



GRETCHEN WHITMER
GOVERNOR

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



LIESL EICHLER CLARK
DIRECTOR

June 29, 2021

Mr. Todd Oltmans
Hoover Road Real Estate, LLC
21590 Hoover Road
Warren, MI 48089

SRN: P1109, Macomb County

Dear Mr. Oltmans:

VIOLATION NOTICE

On June 9, 2021, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), requested records from Hoover Road Real Estate, LLC located at 21590 Hoover Road, Warren, Michigan. The purpose of this records request was to determine Hoover Road Real Estate'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 10-20A.

During the inspection, staff observed the following:

Process Description	Rule/Permit Condition Violated	Comments
FGCOGEN	PTI 10-20A, Special Condition V.1	Permittee failed to verify NOx, CO, VOC, and Ammonia emission factors from each engine included in FGCOGEN, by testing at owner's expense, in accordance with Department requirements.

PTI 10-20A, FGCOGEN, Special Condition V.1 states in part, "*Within 180 days after startup of each engine included in FGCOGEN, the permittee shall verify NOx, CO, VOC and Ammonia emission factors used to calculate emissions from each engine included in FGCOGEN, by testing at owner's expense, in accordance with Department requirements.*" Per my telephone conversation with Mr. James Kelly on June 9, 2021, the required emissions testing within 180 days after startup of each engine included in FGCOGEN was not conducted. Per the email received from Mr. Kelly on June 18, 2021, the startup date for all engines was June 15, 2020. Therefore, per PTI 10-20A, FGCOGEN, Special Condition V.1, the emissions tests were required to be conducted by December 12, 2020.

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Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by July 20, 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, Warren District, at 27700 Donald Court, Warren, Michigan 48092 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If Hoover Road Real Estate, 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 violation cited above and for the cooperation that was extended to me during my records request of June 9, 2021. 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,



Robert Elmouchi
Senior Environmental Quality Analyst
Air Quality Division
586-854-3244

cc: Marijuana Regulatory Agency
Ms. Mary Ann Dolehanty, EGLE
Dr. Eduardo Olaguer, EGLE
Ms. Jenine Camilleri, EGLE
Mr. Christopher Ethridge, EGLE
Ms. Joyce Zhu, EGLE
Mr. James Kelly, Cultivated Power