



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

August 6, 2021

Mr. Daniel Meccariello
Generate Capital
555 De Haro Street, Suite 300
San Francisco, CA 94107

SRN: N8210, Newaygo County

Dear Mr. Meccariello:

VIOLATION NOTICE

On July 7, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), conducted an inspection of Generate Fremont Digester, LLC located at 1634 Locust Street, Fremont, Michigan. The purpose of this inspection was to determine Generate Fremont Digester, LLC'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 (Act 451); the Air Pollution Control Rules; and the conditions of Permit to Install (PTI) number 378-08B.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGBIOGAS	PTI No. 378-08B, FGBIOGAS, Special Condition (SC) II.2	Exceedance of the H2S material limit.
FGICENGINES	PTI No. 378-08B, FGICENGINES, SC V.2	Failure to verify SO2 emission rates from each engine in FGICENGINES within 180 days after issuance of the permit.

The records provided demonstrate that H2S concentration of the biogas combusted in FGBIOGAS exceeded the limit of 1,730 parts per million by volume (ppmv) specified in PTI No. 378-08B, FGBIOGAS, SC II.2 on seven (7) instances on May 27, 2021, June 6-11, 2021, and on June 24, 2021, with H2S concentrations of 2,440 ppmv, 2,282 ppmv, 1,910 ppmv, 2,120 ppmv, 2,004 ppmv, 2,092 ppmv, and 1,756 ppmv, respectively.

Additionally, PTI No. 378-08B, FGICENGINES, SC V.2 required SO2 emissions to be verified from each engine within 180 days after issuance of the permit. The permit was issued on January 25, 2021 and testing should have occurred by July 24, 2021.

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Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by August 27, 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 reoccurrence. Please note that since testing is scheduled for August 19, 2021, the response for the failure to conduct required testing has been satisfied.

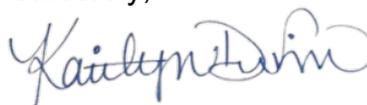
In addition to the response to the H₂S biogas concentration exceedance response, the AQD is requesting updated plans for the following: Nuisance Odor Minimization Plan for EUWASTETRANS and FGBIOGAS, and Preventative Maintenance / Malfunction Abatement Plan for FGBIOGAS no later than 30 days after the date of this letter.

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.

If Generate Fremont Digester 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 Generate Fremont Digester, LLC. 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,



Kaitlyn DeVries
Senior Environmental Quality Analyst
Air Quality Division
616-558-0552

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