



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

March 9, 2021

Mr. Joe Wallace, General Manager
Ventra Fowlerville, LLC
8887 West Grand River
Fowlerville, Michigan 48836

SRN: N7413, Livingston County

Dear Mr. Wallace:

VIOLATION NOTICE

On January 12, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Ventra Fowlerville, LLC located at 8887 West Grand River, Fowlerville, Michigan. The purpose of this inspection was to determine 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 (Act 451); the Air Pollution Control Rules; and the conditions of Renewable Operating Permit (ROP) number MI-ROP-N7413-2020.

During the inspection on January 13, 2021, and review of the stack test report submitted on February 18, 2020, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGBOILERMACT	40 CFR 63.7510g/SC III.1	Failure to complete the boiler tune-ups within 5 years after January 31, 2016.
FGCOATINGLINE	R336.1702(a)/SC IV.3 requires a minimum VOC capture efficiency of 90 percent (by weight).	Tests failed to meet 90 percent capture on August 15, 2019, March 17, 2020 and on January 13, 2021.

In summary, the three capture test results were 68.9%, 79.5% and 81.9% capture efficiency which is below the permit requirement of 90%. Furthermore, the latest set of test results reported over 90% capture in your cover letter, but that value did not include the results from all 6 runs. The AQD requires that all test runs be averaged, which was equivalent to 81.9%. The Boiler MACT tune-up was required within 5 years of the most recent which was October 1, 2015. The tune ups should have been completed by October 1, 2020.

Mr. Joe Wallace, General Manager
Ventra Fowlerville, LLC
Page 2
March 9, 2021

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 30, 2021, (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 recurrence.

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

If Ventra Fowlerville, 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 and for the cooperation that was extended to me during my inspection of January 13, 2021. 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,



Robert Byrnes
Senior Environmental Engineer
Air Quality Division
517-275-0439

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