



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

April 8, 2021

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

SRN: B4001; Eaton County

Dear Ms. Myott:

**VIOLATION NOTICE**

On March 11, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received the Renewable Operating Permit (ROP) No. MI-ROP-B4001-2015 Semi-Annual Report Certification and Deviation Report including the 2<sup>nd</sup> Semi-Annual Mercury and Air Toxics Standard (MATS) Compliance Report (July 1, 2020 to December 31, 2020) for Lansing Board of Water and Light (LBWL) - Erickson Station located at 3725 S. Canal Road, Lansing, Michigan. The purpose of this ROP Certification and Deviation Report was to report LBWL - Erickson Station 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 ROP No. MI-ROP-B4001-2015.

The following was reported:

Process Description	Rule/Permit Condition Violated	Comments
EU001	ROP No. MI-ROP-B4001-2015, EU001, Special Condition (SC) IX.5	Exceeded the 40 CFR 63, Subpart UUUUU mercury emission limit of 1.2 TBtu based on a 30-day rolling average as determined each calendar day the boiler operated for 11 days.

The boiler identified as EU001 at LBWL - Erickson Station is subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coal- and Oil-Fired Electric Utility Steam Generating Units. These standards are found in Title 40 of the Code of Federal Regulations (40 CFR) Part 63, Subpart UUUUU. As reported in the 2<sup>nd</sup> MATS Compliance Report, emissions of mercury from EU001 exceeded the 1.2 lb/TBtu mercury emission limit based on a 30-day rolling average.

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Specifically, the exceedance lasted from July 8, 2020 to July 19, 2020, with the highest 30-day rolling average reported as 1.3 lb/TBtu. This is a violation of the applicable requirements in Renewable Operating Permit (ROP) No. MI-ROP-B4001-2015 for EU001, SC IX.5.

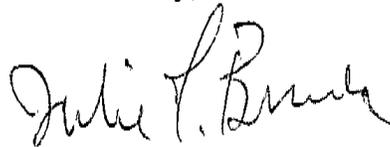
A formal Root Cause Analysis (RCA) was conducted by LBWL of the activated carbon injection system used to control mercury and included the carbon provider and the injection system manufacturer. The investigation found that activated carbon powder had solidified in both feed augers that had been left in the system during a plant outage from April 7, 2020 to June 16, 2020. As a result of the RCA, the Mercury Malfunction Abatement and QA/QC Plan required per Rule 911 was revised. The approvable plan was submitted to the AQD on September 23, 2020.

The actions taken to correct the cited violation and submission of a revised Mercury Malfunction Abatement and QA/QC Plan appear appropriate to bring this facility back into continuing compliance.

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.  
Environmental Quality Specialist  
Air Quality Division  
517-275-0415

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