



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

December 21, 2021

VIA E-MAIL

Ms. Nicole Noll-Williams, President and CEO  
Capital Region Airport Authority  
4100 Capital City Boulevard  
Lansing, Michigan 48903

SRN: N8035, Clinton County

Dear Ms. Nicole Noll-Williams:

**VIOLATION NOTICE**

On December 14, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), staff observed stack testing of EUINCINERATOR at the Capital Regional Airport Authority (CRAA) located at 4100 Capital City Boulevard, Lansing, Michigan. The purpose of this stack testing was to determine 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 Permit to Install (PTI) number 118-08 for EUINCINERATOR.

During the stack testing, AQD staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUINCINERATOR	PTI 118-08, General Condition 11.a	AQD staff observed visible emissions from the stack of one 6-minute average at 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.

Process Description	Rule/Permit Condition Violated	Comments
EUINCINERATOR	PTI 118-08, Special Condition (SC) 1.6 and Michigan Air Pollution Control Rule 910.	EUINCINERATOR is to be installed, maintained, and operated in a satisfactory manner to control emissions. Due to the excess visible emissions, EUINCINERATOR does not appear to be meeting the requirements in SC 1.6 and Rule 910.

During this stack test it was noted that the stack on EUINCINERATOR had visible emissions exceeding the opacity limitation allowed by Rule 301 of the administrative rules promulgated under Act 451.

Enclosed is a copy of the instantaneous and six-minute average readings taken on December 14, 2021, from the stack on EUINCINERATOR.

Also, during the December 14 stack test, AQD staff observed operation of EUINCINERATOR where particulate, smoke, and flames were coming from the stack indicating the requirements of PTI 118-08, SC 1.6 are not being met. This is also a violation of Rule 910 of the administrative rules promulgated under Act 451, which requires that an air-cleaning device shall be installed, maintained, and operated in a satisfactory manner and in accordance with the administrative rules and existing law.

Based on these observations and violations, it is AQD's recommendation that CRAA cease operation of EUINCINERATOR and choose an alternative method for disposing of their international waste until an acceptable compliance plan is agreed upon that ensures EUINCINERATOR can comply with all state and federal environmental regulations. Per this recommendation, please include the date EUINCINERATOR ceased operating, confirmation it is not operating at this time, and the details of an alternative plan to dispose of collected international waste.

Additionally, please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by January 4, 2022, (which coincides with 14 calendar days from the date of this letter). The written response should include at a minimum: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

Ms. Nicole Noll-Williams, President and CEO  
Capital Region Airport Authority

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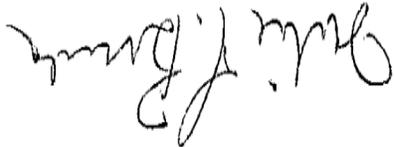
December 21, 2021

Please submit the written response to EGLE, AQD, Lansing District Office,  
P.O. Box 30242, Lansing, Michigan 48909-7760 and submit a copy to Ms. Jenine  
Camilleri, Enforcement Unit Supervisor, at EGLE, AQD, P.O. Box 30260, Lansing,  
Michigan 48909-7760.

If you believe 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 violations cited above and for the  
cooperation that was extended to me during the stack testing on December 14, 2021. If  
you have any questions regarding the violations or the actions necessary to bring this  
facility into compliance, please contact me at the number listed below.

Sincerely,



Julie L. Brunner  
Environmental Quality Specialist  
Air Quality Division  
517-275-0415

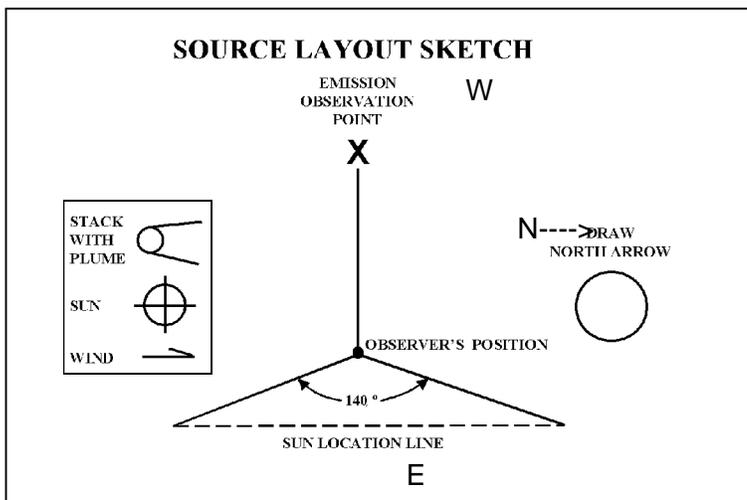
Enclosure

cc: Mr. Ron O'Neil, CRAA  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olague, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Mr. Brad Myott, EGLE

## VISIBLE EMISSION OBSERVATION FORM

Company Name <b>CRAA</b>	
Location <b>Dewitt</b>	
City <b>Dewitt</b>	State <b>MI</b> Zip
Process Equipment <b>Incinerator</b>	Operating Mode <b>Normal</b>
Control Equipment <b>Afterburner</b>	Operating Mode <b>Normal</b>
Describe Emission Point <b>stack</b>	
Height of Emission Point <b>25 ft</b>	Height Relative to Observer Start <b>20 ft</b> End
Distance to Emission Point Start <b>25 ft</b> End	Direction to Emission Point Start <b>20 ft</b> End
Vertical Angle to Observation Pt. Start End	Direction to Observation Point Start End
Describe Emissions Start <b>fire with smoke</b> End	
Emission Color Start <b>black</b> End	If Water Droplet Plume (Circle) Attached Detached <b>N/A</b>
Point In The Plume At Which Opacity Was Determined Start End	
Describe Plume Background Start End	
Background Color Start End	Sky Condition Start <b>overcast</b> End
Wind Speed Start <b>8</b> End	Wind Direction Start <b>north</b> End
Ambient Temp Start <b>46</b> End	Wet Bulb Temp RH Percent

Observation Date 12/14/21		Start Time 334				End Time
Sec Min	0	15	30	45	Comments	
1	80	80	80	80		
2	75	75	75	65		
3	45	40	35	35		
4	30	30	30	25	fire still out top	
5	20	15	10	10		
6	10	10	10	10		
7	0	0	0	0		
8	0	0	0	0		
9	0	0	0	0		
10	0	0	0	0		
11	0	0	0	0		
12	0	0	0	0		
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25	0	0	0	0		
26	0	0	0	0		
27	0	0	0	0		
28	0	0	0	0		
29	0	0	0	0		
30	0	0	0	0		



Additional Information

Observer's Name (Print) <b>Mark Dziadosz</b>	
Observer's Signature	Date
Organization <b>EGLE</b>	
Certified by <b>ERA</b>	Date

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Min \ Sec	0	15	30	45	Comments
31	0	0	0	0	
32	0	0	0	0	
33	0	0	0	0	
34	0	0	0	0	
35	0	0	0	0	
36	0	0	0	0	
37	0	0	0	0	
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46	0	0	0	0	
47	0	0	0	0	
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56	0	0	0	0	
57	0	0	0	0	
58	0	0	0	0	
59	0	0	0	0	
60	0	0	0	0	

<b>Additional Information</b>