



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

October 12, 2021

VIA E-MAIL

Dr. Ora Hirsch Pescovitz, President
Oakland University
Wilson Hall, Room 204
371 Wilson Boulevard
Rochester, MI 48309-4486

SRN: N3422, Oakland County

Dear Dr. Pescovitz:

VIOLATION NOTICE

On June 29, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Oakland University (Oakland U) located at 2200 North Squirrel Road, Rochester Hills, Michigan. The purpose of this inspection was to determine Oakland U'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 419-92C.

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

Process Description	Rule/Permit Condition Violated	Comments
CoGen System: Combined cycle heat and power cogeneration system (Centaur 50-6201S SoLoNox gas turbine generator set) consisting of a natural gas fired turbine (51 MMBtu/hr) and a waste heat recovery unit (equipped with a 10 MMBtu/hr duct burner for additional heat for a total of 60 MMBtu/hr). The stationary combustion turbine is constructed after February 18, 2005 (about June 2016).	PTI No. 419-92C, FG-TURB/WHRU#1 (EU-TURBINE#1 & EU-WHRU#1) and federal New Source Performance Standard, 40 CFR, Part 60, Subparts A and KKKK (NSPS 4K)	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 Combustion Turbines).

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by **November 2, 2021** (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, Warren District, at 27700 Donald Court, Warren, MI 48092-2793, and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Oakland U 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 and for the cooperation that was extended to me during my inspection of June 29, 2021. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number or email listed below.

Sincerely,



Iranna Konanahalli
Senior Environmental Engineer
Air Quality Division
586-596-7630
konanahalli@michigan.gov

cc: Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE
Mr. Jeff Rathbun, EGLE
Ms. Patricia Ann Engle, Oakland University
Ms. Cora Hanson, Oakland University