



REGION 5

CHICAGO, IL 60604

ELECTRONIC MAIL

DELIVERY RECEIPT REQUESTED

Lori L. Myott
Manager, Environmental Services and Reliability Compliance Department
Lansing Board of Water & Light
Lori.Myott@LBWL.COM

RE: Request for Operating Limits / Monitoring Petition under 40 C.F.R. Part 63, Subpart YYYY,
NESHAP for Stationary Combustion Turbines
Lansing Board of Water & Light - Delta Energy Park, Lansing, Michigan

Dear Lori L. Myott:

The U.S. Environmental Protection Agency has received a petition from the Lansing Board of Water & Light (LBWL), for operating limitations and exemptions, dated October 31, 2025 (the Petition).

LBWL proposes that CTG inlet air Temperature (T1) be continuously measured and limited to demonstrate compliance with the formaldehyde limits under 40 C.F.R. § 63.6125(b) for three lean premix gas-fired combustion turbines identified as "EUCTGSC1," "EUCTGHRSG2," and "EUCTGHRSG3" at Delta Energy Park in Lansing, Michigan, while the turbines are operating in simple-cycle mode. In summary, the EPA partially approves and partially denies the Petition to use T1 as operating limits under the regulations at 40 C.F.R. Part 63, Subpart YYYY.

The Petition also requests to reserve the right to operate the three turbines outside of their approved T1 ranges during Energy Emergency Alerts (EEAs). This request is outside the scope of the EPA's authority to approve operating limits and exemptions and is therefore not incorporated into this letter.

Regulatory Background

40 C.F.R. Part 63, Subpart YYYY of the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Stationary Combustion Turbines (Subpart YYYY) establishes national emission limitations and operating limitations for hazardous air pollutants (HAP) emissions from stationary combustion turbines located at major stationary sources of HAP emissions, and requirements to demonstrate initial and continuous compliance with the emission and operating limitations.

40 C.F.R. § 63.6095(a)(3) requires the owner or operator of a new or reconstructed lean premix gas-fired stationary combustion turbine or a diffusion flame gas-fired stationary combustion turbine that started up on or before March 9, 2022, to comply with the emissions limitations and operating

limitations of Subpart YYYY no later than March 9, 2022.

40 C.F.R. § 63.6100 requires that each new or reconstructed lean premix gas-fired stationary combustion turbine must comply with the emission limitations and operating limitations in Table 1 and Table 2 of Subpart YYYY. Table 1 provides that each new or reconstructed lean premix gas-fired stationary combustion turbine must comply with an emission limitation of 91 ppbvd formaldehyde or less at 15% O₂, except during turbine startup. The period for turbine startup is subject to the limitations specified at 40 C.F.R. § 63.6175. Table 2 provides that each stationary combustion turbine that is required to comply with the formaldehyde emissions limitation and is not using an oxidation catalyst must maintain any operating limitations approved by the Administrator.

40 C.F.R. § 63.6120(e) states that if the owner or operator's stationary combustion turbine is not equipped with an oxidation catalyst, the owner or operator must petition the Administrator for operating limitations that it will monitor to demonstrate compliance with the formaldehyde emission limitation in Table 1. The owner or operator must measure these operating parameters during the initial performance test and continuously monitor thereafter. 40 C.F.R. § 63.6120(f) lists the specific information that must be included in a petition to the Administrator for approval of additional operating limitations to demonstrate compliance with the formaldehyde emission limitation in Table 1.

40 C.F.R. § 63.6125(b) requires that the owner or operator of a stationary combustion turbine that is required to comply with the formaldehyde emission limitation and is not using an oxidation catalyst must continuously monitor any parameters specified in the approved petition to comply with operating limitations specified in Table 2 and Table 5 of Subpart YYYY.

All terms used in this letter have their ordinary meaning unless such terms are defined in the Clean Air Act (CAA), 42 U.S.C. §§ 7401 *et seq.*, or Subpart YYYY, in which case they have the meaning ascribed to them in those authorities.

LBWL's Petition

LBWL owns and operates three gas-fired lean premix stationary combustion turbines identified as "EUCTGSC1," "EUCTGHRSG2," and "EUCTGHRSG3" at Delta Energy Park in Lansing, Michigan. The turbines were constructed after January 14, 2003, are not equipped with oxidation catalysts while operating in simple-cycle mode, and will be "affected sources" under Subpart YYYY in Q1 2026.

On October 31, 2025, LBWL submitted its Petition under 40 C.F.R. § 63.6120(e) for operating limitations it proposed to monitor to demonstrate compliance with the formaldehyde emission limitation. LBWL requests that the EPA accept monitoring of T1 as parameters to meet the Subpart YYYY monitoring requirements for lean premix combustion equipped gas-fired turbines, instead of utilizing oxidation catalysts while operating in simple-cycle mode.

