



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

October 1, 2019

Ms. Lori Myott, Manager, Environmental Services  
Lansing Board of Water and Light  
1232 Haco Drive  
Lansing, Michigan 48910

SRN: B2647, Ingham County

Dear Ms. Myott:

**VIOLATION NOTICE**

On September 18, 2019, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received a stack test report on emissions of particulate matter (PM) and hydrogen chloride (HCl) from EUBOILER6. The testing was performed on July 30, 2019, at the Lansing Board of Water and Light (LBWL), Eckert Station located at 601 Island Drive, Lansing. The purpose of the test was to determine compliance with the emission limits in Renewable Operating Permit (ROP) number MI-ROP-B2647-2018 and 40 CFR Part 63, Subpart UUUUU.

The following was indicated:

Process Description	Rule/Permit Condition Violated	Comments
EUBOILER6 - 807 MMBtu/hr Babcock and Wilcox pulverized coal-fired boiler with No. 2 fuel oil for startup and flame stabilization located at Eckert Station. Controlled with LNB, OFA, ESP, and ACI.	Special Condition (SC) I.2 which limits the boiler to 0.0020 lb/MMBtu of HCl per 40 CFR 63.9991, 40 CFR 63, Subpart UUUUU, Table 2.1.b.	The test results show emissions of 0.0033 lb/MMBtu of HCl in excess of the emission limit.

This process is subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP): Coal- and Oil-Fired Electric Utility Steam Generating Units. These standards are found in 40 CFR Part 63, Subpart UUUUU and are otherwise known as the Mercury and Air Toxics Standards (MATS).

The stack testing results indicate an exceedance of the emission limit for HCl in ROP No. MI-ROP-B2647-2018 and MATS.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 22, 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, Lansing District, Constitution Hall, 525 West Allegan, 1 South, P.O. Box 30242, Lansing, Michigan 48909 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 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,



Julie L. Brunner, P.E.  
Senior Environmental Engineer  
Air Quality Division  
517-275-0415

cc: Ms. Sarah Marshall, USEPA  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Heidi Hollenbach, EGLE