



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

October 21, 2021

Mr. Robert W. Benstein, Interim President and CEO
Capital Region Airport Authority
4100 Capital City Boulevard
Lansing, Michigan 48903

SRN: N8035, Clinton County

Dear Mr. Benstein:

VIOLATION NOTICE

On July 20 – 21, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection and observed stack testing of EUINCINERATOR at the Capital Regional Airport Authority (CRAA) located at 4100 Capital City Boulevard, Lansing, Michigan. The purpose of this inspection and stack testing was to determine 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) number 118-08 for EUINCINERATOR.

During the inspection and stack testing, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUINCINERATOR	PTI 118-08, Special Condition (SC) 1.4	Exceeded the maximum charge rate eight times between December 2020 and August 2021
EUINCINERATOR	PTI 118-08, SC 1.5	Operated the incinerator afterburner below 1600°F, the temperature required in SC 1.5.
EUINCINERATOR	PTI 118-08, SC 1.8 and SC 1.10	Not keeping satisfactory records of the temperature monitoring
EUINCINERATOR	Rule 974(9)(d) - Table 6 to Subpart DDDD of Part 60	Non-compliance with emission limits for nitrogen oxides (NOx), hydrogen chloride (HCl), and particulate matter filterable (PM) per Rule 974(9)(d). Testing not completed for dioxins/furans, cadmium, lead, and mercury.

PTI 118-08 - EUINCINERATOR

A copy of the "CRAA International Garbage Incinerator Log" for December 1, 2020, to September 17, 2021, was provided as requested. There are eight (8) exceedances (greater than 66.7 lbs) of the maximum charge rate which is the burn rate divided by three as required in SC 1.4. The highest charge rate was 100.985 lbs on May 10, 2021. The exceedances were confirmed by CRAA, and they have made their incinerator operators aware of this as well. CRAA will also reiterate this in their fall operator training.

A minimum temperature of 1600°F is required to be maintained in the secondary chamber (upper chamber afterburner) per SC 1.5. During the stack test on July 20, 2021, the incinerator timed out (shut off) and the afterburner temperature dropped to below 1400°F. The test run was not acceptable because the incinerator was operating in violation of PTI 118-08, SC 1.5.

From the afterburner temperature monitor on the incinerator, the temperature history can be downloaded electronically but not easily. For the temperature records, the instrument contractor must be contacted to download the information from the temperature monitor controller/recorder. The contractor tried to extract the temperature data from the recorder but was unable to retrieve any information due to the record button not being pressed allowing the recording process. This can occur due to a power outage and dead battery backup. The handwritten data recorded by the CRAA operator during the July 20 – 21, 2021 stack testing is the only afterburner temperature data available for the testing event. The temperature records do not appear to be kept in a satisfactory manner per the requirements in SC 1.8 and SC 1.10.

Rule 974 - Emissions standards for existing commercial and industrial solid waste incinerators.

According to the CRAA Final Emission Test Report sent on October 4, 2021, compliance with the emission limitations in Rule 974(9)(d) – Table 6 to Subpart DDDD of Part 60 for NO_x, HCl and PM was not demonstrated. Also, EUINCINERATOR has a control system (afterburner) that will require EPA to approve this alternative and so far, compliance with some of the emission limits have not been demonstrated for the alternative control system. Plus, testing for dioxins/furans, cadmium, lead, and mercury has not been completed to date.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by November 12, 2021, (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.

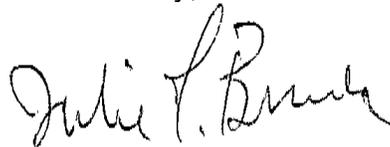
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Please submit the written response to EGLE, AQD, Lansing District, P.O. Box 30242, Lansing, Michigan 48909-7760 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If you believe 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 and stack test observation on July 20 – 21, 2021. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,

A handwritten signature in black ink, appearing to read "Julie L. Brunner". The signature is fluid and cursive, with a period at the end.

Julie L. Brunner, P.E.
Environmental Quality Specialist
Air Quality Division
517-275-0415

cc: Mr. Ron O'Neil, CRAA,
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Mr. Brad Myott, EGLE