On page 2 of the Petition, LBWL states: "the T1 temperature is used by the turbine electronic control system to adjust the inlet air (mass flow) that is required for good combustion."

LBWL's Petition also requests to reserve the right to operate the turbines outside of their approved T1 ranges during Energy Emergency Alerts (EEAs) issued by the Midcontinent Independent System

Operator (MISO), which administers the electric grid in areas including Lansing, MI. LBWL’s petition cites “public safety and grid stability during extreme weather events” on page 2 of the Petition.

The EPA’s Analysis

The Petition includes the required information described in 40 C.F.R. § 63.6120(f)(1) through (5), as summarized below. The EPA makes the following determinations regarding LBWL’s premixed gas-fired combustion turbines under Subpart YYYY, which are operating without oxidation catalysts in simple-cycle mode and are subject to emission and operating limitations.

Based on the information provided by LBWL, the EPA makes the following findings:

(1) LBWL’s Petition proposes that the CTG inlet air Temperature (T1) parameter be continuously monitored to measure compliance with formaldehyde limits in Subpart YYYY.

(2) LBWL’s discussion in its Petition of the relationship between T1 and formaldehyde emissions, and how limitations on these parameters will serve to limit formaldehyde emissions, is insufficient to support the requested parameters. The EPA therefore is making its determination based on the emissions testing and the T1 parameter.

The emissions testing conducted on February 6-8, 2024, August 29, 2024, January 14-16, 2025, and August 13-15, 2025, showed formaldehyde emissions below 91 ppbvd throughout the proposed ranges of T1 for EUCTGSC1 and EUCTGHRSG3; and within part of the proposed range of T1 for EUCTGHRSG2. LBWL’s petition also stated that all testing was performed at maximum capable load for the ambient conditions.

(3) LBWL proposed values for its T1 parameter (see table below). However, LBWL proposed a lower limit for the T1 parameter that was out of the range of test conditions for EUCTGHRSG2. The EPA calculated the T1 limits to determine acceptable ranges that will demonstrate compliance with the 91 ppbvd limit. LBWL has not demonstrated that limiting operations to within the full ranges of its proposed values would ensure compliance for EUCTGHRSG2.

Unit	EUCTGSC1	EUCTGHRSG2	EUCTGHRSG3
Proposed Limits (°F)	1 – 104	4 – 104	4 – 104
Test Conditions (°F)	16.1 – 96.8	18.6 – 95.5	18.7 – 95.0
Approved Limits (°F)	1.0 – 104.0	11.0 – 104.0	4.0 – 104.0

The EPA calculated the approved lower Combustor Temp limit at EUCTGHRSG2 by: [Lowest temp tested at] – (91 ppb limit – 5 ppb buffer – [Highest ppb tested at lower temps]) / [Testing Factor]

Testing factor = 2 instead of 3, because LBWL has tested at broad ranges of T1.

(4) In its Petition, LBWL described the methods it would use to measure and the instruments it would use to monitor the proposed parameters, as well as the relative accuracy and precision of these methods and instruments. LBWL provided the manufacturer documentation requested by the EPA.

(5) In its Petition, LBWL described the frequency and methods of instrument recalibration it would use. LBWL provided the manufacturer documentation requested by the EPA.

LBWL has not demonstrated that limiting operations to within the full ranges of proposed values of T1 would ensure compliance with the 91 ppbv formaldehyde emissions standard.

The EPA therefore approves the Petition for EUCTGSC1 to operate between a T1 of 1.0 – 104.0 °F, for EUCTGHRSG2 to operate between a T1 of 11.0 – 104.0 °F, and for EUCTGHRSG3 to operate between a T1 of 4.0 – 104.0 °F; all when operating around maximum capable load for the ambient conditions, and in simple-cycle mode.

The EPA therefore denies the Petition at all other ranges for EUCTGHRSG2, but would consider approving a broader range of T1 if LBWL submits a new or revised petition including information showing that the formaldehyde standard is met at wider ranges of operating conditions.

The EPA has not identified any authority in the CAA or NESHAP that would allow it to address the request for LBWL to operate their turbines outside of the approved ranges for T1 cited above, during EEAs issued by MISO. Depending on the specific circumstances, other mechanisms, such as orders from the U.S. Department of Energy (DOE) pursuant to Section 202(c) of the Federal Power Act, 16 U.S.C. § 824a(c), may be available to LBWL.

We have coordinated this determination with the Office of Enforcement and Compliance Assurance (OECA) and the Office of Clean Air Programs (OCAP). If there are any further questions, please contact Jacob Herbers of my staff at Herbers.Jacob@epa.gov.

Sincerely,

CAROLYN
PERSOON

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