



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

February 19, 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:

SECOND VIOLATION NOTICE

On February 11, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received a stack test report on emissions of particulate matter (PM), particulate less than 10 microns (PM10), and particulate less than 2.5 microns (PM2.5) from EUNGENGINE. This was a retest to resolve a violation notice (VN) dated October 12, 2018. The retest was performed on December 12 & 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 on-going 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 performed on September 13, 2018, indicated that actual emissions from EUNGENGINE were 0.175 pph and 0.175 pph for PM10 and PM2.5, respectively. The most recent stack testing performed on December 12 & 13, 2018, indicated that actual emissions from EUNGENGINE were 0.158 pph and 0.158 pph for PM10 and PM2.5, respectively. While the emissions tested were lower in the most recent stack test, exceedance of the PM10 and PM2.5 allowable emission limits are still occurring.

Ms. Lori Myott
Page 2
February 19, 2019

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 12, 2019, (which coincides with 21 calendar days from the date of this letter). The written response should include: 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.

Please submit the written response to the DEQ, AQD, Lansing District, at 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, 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. 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, P.E.
Senior Environmental Engineer
Air Quality Division
517-275-0415

cc: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Ms. Heidi Hollenbach, DEQ