



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
JACKSON DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

July 29, 2019

CERTIFIED MAIL 7017 3380 0000 4105 8421
RETURN RECEIPT

Mr. Sreedhar Mullapudi, P.E.
Director Wastewater Operations/Compliance
Ypsilanti Community Utilities Authority
2777 State Road
Ypsilanti, Michigan 48198-9112

SRN: B6237, Washtenaw County

Dear Mr. Mullapudi:

VIOLATION NOTICE

In March 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), requested several compliance reports from Ypsilanti Community Utilities Authority (YCUA) located at 2777 State Road, Ypsilanti, Michigan. The purpose of this request was to determine YCUA's 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 (Act 451); the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-B6237-2015.

Based on our review of the reports, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EU-FBSSI, Fluidized Bed Sewage Sludge (Biosolids) Incinerator	ROP Condition I. 14. Beryllium	Instantaneous limit of 0.25 mg/kg dry sewage sludge was exceeded based on sampling (see details below)

YCUA's ROP contains emission limits for metals and requires annual sampling in the Testing Section, Condition V.5., as follows, "The permittee shall collect a well-mixed representative grab sample of the sewage sludge fed to EU-FBSSI and analyze it for arsenic, beryllium, cadmium, total chromium, and mercury, in mg pollutant per kg of sewage sludge fed to the incinerator, once per calendar year."

YCUA's ROP specifies that for the indicated metals, "If the instantaneous sample shows an exceedance in the metal contents listed above, the permittee shall collect two additional samples for analysis within one week. For any year that stack testing is required pursuant to SC V.1, SC V.2, and/or SC V.4, the sewage sludge sampling shall occur at the same time."

The AQD requested YCUA's 2018 Biosolids report following the performance testing that occurred in December 2018 and as supporting documentation for their 2018 Annual ROP Certification and Deviation reporting. YCUA's analytical report showed compliance except for the Beryllium sample for the month of June 2018. The Beryllium sample result was 0.26 mg/kg which is greater than the 0.25 mg/kg permit limit.

The AQD discussed this with YCUA and additional time was provided to YCUA to investigate the accuracy of the sampling and analysis and to provide additional sampling. On May 10, 2019 YCUA submitted results of February 13, 2019 Biosolids sampling and Beryllium again exceeded the permit limit at 0.44 mg/kg, however it was noted that the EU-FBSSI was offline between December 19, 2018 and March 25, 2019 for preventative maintenance. Another Biosolids sample was obtained on April 3, 2019 and the result was below the detection limit for Beryllium. YCUA at that time proposed to monitor the situation and conduct more frequent sampling.

On July 23, 2019, YCUA submitted to AQD the results of their July 8, 2019 Biosolids sampling. The laboratory report shows the Beryllium concentration of 0.29 mg/kg exceeded the permit limit. YCUA also collected influent and effluent samples, the results of which did not indicate the presence of Beryllium above the detection limit.

AQD acknowledges that YCUA's July submittal stated that they will collect two additional samples the week of July 29, and the results will be provided to AQD.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by August 19, 2019. 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.

Please submit the written response to EGLE, AQD, Jackson District, at 201 East Louis Glick Hwy., Jackson, Michigan 49201-1556 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If YCUA 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,

A handwritten signature in black ink that reads "Diane Kavanaugh Vetort". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Diane Kavanaugh Vetort
Senior Environmental Quality Analyst
Air Quality Division
517-416-3537

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Scott Miller, EGLE