



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 2, 2021

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

On May 26, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), observed air emissions testing conducted by Ypsilanti Community Utilities Authority (YCUA) located at 2777 State Road, Ypsilanti, Michigan. The purpose of this testing 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; the conditions of Renewable Operating Permit (ROP) number MI-ROP-B6237-2020; and the federal New Source Performance Standard (NSPS) 40 CFR 60 Subpart Mmmm.

The air emissions test report was received by the AQD on July 19, 2021, and a revised report was received on August 26, 2021. The testing involved determination of polychlorinated biphenyls (PCBs) and mercury (Hg) emissions from the fluidized-bed sewage sludge incinerator (EU-FBSSI). The results of the emissions testing indicate that emissions of Hg emissions are within the permitted limits; however; the PCB emissions exceeded the permitted limit.

Therefore, AQD has identified the following violation:

Process Description	Rule/Permit Condition Violated	Comments
EU-FBSSI	MI-ROP-B6237-2020, Condition I. 11	Results of emission testing exceeded PCB emission limit

The test results provided demonstrate that actual emissions of Total PCBs from the EU-FBSSI process equipment are an average of 2.08E-6 pound per dry ton sewage sludge (based on three one hour test runs). This is greater than the permit limit of 1.20E-06 lb/dry ton sewage sludge.

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

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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 301 E. Louis Glick Hwy, Jackson, Michigan 49201 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 and for the cooperation that was extended to me during the testing observation. 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,



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
Ms. Regina Angellotti, EGLE