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Roderick J. Lesko  
General Manager and Secretary  
3200 Biddle Avenue, Suite 200  
Wyandotte, MI. 48192-0658  
Telephone: (734) 324-7100  
Fax: (734) 324-7119

April 28, 2014

Mr. Stephen Weis  
Michigan Dept. of Environmental Quality  
Air Quality Division  
3058 West Grand Boulevard  
Suite 2-300  
Detroit, Michigan 48202



Subject: Response to Violation Notice Dated April 1, 2014  
Wyandotte Municipal Services-Power Plant (B2132)

Dear Mr. Weis:

Wyandotte Municipal Service (WMS) is providing this response, as requested, to the April 1, 2014, Violation Notice from the Michigan Department of Environmental Quality (MDEQ) Air Quality Division. The Violation Notice was issued for the following:

- Excessive downtime for the nitrogen oxide (NO<sub>x</sub>) and sulfur dioxide (SO<sub>2</sub>) continuous emissions monitor (CEMS) in 4Q13 for EUUNIT7BLR and EUUNIT8BLR
- NO<sub>x</sub> emissions above 0.20 lb/MMBTU in 4Q13 when firing natural gas in exceedance of the limit in 40 CFR 60.44(a)(1) for EUUNIT7BLR.

**1. NO<sub>x</sub> and SO<sub>2</sub> CEMS Downtime in 4Q2013**

New NO<sub>x</sub> and SO<sub>2</sub> analyzers were installed on November 19, 2013 at EUUNIT7BLR and EUUNIT8BLR. Additional monitor downtime was flagged for data considered invalid due to a late linearity test for the new NO<sub>x</sub> and SO<sub>2</sub> analyzers. A probationary calibration error test was performed on each analyzer following installation. Each analyzer then passed the appropriate QA re-certification tests including the linearity test, 7-day calibration error test and relative accuracy test audit (RATA). However, the linearity tests were not performed within the 168 hour allowance period per 40 CFR 75.20. Therefore, all hours from replacement of the analyzers until completion of the final QA re-certification test have been marked as monitoring equipment out of service (OOS)/out of control (OOC) time, as required pursuant to Part 75. For EUUNIT7BLR, this included operating time until the completion of the RATA on December 11, 2013 since the linearity and 7-day calibration error tests were passed prior to successful completion of the RATA. For EUUNIT8BLR, this included operating time until completion of the linearity test (the final QA re-certification test), performed on December 19, 2013. Note that EUUNIT8BLR was offline at the time of the analyzer

replacement and operated only for a few hours on November 22, 2013, until EUUNIT8BLR was brought on line for a more extended period starting December 3, 2013.

This violation has been resolved as the required CEMS QA/QC testing has been completed and on-going QA/QC is being performed as required. WMS is working with the CEMS technicians to ensure timely response to any CEMS performance issues.

## **2. EUUNIT7BLR – Nitrogen Oxide (NOx) Excess Emissions**

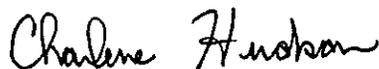
Pursuant to its Renewable Operating Permit (ROP), EUUNIT7BLR is permitted to burn solid fossil fuel (coal) and natural gas. The current NOx emission limit in the ROP for EUUNIT7BLR is 0.70 lb/MMBTU. This permit limit is derived from the New Source Performance Standard (NSPS) found in 40 CFR 60 Subpart D. Section 26 of the ROP provides that “[c]ompliance with the conditions of the ROP shall be considered compliance with any applicable requirements as of the date of the ROP issuance, if . . . [t]he applicable requirements are included and are specifically identified in the ROP.” Because the Permit specifically includes a NOx limit of 0.70 lb/MMBTU for Unit 7 and is permitted to burn natural gas, the facility complied with the permitted limit. However, based upon the April 1, 2014 Violation Notice, MDEQ is now requiring WMS to comply with the alternative limit of 0.20 lb/MMBTU for gaseous fuels. WMS will make every effort to comply with the 0.20 lb/MMBTU standard for gaseous fuels, even though the ROP NOx emission limit is 0.70 lb/MMBTU for EUUNIT7BLR. However, Wyandotte cannot agree that any minor exceedances of the 0.20 lb/MMBTU NSPS limit constitute violations given the applicable NOx limit in Wyandotte’s permit.

During the period of November 8 through December 11, 2013, NOx emissions were slightly higher than 0.20 lb/MMBTU, but remained significantly lower than the current ROP limit. A new controller system was installed on EUUNIT7BLR in November and adjustments to air flows and set points were made to reduce emissions below 0.20 lb/MMBTU in anticipation of a potentially new NOx permit limit for gaseous fuels. EUUNIT7BLR NOx emissions have not exceeded 0.20 lb/MMBTU since this adjustment for the remainder of 2013 nor for 1Q2014. This issue has been resolved through the air flow and set point adjustment.

We look forward to working with MDEQ as we continue to improve our environmental performance. If additional information is required please call me at (734) 324-7158.

On behalf of the Wyandotte Municipal Services-Power Plant

Sincerely,



Charlene Hudson

Power Systems Supervising Engineer

cc: R. Lesko, C. Brohl, C. Campeau, WMS-PP