



STATE OF MICHIGAN  
 DEPARTMENT OF ENVIRONMENTAL QUALITY  
 LANSING DISTRICT OFFICE



RICK SNYDER  
 GOVERNOR

DAN WYANT  
 DIRECTOR

July 2, 2014

Mr. Mark Matus  
 Environmental Services Manager  
 Lansing Board of Water and Light  
 1201 S. Washington Avenue  
 Lansing, MI 48910

SRN: B2647, Ingham County

Dear Mr. Matus:

**VIOLATION NOTICE**

On June 1, 2014, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) received a winter emissions test report on carbon monoxide (CO), particulate matter (PM), particulate less than 10 microns (PM10), and particulate less than 2.5 microns (PM2.5) from EUTURBINE1, EUTRUBINE2, FGTURB/HRSG1, FGTURB/HRSG2, and EUAUXBOILER. The testing was performed on January 18-24, 2014, at Lansing Board of Water and Light (LBWL) REO Town located at 1201 South Washington Avenue, Lansing. The purpose of the test was to determine your facility's compliance with the emission limits of your renewable operating permit (ROP) number MI-ROP-B2647-2012.

The Technical Programs Unit of the AQD completed its review of the test report on June 18, 2014, and determined that the test results are acceptable to the AQD. The stack test report indicated the following violations of MI-ROP-B2647-2012.

Process Description	Rule/Permit Condition Violated	Comments
EUTURBINE1 EUTURBINE2.	Conditions 7, 8 and 9	Emissions test data indicated that the turbines exceeded the PM, PM10, and PM2.5 allowable limits.
FGTURB/HRSG1	Conditons 8, 9, and 10	Emissions test data indicated that Turbine/HRSG 1 with ductburner exceeded the PM, PM10, and PM2.5 allowable limits.
FGTURB/HRSG2	Conditions 9 and 10	Emissions test data indicated that the Turbine/HRSG 2 with duct burner exceeded the PM10 and PM2.5 allowable limits.

The allowed maximum emission rates of PM, PM10, and PM2.5 for the turbines are 2.0, 5.0, and 5.0 pounds per hour respectively as specified in Conditions 8, 9, 10 of MI-ROP-B2647-2012. However, stack testing indicated that actual emissions from EUTURBINE1 were 2.3, 7.8, and 7.8 pounds per hour for PM, PM10, and PM2.5 respectively. Test results for EUTURBINE2 were 104, 199, and 199 pounds per hour for PM, PM10, and PM2.5 respectively.

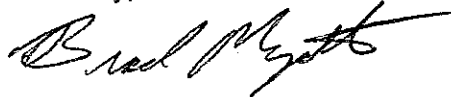
The allowed maximum emission rates of PM, PM10, and PM2.5 for turbine 1 and turbine 2 with ductburner (FGTURB/HRSG1 and FGTURB/HRSG2) are 2.1, 5.5, and 5.5 pounds per hour respectively as specified in Conditions 8, 9, 10 of MI-ROP-B2647-2012. However, stack testing indicated that actual emissions from FGTURB/HRSG1 were 2.5, 6.9, and 6.9 pounds per hour for PM, PM10, and PM2.5 respectively. Emissions results from FGTURB/HRSG2 indicated that actual emissions for PM10 and PM2.5 were 13.9 and 13.9 pounds per hour respectively.

These emission exceedances constitute violations of the conditions of your ROP No. MI-ROP-B2647-12. Therefore, please initiate actions necessary to correct the cited violations and submit a written response to this violation notice by July 25, 2014. The written response should include the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing, a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

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

Sincerely,



Brad Myott  
Senior Environmental Engineer  
Air Quality Division  
517-284-6639

BAM:TG

cc: Mr. Michael McClellan, DEQ  
cc/via email: Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