

**DEPARTMENT OF ENVIRONMENTAL QUALITY  
AIR QUALITY DIVISION  
ACTIVITY REPORT: Scheduled Inspection**

B172946759

FACILITY: GRAND RAPIDS WASTEWATER TREATMENT PLANT		SRN / ID: B1729
LOCATION: 1300 MARKET AVE SW, GRAND RAPIDS		DISTRICT: Grand Rapids
CITY: GRAND RAPIDS		COUNTY: KENT
CONTACT: Brian Vu , Assistant Superintendent		ACTIVITY DATE: 10/22/2018
STAFF: Kaitlyn DeVries	COMPLIANCE STATUS: Non Compliance	SOURCE CLASS: MINOR
SUBJECT: The purpose of the visit was to follow-up regarding the status of the digester project and to conduct a scheduled inspection pursuant to PTI No. 502-93.		
RESOLVED COMPLAINTS:		

On Monday October 22, 2018 Air Quality Division (AQD) staff Kaitlyn DeVries (KD) and Eric Grinstern (EG) visited the Grand Rapids Waste Water Treatment Plant located at 1300 Market Ave, SW, Grand Rapids Michigan. The purpose of the visit was to assess the status of the proposed digester project and to conduct a scheduled inspection pursuant to permit to install No. 502-93.

### Facility Description

The Grand Rapids Waste Water Treatment Plant, or the Water Resource Recovery Facility (GRWRRF), treats the wastewater from the City of Grand Rapids, and treats up to 40 million gallons per day.

### Regulatory Analysis

Currently, GRWRRF holds one (1) permit, PTI No. 502-93 for an odor control scrubber; two (2) other PTI's (66-89 and 28-13) were voided in 2018 and operate the equipment associated with those permits under Rule 201 permitting exemptions. Previously, EG had been in communication with the facility regarding the possibility of installing a biodigester and other associated equipment, including the possibility of engines.

### Compliance Evaluation

Staff arrived on site around 1:30 pm and met with Mr. Brian Vu, Assistant Superintendent. EG asked about the status of the digester and the construction that has been on-going on site.

Mr. Vu escorted staff to the area where the proposed digester will be located. It appeared as if construction had commenced during EG's June 6, 2018 visit, and has continued, as depicted in the three (3) attached photos. AQD had sent the GRWRRF a Violation Notice in June 2018 for the failure to obtain a permit to install, since construction had begun on site. GRWRRF responded to AQD stating that construction had not begun with respect to anything that has the possibility of emitting air contaminants. Mr. Vu stated that he has only been with the GRWRRF for 8-9 months and did not have familiarity with the VN and subsequent response; Mr. William Kaiser, Superintendent, with whom EG had previous correspondence with regarding the VN, was not available at the time of the visit. EG went on to explain that in order to commence construction a permit to install (PTI) is required under the Clean Air Act. As of the date of this report, no permit to install application has been received by the AQD. Mr. Vu, however, did state that all the decisions regarding the biodigester project have not yet been made. AQD's rules, specifically Rule 201, states that "... a person shall not install, construct, reconstruct, relocated, or modify any process or process equipment, including control equipment pertaining thereto, which may emit any of the following, unless a permit to install that authorizes such action is issued by the department." The United States Environmental Protection Agency (USEPA) constitutes physical on-site construction "as the placement, assembly, or installation of materials, equipment, or facilities with will make up part of the ultimate structure of the source". AQD has adopted this definition.

AQD followed up with Mr. Kaiser regarding the proposed project and if any final decisions had been made. Mr. Kaiser stated that the approved request was for purchase of mechanical and process equipment. No additional information was provided to AQD at that time.

On November 5, 2018 a permit to install application was received electronically for the biodigester project, and the associated construction that had commenced. This aligns with AQD's stance on construction occurring prior to obtaining a permit to install. Since it appears that GRWRRF has continued construction associated with the biodigester project without a PTI, this is violation of Rule 201 and a second violation notice will be sent.

PTI No. 502-93 is for an odor control scrubber, which was properly operating at the time of the visit. No visible

emissions were noted, which is the only special condition associated with the permit.

There is also one (1) additional odor control scrubber, that was formerly permitted, but the PTI has since been voided. GRWRRF now relies on Rule 201 permitting exemption Rule 285(2)(m).

