



RICK SNYDER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING DISTRICT OFFICE



C. HEIDI GREYER  
DIRECTOR

July 21, 2017

CERTIFIED MAIL – RETURN RECEIPT REQUESTED

Mr. Robert Ellerhorst  
Director of Utilities  
354 Service Road  
East Lansing, Michigan 48824

Mr. Tom Grover  
Environmental Compliance Officer  
Suite B20, 4000 Collins Road  
Lansing, Michigan 48910

SRN: K3249, Ingham County

Dear Mr. Ellerhorst and Mr. Grover:

**VIOLATION NOTICE**

On April 17 and April 18, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of the Michigan State University Campus located in East Lansing. The purpose of this inspection was to determine Michigan State University'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; the conditions of Renewable Operating Permit (ROP) number MI-ROP-K3249-2016 and the conditions of PTI's 575-85, 127-07, 95-12A, and 75-14C.

During the inspection, staff observed the following:

Violation Number	Process Description	Rule/Permit Condition Violated	Comments
1.	FG-4MATVENTS	MI-ROP-K3249-2016 Section 2, FG-4MATVENTS Special Condition VI.1.	Semi-annual maintenance check and repairs are not being conducted or recorded.
2.	EU-ETO	MI-ROP-K3249-2016 Section 1, EU-ETO Special Condition VII.1.b	Thermal oxidizer monitoring is not being conducted due to lack of temperature monitoring device.

Violation Descriptions as numbered in the above table:

1. FG-4MATVENTS consists of devices that were once used for the purpose of handling products for coal burning and are now used for the handling of sand which is used for heat retention on the fluidized bed of EU-UNIT4. EU-SPENTSANDSILO4 and EU-SANDSILO each are controlled by small baghouses or "bag filters". During the handling of the sand, there are

small baghouses installed for the control of particulate matter. These small baghouses are required to have semi-annual maintenance checks conducted and repairs as necessary. Records for the checks and repairs are required per Special Condition VI.1. Upon inspection, it was found that these checks were not being conducted as required and thus records were not completed.

2. EU-ETO is an ethylene oxide (ETO) sanitization device located at the Vet Medical Center used for the cleaning of surgical utensils. The device is controlled by a thermal oxidizer that advertises the control of ETO at 99.9 percent when operated properly. Special Condition VI.1.b. requires the constant monitoring of the oxidation temperature in the catalyst bed. Upon inspection, it was found that a thermal oxidizer temperature monitor was not installed and thus not being monitored to ensure proper control/destruction of the ETO emissions.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 11, 2017. 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.

If Michigan State University 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 telephone number listed below.

Sincerely,



Nathan Hude  
Environmental Quality Analyst  
Air Quality Division  
517-284-6779

NNH:TG

cc/via e-mail: Ms. Lynn Fiedler, DEQ  
Ms. Mary Ann Dolehanty, DEQ  
Mr. Chris Ethridge, DEQ  
Mr. Thomas Hess, DEQ  
Mr. Nathan Hude, DEQ  
Mr. Brad Myott, DEQ