



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

May 11, 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 May 5, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received notice of missed testing required by Title 40 of the Code of Federal Regulations (40 CFR) Part 60, Subpart Y. The testing needed to be conducted at Lansing Board of Water and Light (LBWL) – Erickson Station located at 3725 S. Canal Road, Lansing, Michigan. The facility is operating under the conditions of Renewable Operating Permit (ROP) number MI-ROP-B2647-2018 and Permit to Install (PTI) No. 43-20.

On March 5, 2021, staff was informed of the following:

Process Description	Rule/Permit Condition Violated	Comments
EUCOAL	PTI No. 43-20, EUCOAL - Special Condition (SC) V.1	Verification of visible emission rates was required within 180 days of permit issuance.

PTI No. 43-20 was issued on October 8, 2020. Verification of visible emission rates per the requirements of 40 CFR 60, Subpart Y – Standards of Performance for Coal Preparation and Processing Plants has not been completed and it has been more than 180 days since the issuance of PTI. This is a violation of PTI No. 43-20, EUCOAL, SC V.1 which requires the visible emission testing. PTI No. 43-20 will be incorporated into ROP No. MI-ROP-B2647-2018 which is currently in renewal.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by June 1, 2021, (which coincides with 21 calendar days from the date of this letter). 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,

A handwritten signature in black ink, appearing to read "Julie L. Brunner". The signature is fluid and cursive, with a period at the end.

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