



RICK SNYDER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



C. HEIDI GREYER
DIRECTOR

March 28, 2018

Mr. Dan Zimmerman
Director of OHS and Compliance
Energy Developments, LLC
608 South Washington Avenue
Lansing, Michigan 48833

SRN: N5991, Genesee County

Dear Mr. Zimmerman:

VIOLATION NOTICE

On March 16, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) received updated 2017 MAERS emission calculations for Energy Developments Grand Blanc, LLC located at Citizens Disposal, Incorporated, 2361 West Grand Blanc Road, Grand Blanc. The information indicates an issue with the following conditions of Renewable Operating Permit (ROP) number MI-ROP-N5991-2016:

Process Description	Rule/Permit Condition Violated	Comments
Two Caterpillar G3520, 2,233 hp, landfill gas-fired, lean burn, spark ignition (SI), reciprocating internal combustion engines (RICE) identified as EUENGINE6 and EUENGINE7.	Special Condition (SC) I.1 which limits each engine to 1.7 lb/hr of SO _x . (R 336.2803, R 336.2804, 40 CFR 52.21 (c) and (d))	The emissions information received shows emissions of 3.26 lb/hr of SO _x from EUENGINE6 and 3.22 lb/hr of SO _x from EUENGINE7 both in excess of the emissions limit.

The records provided demonstrate that actual emissions of sulfur oxides (SO_x) from EUENGINE6 and EUENGINE7 are estimated at 28.4 tons per year (tpy). The emissions are based on gas samples that were collected May 31, 2016. Please be advised that potential emissions of SO_x could be greater than 40 tpy which exceeds the significant threshold for sulfur dioxide (SO₂) which may trigger New Source Review (NSR) for a major modification.

AQD staff have advised you that, at a minimum, this is a violation of Rule 201 (R 336.1201) of the administrative rules promulgated under Part 55, Air Pollution Control, of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (Act 451).

A program for compliance will include a completed PTI application for the EUENGINE6 and EUENGINE7. An application form is available by request, or at the following website:
www.michigan.gov/deqair.

Be advised that Rule 201 requires that a permit be obtained prior to installation, construction, operation, reconstruction, relocation, or alteration of any process or process equipment which may be a source of an air contaminant.

In addition, please provide a facility-wide Potential to Emit (PTE) demonstration for all pollutants at the source. Information on calculating PTE can be found at the following website:

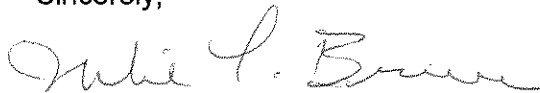
http://www.michigan.gov/deq/0,4561,7-135-3310_70487-112202--,00.html

Please initiate actions necessary to correct the cited violation and submit a written response to this Violation Notice by April 18, 2018. 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.

If it is believed that the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide appropriate 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. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the telephone number listed below.

Sincerely,



Julie L. Brunner, P.E.
Senior Environmental Engineer
Air Quality Division
517-275-0415

JLB:TG

cc/via e-mail: Ms. Mary Ann Dolehanty, DEQ
Mr. Craig Fitzner, DEQ
Mr. Thomas Hess, DEQ
Mr. Christopher Ethridge, DEQ
Mr. Brad Myott, DEQ