 2019, and 284 hours for the 2nd quarter of 2019. Testing was conducted on April 4, 2019. EUBOILER4 was shut down on April 12, 2019, before an additional MATS test could be completed as required by 40 CFR 63.10006(f)(3). MATS testing was completed in the 3rd quarter on July 16, 2019, but this does not resolve the issue that additional MATS testing was not completed in the previous quarters.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 22, 2019. 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, Lansing District, Constitution Hall, 525 West Allegan, 1 South, P.O. Box 30242, Lansing, Michigan 48909 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If you believe 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,



Julie L. Brunner, P.E.
Senior Environmental Engineer
Air Quality Division
517-275-0415

cc: Ms. Sarah Marshall, USEPA
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE