



THOMAS R. CARPENTER  
EXECUTIVE DIRECTOR

# BOARD OF LIGHT AND POWER

CITY OF MARQUETTE  
2200 WRIGHT STREET  
MARQUETTE, MI 49855-1398

June 18, 2024

Attn: Lauren Luce  
State of Michigan  
Department of Environment, Great Lakes, and Energy (EGLE)  
Upper Peninsula District Office – Air Quality Division  
1504 W. Washington St.  
Marquette, MI 49855  
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This is in response to the Department of Environment, Great Lakes and Energy's (EGLE) Violation Notice (VN) letter dated May 28<sup>th</sup>, 2024 regarding the requirements for semi-annual excess emissions reporting, monitor downtime associated with the water-to-fuel ratio, and the lack of operational data during the past two years of operation at the Marquette Board of Light & Power's (MBLP) Powder Mill Road Combustion Turbine (CT) site (PTI-472-78A). The MBLP has initiated the necessary actions to correct the cited violations and is submitting this letter in response.

MBLP has updated its Environmental Management System (EMS) to include the semi-annual reporting requirements for the CT. Semi-annual reporting will be postmarked or received by the EGLE's Air Quality Division's District Office by September 15<sup>th</sup> of each calendar year. The report will include the Semi-Annual Report Certification, Deviation Report (form EQP 5737), and Semi-Annual (January 1 – June 30) Excursion/Exceedance Summary Report Form. Annual reporting will be postmarked or received by the EGLE's Air Quality Division's District Office by March 15<sup>th</sup> of each calendar year and will include the Annual Compliance Certification, Semi-Annual Report Certification, Deviation Reports (form EQP 5737), and Semi-Annual (July 1 – December 31) Excursion/Exceedance Summary Report form.

The software for the CT was configured to retain operational data such as the water-to-fuel consumption ratio for a period of 90 days. Because of this, MBLP was unable to provide data from the last time the CT was operational (December 12<sup>th</sup>, 2023). The CT was operational eight times during the last two years, totaling 10.75 hours of total run time. Although the MBLP cannot provide operational data to prove it stayed in compliance, no issues were observed with water injection during the 10.75 hours of operation listed. The dates and durations of each operation of the CT within the last two years is as follows;



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<i>May 5, 2022</i>	<i>(0.95 hours of operation)</i>
<i>August 8, 2022</i>	<i>(1.63 hours of operation)</i>
<i>December 23, 2022</i>	<i>(2.84 hours of operation)</i>
<i>October 3, 2023</i>	<i>(1.11 hours of operation)</i>
<i>October 5, 2023</i>	<i>(0.51 hours of operation)</i>
<i>October 20, 2023</i>	<i>(1.26 hours of operation)</i>
<i>November 1, 2023</i>	<i>(1.3 hours of operation)</i>
<i>December 12, 2023</i>	<i>(1.15 hours of operation)</i>

To prevent a reoccurrence of lost operational data, the CT's software system will be updated. MBLP is contracting Petrotech to update the historical logs to retain operational data for a period of two years (730 days). Moving forward, MBLP compliance personnel will collect, save, and print the necessary operational data after each operation of the CT to maintain compliance. Semi-annual reporting requirements have been entered into the MBLP's EMS and will be received by EGLE no later than September 15<sup>th</sup> & March 15<sup>th</sup> of each calendar year.

MBLP believes that the necessary actions to correct the cited violations have been completed. If you require any additional information regarding MBLP's response to EGLE's VN, please don't hesitate to contact me at (906) 225-8670.

Sincerely,

Tom Skewis  
Utility Compliance

*cc: J. Hendrickson/MBLP  
T. Carpenter/MBLP  
J. Camilleri/EGLE  
M. Conklin/EGLE*



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