



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF
ENVIRONMENT, GREAT LAKES, AND ENERGY
LANSING



LIESL EICHLER CLARK
DIRECTOR

April 5, 2022

UPS NEXT DAY DELIVERY

Mr. Todd Oltmans
Hoover Road Real Estate, LLC
21590 Hoover Road
Warren, Michigan 48089

SRN: P1109, Macomb County

Dear Mr. Oltmans:

VIOLATION NOTICE

The Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) is in the process of performing a technical review of the emissions test report submitted on March 28, 2022 by Hoover Road Real Estate, LLC located at 21590 Hoover Road in Warren, Michigan.

During the report review, staff noted the following:

Process Description	Rule/Permit Condition Violated	Comments
FGCOGEN, six (6) natural gas-fired engines used for electricity generation for the cannabis cultivation, extraction, processing, and distribution operations.	PTI 10-20A, Special Condition V.2.	Permittee failed to submit a complete report of the test results to the AQD Technical Programs Unit and District Office within 60 days following the last date of the test. The test report is incomplete.

The test plan for the November 16, 2021 emissions test was received by the AQD on August 3, 2021. The test plan was incomplete and the AQD requested a complete test plan which was received on August 27, 2021. The AQD performed a quality assurance review of the revised test plan and issued an approval letter on September 13, 2021 that included requirements for sampling, data analysis, and reporting. The following errors and or deficiencies require correction in order for the AQD to determine if the test data are valid and can be used to determine compliance.

Approval Condition	Comments
Incorrect ammonia (NH3) emissions reported	Raw emissions data that are non-detect are to be reported at the detection limit of the analytical finish. The method of determining the detection limit will be reported.

VIOLATION NOTICE

Mr. Todd Oltmans

Page 2

April 5, 2022

Approval Condition	Comments
Natural gas BTU value	Process operating parameter data not included in test report
Natural gas fuel usage	Process operating parameter data not included in test report.
Ventilation flow rates through ERV1 and ERV2	Process operating parameter data and/or detailed equipment design specifications not included in test report.
Method 320 documentation of manually analyzed difference spectrum	This condition is a quality assurance requirement of the USEPA Method 320. The AQD provided additional, written instructions to the responsible official on November 22, 2021.
Method 320 raw interferograms must be recorded and stored at approximately one-minute intervals	The test report states that the data was collected at approximately 30 second data points. This deviation was not approved by the AQD and is lacking insufficient analytical justification.
Method 320 Manufacturer's Quantitation Recipe	During the test event, the AQD observed that the quantitation routine used for the test event was analytically inaccurate and not in accordance with the test plan approval. Additional written instructions were provided to the responsible official on November 22, 2021. The report is lacking insufficient detail to determine that the specified quantitation routine was utilized.
Method 320 analyte spike tabulated data recorded continuously from steady state native to post spike	The complete, raw, tabulated Method 320 data file, in the original exported format (text tab delimited) for the entirety of the test event, including all quality assurance checks will be provided.
Method 320 gas cell temperature and pressure will be recorded at all times	Cell temperature and pressure not included in tabulated run data. Incomplete gases reported in quality assurance tabulated data.
Method 320 documentation of pre-test analyzer diagnostics	The diagnostics data are illegible.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by April 26, 2022 (which coincides with 21 calendar days from the date of this letter). The written response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

VIOLATION NOTICE

Mr. Todd Oltmans

Page 3

April 5, 2022

If Hoover Road Real Estate, LLC 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 violations cited above. If you have any questions regarding the violations or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Lindsey Wells
Environmental Quality Analyst
Air Quality Division
Technical Programs Unit
517-282-2345

cc: Marijuana Regulatory Agency
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Tammy Bell, EGLE
Ms. Joyce Zhu, EGLE
Mr. Robert Elmouchi, EGLE
Ms. Jenine Camilleri, EGLE
Ms. Kaitlyn Leffert, EGLE