



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
AIR QUALITY DIVISION



PHILLIP D. ROOS
DIRECTOR

November 22, 2024

VIA EMAIL AND U.S. MAIL

Scott Wendt
Director of Environmental Health and Safety
Michigan Technological University
1400 Townsend Drive
Houghton, Michigan 49931-1295

SRN: N7350, Houghton County

Dear Scott Wendt:

VIOLATION NOTICE

On September 24, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the Michigan Technological University (MTU) Central Energy Plant located at 1400 Townsend Drive, Houghton, Michigan (Inspection Report enclosed). The purpose of this inspection was to determine MTU Central Energy Plants 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 (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) #91-04A.

During the inspection, staff found the following:

Process Description	Rule/Permit Condition Violated	Comments
FGPLANT - All process equipment at the facility including equipment covered by other permits, grand-fathered equipment and exempt equipment.	R 336.1205(3)/Special Condition 3.1a, 3.1b, and 3.1c of PTI #91-04A	The facility had not been maintaining records of emissions calculations to demonstrate compliance with the source-wide limits.

During this inspection, the MTU Central Energy Plant was unable to provide emission records to demonstrate compliance with Special Conditions 3.1a, 3.1b, and 3.1c under FGPLANT. This is a violation of the recordkeeping and emission limitations specified in Special Condition 3.1a, 3.1b, 3.1c and Appendix A of PTI #91-04A.

The conditions of PTI #91-04A require calculation of actual emissions for the purposes of demonstrating compliance with the limits contained in Special Condition 3.1a, 3.1b, and 3.3c and shall be done on a monthly basis, based upon daily fuel use information aggregated for the calendar month. All information used to show compliance with the

limits of PTI #91-04A shall be maintained for a period of five years and shall be made available for review upon request by the AQD staff.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by December 13, 2024 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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 Joseph Scanlan at EGLE, AQD, Marquette District Office, via email to ScanlanJ@Michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If the MTU Central Energy Plant 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 violation cited above and for the cooperation that was extended to me during my inspection of the MTU Central Energy Plant. 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,



Joseph Scanlan
Environmental Quality Analyst
Air Quality Division
906-458-6405

Enclosure

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