

## STATE OF MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY LANSING DISTRICT OFFICE



C. HEIDI GRETHER DIRECTOR

June 6, 2017

Mr. Scott Davis, Facilities Supervisor State of Michigan, DTMB Secondary Complex Energy Center 7432 Parsons Road Lansing, Michigan 48913

SRN: P0152, Eaton County

Dear Mr. Davis:

## VIOLATION NOTICE

On April 28, 2017, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) conducted an inspection of the DTMB Secondary Complex Energy Center (DTMB Energy Center) located at 7432 Parsons Road, Lansing. The purpose of this inspection was to determine the Energy Center'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 156-10A and 286-73.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUENGINE1	PTI 156-10A SC IV.2	Nameplate capacity exceeds 1,662 brake horsepower.
EUENGINE1	PTI 156-10A SC VI.5	NO <sub>x</sub> emissions were not calculated.
FGTURB/HRSG1 FGTURB/HRSG2	PTI 156-10A SC VI.2	Visible emission readings were not documented.
FGTURB/HRSG1 FGTURB/HRSG2	PTI 156-10A SC VI.3	Monthly log of hours of operation were not kept.

During the inspection, it was determined that EUENGINE1 had a nameplate capacity of 1645 kW, which is equivalent to 2,206 brake horsepower. This is a violation of Special Condtion IV.2 of PTI number 156-10A, which requires that the brake horsepower not exceed a nameplate capacity of 1,662 brake horsepower.

Additionally, DTMB Energy was unable to produce  $NO_x$  emission calculations records for EUENGINE1. This is a violation of the recordkeeping limitations specified in Special Condition number VI.5 of PTI number 156-10A which requires that 12-month rolling time period  $NO_x$  emission calculation records be kept.

Additionally, during the inspection, the following records required by PTI number 156-10A were not available for FGTURB/HRSG1 and FGTURB/HRSG2:

- Records of the non-certified visible emissions observations, the United States Environmental Protection Agency Method 9 observations, the reason for any visible emissions observed, and any corrective actions taken as a result of observing visible emissions. (SC VI.2)
- 2. Written log of the monthly hours of operation of FGTURB/HRSG1 and FGTURB/HRSG2 kept in a satisfactory manner. While logs of start and stop times appear to be recorded, these are not considered sufficient for recording hours operated. (SC VI.3)

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by June 27, 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 the DTMB Energy Center 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 the DTMB Energy Center. 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,

Michan Supro

Michelle Luplow Environmental Quality Analyst Air Quality Division 517-284-6636

ML:TG

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