



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION

DEQ-AQD LANSING D.O.

SEP 26 2016

RENEWABLE OPERATING PERMIT  
REPORT CERTIFICATION

Authorized by 1994 P.A. 451, as amended. Failure to provide this information may result in civil and/or criminal penalties.

Reports submitted pursuant to R 336.1213 (Rule 213), subrules (3)(c) and/or (4)(c), of Michigan's Renewable Operating Permit (ROP) program must be certified by a responsible official. Additional information regarding the reports and documentation listed below must be kept on file for at least 5 years, as specified in Rule 213(3)(b)(ii), and be made available to the Department of Environmental Quality, Air Quality Division upon request.

Source Name Michigan State University County Ingham

Source Address 354 Service Rd. City East Lansing

AQD Source ID (SRN) K3249 ROP No. MI-ROP-K3249-2009 ROP Section No. 2

Please check the appropriate box(es):

☐ Annual Compliance Certification (Pursuant to Rule 213(4)(c))

Reporting period (provide inclusive dates): From \_\_\_\_\_ To \_\_\_\_\_

- ☐ 1. During the entire reporting period, this source was in compliance with ALL terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference. The method(s) used to determine compliance is/are the method(s) specified in the ROP.
- ☐ 2. During the entire reporting period this source was in compliance with all terms and conditions contained in the ROP, each term and condition of which is identified and included by this reference, EXCEPT for the deviations identified on the enclosed deviation report(s). The method used to determine compliance for each term and condition is the method specified in the ROP, unless otherwise indicated and described on the enclosed deviation report(s).

☐ Semi-Annual (or More Frequent) Report Certification (Pursuant to Rule 213(3)(c))

Reporting period (provide inclusive dates): From \_\_\_\_\_ To \_\_\_\_\_

- ☐ 1. During the entire reporting period, ALL monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred.
- ☐ 2. During the entire reporting period, all monitoring and associated recordkeeping requirements in the ROP were met and no deviations from these requirements or any other terms or conditions occurred, EXCEPT for the deviations identified on the enclosed deviation report(s).

☒ Other Report Certification

Reporting period (provide inclusive dates): From May 16, 2016 To June 30, 2016

Additional monitoring reports or other applicable documents required by the ROP are attached as described:

Response to Violation Notice dated September 9, 2016

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in this report and the supporting enclosures are true, accurate and complete

Robert Ellerhorst, P.E.

Director of Utilities

517-355-3314

Name of Responsible Official (print or type)

Title

Phone Number

9-23-16

Signature of Responsible Official

Date

# MICHIGAN STATE UNIVERSITY

September 23, 2016

Nathan Hude  
Environmental Quality Analyst  
Department of Environmental Quality  
Air Quality Division  
525 W. Allegan St.  
Constitution Hall, 3<sup>rd</sup> Floor  
Lansing, MI 48909

Re: Michigan State University – K3249  
Response to Violation Notice dated September 9, 2016

Dear Mr. Hude:

Michigan State University (MSU) is writing in response to the Violation Notice dated September 9, 2016, and in accordance with the requirements of the renewable operating permit MI-ROP-K3249-2009. The issues related to this violation notice were reported in the second quarterly EER and the first semi-annual deviation report.

EU-2-UNIT3 – NOx Continuous Emissions Monitor System (CEMS) downtime



## Infrastructure Planning and Facilities

### Power and Water

T.B. Simon Power Plant  
Michigan State University  
354 Service Road  
East Lansing, MI 48824

517-355-3314  
Fax: 517-432-2368  
ipf.msu.edu

### Date and Cause

Unit 3 boiler went offline for annual overhaul and maintenance on February 18, 2016 and was still down at the beginning of the second quarter of 2016. Second quarter CEMS linearity tests for all operating Simon Plant units were performed between April 25 and 27. Unit 3 boiler was returned to service on May 16, 2016 but no CEMS linearity test was performed until July 12 when the third quarter linearities were completed. This resulted in 1096.15 hours of reported NOx monitor downtime for the second quarter. Despite reporting monitor downtime, actual operation of the monitor was maintained and hourly records of operation show no exceedances of emissions limits during this period.

The cause of this missed CEMS linearity test is related to the retirement of a longtime CEMS technician and the reassignment of this CEMS QA/QC function.

### Emissions Verification

In accordance with the rules under 40 CFR Part 60 and Part 75, the failure to perform a second quarter 2016 CEMS linearity test on No 3 boiler resulted in MSU reporting all 1096 hours of operating time between May 16 and June 30 as downtime for NOx monitoring. In addition, because this time was within the 2016 ozone period, data substitutions of the maximum potential NOx emissions were reported.

The first quarter linearity was successfully completed on January 13, 2016 with a RATA completed on February 9, 2016. The analyzer passed daily calibrations, except for one on July 15, which was repeated and passed. The recorded hourly Unit 3 NOx emissions did not exceed 0.20 lb/MMBtu, between May 16<sup>th</sup> and June 30 (see attached).

### Steps Taken to Prevent Reoccurrence

MSU used labor management contractual practices to hold staff accountable for missing work assignments. The Simon Plant CEMS QA/QC Plan and the requirements of quality assurance under 40 CFR Part 60 and Part 75 have been re-reviewed with the responsible team members. New daily actions logs have been created by the CEMS technicians to improve tracking of assignments. In addition, MSU management will take advantage of electronic work order tracking systems to manage time sensitive regulatory requirements. This will be in place as part of the fourth quarter 2016 management process.

Please contact me with if you have any further questions about this event.

Thank you,

A handwritten signature in black ink, appearing to read 'R. Ellerhorst', with a long horizontal line extending to the right.

Robert Ellerhorst, P.E.  
Director of Utilities  
Michigan State University

c. K. Eisenbeis  
D. Bollman  
R. Johnson