



CAPITAL REGION AIRPORT AUTHORITY

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President - CEO

December 22, 2021

EGLE
AQD Lansing District
Environmental Great Lakes and Energy
P.O. Box 30242
Lansing, Michigan 48909-7760

Dear Ms. Brunner,

I am writing to you in response to our violation notice dated December 21, 2021, regarding our euincinerator inspection performed on December 14, 2021 at Capital Region International Airport.

PTI 118-08 General Condition 11.a Violation

AQD staff observed visible emissions from the stack during our incinerator stack testing on December 14, 2021. AQD staff observed one 6-minute average 40% opacity in a 1-hour period. Rule 301 allows no more than one 6-minute average per hour of not more than 27% opacity.

The test criteria required us to burn more material (higher load) for a longer period of time than we typically do. In addition, due to the lack of a sufficient quantity of International Regulated Garbage, we attempted to, but were unable to acquire a suitable amount of waste that replicated the contents of International Regulated Garbage. These two factors combined to create hotter than normal temperatures and higher than normal emissions. Given this, the test scenario was not representative of normal operating conditions.

CRAA will cease use of the incinerator on December 22, 2021, via a lock out tag out scenario until CRAA can create a business plan regarding the ownership and use of the incinerator. CRAA believes this is the only way to comply and incur no further violations.

PTI 118-08, Special Condition (SC) 1.6 and Michigan Air Pollution Control Rule 910 not being met
AQD staff observed particulate, smoke and flames coming from the stack of the incinerator during our stack testing on December 14, 2021. The excessive heat caused from burning other materials than International Regulated Garbage was the cause of this condition. Please refer to my explanation and cease use above.

Sincerely,



Ron O'Neil, CM, FMP
Director of Facilities & Infrastructure