



DEQ-AQD LANSING D.O.

OCT 09 2015

October 7, 2015

Ms. Michelle Luplow, MPH  
Environmental Quality Analyst  
Air Quality Division, Lansing District Office  
Michigan Department of Environmental Quality  
P.O. Box 30242  
Lansing, MI 48909

Dear Ms. Luplow:

On September 15, 2015, the Lansing Board of Water & Light (BWL) received a 'Violation Notice' for our Erickson Station, SRN B4001, located in Eaton County. The Notice alleges FGASHHANDLING was in violation of the recordkeeping Special Conditions 4a and 4b of MI-ROP-B4001-2010; specifically the CAM report for the period of January 1 through June 30, 2015. Our understanding of the basis for this allegation was a belief by the MDEQ Lansing District staff that the CAM semi-annual report failed to include a description of an event that took place in February or March 2015. DEQ staff believed this event caused an excursion which would then require a description of the event in the semi-annual report. The BWL asserts that there was neither an excursion nor any monitor downtime during the reporting period.

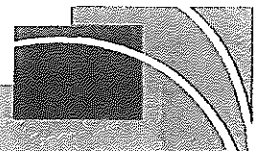
CAM reporting requirements are set forth in Section VII. 4 of the FGASHHANDLING Flexible Group Conditions of the 2010 Renewable Operating Permit (p. 20 – 22). Paragraph 4a calls for the inclusion of summary information regarding excursions and exceedances.

Each semi-annual report of monitoring and deviations shall include summary information on the number, duration and cause of excursions and/or exceedances and the corrective actions taken. If there were no excursions and/or exceedances in the reporting period, then this report shall include a statement that there were no excursions and/or exceedances.

Special condition 4b sets forth a similar requirement for monitor downtime:

Each semi-annual report of monitoring and deviations shall include summary information on monitor downtime. If there were no periods of monitor downtime in the reporting, then this report shall include a statement that there were no periods of monitor downtime.

Section VI. 1 of the FGASHHANDLING Flexible Group Conditions defines an excursion as "any period of visible emission lasting longer than 2 consecutive hours." Section VI. 5 requires "operating a continuous monitoring system to monitor differential pressure across the FGASHHANDLING particulate control device."





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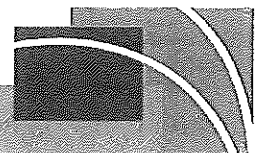
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The BWL's semi-annual report inadvertently omitted the word "NONE" in the first line in the 'Date/Time' column of Form 1: MDEQ Compliance Assurance Monitoring (CAM) Ash Handling Excursion/Exceedance Summary Report. We understand that MDEQ interpreted the omission as an indication of a reportable event for both excursions and downtime, and therefore expected a description of the event pursuant to special conditions 4a and 4b.

The event that seems to have given rise to the expectation for a report stems from a June 9, 2015 inspection at Erickson Station. The Inspection Report for the June 9 inspection recounts a discussion between the Erickson Plant Manager, Ms. Debi Allen, and the District Inspector about an incident Ms. Allen observed in February or March 2015, wherein fly ash was being emitted through cracks in the seals of one of the mass storage building's overhead doors. Ms. Allen further advised that she ordered the system shut down immediately and kept it shut down until the baghouse was fixed by replacing the bags in the storage building baghouse.

This incident, however, did not meet the definition of an excursion, and was therefore not subject to any reporting requirements. In reviewing the operating logs, the incident actually occurred on January 23, 2015. The facility was pulling fly ash from the Erickson plant to the mass storage facility beginning 11:10 a.m., and a Visible Emissions Check was conducted by the plant operators and recorded in the operating logs. No visible emissions were noted at the beginning of the operation. At 11:46, Ms. Allen observed dust coming from the seal of an overhead door at the mass storage building and had the plant shut down the ash pulling operation. Intermittent, not continuous, particulate emissions occurred at the door for a period of about 20 minutes. However, because the ash lines need to be purged with air after ash delivery ceases, the entire operation was not totally shut down until 12:30.

A work order was entered into the BWL system that same day to clean or replace bag filters and test the pulse air system, which cleans the bags. The next day the bag filters were cleaned and replaced and the 6 diaphragms in the pulse air system to each row of filters were also replaced. Two shift logs (1/23 & 24/2015) and a work order reflect these events, with the exception of Ms. Allen's observation and order to shut down the process which was not recorded in the logs, and copies of all three records are enclosed. Note: The January 23<sup>rd</sup> shift log reflects that fly ash was pulled following the shutdown of the mass storage facility from 1510 to 1650 but does not identify where the ash was sent. Plant personnel advise that, given the earlier directive from the plant manager for shutdown of the mass storage building and the work order for repairs, in all likelihood the ash would have gone to one of Millett Road silos during the afternoon event.





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The intermittent release from the mass storage building did not last for more than 2 hours, and was therefore not an excursion. The entire duration of the ash pulling event from start to finish was 1 hour and 20 minutes, but only about 20 minutes of that process lead to intermittent releases from the building. As to future management of the facility to prevent a reoccurrence, in addition to repairing the door plant staff are evaluating whether to shorten the schedule for baghouse cleaning and maintenance. We also recognize that the new Renewable Operating Permit includes more stringent conditions for the FGASHHANDLING Flexible Group and we welcome your input as we prepare to meet those new conditions.

Also, the differential pressure gauges, which are the system monitoring devices, continued to function and had no downtime during the entire reporting period of January 1 through June 30 of 2015.

The BWL does not believe there were violations of Special Conditions 4a and 4b of the CAM reporting requirements for semi-annual reporting period because there was no incident that met the definition of "excursion" and no monitor downtime. We request that MDEQ reconsider its issuance of the September 15, 2015 Violation Notice.

Please contact Sue Pemberton at (517) 702-6363 or me at (517) 702-6153 if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Matus", written over a horizontal line.

Mark Matus  
Manager

Environmental Services Department

cc: Debie Allen, BWL  
Brandie Ekren, BWL  
George, Stojic, BWL  
Mark Williams, BWL

