



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

September 2, 2021

UPS NEXT DAY DELIVERY

Ms. Danielle Sheen  
The University of Michigan  
1239 Kipke Drive  
Ann Arbor, Michigan 48161

SRN: M0675; Washtenaw County

**VIOLATION NOTICE**

The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) reviewed the quarterly excess emission report submitted by The University of Michigan – Central Power Plant located in Ann Arbor. The Renewable Operating Permit Number MI-ROP-M0675-2021 requires the facility to monitor and record emissions of nitrogen oxides (NO<sub>x</sub>) from EUB0260-06 (No. 6 Boiler) on a continuous basis in a manner and with instrumentation acceptable to the AQD. This unit is also subject to Title 40 of the Code of Federal Regulations (40 CFR), Part 60, Subpart Db Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units and 40 CFR, Part 96, Subpart H NO<sub>x</sub> State Implementation Plan Call (NO<sub>x</sub> SIP), and 40 CFR, Part 52.21 Prevention of Significant Deterioration of Air Quality (PSD).

The Second Quarter 2021 Continuous Emission Monitoring (CEMS) Downtime and Excess Emission Report was received on July 27, 2021. During review of the Second Quarter 2021 CEMS report, the AQD evaluated compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) Number MI-ROP-M0675-2014a and MI-PTI-M0675-2014a which was in effect during the Second Quarter 2021 reporting period.

The Second Quarter 2021 Excess Emissions Report indicated that there were extended periods of monitor downtime. Specifically, 110 hours of NO<sub>x</sub> monitor downtime were reported for the period of April 1, 2021 – June 30, 2021. During the review, the following violations were identified:

During the report review, staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
EUB0260-06, natural gas-fired boiler with No. 2 fuel oil back-up capability.	EUB0260-06, SC VI.2, SC VI.7, SC IX.1, SC IX.3	Second Quarter 2021 Nitrogen Oxides (NO <sub>x</sub> ) monitor downtime was 10.4% of the operating time for the quarter.

## VIOLATION NOTICE

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by September 23, 2021 (which coincides with 21 calendar days from the date of this letter).

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. If The University of Michigan 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 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,



Lindsey Wells  
Technical Programs Unit  
Field Operations Section  
Air Quality Division  
517-282-2345  
WellsL8@Michigan.gov

cc: Mr. Stephen O'Rielly, University of Michigan  
Ms. Sarah Marshall, EPA Region 5  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Karen Kajiya-Mills, EGLE  
Ms. Diane Kavanaugh Vetort, EGLE  
Mr. Scott Miller, EGLE  
Ms. Jenine Camilleri, EGLE