



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

September 13, 2022

Lori Myott, Manager Environmental Services Department
Lansing Board of Water and Light
1232 Haco Drive
Lansing, Michigan 48912

SRN: B4001, Eaton County

Dear Lori Myott:

VIOLATION NOTICE

On July 29, 2022, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received the 1st Semi-Annual Excess Emissions and Downtime Reports for Lansing Board of Water and Light (LBWL) – Delta Energy Park located at 3725 S. Canal Road, Lansing, Michigan. The purpose of this was to report LBWL - Delta Energy Park’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 (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 74-18C.

The following was reported:

Process Description	Rule/Permit Condition Violated	Comments
EUCTGHRSG2 - A nominally rated 667 MMBTU/hr natural gas-fired combustion turbine generator (CTG) coupled with a heat recovery steam generator (HRSG).	R 336.1205(1)(a) & (b), R 336.2810 / PTI 74-18C, FGCTGHRSG - Special Condition (SC) I.1	Exceeded the NOx emission limit of 3 ppmvd at 15% Oxygen based on a 24-hour rolling average as measured by a CEMS.
EUCTGHRSG3 - A nominally rated 667 MMBTU/hr natural gas-fired combustion turbine generator (CTG) coupled with a heat recovery steam generator (HRSG).	R 336.1205(1)(a) & (b), R 336.2810 / PTI 74-18C, FGCTGHRSG - Special Condition (SC) I.1	Exceeded the NOx emission limit of 3 ppmvd at 15% Oxygen based on a 24-hour rolling average as measured by a CEMS.

For EUCTGHRSG2, the excess emissions duration was for 653.00 hours (38.83% of the operating time) for the first semi-annual reporting period in 2022. The maximum NOx emissions reported was 46.9 ppmvd at 15% Oxygen based on a 24-hour rolling average on January 14, 2022.

For EUCTGHRSG3, the excess emissions duration was for 343 hours (22.85% of the operating time) for the first semi-annual reporting period in 2022. The maximum NOx emissions reported was 46.6 ppmvd at 15% Oxygen based on a 24-hour rolling average on January 11, 2022.

Lori Myott
Lansing Board of Water & Light
Page 2
September 13, 2022

The summary provided by LBWL stated that the reporting for EUCTGHRSG2 and EUCTGHRSG3 was during the initial commissioning time period. This included initial commissioning of the HRSGs, SCR, catalyst system, and CEMS. This time period covered an array of commissioning which included incomplete equipment installation and multiple startups and shutdowns while staff learned the process and troubleshoot interruptions in operations.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by October 4, 2022, (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 EGLE, AQD, Lansing District, P.O. Box 30242, Lansing, Michigan 48909-7742 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

In addition, please submit a 3rd Quarter 2022 Excess Emissions and Downtime Report for LBWL – Delta Energy Park within 30 days following the end of the calendar quarter.

If LBWL 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. 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,



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

cc: Nathan Hude, LBWL
Mary Ann Dolehanty, EGLE
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Heidi Hollenbach, EGLE
Robert Byrnes, EGLE