



**CITY OF GRAND RAPIDS**  
ENVIRONMENTAL SERVICES DEPARTMENT

Eric Grinstern  
Air Quality Division  
Grand Rapids District  
350 Ottawa Avenue NW  
Grand Rapids, MI 49503



July 3, 2018

Re: Violation Notice dated June 15, 2018  
SRN1729, Kent County

The City does not believe that a violation of Rule 201 has occurred because the activities that have taken place to date are not a part of the activities that require a permit to install. Site preparation activities to stabilize soils began on March 22, 2018. No foundations for the digesters, engines or flares have been installed yet. To date, no equipment has been purchased either.

The City of Grand Rapids is currently preparing the PTI application for its biodigester and combined heat and power (nonsteam) engine project to cover the processes subject to Michigan air permitting requirements. The PTI application is expected to be complete for agency review by July 15th, 2018. No construction of the applicable processes will occur until the permit is obtained.

At this time the proposed application includes 37 pieces of natural gas burning equipment with a total heat input capacity of 10.6 MMBtu/hr, the largest of which is a 3 MMBtu/hr boiler in the South Blower Building of the Water Resource Recovery Facility located at 1300 Market Ave SW. Emissions for the complete project are not expected to exceed major source threshold but will potentially trigger modeling demonstrations as required by MDEQ guidance.

Sincerely,

William Kaiser  
Water Resource Recovery Facility Superintendent  
Environmental Services Department  
City of Grand Rapids  
(616) 456-3625

Cc: Mr. Michael Lunn, City of Grand Rapids  
Ms. Jenine Camilleri, DEQ

**Water Resource  
Recovery Facility**  
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