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AIR QUALITY DIVISION

VENICE PARK RDF

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October 14, 2015

Ms. Julie Brunner, P.E.
Senior Environmental Engineer
Michigan Department of Environmental Quality
Air Quality Division – Lansing District
525 W. Allegan Street, 1 South
Lansing, MI 48933

**RE: Venice Park Recycling and Disposal Facility (SRN: N5910)
Response to Violation Notice – September 25, 2015**

Dear Ms. Brunner:

Venice Park Recycling and Disposal Facility (Venice Park) is submitting this letter as formal response to the Violation Notice (VN), dated September 25, 2015. The VN was issued subsequent to an unannounced on-site inspection that was performed on September 14, 2015. During a record review, staff noted that the permitted limit for the landfill gas usage for FGEngines 1-2 on a 12-month rolling time period (158,832 MMBtu) had been slightly exceeded in August 2015.

After discussing with our permit consultant, Derenzo Environmental Services, as to how the permitted limit had been calculated, it was determined that the material use limit was based on the CAT spec sheet (included with this letter). The spec sheet heat input is based on the lower heating value, and, technically speaking, the engine should not be able to exceed this value. The values for the average monthly MMBtu's that was utilized to calculate the 12-month rolling total in the records provided to the DEQ were obtained from the ABB gas analyzer. The ABB representative informed us that the on-site gas chromatograph reports this value based on the higher heating value (HHV) of the gas, and confirmed that the CAT program reports LHV with water included, which lowers the BTU even more.

Therefore, it is Venice Park's opinion that no violation of the permitted limit occurred, and that the apparent exceedance is due to a misunderstanding/reporting error as a result of the discrepancy between heating values used for the various calculations. A revised spreadsheet utilizing the LHV is provided with this letter as documentation that no exceedance occurred.

From everyday collection to environmental protection, Think Green.® Think Waste Management.

We trust that the information and explanation provided are sufficient to address the concerns expressed in the VN. Please don't hesitate to contact me at (517) 294-3907 if you have any questions regarding this submittal.

Sincerely,

A handwritten signature in cursive script that reads "Lori A.H. Winters".

Lori A.H. Winters, P.E.
Division Engineer and Compliance Manager
Waste Management of Michigan, Inc.

Enclosures

Cc: Mr. John Gall, Waste Management
Mr. Brad Myott, DEQ
Cc via email: Ms. Lynn Fiedler, DEQ
Ms Teresa Seidel, DEQ
Mr. Thomas Hess, DEQ