

CAPITAL REGION AIRPORT AUTHORITY

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November 12, 2021

EGLE
AQD Lansing District
Environmental Great Lakes and Energy
P.O. Box 30242
Lansing, Michigan 48909-7760

To Whom It May Concern:

I am writing to you in response to our violation notice dated October 21, 2021 regarding our euincinerator inspection performed on July 20-21, 2021 here at Capital Region International Airport.

PTI 118-08 EUINCINERATOR

CRAA International Garbage Incinerator Log for December 1, 2020 – September 17, 2021 had (8) Exceedances of our 66.7 lb maximum charge rate.

I have discussed and reiterated this rule to all staff that are trained to incinerate Regulated Garbage. This is also included in the annual training. The 2021 training will occur in December 2021 and this rule will be highlighted once again. I am hopeful that this violation will never reoccur in the future.

Also noticed during the stack test on July 20, 2021 the incinerator temperature fell below the required 1600 degrees Fahrenheit due the timer not being restarted after the incinerator was up to temperature. This procedure to reset the timer after the temperature has been reached is covered in our SOP. This was my error due the fact I left to attend a meeting prior to the temperature reaching the 1600 degrees and didn't pass on to the operator that I hadn't reset the timer.

The temperature recorder was disable due to power outage and we did not know this until after the burn. This has now been resolved and the incinerator is again recoding temperature for down loading.

RULE 974

According to the CRAA Final Emission Test Report that was sent to EGLE on October 4, 2021 the testing limits were not met on NOx, HCl and PM. However, the testing results



were very close to the limits I have contacted the incinerator manufacturer to tune the incinerator burner in order to pass the NOx. The PM was over due the trash makeup burned was made up of mostly flat paper creating a large amount of ash. Future testing's will be conducted with a higher mixture of garbage in place of paper. General incineration is regulated garbage which highly reduces the PM.

Sincerely,
Sincerely,

Ron O'Neil, CM, FMP
Director of Facilities & Infrastructure