



April 9, 2018  
ECT No.: 17-0189-1200

Mr. Chance Collins  
Environmental Quality Analyst  
MDEQ-AQD Cadillac District Office  
120 West Chapin Street  
Cadillac, Michigan 49601-2158

Re: **Response to March 19, 2018 Violation Notice**  
PTI 226-02A/SRN N7190 – Vienna 6/7 CPF  
Ward Lake Energy

Dear Mr. Collins:

Environmental Consulting & Technology, Inc. (ECT), on behalf of Ward Lake Energy (WLE), compiled the following response to the Michigan Department of Environmental Quality-Air Quality Division (MDEQ-AQD) Violation Notice dated March 19, 2018 for the Vienna 6/7 CPF, Permit to Install (PTI) 226-02A, SRN N7190.

The following violations were cited:

Process Description	Rule/Permit Condition Violated	Comments
EUENGINE1 – CO emission limit of 2 tpy, based on a 12 month rolling time period	PTI 226-02A, SC I.2	Actual emissions exceeded limit (as high as 5.860 tpy, based on a 12 month rolling time period)
EUENGINE1 – Reporting of replacement engine	PTI 226-02A, SC VII.1	Engine change out with similar engine is allowed, but must be reported within 30 days

The following information was requested by MDEQ-AQD in the Violation Letter:

- **Dates the violation occurred:** The PTI application indicated a Caterpillar G3408TA 400 hp engine would be installed whereas a Caterpillar G3408TA 405 hp engine was installed.
- **Explanation of the causes and duration of the violations:** A different engine than what was permitted was installed that resulted in actual emissions exceeding emission limits.
- **Whether the violations are ongoing:** The violation is ongoing but, as discussed below, is being addressed via PTI Application 226-02B dated February 8, 2018.

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- **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:** PTI Application 226-02B dated February 8, 2018 was submitted to MDEQ-AQD Permit Section.
- **What steps are being taken to prevent a recoccurrence:** WLE will provide notice to MDEQ-AQD as noted in Special Conditions for PTI 226-02B for potential future engine changeouts.

### Closing

ECT sincerely appreciates the opportunity to provide our consulting services on this important project. Should you have questions or require additional information, please do not hesitate to contact the undersigned at 231.946.8200, [lharriger@ectinc.com](mailto:lharriger@ectinc.com), or [jlewandowski@ectinc.com](mailto:jlewandowski@ectinc.com).

Sincerely,

**ENVIRONMENTAL CONSULTING & TECHNOLOGY, INC.**



Lisa M. Harriger-Jones  
Senior Scientist



Jeremy S. Lewandowski  
Senior Engineer

cc: Mr. Jeff Riling – Ward Lake Energy

## Collins, Chance (DEQ)

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**From:** Jeremy Lewandowski <jlewandowski@ectinc.com>  
**Sent:** Monday, April 09, 2018 3:37 PM  
**To:** Collins, Chance (DEQ)  
**Cc:** Jeff Riling; Lisa Harriger  
**Subject:** Response to March 19, 2018 Violation Notice - Vienna 6/7 CPF SRN N7190  
**Attachments:** Vienna 6-7 CPF PTI226-02A.Response to Violation Notice.4-09-2018.pdf

Hi Chance –

Attached please find the response to the March 19, 2018 Violation Notice for the Vienna 6/7 CPF, SRN N7190.

Thank you –

Jeremy S. Lewandowski  
Senior Engineer



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