

MK VNK H5877



July 25, 2023

VIA EMAIL and U.S. MAIL

To: ENGL, AQD Jackson District  
301 East Louis B Glick Highway  
Jackson, MI 49201

SRN: H5877, Washtenaw County

Copy to: Ms. Jenine Camilleri, Enforcement Unit Supervisor, DEQ, AQD  
P.O. Box 30260  
Lansing, MI 48909-7760

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Mr. Mike Kovalchick,

AIR QUALITY DIVISION

In response to your letter to Eastern University (EMU) dated July 11, 2023, it was noted that EMU was in violation of PTI 39-18, Special Condition EU-POWERGENERATION V TESTING/SAMPLING 1 due to the last stack testing being completed on May 22, 2018 without a written/approved parameter monitoring plan in place. EMU is planning to switch to a parameter monitoring plan in lieu of future stack testing every 2 years to avoid any future reoccurrences of this violation.

EMU has initiated actions to remedy this situation. We have obtained estimates for Stack Testing with Parameter Monitoring and controls upgrades to include this parameter monitoring in our DCS system moving forward. The stack testing will be conducted to meet the Michigan Department of Environmental Quality Air Division Permit No. 46-17, as well as Title 40, Part 60, Subpart KKKK of the Code of Federal Regulations (40 CFR 60, Part KKKK) required for verification of nitrogen oxides (NOx) emission rates. The proposal is to measure exhaust NOx emission rates from the cogeneration system while firing on natural gas. Sampling and analysis procedures will follow the methodologies of the following emissions test methods codified at 40 CFR 60, Appendix A:

- Method 3A – Determination of Oxygen and Carbon Dioxide Concentrations in Emissions from Stationary Sources will be used to evaluate the oxygen content of the exhaust.
- Method 7E – Determination of Nitrogen Oxides Emissions from Stationary Sources will be used to determine the concentration of NOx in the exhaust gas.

This testing is expected to be completed in the 3<sup>rd</sup> or 4<sup>th</sup> quarter of 2023, based upon acceptance from the State of the proposed testing plan and proposed parameter monitoring plan, prior to proceeding with the stack emissions testing.

Thank you,

Scott Storrar  
Executive Director, Facilities Planning, Maintenance & Construction  
Eastern Michigan University  
875 Ann Street  
Ypsilanti, Mi 48197  
Phone (734) 487-3591