



May 8, 2023

EGLE – Air Quality Division
350 Ottawa Avenue NW, Unit 10
Grand Rapids District (Central West Michigan)
Grand Rapids, MI 49503-2316
Attn: Ms. Kaitlyn DeVries



Re: Response to EGLE Violation Notice Dated 5-2-2023
City of Portland [SRN: N5352] – Ionia County

Dear Ms. DeVries:

The City of Portland (Portland) conducted stack testing on EUENGINE5, a dual fuel-fired reciprocating internal combustion engine (RICE), on April 25 and 26, 2023. In response to your violation notice dated May 2, 2023, below please find the information you requested and our actions in place to rectify the situation.

1. The dates the violation occurred: The testing violation occurred on April 25 and 26, 2023 for the Fairbanks Morse DLA engine (EUENGINE5) only.
2. The cause of the event: The cause appears to be spent catalyst; Portland is replacing the catalyst to resolve the issue. However, prior to April 25, the required catalyst parameter monitoring (pressure drop of ± 2 in. H₂O of the initial test and inlet temperature range of 450-1,350°F) appeared to be compliant with the specific regulatory requirements, indicating proper operation of the control device, in accordance with Table 6 to 40 CFR Part 63 Subpart ZZZZ.
3. The duration of the event: The combined duration of hours logged for EUENGINE5 operation on April 25 and 26 is 11 hours and 36 minutes.
4. Is the violation ongoing: The violation is not ongoing. The engine has not operated since the testing event and will not operate until a new catalyst is installed.
5. Summary of corrective actions: Portland observed unusual pressure readings on the EUENGINE5 manometer during operation on April 25 and 26, 2023. Portland immediately investigated by removing the catalyst from the stack for inspection and cleaning. Following the maintenance, Portland contacted the catalyst manufacturer to order a replacement catalyst to be installed at EUENGINE5. The manufacturer's ship date is estimated to be May 15, 2023. The catalyst will be installed upon receipt; EUENGINE5 will be retested once the new catalyst is installed. The carbon monoxide (CO) emissions from the EUENGINE5, prior to the catalyst, closely correlated with previous performance tests. Operation and testing data point to the catalyst as the root cause of the reduction in emission control performance.

We have tentatively scheduled retesting EUENGINE5 by Montrose Air Quality Services, LLC for Friday, May 19 or Monday, May 22, 2023. As soon as we have a firm retesting schedule, we will correspond with both you and Trevor to confirm acceptability.

Sincerely,



Todd Davlin
Superintendent of the Electric Department
City of Portland

CC: City Manager
Annette Switzer, EGLE
Christopher Ethridge, EGLE
Brad Myott, EGLE
Jenine Camilleri, EGLE
Heidi Hollenbach, EGLE