



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

January 17, 2019

Mr. Dan Zimmerman
Director of OHS and Compliance
Energy Developments, LLC
608 South Washington Avenue
Lansing, Michigan 48933

SRN: N5991, Genesee County

Dear Mr. Zimmerman:

SECOND VIOLATION NOTICE

On January 11, 2019, the Department of Environmental Quality (DEQ), Air Quality Division (AQD), received a stack test report on emissions of carbon monoxide (CO), nitrogen oxides (NOx), sulfur oxides (SOx) and volatile organic compounds (VOC) from EUENGINE6 and EUENGINE7. The testing was performed on November 28, 2018, at Energy Developments of Grand Blanc, LLC located at Citizens Disposal, Incorporated, 2361 West Grand Blanc Road, Grand Blanc. The purpose of the test was to determine compliance with the emission limits in Renewable Operating Permit (ROP) number MI-ROP-N5991-2016.

The results in the stack test report indicate the following violation:

Process Description	Rule/Permit Condition Violated	Comments
Two Caterpillar G3520, 2,233 hp, landfill gas-fired, lean burn, spark ignition (SI), reciprocating internal combustion engines (RICE) identified as EUENGINE6 and EUENGINE7.	Special Condition (SC) I.1 which limits each engine to 1.7 lb/hr of SOx. (R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d))	The test results received show emissions of 5.44 lb/hr of SO ₂ from EUENGINE6 and 5.16 lb/hr of SO ₂ from EUENGINE7 both in excess of the emissions limit.

The stack testing results indicate that the exceedance of the permit limit of 1.7 lb/hr of SOx for each engine remains an ongoing violation of SC I.1 of FGENGINES in ROP No. MI-ROP-N5991-2016. The first violation notice dated March 28, 2018, estimated emissions at 3.26 lb/hr of SOx from EUENGINE6 and 3.22 lb/hr of SOx from EUENGINE7 both in excess of the emissions limit, and were based on gas samples that were collected on May 31, 2016. Actual emissions of SOx from EUENGINE6 and EUENGINE7 are now estimated at 46.4 tons per year (tpy) based on the results of the recent stack testing.

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AQD staff have advised you that, at a minimum, this is a violation of Rule 201 (R 336.1201) of the administrative rules promulgated under Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451).

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by February 7, 2019, (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.

Please submit the written response to the DEQ, AQD, Lansing District, at 525 West Allegan, 1 South, P.O. Box 30242, Lansing, Michigan 48909 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If you believe 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,



Julie L. Brunner, P.E.
Senior Environmental Engineer
Air Quality Division
517-275-0415

cc: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Mr. Brad Myott, DEQ