



STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING DISTRICT OFFICE



GRETCHEN WHITMER  
GOVERNOR

LIESL EICHLER CLARK  
DIRECTOR

March 4, 2019

Mr. Dan Zimmerman, Director of North American HSE & Compliance  
Energy Developments, LLC  
608 South Washington Avenue  
Lansing, Michigan 48933

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 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 and operating at the gas-to-energy plant, as follows:

Process Description	Rule/Permit Condition Violated	Comments
EUENGINE1 – Caterpillar 3516 landfill gas-fired reciprocating engine located in Plant 1	Rule 201 (R 336.1201) – Permits to Install	The information provided with the MAERS report demonstrate that actual emissions of sulfur dioxide (SO <sub>2</sub> ) from the engine have increased.
EUENGINE2 – Caterpillar 3516 landfill gas-fired reciprocating engine located in Plant 1	Rule 201 (R 336.1201) – Permits to Install	The information provided with the MAERS report demonstrate that actual emissions of SO <sub>2</sub> from the engine have increased.
EUENGINE3 – Caterpillar 3516 landfill gas-fired reciprocating engine located in Plant 1	Rule 201 (R 336.1201) – Permits to Install	The information provided with the MAERS report demonstrate that actual emissions of SO <sub>2</sub> from the engine have increased.
EUENGINE4 – Caterpillar 3516 landfill gas-fired reciprocating engine located in Plant 1	Rule 201 (R 336.1201) – Permits to Install	The information provided with the MAERS report demonstrate that actual emissions of SO <sub>2</sub> from the engine have increased.
EUENGINE5 – Caterpillar 3516 landfill gas-fired reciprocating engine located in Plant 1	Rule 201 (R 336.1201) – Permits to Install	The information provided with the MAERS report demonstrate that actual emissions of SO <sub>2</sub> from the engine have increased.

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It appears the engines were originally evaluated using U.S. Environmental Protection Agency's *Compilation of Air Pollutant Emissions Factors* (AP-42) emission factors. The reported emissions for the 2017 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 concentrations. Please be advised that potential emissions of SO<sub>2</sub> could be greater than 40 tons per year which exceeds the significant threshold and 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).

A program for compliance includes a completed PTI application for the five (5) Caterpillar 3516 engines. An application has been submitted to address the increase in SO<sub>2</sub> emissions but is deficient and currently off-line. As stated in the additional information request letter dated February 20, 2019:

- 1) Since the increase in total sulfur in the landfill gas is considered a change in the method of operation, and effects the exempt equipment at the facility, the five (5) 3516 engines are part of the project and require permitting, per Rule 201. This includes, but is not limited to, a regulatory discussion (state and federal), control technology discussion, emission calculations (including Volatile Organic Compound (VOC) emissions), equipment parameters and locations. Please provide all calculations, assumptions, and documentation of the applicable requirements and how you intend to comply with items 2- 7 below. *(Items 2 – 7 not included here.)*

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 25, 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, 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.

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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