



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



GRETCHEN WHITMER  
 GOVERNOR

PHILLIP D. ROOS  
 DIRECTOR

March 21, 2024

VIA EMAIL ONLY

Michael Walton  
 Executive Director / Facilities Management Operations  
 Central Michigan University  
 1730 East Campus Drive  
 Mt. Pleasant, Michigan 48859

SRN: K2460, Isabella County

Dear Michael Walton:

**VIOLATION NOTICE**

On July 19, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Central Michigan University (CMU) located at 1730 East Campus Drive, Mt. Pleasant, Michigan. The purpose of this inspection was to determine CMU'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 Renewable Operating Permit (ROP) number MI-ROP-K2460-2021.

Staff observed the following resulting from the inspection and historical file review:

Process Description	Rule/Permit Condition Violated	Comments
Boiler 5	40 CFR Part 60, Subpart Db 60.48b(b)	40 CFR Part 60, Subpart Db requires a continuous or predictive emission monitor system to be installed and operating properly to verify NOx emission rates
Boiler 5	MI-ROP-K2460-2021, EUBLR5, IX.1.	The permittee shall comply with all applicable provisions of the Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, as specified in 40 CFR Part 60, Subparts A and Db.

This process is also subject to the federal New Source Performance Standards (NSPS) for Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units. These standards are found in Title 40 of the Code of Federal Regulations (CFR) Part 60, Subpart Db. The NSPS contains performance testing, emissions monitoring, reporting, and

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record keeping requirements. For oxides of nitrogen (NOx) emissions, monitoring requirements consist of a continuous emissions monitoring system (CEMS) or a predictive emission monitoring system (PEMS). CMU has neither system. The situation was thoroughly investigated internally and reviewed with CMU via calls, a meeting, and emails, prior to issuance of the violation notice.

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 11, 2024 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violation occurred; an explanation of the causes and duration of the violation; whether the violation is ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violation 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 Ben Witkopp at EGLE, AQD, Bay City District, at 401 Ketchum Street, Suite B, Bay City, Michigan 48708 or WitkoppB@Michigan.gov and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If CMU 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 violation cited above and for the cooperation that was extended to me during my interactions with CMU. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Ben Witkopp  
Environmental Engineer  
Air Quality Division  
989-295-1612

cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Chris Hare, EGLE