



SENT VIA UPS (CONTROL NO: 1Z 450 394 01 6855 6001) AND E-MAIL

November 2, 2021

Mr. Iranna Konanahalli
Senior Environmental Engineer
EGLE – Air Quality Division
Warren District Office
27700 Donald Court
Warren, MI 48092-2793

Subject: Response to Violation Notice Dated October 12, 2021
Oakland University; SRN: N3422

Dear Mr. Konanahalli:

Oakland University has prepared this correspondence in response to the Michigan Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) October 12, 2021 Violation Notice addressed to Dr. Ora Hirsch Pescovitz of Oakland University. The Violation Notice requested a written response by November 2, 2021. The alleged violation specified in the above referenced correspondence and our response is presented below.

Violation Notice Comments

Oakland University operates a combined cycle heat and power cogeneration system (CoGen System) consisting of a natural gas fired turbine generator set (51 MMBtu/hr Centaur 50-6201S SoLoNox gas turbine) and a waste heat recovery unit equipped with a 35.6 MMBtu/hr duct burner for additional heat). The stationary combustion turbine was constructed after February 18, 2005. The flexible emission group FG-TURB/WHRU#1 (consisting of EU-TURBINE#1 & EU-WHRU#1) is subject to conditions to Permit to Install 419-92C and federal New Source Performance Standard, 40 CFR, Part 60, Subparts A and KKKK (NSPS 4K).

During the June 29, 2021 inspection and subsequent records review, the AQD staff observed the following:

Oakland U failed to provide records and demonstrate compliance with the applicable conditions of the permit (especially, FG-TURB/WHRU#1) and the federal regulations (NSPS 4K Standards of Performance for Stationary

Response; Startup Date

The construction permit for emission units EU-TURBINE#1 & EU-WHRU#1 (Permit to Install 419-92C) was issued in January 2016. The Notice of Violation indicates that construction of the cogeneration system was completed June 2016. Installation of the major system components was completed in June 2016. The actual startup (first time the unit combusted natural gas) occurred on July 2, 2016, however the turbine was producing power at only 65% of its maximum capacity and the WHRU / duct burners were not operational. The entire system was off the entire month of August 2016: Consumers Energy replaced the gas meter, the WHRU bypass damper and ductwork were repaired, and the roof curb and insulation were replaced around the stack. In November, the Turbine was able to run at 100% while the duct burners were still not operational. The duct burner issues were resolved in July 2019 after a full season of testing, performance validation and monitoring. The interconnection agreement with DTE Energy was finalized in October 2021. Fuel use records have been provided to EGLE annually through submittal of the Michigan Air Emissions Reporting System (MAERS) report.

Response; Emission Testing Requirements

Following startup of FG-TURB/WHRU#1, Oakland University contracted with Solar Turbines to perform regular maintenance of the cogeneration system. This service included periodic sampling of the turbine exhaust gas to monitor combustions pollutants, specifically carbon monoxide (CO) and nitrogen oxides (NOx), to verify that the low-NOx combustion system was operating properly. These monitoring records were provided by Solar Turbines to Oakland University after each service visit and have been maintained on file. It was Oakland University's understanding that this regular maintenance emission testing satisfied the emission testing requirement in PTI 419-92C, which incorporates the requirements of NSPS 4K. Following receipt of the Violation Notice, Oakland University consulted with other environmental service companies and learned that these emission records, while useful for demonstrating proper maintenance of the system, do not satisfy the Testing / Sampling conditions of PTI 419-92C.

Therefore, FG-TURB/WHRU#1 is subject to the additional NOx emission testing requirements specified in PTI 419-92C and NSPS 4K. The unit has only been fired with pipeline-quality natural gas to comply with the sulfur dioxide (SO₂) emission standards specified in NSPS 4K.

To assure compliance with 40 CFR, Part 60, Subparts A and KKKK, Oakland University is in the process of scheduling the emission test for emission unit FG-TURB/WHRU#1. A test plan will be submitted to EGLE-AQD by November 16, 2021 to provide the agency with at least 60 days notice of the test as required by Condition No. FG-TURB/WHRU#1

V.1 (page 11 of 13), Permit No. 419-92C. It is anticipated that test will be performed in January 2022. A scheduled test date will be specified in the test plan.

We appreciate EGLE's consideration of the information presented in this letter in response to the issued Violation Notice. If you have any comments or requests relative to the proposed corrective actions, please feel free to contact Oakland University, Cora Hanson at 248-370-4427 or chanson@oakland.edu. Note: ***Impact Compliance & Testing, Inc. (ICT) assisted Oakland University in preparing this correspondence and is authorized to respond to any questions from EGLE. Please contact Geed Salam at 248-943-4288 or geed.salam@ImpactCandT.com***

Sincerely,



Cora Hanson
Director of Environmental Health and Safety

cc: Ora. Hirsch Pecovitz – President
Tom Lemarbe – Interim Vice President Finance and Administration
Pat. Engle - Associate Vice President for Facilities Management

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Enclosure: October 12, 2021 Violation Notice Letter