



GRETCHEN WHITMER  
GOVERNOR

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



LIESL EICHLER CLARK  
DIRECTOR

September 10, 2021

Mr. Richard Spranger, Director of Operations  
North American Natural Resources  
300 North 5<sup>th</sup> Street, Suite 100  
Ann Arbor, Michigan 48104

SRN: N6006, Ottawa County

Dear Mr. Spranger:

**VIOLATION NOTICE**

On August 19, 2021, the Department of Environment Great Lakes and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of the North American Natural Resources (NANR)– Autumn Hills Compressor and Generating Stations located at 5615 Adams Street, in Zeeland, Michigan. The purpose of this inspection was to determine NANR'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; the Air Pollution Control Rules; and Renewable Operating Permit (ROP) No. MI-ROP-N6006-2018a.

During the inspection, staff verified the following:

| Process Description  | Rule/Permit Condition Violated  | Comments   |
|----------------------|---|--|
| FGTREATMNTSYSTEM-XXX | ROP No. MI-ROP-N6006-2018a, FGTREATMNTSYSTEM-XXX, Special Condition III.3.a | Company did not maintain daily records of filtration, dewatering, and compression parameters that ensure the treatment system is operating properly as outlined in the NANR site-specific monitoring plan. |

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by October 1, 2021 (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.

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 Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

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In addition, per ROP No. MI-ROP-N6006-2018a, FGTREATMNTSYSTEM-XXX, Special Condition VI.4, please provide an updated monitoring plan that clearly states the operating parameters and values that will indicate acceptable operation of the treatment system, and specific procedures that will be used to monitor these parameters as part of a daily inspection and recordkeeping program for the treatment system. This update should be submitted as part of your corrective action toward addressing the violation cited above.

If NANR believes the above observation or statement is inaccurate or does not constitute a violation 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. 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,



David L. Morgan  
Environmental Quality Specialist  
Air Quality Division  
616-824-1139

cc: Mr. Robert Pliska, Waste Management Inc.  
Ms. Mary Ann Dolehanty, EGLE  
Dr. Eduardo Olaguer, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Jenine Camilleri, EGLE  
Ms. Heidi Hollenbach, EGLE