



MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY
AIR QUALITY DIVISION

DEQ-AQD LANSING D.O.

AUG 14 2017

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-K3249-2016 ROP Section No. 1 & 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 July 21, 2017 To July 21, 2017

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

Written Response to Violation Notice dated July 21, 2017

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

Signature of Responsible Official

Date

8-9-17

**MICHIGAN STATE
UNIVERSITY**

DEQ-AQD LANSING D.O.

AUG 14 2017

August 9, 2017

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

Re: Michigan State University – K3249
Written Response to Violation Notice dated July 21, 2017

Dear Mr. Hude,

This letter is in response to your Violation Notice on July 21, 2017. Michigan State University (MSU) is submitting this written response to the violation notice in accordance with the requirements of renewable operating permit MI-ROP-K3249-2016. This notice is the outcome of Department of Environmental Quality inspections at Michigan State University on April 17 and 18, 2017.



**Infrastructure
Planning and
Facilities**

Power and Water

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FG-4MATVENTS – Semi-annual maintenance check and repairs are not being conducted.

As a follow-up to the onsite inspection, on June 9, 2017 you requested the previous two years' records for compliance with SCVI.1 (semiannual maintenance checks and repairs). On June 28, 2017 we provided copies of records for the purchase of replacement cages and filters from Flex-Kleen. These materials were used during the repairs to SVSANDSILO that occurred in 2015.

These filters are part of the auxiliary material handling equipment required to operate EU- Unit 4. The inspections of these auxiliary system have been performed as part of the annual inspection and overhaul of EU- Unit 4. Also a visual inspections of these equipment vents is performed in accordance with SCVI.2. Attachment 1 is a copy of the Annual Checklist of routine inspections that have been performed for EU-Unit 4. See items 13, 21, 22 and 23. The next scheduled annual inspection of EU-Unit 4 will occur sometime in late Q3 or early in Q4 of 2017.

Attachment 2 is a copy of the original equipment manufacturer's recommendations for routine inspections of SVSANDSILO. We will use this sample form for the documentation of future demonstrations of compliance with SCVI.1. This form will be used to document the inspections for fall 2017 of EU-Unit 4 and future semiannual inspections that will occur approximately 6 months after the completion of the fall

inspection of EU-Unit 4. In addition, a work order has been released to complete and document inspections of FG-4MATVENTS during August 2017.

EU-ETO –Thermal oxidizer monitoring is not being conducted due to lack of temperature monitoring device

A new replacement sterilizer, model 3M-GS5 with Honeywell temperature recording chart was ordered, and the sterilization unit has been delivered to the Veterinary Medical School (attachment 3, chart recorder spec sheet). Installation will occur upon approval of the Permit to Install PTI N0. 99-17, received by MDEQ June 27, 2017 (attachment 4, MDEQ confirmation letter).

Staff at the Vet School will continue to monitor the Abator Indicator Panel and will document (moving forward) that the working Light is in the normal “On” mode, until the new unit is installed.

The MDEQ approved the installation of the Abator Unit in January of 2004. Over the years, the Abator has also been inspected several times by the Air Quality Division with no discrepancies noted. The unit temperature is monitored at all times.

An important safeguard is if the temperature of the catalytic cell is too low, the sterilizer will hold and not allow the effluent to exhaust until the cell is at appropriate temperature. If the temperature is too high, the Abator closes the valve allowing the EO to be directed into the catalytic cell until the temperature is reduced.

The unit has three monitoring points all read by thermocouples. This includes the heater elements, and both up-stream and down-stream sensors reading the air entering and exiting the catalytic cell. This is monitored and displayed on the Abator Indicator Panel (located in the sterilization room) as the “Working” light. The Indicator Panel also monitors air flow and high temperature of the Catalytic Cell (see attached photo).

Please contact us if you need additional information related to this response.

Sincerely,



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

c. Kevin Eisenbeis
Dan Bollman
Tom Grover

Attachments