



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

May 6, 2021

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Ms. Lori Myott, Manager, Environmental Services Department
Lansing Board of Water and Light
1232 Haco Drive
Lansing, Michigan 48912

SRN: B2647, Ingham County

Dear Ms. Myott:

VIOLATION NOTICE

On March 17, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Lansing Board of Water and Light (LBWL) – Eckert Power Station and REO Town Plant, located at 601 Island Drive and 1201 S. Washington Avenue, Lansing, Michigan. The purpose of this inspection 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 Renewable Operating Permit (ROP) number MI-ROP-B2647-2018.

During the March 17, 2021 inspection, staff was informed of the following:

Process Description	Rule/Permit Condition Violated	Comments
EUTURBINE2	Special Condition (SC) I.2	Exceeded the NOx emission limit of 39.6 pph based on a 24-hour rolling average on March 15, 2021.

According to the Rule 912 report received electronically on March 23, 2021, (signed hard copy received April 2, 2021), the exceedance was from 03:00 a.m. to 08:59 a.m. on March 15, 2021. During this time, the highest emission rate of NOx from EUTURBINE2 was 40.6 pounds per hour (24-hour rolling average). This is a violation of the applicable requirements in Renewable Operating Permit (ROP) No. MI-ROP-B2647-2018 for EUTURBINE2, SC I.2. The actions taken to minimize emissions was to reduce the turbine load from 43 megawatts to 38 megawatts.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by May 27, 2021, (which coincides with 21 calendar days from the date of this letter).

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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, P.O. Box 30242, Lansing, Michigan 48909-7742 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 and for the cooperation that was extended to me during my inspection. 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.
Environmental Quality Specialist
Air Quality Division
517-275-0415

cc/email: Mr. Nathan Hude, LBWL
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Heidi Hollenbach, EGLE