



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



C. HEIDI GREETHER
DIRECTOR

October 12, 2018

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 October 10, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) received a stack test report on emissions of carbon monoxide (CO), particulate matter (PM), particulate less than 10 microns (PM10), particulate less than 2.5 microns (PM2.5) and volatile organic compounds (VOC) from EUNGENGINE. The testing was performed on September 13, 2018, at the Lansing Board of Water and Light (LBWL), REO Town Plant located at 1201 South Washington Avenue, Lansing. The purpose of the test was to determine compliance with the emission limits in Renewable Operating Permit (ROP) number MI-ROP-B2647-2018.

The results in the stack test report indicate the following violation:

| Process Description | Rule/Permit Condition Violated | Comments |
|--|-------------------------------------|--|
| EUNGENGINE - A 1,300 natural gas-fired spark ignition internal combustion engine (RICE) located at REO Town Plant for emergency use. | Special Conditions (SC) I.4 and I.5 | Emissions test data indicate exceedance of the PM10 and PM2.5 allowable emission limits. |

The allowed maximum emission rates of PM10 and PM2.5 are 0.13 pounds per hour (pph) and 0.13 pph as specified in SC I.4 and SC I.5 for EUNGENGINE. However, stack testing indicated that actual emissions from EUNGENGINE were 0.175 pph and 0.175 pph for PM10 and PM2.5, respectively.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by November 2, 2018. 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 the DEQ/AQD, Lansing District Office, 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 the DEQ/AQD, Constitution Hall, 525 West Allegan, 2 South, P.O. Box 30260, Lansing, Michigan 48909.

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 telephone number listed below.

Sincerely,

A handwritten signature in cursive script that reads "Julie L. Brunner".

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

JLB:TG

cc: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Heidi Hollenbach, DEQ