



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

February 1, 2022

VIA EMAIL AND CERTIFIED MAIL

Mr. Sreedhar Mullapudi, P.E.
Director Wastewater Operations/Compliance
Ypsilanti Community Utilities Authority
2777 State Road
Ypsilanti, Michigan 48198-9112

SRN:B6237, Washtenaw County

Dear Mr. Mullapudi:

SECOND VIOLATION NOTICE

On November 22 and 23, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), observed the **retest** of air emissions conducted by Ypsilanti Community Utilities Authority (YCUA), located at 2777 State Road, Ypsilanti, Michigan. The purpose of this testing was to determine YCUA's compliance with the requirements of the federal Clean Air Act; and Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; the Air Pollution Control Rules; the conditions of Renewable Operating Permit (ROP) number MI-ROP-B6237-2020; and the federal New Source Performance Standard (NSPS) 40 CFR 60 Subpart M.

The initial air emission testing was conducted on May 26, 2021. The testing involved the determination of polychlorinated biphenyls (PCBs) emissions from the fluidized-bed sewage sludge incinerator (EU-FBSSI). The results of the emissions testing indicated that emissions of PCBs exceeded the permitted limit as specified in MI-ROP-B6237-2020, EU-FBSSI, Condition I. 11.

On September 2, 2021, the AQD sent YCUA a Violation Notice citing the PCB emission limit violation. AQD requested and received your written response by September 21, 2021. YCUA's response included several corrective actions including the November 2021 **retest**.

The air emissions **retest** report was received by the AQD on January 20, 2022. Results indicated emissions of PCBs again exceeded the permitted limit. The average of the three test runs was 1.5E-06 lb/dry ton sludge which is greater than the permit limit of 1.2E-06 lb/dry ton sludge.

Please respond in writing and identify the additional corrective actions YCUA will take or has taken to resolve the cited and continuing PCB violation. A program for compliance may include a completed PTI application for the EU-FBSSI process equipment. An

Mr. Sreedhar Mullapudi, P.E
Ypsilanti Community Utilities Authority
Page 2
February 1, 2022

application form is available by request, or at the following website:
www.michigan.gov/air (in the shaded box on the upper right-hand side of the page).

Please provide a compliance program by February 21, 2022, which corresponds to 21 days from the date of this letter.

Please submit the written response to EGLE, AQD, Jackson District, at 301 E. Louis Glick Highway, Jackson, Michigan 49201, and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Be further advised that issuance of this Violation Notice does not preclude or limit EGLE's ability to initiate any other enforcement action under state or federal law as appropriate.

Thank you for your attention to resolving the violation cited above and for the cooperation that was extended to me during the testing observation. 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,



Diane Kavanaugh Vetort
Senior Environmental Quality Analyst
Air Quality Division
517-416-3537

cc:

Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Scott Miller, EGLE