



GRETCHEN WHITMER  
GOVERNOR

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



DANIEL EICHINGER  
ACTING DIRECTOR

February 7, 2023

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 January 30, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), received the 4<sup>th</sup> Quarter 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) numbers 74-18C and 74-18D.

The following was reported:

Process Description	Rule/Permit Condition Violated	Comments
EUCTGHRSG3 - A nominally rated 667 MMBTU/hr natural gas-fired combustion turbine generator (CTG) coupled with a heat recovery steam generator (HRSG)	PTI 74-18C&D, 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.

The excess emissions occurred in two incidents resulting in the exceedance of the NOx emission limit in SC I.1. On November 15, 2022, until November 16, 2022, the NOx emission limit was exceeded for 24 hours. The maximum NOx emissions reported was 4.9 ppmvd at 15% Oxygen based on a 24-hour rolling average. On November 17, 2022, the NOx emission limit was exceeded for 2 hours. The maximum NOx emissions reported was 3.7 ppmvd at 15% Oxygen based on a 24-hour rolling average. Total duration for excess emissions was for 26 hours (5.49% of the operating time) for the 4<sup>th</sup> Quarter reporting period in 2022.

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The summary provided by LBWL stated that following unit start up, a control equipment malfunction occurred with the selective catalytic reduction (SCR). After reaching permissive catalyst temperature for SCR startup, ammonia valve issues occurred. To address and abate future occurrences, a detailed SCR operation checklist for operators to perform prior to start-ups has been created by the BWL. This checklist will ensure that valving is correct and identify valve malfunctions prior to the start-up attempt. They have also created a NOx tracking log that the operators will fill out during unit start-up to ensure NOx emissions are being monitored and a timelier reaction to malfunctions that could lead to exceedances. The checklists and log sheet were included with the 4<sup>th</sup> Quarter Excess Emissions and Downtime Report for 2022. The Start-up and Shutdown Plan will be updated to include the checklists and log sheet. The updated Start-up and Shutdown Plan will be submitted to the AQD.

The actions taken to correct the cited violation and updating the Start-up and Shutdown Plan appear appropriate to bring this facility back into compliance. As a reminder, a notice of abnormal conditions, start-up, shutdown, and malfunction per Rule 912, should have been submitted for these incidents. Please submit the notification and written report per Rule 912 in the future.

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 violation cited above. 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,



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

cc: Nathan Hude, LBWL  
Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Bob Byrnes, EGLE  
Heidi Hollenbach, EGLE