



GRETCHEN WHITMER
GOVERNOR

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



PHILLIP D. ROOS
DIRECTOR

May 28, 2024

VIA EMAIL AND U.S. MAIL

Tom Skewis
Marquette Board of Light & Power
2200 Wright Street
Marquette, Michigan, 49855

SRN: N5887, Marquette County

Dear Tom Skewis:

VIOLATION NOTICE

On April 15, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of MBLP - Powdermill located at Powdermill Road, Marquette, Michigan. The purpose of this inspection was to determine MBLP - Powdermill's compliance with the requirements of the federal Clean Air Act; Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended; the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 472-78A.

During the inspection, staff observed the following:

| Process Description | Rule/Permit Condition Violated | Comments |
|------------------------|---|--|
| Stationary Gas Turbine | 40 CFR 60.334(j)(1)(i)), Special Condition (SC) 19 | Semiannual reports for excess emission and monitor downtime have not been submitted. |
| Stationary Gas Turbine | SC 19 | Operating data for water to fuel injection was not available for the previous two years. |

The stationary gas turbine is subject to the federal New Source Performance Standards (NSPS) for Stationary Gas Turbines. These standards are found in Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart GG.

NSPS GG (40 CFR 60.334(j)(1)(i)) requires semiannual reports for excess emissions and monitor downtime associated with the water to fuel ratio monitoring. These reports have not previously been submitted.

During this inspection, MBLP - Powdermill was unable to produce records regarding the water to fuel injection ratio during operations. This is a violation of (SC 19 of PTI number 472-78A. The conditions of PTI number 472-78A require all source emissions data and operating data shall be kept on file for a period of at least two years and made available to the AQD upon request.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 18, 2024 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations 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 Lauren Luce at EGLE, AQD, Marquette District, at 1504 West Washington Street, Marquette, Michigan 49855 or LuceL1@Michigan.gov, and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If MBLP- Powdermill believes 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 violations cited above and for the cooperation that was extended to me during my inspection of MBLP - Powdermill (Inspection Report enclosed). If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me via email.

Sincerely,



Lauren Luce
Environmental Quality Analyst
Air Quality Division

Enclosure

cc: Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Michael Conklin, EGLE