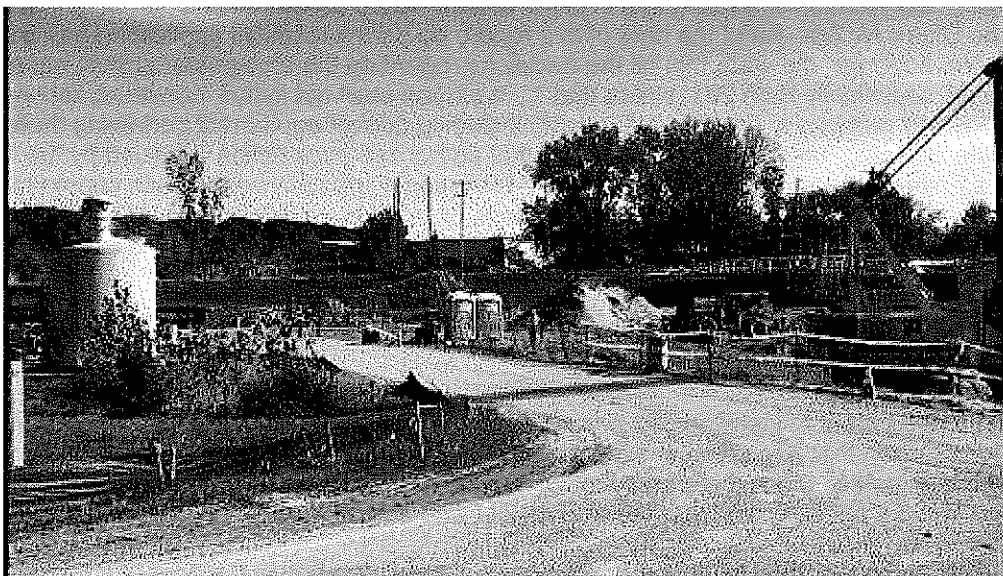
The permitted equipment from PTI No. 66-89 was removed from the site.

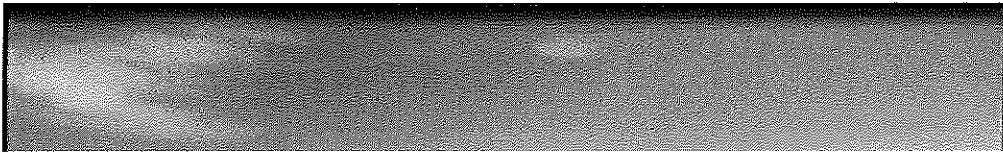
**Compliance Determination**

Based upon the observations made during the inspection the Grand Rapids Water Resource Recovery Facility is not compliant with Michigan Air Quality Rules, and Violation Notice will be issued for the failure to obtain a permit to install.

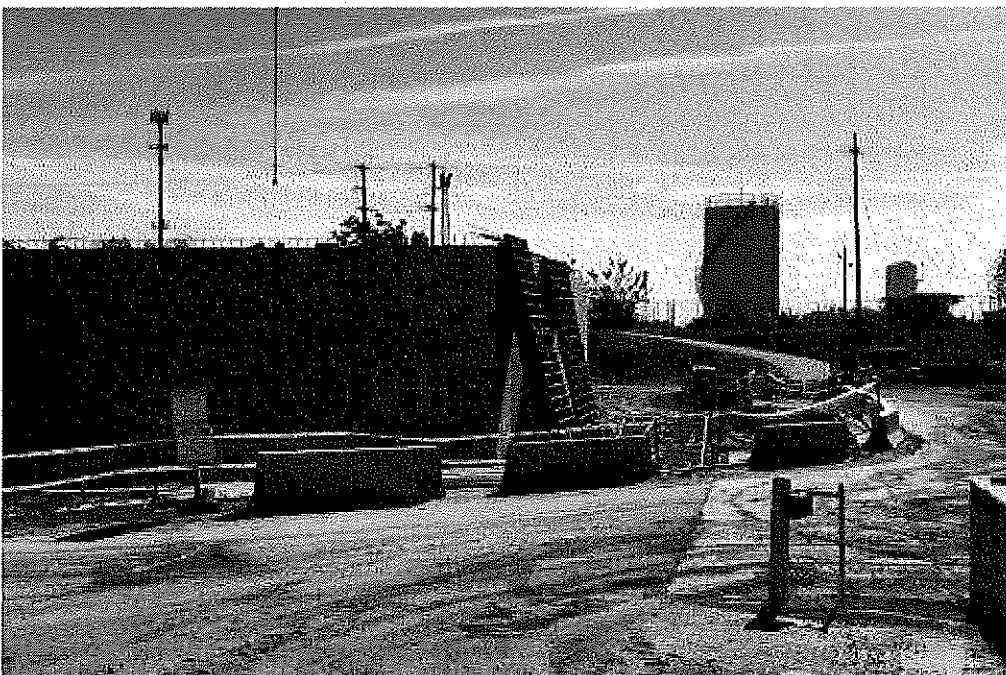


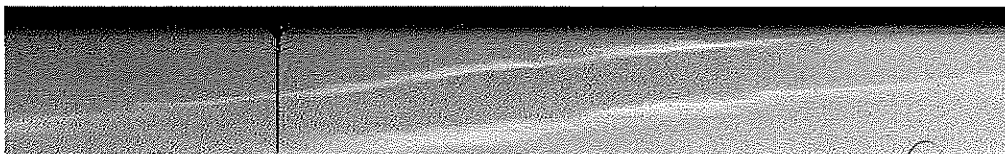
**Image 1(GRWWTP1) : Photo 1**





**Image 3(GRWWTP3)** : Photo 3 is the same image as photo 4





NAME Kaitlyn Burke DATE 11/7/2018 SUPERVISOR [Signature]