



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
GRAND RAPIDS DISTRICT OFFICE



DANIEL EICHINGER  
ACTING DIRECTOR

May 2, 2023

Todd Davlin  
City of Portland  
723 East Grand River Avenue  
Portland, Michigan 48875

SRN: N5352, Ionia County

Dear Todd Davlin:

**VIOLATION NOTICE**

On April 25 and April 26, 2023, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), attended required Stack Testing at the City of Portland located at 723 East Grand River Avenue, Portland, Michigan. The purpose of testing was to determine the City of Portland’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 40 CFR 63 Subpart ZZZZ.

During the stack testing, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
EUENGINE5	40 CFR Part 63.6603(a) Table 2d	Failure to meet the CO emission reduction requirement of 70%.

This process is subject to the federal National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines (RICE). These standards are found in 40 CFR 63 Subpart ZZZZ. This regulation requires existing non-emergency, non-black start, compression ignition stationary RICE engines greater than 500 HP located at an area source of Hazardous Air Pollutants to reduce Carbon Monoxide (CO) emissions by 70% or more. Preliminary testing indicated a CO reduction of less than 50% for EUENGINE5.

Please initiate actions necessary to correct the cited Violation and submit a written response to this Violation Notice by May 23, 2023 (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.

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Please submit the written response to EGLE, AQD, Grand Rapids District, at 350 Ottawa Avenue NW, Unit 10, Grand Rapids, Michigan 49503 and submit a copy to Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If the City of Portland 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 visit to the City of Portland. 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,

A handwritten signature in blue ink that reads "Kaitlyn DeVries".

Kaitlyn DeVries  
Senior Environmental Quality Analyst  
Air Quality Division  
616-558-0552

cc: Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jenine Camilleri, EGLE  
Heidi Hollenbach, EGLE