



GRETCHEN WHITMER
GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY
LANSING DISTRICT OFFICE



LIESL EICHLER CLARK
DIRECTOR

February 13, 2019

Mr. Robb Moore, P.E., Environmental Manager
Republic Services
2361 West Grand Blanc Road
Grand Blanc, Michigan 48439

SRN: N5991, Genesee County

Dear Mr. Moore:

VIOLATION NOTICE

On March 16, 2018, the Department of Environmental Quality (DEQ), Air Quality Division (AQD) received updated 2017 Michigan Air Emission Reporting System (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 emission units on Renewable Operating Permit (ROP) number MI-ROP-N5991-2016:

Process Description	Rule/Permit Condition Violated	Comments
EUGROFFLARE - A 600 CFM open flare for backup control of the landfill gas.	Rule 201 (R 336.1201) – Permits to Install	The information provided with the MAERS report demonstrate that actual emissions of sulfur oxides (SOx) from the flare have increased.
EUZINKFLARE - A 3,000 CFM utility flare (open flare) for backup control of the landfill gas.	Rule 201 (R 336.1201) – Permits to Install	The information provided with the MAERS report demonstrate that actual emissions of sulfur oxides (SOx) from the flare have increased.

The flares were originally evaluated using U.S. Environmental Protection Agency's *Compilation of Air Pollutant Emissions Factors (AP-42)* emission factors. The reported emissions to MAERS were based on gas samples that were collected May 31, 2016. On-going landfill gas sampling is demonstrating sulfur concentrations in the gas that are approximately 16 times the AP-42 concentration. Please be advised that potential emissions of SOx 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.

At a minimum, this is a violation of Rule 201 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).

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A program for compliance may include a completed PTI application for the EUGROFFLARE and EUZINKFLARE. An application form is available by request, or at the following website: www.michigan.gov/deqair (in the shaded box on the upper right-hand side of the page).

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.

Please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice by March 6, 2019, (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 submit the written response to the DEQ, AQD, Lansing District, at P.O. Box 30242, Lansing, Michigan 48909 and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor at the DEQ, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

If you believe 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. 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,



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

cc: Ms. Mary Ann Dolehanty, DEQ
Dr. Eduardo Olaguer, DEQ
Mr. Christopher Ethridge, DEQ
Ms. Jenine Camilleri, DEQ
Mr. Brad Myott, DEQ