



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
LANSING DISTRICT OFFICE



LIESL EICHLER CLARK  
DIRECTOR

December 17, 2019

CERTIFIED MAIL—7018 0360 0000 2598 8816  
RETURN RECEIPT REQUESTED

Mr. Dan Zimmerman  
Director of OHS and Compliance  
Energy Developments, LLC  
608 South Washington Avenue  
Lansing, Michigan 48933

SRN: N5991, Genesee County

Dear Mr. Zimmerman:

**SECOND NOTICE OF ONGOING VIOLATIONS**

The Department of Environmental, Great Lakes, and Energy (EGLE), Air Quality Division (AQD), continues to receive sampling results on the landfill gas from Energy Developments Grand Blanc, LLC (EDGB) located at Citizens Disposal, Incorporated, 2361 West Grand Blanc Road, Grand Blanc. The information indicates sulfur concentrations (measured as hydrogen sulfide) in the landfill gas range between 800 parts per million (ppm) to 1000 ppm. The sulfur concentration in the landfill gas indicates that the violations for EUENGINE1-7 at EDGB identified below remain ongoing.

Process Description	Rule/Permit Condition Violated	Comments
EUENGINE1 – 5, Caterpillar 3516 landfill gas-fired reciprocating engines 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 engines have increased. This violation was originally communicated to EDGB on March 4, 2019.
Two (2) Caterpillar G3520, 2,233 hp, landfill gas-fired, lean burn, spark ignition (SI), reciprocating internal combustion engines (RICE) identified as EUENGINE6 and EUENGINE7 located in Plant 2	Special Condition (SC) I.2 which limits each engine to 1.7 lb/hr of SO <sub>x</sub> . (R 336.2803, R 336.2804, 40 CFR 52.21(c) and (d))	Sampling results and stack testing indicate emissions in excess of the emission limit for each engine. These violations were originally identified in letters dated March 28, 2018, and January 17, 2019.

On March 16, 2018, AQD received updated 2017 MAERS emission calculations for EDGB. This information included total sulfur concentrations of 614 ppm based on site-specific sampling on May 31, 2016, of the landfill gas. EUENGINE6 and EUENGINE7 were originally permitted under Permit to Install (PTI) No. 331-08, and SO<sub>x</sub> emissions were based on a ppm value of 305 that was provided by EDGB. Also, site-specific sampling of landfill gas on March 26, 2018, showed total sulfur concentrations of 1102 ppm. The stack testing performed on November 28, 2018, indicated 5.44 lb/hr of SO<sub>2</sub> from EUENGINE6, and 5.16 lb/hr of SO<sub>2</sub> from EUENGINE7. This information indicates a violation of SC 1.2 of FGENGINES in Renewable Operating Permit (ROP) No. MI-ROP-N5991-2016. These violations were previously identified to you in letters dated March 28, 2018, and January 17, 2019, and remain ongoing.

Furthermore, the five (5) previously exempt landfill gas-fired Caterpillar 3516 engines designated as EUENGINE1, EUENGINE2, EUENGINE3, EUENGINE4, and EUENGINE5 continue to fire landfill gas with increased concentrations of total sulfur in the landfill gas. The 2017 MAERS report was based on a total sulfur concentration of 614 ppm from the May 31, 2016, sampling. This data along with ongoing landfill gas sampling demonstrate that actual emissions of SO<sub>2</sub> from the engines have increased from when they were originally installed. The increase in total sulfur in the landfill gas is considered a change in the method of operation of the engines and thus a violation of Rule 201. The five (5) Caterpillar 3516 engines are part of the project and require permitting per Rule 201. Also, potential emissions of SO<sub>2</sub> from the project could be greater than 40 tons per year, which exceeds the significant threshold and may trigger New Source Review (NSR) for a major modification.

As of this date, we still have not received a satisfactory response to these ongoing violations. Therefore, please initiate actions necessary to correct the cited violations and submit a written response to this Violation Notice (VN) by January 15, 2020. The written response should include at a minimum a summary of the actions that are proposed to be taken to correct the violations and the dates by which these actions will take place. An acceptable program for compliance shall include an administratively complete PTI application for the two (2) Caterpillar G3520 engines and the five (5) Caterpillar 3516 engines that addresses all applicable state and federal requirements, including NSR applicability.

Notwithstanding your response to the preceding citation, the AQD may initiate further enforcement action to address violations of both the state and federal Clean Air Acts, and the rules and regulations promulgated thereunder.

Please submit the written response to EGLE, AQD, Lansing District Office, at P.O. Box 30242, Lansing, Michigan 48909, and submit a copy to Ms. Jenine Camilleri, Enforcement Unit Supervisor, at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760.

Be further advised that issuance of this VN does not preclude or limit EGLE's ability to initiate any other enforcement action under state or federal law as appropriate.

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, EGLE  
Dr. Eduardo Olaguer, EGLE  
Mr. Christopher Ethridge, EGLE  
Ms. Jenine Camilleri, EGLE  
Mr. Brad Myott, EGLE