

**Grinstern, Eric (DEQ)**

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**From:** Bryan Heiss <Bryan@fcdbiogas.com>  
**Sent:** Monday, March 17, 2014 1:59 PM  
**To:** Grinstern, Eric (DEQ)  
**Cc:** aagangad@novienergy.com; agangadh@novienergy.com  
**Subject:** FCD Air Permit  
**Attachments:** FCD-PIT.pdf

Eric:

Attached you will find our response for the violation letter dated from February 25, 2014. Please be advised that I will also be emailing you our test plan by Wednesday, March 19<sup>th</sup> for your review. We will be mailing you the original today. Thank you for working with us on getting this resolved.

Have a great day,  
Bryan



Bryan Heiss, Plant Manager  
Fremont Community Digester  
(231)924-3211 Ext. 209  
(231-924-3213 – Fax  
[www.fcdbiogas.com](http://www.fcdbiogas.com)



Bryan Heiss  
Plant Manager

March 17, 2014

Eric Grinstern  
Environmental Quality Specialist  
Air Quality Division  
MDEQ - Grand Rapids District Office  
350 Ottawa Avenue, NW  
Grand Rapids, Michigan 49503-2341

RE: Fremont Community Digester - Permit To Install (PTI) No. 378-08A

Mr. Grinstern:

Fremont Community Digester has been operating two reciprocating combustion engines (EUCENGINE1 and EUCENGINE2) at 1634 Locust Street, Fremont, Michigan according to the Permit To Install (PTI) No. 378-08A, granted to Fremont Community Digester, LLC. The PTI requires initial performance testing in accordance with 40 CFR Part 60, Subpart JJJJ, unless the engines have been certified by the manufacturer. MDEQ provided a violation notice to Fremont Community Digester on February 25, 2014 that Fremont Community Digester (FCD) is in violation of the PTI. It is not the intention of Fremont Community Digester to operate the engines in violation of the PTI and is taking actions to correct the violation as soon as possible. EUCENGINE1 has operated for 4547 hours and EUCENGINE2 has operated for 3116 hours as of February 28, 2014.

FCD contacted the supplier Inland Power Group regarding the certification of EUCENGINE1 and EUCENGINE2 at FCD. The engines were started up on December 27, 2012 and the testing was to be conducted within 1 year of start-up. We were informed by Inland Power Group that these engines were certified and therefore further testing was not needed. A document showing the certification was provided to Fremont Community Digester and therefore FCD decided not to do the performance testing. However it was later determined by Inland Power Group that the document provided to FCD was in error. This resulted in the violation.

FCD was informed by MDEQ verbally on February 21, 2014 that testing is needed for the engines. Following have been or will be completed as soon as possible to correct the violation.

1. FCD has contracted with Derenzo and Associates, Inc to develop the test procedure and conduct the tests as required by PTI.
2. The test procedure will be submitted to MDEQ for review by March 19<sup>th</sup> 2014

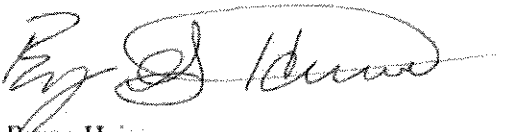
March 17, 2014

3. The testing will be conducted on April 29, 2014.

FCD did not conduct the tests due to the wrong information provided by the engine supplier and FCD respectfully requests MDEQ to provide some time to rectify this violation. FCD is aware of the requirements of the PTI and will comply with all the requirements in the future. The next testing will be performed within 8760 hours or 3 years after April 29, 2014 whichever occurs first.

Please contact me at 231-924-3211 Ext 209 with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Bryan Heiss', with a large, loopy flourish extending from the end.

Bryan Heiss  
Plant Manager  
Fremont Community Digester

cc: Ms. Heidi Hollenbach, DEQ  
Ms. Lynn Fiedler, DEQ  
Ms. Teresa Seidel, DEQ  
Mr. Thomas Hess, DEQ  
Anand Gangadharan, NOVI Energy