



October 22, 2019

DEQ/AQD Lansing District Office
ATTN: Julie Brunner
Constitution Hall
525 W. Allegan, 1 South
P.O. Box 30242
Lansing, MI 48909

DEQ/AQD Enforcement Supervisor
ATTN: Jenine Camilleri
Constitution Hall
525 W. Allegan, 2 South
P.O. Box 30260
Lansing, MI 48909

**SUBJECT: ECKERT STATION EUBOILER6
RESPONSE TO NOTICE OF VIOLATION**

Dear Ms. Brunner,

On October 9, 2019, the Lansing Board of Water & Light (BWL) received a Violation Notice for Eckert Station EUBOILER6 (dated October 1, 2019). In this notice, the Department of Environment, Great Lakes and Energy cited an exceedance of the Hydrogen Chloride (HCl) emission limit specified in Renewable Operating Permit (ROP) No. MI-ROP-B2647-2018 FGMATS Special Condition I.2. and 40CFR63.9991 Table 2.1.b. The Violation Notice states that the results of testing performed on July 30, 2019 indicate an emission rate of 0.003 lbs/MMBtu, based on a three (3) run average, which is slightly above the MATS limit of 0.002 lb/MMBtu. A written response was requested by October 22, 2019. The following paragraphs are the response to this Violation Notice.

The results of the quarterly test event for HCl from EUBOILER6 are as follows:

Run 1: 0.0083 lbs/MMBtu
Run 2: 0.0006 lbs/MMBtu
Run 3: 0.0009 lbs/MMBtu

This provides a three-run average of 0.003 lbs/MMBtu. As shown above, Run 1 is significantly higher than Runs 2 and 3. The Run 1 sample indicates emissions of HCl at 4.56 lbs/hr (0.008 lbs/MMBtu); Runs 2 and 3 result in HCl rates of 0.33 lbs/hr (0.0006 lbs/MMBtu) and 0.51 lbs/hr (0.0009 lbs/MMBtu), respectively. Both the testing contractor (Mostardi Platt) and BWL believe that Run 1 is an outlier and could be a result of some sort of contamination that may have occurred but cannot isolate a cause. These results are not believed to be a product of the combustion process.





During testing, Unit 6 operated at normal load with an average of 39.5 Megawatts (MW). The heat input ranged from 442 MMBtu/hr to 491 MMBtu/hr. The BWL monitors coal chloride (Cl) content of the coal for every shipment received. The Cl content of the coal in use during the test period was an average of 7.5 ppm or 0.0006 lbs/MMBtu, with the highest Cl content at 10 ppm or 0.0008 lbs/MMBtu. Using the highest heat input of 491 MMBtu/hr, the highest coal Cl content of 0.0008 lbs/MMBtu, and assuming 100% of the Cl converts to HCl, the results are 0.39 lbs/hr or 0.0006 lbs/MMBtu of HCl. This shows that the Run 1 results are not indicative of actual boiler performance.

The BWL has investigated possible Cl contamination at the plant, including any maintenance solvent containing chlorides. No possible sources of contamination were found.

Due to the reported result of Run 1 being more than 8 times the amount of Runs 2 and 3, and the calculations based on fuel Cl content and boiler heat input, BWL believes Run 1 is not reflective of actual operating conditions. Previous testing conducted has provided consistent results with those found in Runs 2 and 3 with comparable coal quality and Cl content. Looking at the historical testing of all boilers located at Eckert, the highest HCl result was 0.0014 lbs/MMBtu in 2016. Also of note is the fact that EUBOILER4 and EUBOILER5 test results during the July 2019 test event and using similar coal quality all tested at Low Emitting EGU (LEE) status.

Unfortunately, the BWL cannot provide an explanation for the Run 1 result that creates an over the limit average for this test event. We do not believe this is an ongoing issue as indicated by Run 2 and Run 3 results, as well as historic quarterly testing.

We appreciate the opportunity to respond to your concerns and hope that you find our response to be satisfactory. If you have any questions, please contact Nathan Hude at 517-702-6170.

Sincerely,

A handwritten signature in blue ink that reads "Lori Myott". The signature is fluid and cursive, with a long horizontal line extending to the right.

Lori Myott
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517-702-6639

cc: Nathan Hude, BWL
Mark Matus, BWL
Tom Dickinson
Scott Hamelink, BWL

